

COMMENT LETTER 18

Los Angeles County  
Department of Regional Planning

*Planning for the Challenges Ahead*



Bruce W. McClendon FAICP  
Director of Planning

February 14, 2008

Mr. Rich Macias, Manager, Planning and Policy  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017

Re: **County of Los Angeles Department of Regional Planning (DRP) Response to the Southern California Association of Governments (SCAG) Draft 2008 Regional Transportation Plan Program Environmental Impact Report (RTP PEIR)**

Dear Mr. Macias,

Thank you for the opportunity to review and respond to the SCAG Draft 2008 Transportation Plan Program Environmental Impact Report. The Department of Regional Planning (DRP) is the regulating agency for land use in the unincorporated areas of Los Angeles County.

Following our review of the RTP PEIR we have concluded that it has failed to address the likely significant impacts upon the SCAG region's mineral resources. There is no discussion regarding the approximate additional demands for sand and gravel that implementation of the plan will require in comparison to current supply of sand and gravel reserves located within the Mineral Resource Zones that have been adopted by the California Department of Conservation and local planning agencies. The capabilities of existing approved surface mines to meet the anticipated demand should also be addressed.

The DRP is responsible for processing all applications requesting approval of mining proposals within the unincorporated portions of Los Angeles County. The Surface Mining Permit applications are processed under the provisions of both the California Surface Mining and Reclamation Act (SMARA) as well as County ordinances. Such proposals are often controversial and, if approved, unavoidably result in a loss of open space. Such projects frequently create biotic, visual, air quality and other environmental impacts.

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Given the scope of the proposed RTP and the quantities of sand and gravel that are required to construct transportation infrastructure, the DRP has concluded that existing surface mining operations will have to be expanded and/or new surface mining operations would have to be developed within our jurisdiction. The Department is currently processing two such applications. Each applicant has stated that the project is intended to serve projects being constructed by CALTRANS (California Department of Transportation).

2

The DRP believes that the requested analysis will conclude that the environmental impacts created by expansion of surface mining operations within the SCAG region are significant and unavoidable.

If you should have any questions or comments, please contact myself at (213) 974-6461 or [pmccarthy@planning.lacounty.gov](mailto:pmccarthy@planning.lacounty.gov). Our offices are open Monday through Thursday from 7:30 a.m. to 6:00 p.m.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING  
Bruce W. McClendon, FAICP



Paul D. McCarthy, Section Head  
Impact Analysis Section

## COMMENT LETTER 19

**From:** Chen, Hsiao-Ching [hchen@planning.lacounty.gov]  
**Sent:** Tuesday, February 19, 2008 1:16 PM  
**To:** Jessica Kirchner  
**Cc:** Richard.Martinez@lacdc.org  
**Subject:** FW: SCAG Draft Program EIR

**Follow Up Flag:** Follow up  
**Flag Status:** Orange

**Attachments:** RTP PEIR Comments.doc  
Ms. Kirchner:

Please accept the attached comments from the Los Angeles County Community Development Commission (CDC).  
Thank you.

Hsiao-ching Chen, PhD, AICP  
Unincorporated Area Services Liaison  
Department of Regional Planning  
Phone: (213) 974-6559  
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## COMMENT LETTER 19

### Comments on SCAG Regional Transportation Plan Draft Program Environmental Impact Report:

These comments on the Program EIR for the 2008 Regional Transportation Plan consider the environmental impacts identified in the PEIR and not potential economic (or other) issues resulting from long range implementation of the RTP.

The main focus here is to determine whether or not identified environmental impacts (and their mitigation measures) will impact the CDC/Housing Authority's activities.

This EIR identifies potential environmental impacts on a regional level. While the RTP preliminarily identifies individual projects, the PEIR is programmatic and does not analyze any specific projects. Future project-level EIRs developed as a result of the implementation of the RTP should be reviewed for possible impacts to CDC/Housing Authority activities or sites. The CDC/Housing Authority should ensure that we monitor development of transportation projects within the County of Los Angeles.

1

### Mitigation Measures:

Under mitigation measures for Cultural Resources impacts (3.4-1.3), the PEIR indicates that any project receiving federal funding or requiring federal approval shall comply with Section 106 of the National Historic Preservation Act (NHPA). We believe it is prudent to require compliance with the NHPA even when no federal funding or approvals are required if there are potential impacts to structures listed on or eligible for listing on the National Register of Historic Places.

2

Under mitigation measures for Cultural Resources/Cumulative impacts (3.4-5.17) our comment under (3.4-1.3) applies here as well.

Under mitigation measures for Energy impacts (3.5-2.12), we support SCAG efforts to develop a data collection and analysis system to measure greenhouse gas emissions in the region as this will assist CDC/Housing Authority efforts to determine greenhouse gas impacts and mitigations for our projects.

3

Under mitigation measures for Energy impacts (3.5-2.16), we support adoption of a "Green Building Program" in Los Angeles County to reduce greenhouse gas emissions and lower long-term energy costs.

Under mitigation measures for Noise impacts (3.9-1.2), hours for construction activities should be restricted to limits within each jurisdiction.

4

Under mitigation measures for Public Services and Utilities impacts (3.12-3.7), we encourage integration of green building design into future project design to ensure consistency with developing Los Angeles County requirements.

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### BY PERSONAL DELIVERY AND EMAIL

February 19, 2008

Regional Council  
Southern California Association of Governments  
c/o Hasan Ikhata, Executive Director  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles California 90017

Re: Comments Draft PEIR for the 2008 RTP.

To the Members of the Regional Council:

The Endangered Habitats League (EHL) submits the following comments on the SCAG Draft Programmatic Environmental Impact Report (DPEIR) for the 2008 Regional Transportation Plan. EHL also submits some initial comments about the 2008 RTP federal law compliance strategy, specifically as it relates to the requirement of fiscal constraint. As discussed below, EHL cannot support the current draft of the 2008 RTP and the DPEIR.

### **1. The Challenges of the Existing Regional Environmental Setting**

SCAG has done an admirable job describing the existing regional environmental setting and of setting forth the challenges of planning for growth in the Southern California region. Its discussion underscores the compelling need for greater regional and interregional coordination among land use and environmental regulatory authorities.

Many of the new transportation facilities proposed in the 2008 RTP are understandable--yet ultimately short-sighted--reactions to congestion from unsustainable auto-dependent growth patterns throughout the region, patterns resulting from thousands of local land use decisions over the years. Local jurisdictions jealously guard their virtually exclusive jurisdiction over land use, but the resulting piecemeal planning creates regionally insurmountable problems that existing

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regional entities are simply powerless to fix.

After nearly two decades of advocacy at all levels of government, EHL has concluded that this needed coordination will not occur in any meaningful way without the appropriate intervention of the state, and *EHL looks to the SCAG Regional Council to support reasonable state land use legislation reform to incentivize local jurisdictions to plan for efficient transportation and land use solutions. SB 375 constitutes one such reasonable solution.*

1 cont.

Unless local jurisdictions take the lead in planning for efficient growth patterns with the support of the state, SCAG will remain locked in this reactive mode, responding to the latest congestion nightmare that has already come or lies just beyond the horizon. For this reason, and as discussed below, EHL cannot support the current draft of the 2008 RTP and the DPEIR.

### 2. The Proposed Project.

The 2008 RTP Project appears to consist of two elements: (1) a series of transportation-related infrastructure investments across modes designed to both support and augment existing regional transportation capacity and (2) alterations in existing and projected planned land uses in 2 percent of the SCAG land area designed to reduce overall travel demand and to make more efficient use of existing and planned infrastructure, and known as the Compass Blueprint regional growth strategy.

2

As for the first element of the Project, it is generally well-defined. It is also well within SCAG's discretionary authority to implement. SCAG is therefore well within its authority under CEQA to assume lead agency status.

SCAG's authority to implement the second element of the Project—Compass Blueprint—is less clear. CEQA requires that the lead agency have the authority to “carry out” the project. (CEQA Guidelines, § 15051(b).) The dictionary defines “to carry out” as “to put into operation; execute; to effect or accomplish; complete.” (Random House Webster's College Dictionary.) SCAG has no land use authority. It is therefore unclear how it intends to “carry out” this element of the Project within the meaning of CEQA. SCAG should clarify the basis of its discretionary authority to act as lead agency for this part of the project.

Furthermore, to the extent the Compass Blueprint program is a component of the Project, the Project and proposed mitigation for Project *impacts* have been improperly conflated, potentially in violation of CEQA. Specifically, the proposed Project “contains transportation and urban form strategies, [i.e., the Compass Blueprint 2% strategy] that encourage compact growth, increased jobs/housing balance and centers-based development, where feasible, in all parts of the region.” (1-3.) This very same Compass Blueprint strategy, however, is also proposed

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*mitigation* for the proposed project, leading to “double counting” of impact reductions in violation of CEQA.

For example, Mitigation Measures MM-OS.33 and MM-OS.27 propose that the Compass Blueprint program be adopted to mitigate the significant impacts on open space of the Proposed Project--which *itself already assumes* implementation of Blueprint program. (See also MM-POP.4 [same]; MM-SEP.20 [same]; MM-LU.6 [same]. *But the benefits of Compass Blueprint have already been credited in the baseline in assessing the impacts of the project.*

2 cont.

Specifically, the 2008 RTP DPEIR states that:

“The RTP includes growth polices from the Compass Blueprint that encourage a more compact landform, with growth focused at transit nodes, centers and in areas to balance out the ratio of jobs to housing. This growth pattern results in substantially less consumption of vacant, open space/recreation and agricultural land compared to the No Project (referred to as Baseline growth forecast in the Plan) -- 200,000 acres compared to up to 655,000 acres under the Plan.” (1-3 to 1-4.)

Because the mitigation is intended to offset the impact from the RTP—as opposed to the No Project--the Compass Blueprint cannot legitimately be characterized as mitigation without double counting.

### 3. Project Alternatives Are Not Presented.

The overwhelming focus of the 2008 RTP Project is the series of transportation-related infrastructure investments across modes designed to both support and augment existing regional transportation capacity. The second element—the Compass Blueprint regional growth strategy—is at best an ancillary part of the project, and likely is beyond the authority of SCAG to implement. Yet the alternatives section of the DPEIR devotes all of its effort to considering alternatives to the second element.

3

Literally *no* effort is made to develop, discuss and consider *alternative transportation investment strategies*, even though RTP development and approval is the core element of the Project, and even though RTP development constitutes the essence of SCAG’s discretionary authority. This failure renders the DPEIR invalid under CEQA.

The DPEIR states that

“The alternatives evaluated include:

(1) The **Proposed 2008 Plan** is a blueprint to help achieve a coordinated and balanced

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regional transportation system. The Plan contains transportation and urban form strategies that encourage compact growth, increased jobs/housing balance and centers-based development, where feasible, in all parts of the region. The proposed Plan is fully described in the Project Description.

(2) The **No Project Alternative** includes only those transportation projects that were programmed and/or received federal environmental clearance by December 2006, and projects in the first year of the 2006 TIP and projects under right-of-way acquisition or under construction. *These reasonably foreseeable projects fulfill the definition of the mandated CEQA No Project Alternative (CEQA Guidelines § 15126.6(e)).*

(3) The **2004 Modified RTP** Alternative is an update of the adopted 2004 RTP to reflect the most recent growth estimates and transportation planning decisions and assumptions. This alternative does not include all the urban form strategies included within SCAG's Compass Blueprint to the extent included within the Plan.

(4) The **Envision** Alternative builds on the enhanced density and ideas of the SCAG Compass Blueprint and described in the Plan and goes further. It includes far more aggressive densities than the proposed plan and limits the single family housing that would be built in the region.

“Each alternative maintains a constant total for population, households and jobs for the region in 2035. The year 2035 growth projections for each alternative differ only in the distribution of people, households and jobs such that some counties have higher totals for a given alternative while other counties will have lower totals. The alternatives differ in terms of the distribution because the different transportation investments and urban form strategies would be expected to support different regional distributions of population, households and employment.” (1-3.)

In essence, the DPEIR contains two proposed transportation networks: doing nothing (no project) and the Plan.<sup>1</sup> For example, no effort was made to explore the consequences of increasing transit investment at the expense of new highways under a given land use scenario, limiting investment to existing corridors, of emphasizing the use of innovative para-transit strategies, the potential role of existing road pricing and increasing transportation systems management investment. This “take-it-or-leave-it” approach is not the reasonable range of alternatives required under CEQA.

Thus, while EHL applauds SCAG for its innovative role in exploring the role that land use reform plays in reducing travel demand, this emphasis should not be at the expense of its

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<sup>1</sup> “Both the Envision Alternative and the Plan have the same transportation network.” (4-21.)

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disregard of the role that transportation investment decisions play in determining urban form, and of SCAG's authority in shaping these decisions. SCAG's inadequate alternatives analysis of the 2008 RTP DPEIR reflects this disregard.

3 cont.

### 4. Impact Analysis

The DPEIR correctly notes that "the population growth projected by 2035 in combination with the projects in the 2008 RTP would consume approximately 2,000,000 acres of land that is currently vacant." (ES-12.) This development will result in massive impacts to the environment in virtually every category and contrasts with the overall visual character of the existing landscape setting.

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EHL applauds SCAG's frank recognition of the extensive nature of the impact on the environment in all relevant areas after implementation of the 2008 RTP and associated growth occurs.

### Air Quality

The DPEIR correctly notes that "[e]missions of particulate matter are directly related to growth and VMT. Regardless of how clean a vehicle operates, the vast majority of PM10 and PM2.5 emissions from on-road sources are generated from re-entrained dust on paved roads and is a function of the vehicle miles traveled." (3.2-24.) Nonetheless, implementation of the proposed project will result in substantial absolute increases in total VMT in the region.

### 5. Environmentally Superior Alternative

As shown above, SCAG's failure to exercise its authority under state and federal law to explore transportation investment alternatives precludes a reliable determination of a feasible environmentally superior alternative. It is likely that the No Project alternative will result in unacceptable congestion and other impacts. But it is also likely that a feasible, environmentally superior alternative to the 2008 RTP can be developed by incorporating proven strategies, some of which have been endorsed by SCAG staff. These include:

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- (1) Condition inclusion of local and subregional infrastructure investment in RTPs on local government support of legislation implementing a carbon-based VMT charge on private autos, with revenues to support system maintenance and public transit;
- (2) Condition inclusion of local and subregional infrastructure in RTPs on local government support of real-cost parking management and fee structures, with revenues to provide equity mechanism;
- (3) No net VMT growth test for additional general purpose lane capacity

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- (4) Local government commitment to implement Blueprint strategies.
- (5) Completion of westbound Red Line to Ocean
- (6) Deregulation of private transit
- (7) Increased funding for surface transit

5 cont.

Only if the DPEIR considers these and other strategies can a defensible conclusion that the environmentally superior alternative has at least been considered.

### 6. Mitigation Is Someone Else's Responsibility.

In general, the DPEIR exhorts other entities to implement mitigation, rather than proposing mitigation as part of the 2008 RTP planning process:

“Mitigation Measures proposed in this PEIR can be incorporated as policies in the Final 2008 RTP and will help ensure that feasible mitigation measures are implemented at the project level. *The implementing agencies and local Lead Agencies shall be responsible for ensuring adherence to the mitigation measures as RTP projects are considered for approval over time.* Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG’s monitoring efforts, including SCAG’s Intergovernmental Review (IGR) process.” (1-4, emphasis added.)

6

While EHL commends SCAG for its comprehensive effort to suggest mitigation for other agencies to implement, the same level of effort is not made to determine measures that SCAG itself can implement through its own authority as a planning agency under federal and state law.

“SCAG is the federally designated Metropolitan Planning Organization under Title 23, USC § 134(g)(1), for the six-county region. SCAG is required by state and federal mandates to prepare an RTP every four years.” (2-4.) SCAG has the discretionary authority and responsibility to select projects for inclusion into the Regional Transportation Plan, and to develop Transportation Control Measures under the federal Clean Air Act. (42 U.S.C. § 108(f).) SCAG also has planning authority under the SAFETEA-LU.

### Air Quality, Energy, Transportation, and GHG Emissions

SCAG acknowledges the massive impacts on Air Quality, Energy and Greenhouse Gas Emissions of the 2008 RTP. Specifically, “[i]n 2035 there would be substantially more total daily Vehicle Miles of Travel (VMT) than the current daily VMT. Implementation of the 2008 RTP would contribute to this increase.” (ES-68, 3.14-21.) As the DPEIR acknowledges, “[t]he 2008 RTP, by increasing mobility and including land-use-transportation measures, influences the pattern of ... urbanization.” (ES-43, ES-58, ES-62, ES-67.)

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This inability to meet AB 32 mandated objectives is largely attributable to VMT growth. Indeed, “it is unlikely that mitigation measures would reduce GHG emissions below existing conditions (let alone to 1990 levels as required by AB 32) due to anticipated population growth” (ES-17.) In addition, the DPEIR observes that “[t]he implementation of the 2008 RTP is likely to substantially increase the consumption of electricity, natural gas, gasoline, diesel, and other non-renewable energy in the operation of the transportation system.” (ES-35.)

7 cont.

Unlike in many other areas of concern, SCAG has the ability and authority to implement feasible strategies--through the regional transportation planning process--to adopt alternatives and measures to avoid or mitigate the VMT increases that are the root cause of increased particulate emissions, and transportation, energy and GHG impacts.

But the DPEIR does not adequately address SCAG’s planning authority to reduce these impacts, relying instead on a mere listing of existing measures from applicable and proposed air plans, TCMs from section 108 of the federal Clean Air Act, existing and proposed ARB tailpipe emissions standards, and hoped-for measures from local jurisdictions and project sponsors. (ES-13 to 14, ES-17, ES-29, ES-35 to 38.) In the case of energy consumption, SCAG improperly defers any real measures until the next RTP cycle. (“SCAG shall continue to consider energy uncertainty impacts prior to the development of the next Regional Transportation Plan” [ES-35, ES-48].)

The DPEIR concludes that “[e]ven with implementation of all feasible mitigation measures and incorporation of measures as described above, regional emissions of PM10 and PM2.5 would increase substantially in the region.” (3.2-31.) But where is the discussion showing that SCAG has exercised its planing authority to the fullest extent feasible?

EHL believes that SCAG can feasibly do more, and do more now, to reduce these impacts. These feasible measures can be classified into two broad groups.

### **(1) Infrastructure Selection**

EHL fully supports the significant portion of available funding that is dedicated to the maintenance and preservation of existing infrastructure. SCAG has the discretion and authority to ensure that provision of new infrastructure not result in an increase in net VMT, and to ensure that the conceptual alignment does not directly and indirectly (through growth) impact sensitive habitat. EHL requests that SCAG exercise this authority when deciding to include new infrastructure in the RTP.

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### (2) Land Use

The DPEIR states that “[t]hrough the integration of land use planning and transportation infrastructure investments, land use strategies can encourage development patterns that increase transportation options and the use of alternate modes of travel to reduce vehicle miles traveled.” (2-7.) Specifically, “[c]ompared to the “baseline” growth forecast, the adopted land use strategy reduces travel by more than 20 million vehicle miles traveled (VMT) per day (**Figure 2-1**), eliminates about 0.9 million hours of travel per day (**Figure 2-2**) and reduces daily congestion delay by 0.5 million hours (**Figure 2-3**.” (2-12.) Moreover, “the “4D” model is capable of yielding an additional reduction of 8.6 million daily VMT region-wide *in addition to* the 19 million daily VMT reduction modeled by SCAG.” (2-12, emphasis added.)

Clearly, the problem with land use strategies is not one of effectiveness, it is one of implementation. Under the status quo, local governments have no obligation, or even an incentive, to conform their land use decisions to meet regional growth strategies. Until such a commitment or incentive exists that reasonably assures local government implementation, the RTP should defer taking credit for any VMT reduction benefits.

### Biological Resources

The DPEIR acknowledges that “Transportation projects included in the 2008 RTP on previously undisturbed land could displace natural vegetation, and thus habitat, some of which is utilized by sensitive species in the SCAG region.” (ES-18.) It also states that “The 2008 RTP would potentially contribute to the fragmentation of existing habitat, decreasing habitat patch sizes, reducing habitat connectivity, and causing direct injury to wildlife. The 2008 RTP includes new transportation corridors that may form barriers to animal migration or foraging routes.” (ES-27.) Finally, “[t]he 2008 RTP’s influence on growth patterns contributes to regional cumulatively considerable impacts to open space and result in a loss of open space and agricultural lands in the region.” (ES-56.)

Instead of examining its ability to exercise its own authority in the planning development process, SCAG relies on project sponsors and local jurisdictions to mitigate these impacts *after* the fact. SCAG ignores the fact that it has the ability to exercise its transportation planning authority not to propose or adopt projects into the RTP whose conceptual alignments clearly traverse high quality undisturbed habitat areas, and consume directly or indirectly large quantities of valuable open space.

The DPEIR also states that “[t]he 2008 RTP is not in conflict with any adopted Habitat Conservation Plan or Natural Communities Conservation Plan” and thus no mitigation measures are necessary.” (ES-29.) But SCAG make not make any apparent attempt to ensure that

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projects, when considered with their indirect impacts, that SCAG proposes to adopt into the RTP are consistent at a large-scale planning level with adopted and proposed regional habitat conservation plans. Instead, it proposes merely that *after* adoption, “[f]uture impacts to biological resources *shall be* minimized through cooperation, information sharing, and program development as part of SCAG’s regional planning efforts. SCAG *shall* consult with the resource agencies, such as USFWS and CDFG.” (ES-30.) The problem is, “after” adoption is too late in many cases to avoid significant environmental harm.

10 cont.

### 7. Significance After Mitigation

Almost across the board, the DPEIR recognizes that environmental impacts from 2008 RTP mitigation will remain significant even after mitigation. In general, EHL applauds this recognition.

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The problem is, however, that merely recognizing significant impacts takes a distant second place to avoiding them in the first place. Adoption of some of the approaches suggested above regarding alternatives, additional transportation strategies, and the lawful exercise of SCAG’s authority to exclude projects from the RTP could well result in significant environmental benefits even compared with the 2008 RTP.

### 8. Fiscal Constraint Requirements

As SCAG staff well knows, federal law requires that the fiscally constrained portion of the 2008 RTP be supported by a demonstration that the funding for the projects in the plan, when taken as a whole, is “reasonably available.” The 2008 RTP does not measure up to those standards.

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Specifically, DOT regulations require that Regional Transportation Plans be supported by “[a] financial plan that demonstrates how the adopted transportation plan can be implemented.” (23 C.F.R § 450.322(a)(10).) Further, “[i]n the case of new funding sources, strategies for *ensuring* their availability shall be identified.” (23 C.F.R 450.322(a)(10)(iii), emphasis added.)

The fiscal constraint requirement is intended to ensure that metropolitan long-range transportation plans, TIPs, and STIPs reflect realistic assumptions about future revenues, rather than being lists that include many more projects than could realistically be completed with available revenues. Accordingly, EPA’s transportation conformity regulations specify that an air quality conformity determination can only be made on a fiscally constrained long-range transportation plan. (See 40 CFR § 93.108.)

The 2008 RTP relies on several new sources of funding, including approximately \$ 26

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billion from the imposition of tolls to finance the construction and operation of several new mixed-flow lane highways in new alignments throughout the SCAG region:

“Within the time horizon of the 2008 RTP, additional toll road facilities are expected to be implemented, including the I-710 Tunnel Gap Closure (I-710/Valley Blvd to California Blvd/Pasadena Ave), the I-710 South Corridor (dedicated lanes for clean technology trucks from the Ports to the SR-60 Interchange), the High Desert Corridor (I-5 to US-395), and the CETAP Riverside County to Orange County Corridor.”

Appendix B of the 2008 RTP, at Table 3.3, further states:

“Highway Tolls **Description:** Toll revenues generated from I-710 tunnel. Also, tolls assumed for the I-710 dedicated truck lanes, High Desert Corridor, and CETAP Corridor **Assumptions:** Toll revenues based on recent feasibility studies for applicable corridors. Also includes toll revenue bond proceeds. \$26.0 Billion”

Recognizing that *simply assuming* that these corridors can credibly be financed purely through the imposition of tolls is insufficient to meet the fiscal constraint requirement, the 2008 states:

“The financing of toll road facilities has become sophisticated in recent years, with increasing levels of participation by the private sector. *SCAG is fully aware of the need to carefully consider the economics of specific projects as there is not a “one size fits all” solution.* Various toll road financing models are being evaluated including public and private concessions, shadows [sic] tolls, and direct user paid tolls. For purposes of developing the 2008 RTP financial plan, projections of traffic and revenue generation potential were based on a review of toll feasibility studies and consideration of comparable facilities. Revenue potential from tolling new facilities depends on several factors including length of lanes, configuration of the facilities, and tolling policy. *Documentation on reference sources utilized to analyze toll revenue potential is included in Appendix B.* Additional financial feasibility work for specific facilities is included in this Appendix F.” (Appendix F, Emphasis added.)

As noted above, the reader is referred to “documentation on reference sources utilized to analyze toll revenue potential” on these corridors that is “included in Appendix B.” But a review of Appendix B reveals no studies or reference sources showing that sufficient toll revenue is “reasonably available.” It simply states that “[t]oll revenues [are] based on recent feasibility studies.”

But where are these feasibility studies and what to they show? While Appendix B *does*

12 cont.

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refer to and rely on *traffic* forecasts for the various new corridors assumed to be financed with tolls, there is no evidence that the demand for these facilities *as toll roads* was ever assessed. Nor is there *any* evidence showing that sufficient numbers of drivers *would be willing to pay a toll high enough to generate the assumed \$ 26 billion plus interest in revenue necessary to construct these facilities.*

12 cont.

Studies relating to the performance of the Orange County tollroads and to the State Route 91 median toll lanes, cited by the 2008 RTP, also do not demonstrate the potential feasibility of entirely *different* alignments in *different* regions of Southern California and on projects (such as tunnels) with entirely distinct cost characteristics. SCAG itself admits that it *“is fully aware of the need to carefully consider the economics of specific projects as there is not a “one size fits all” solution.”* (Appendix F, Emphasis added.) At best, these Orange County studies show that toll roads in these *other* locations have worked, but even there the record is mixed. Despite confident projections to the contrary, for example, the San Joaquin Hills Toll Road in high-income coastal Orange County has been a colossal financial failure, relying on a series of loans and refinancings to stay alive.

There is yet another reason why tolls for general purpose “mixed flow” lanes on these facilities cannot be determined to be “reasonably available”—there is no legislation permitting it. Indeed, the only legislation cited by the 2008 RTP in support of its financial plan specifically *excludes* such lanes from tolls. Assembly Bill 1467 states that the tolls it authorizes shall finance projects “primarily designed to improve goods movement, including, but not limited to, exclusive truck lanes and rail access and operational improvements.” (Legislative Counsel’s Digest.) Section 143(e)(4) of the Street and Highways Code now specifically states that “[t]olls and user fees may *not* be charged to noncommercial vehicles with three or fewer axles.” If tolls cannot be levied on passenger cars—i.e., vehicles with three or fewer axles—then how can this legislation support the fiscal constraint demonstration?

Finally, the strategic plan submitted for these projects only serves to underscore the work that SCAG failed to require before they could be considered “fiscally constrained.” It shows that there is no legislation even proposed to authorize such tolls; as mentioned, AB 1467 specifically *prohibits* tolls on passenger vehicles. It also shows that there is no commitment from any private stakeholder, or even a serious expression of interest, and no serious business plan. It shows that there are no marketing studies. It shows that feasibility pre-development work has not even been started.

In short, if funding for these facilities is “reasonably available,” then it strains the imagination to consider what *isn’t* “reasonably available?” Until additional support for the toll strategies is provided, federal mandates require that new general purpose lanes in projects that rely heavily on new sources of toll revenue be removed from the constrained 2008 RTP.

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Thank you for considering EHL's views. As always, EHL would be more than happy to discuss our position concerning the 2008 RTP with SCAG staff.

Very truly yours,

Michael D. Fitts  
Staff Attorney



CITY of LAGUNA WOODS

Bert Hack  
Mayor

February 19, 2008

Bob Ring  
Mayor Pro Tem

Robert Bouer  
Councilmember

Milt Robbins  
Councilmember

Brenda B. Ross  
Councilmember

Leslie A. Keane  
City Manager

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

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

Dear Ms. Kirchner:

The City of Laguna Woods (City) offers the following comments on the 2008 Regional Transportation Plan (RTP) and related Draft Program Environmental Impact Report (PEIR):

1. Land Use Impact 3.8-1 and Mitigation Measure (MM)-LU.3: Adopt the Baseline Growth Forecast rather than the Policy Growth Forecast to make the RTP more consistent with city general plans in Orange County and to reduce potential significance after mitigation. The City is very concerned over the distribution of growth in households and employment contained in the RTP's Policy Growth Forecast compared with the Baseline Growth Forecast using data from Orange County Projections (OCP) 2006. In the three U.S. Census tracts that comprise most of the city, households were reduced by 257 and employment by 1,082:

2000 Census Tract	Policy Forecast Households	Policy Forecast Employment
626.22	-132	-809
626.23	-88	-138
626.46	-37	-135

Other Census Tracts that the City shares with adjacent communities also show similar reductions from OCP 2006. These combined reductions are a significant change from the City's General Plan. Laguna Woods is unique among cities nationwide in having residents with an average age of 78. There is only a limited amount of developable land, with the rest built out as a residential retirement community or for commercial uses. Adoption of the Policy Growth Forecast and efforts to bring the City's General Plan into

## COMMENT LETTER 21

Jessica Kirchner, SCAG  
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consistency with it could reduce City revenues which could undermine our ability to provide services to residents.

1 cont.

2. MM-AV.1 through MM-AV.10: Change the word “shall” to “should,” or explain why such a change will not be made.
3. MM-BIO.1 through MM-BIO.45: Change the word “shall” to “should,” or explain why such a change will not be made.
4. MM-CUL.1 through MM-CUL.17: Change the word “shall” to “should,” or explain why such a change will not be made.
5. MM-EN.17: Change language to: “Local governments should consider jobs/housing balance and, to the extent practical and feasible, encourage the development of communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel.”
6. MM-GEO.1 through MM-GEO.10: Change the word “shall” to “should,” or explain why such a change will not be made.
7. MM-HM.1 through MM-HM.6: Change the word “shall” to “should,” or explain why such a change will not be made.
8. MM-LU.1 through MM-LU.9 and MM-LU.16 through MM-LU.18: Change the word “shall” to “should,” or explain why such a change will not be made.
9. MM-NO.1 through MM-NO.19: Change the word “shall” or “will” to “should,” or explain why such a change will not be made.
10. MM-OS.1 through MM-OS.10, MM-OS.12 through MM-OS.21, and MM-OS.26 through MM-OS.30: Change the word “shall,” “make,” or “will” to “should,” or explain why such a change will not be made.
11. MM-OS 3.10-1 through MM-OS 3.10-3: Please change language to: “The Mitigation measures listed above for impacts 3.10-1 through 3.10-3 ~~shall~~ **would** be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.” This is one of several recommended changes in mitigation measure wording from “shall” to “should” to make them more consistent and allow local governments greater flexibility in achieving the goals of the RTP.

2

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- 12. MM-OS.23: This measure, "Project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth that accompanies transportation projects/improvements," should be eliminated as it duplicates mitigation stated in MM-O.15, implementing agency consideration of loss of open space before final project approval.
- 13. MM-POP.1 through MM-POP.4: Change the word "shall" or "will" to "should," or explain why such a change will not be made.
- 14. MM-PS.1 through MM-PS.26: Change the word "shall" to "should," or explain why such a change will not be made.
- 15. MM-SEP.1 through MM-SEP.22: Change the word "shall" to "should," or explain why such a change will not be made.
- 16. MM-W.1 through MM-W.19: Change the word "shall" to "should," or explain why such a change will not be made.
- 17. SR 241/Foothill Transportation Corridor South (FTC-S): Include the full SR 241/FTC-S alignment in South Orange County on all RTP base maps, including the Policy Forecast base maps, reflecting its status as a transportation control measure in the RTP and in the South Coast Air Quality Management Plan. Adopt the Baseline Growth Forecast rather than the Policy Growth Forecast to maintain the substantial revenue-producing residential and employment population on the corridor that has been projected since 1991.
- 18. Orange County Council of Governments (OCCOG) Comments on Mitigation Measure in PEIR: Adopt all OCCOG recommendations regarding PEIR Mitigation Measures.
- 19. Cal State Fullerton Center for Demographic Research (CDR): Adopt all CDR recommendations regarding PEIR Mitigation Measures.

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Thank you for the opportunity to comment on the 2008 RTP and draft PEIR. Please contact me or Assistant City Manager Douglas Reilly at (949) 639-0500 if you have any questions.

Sincerely,



Leslie A. Keane  
City Manager



CITY of LAGUNA WOODS

Bert Hack  
Mayor

February 19, 2008

Bob Ring  
Mayor Pro Tem

Robert Bouer  
Councilmember

Milt Robbins  
Councilmember

Brenda B. Ross  
Councilmember

Leslie A. Keane  
City Manager

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

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

Dear Ms. Kirchner:

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

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

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

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

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

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

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

Sincerely,



Bert Hack  
Mayor

3 cont.

**COMMENT LETTER 23**

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**From:** El-Rabaa, Maged [MEIRabaa@dpw.lacounty.gov]  
**Sent:** Thursday, February 14, 2008 5:25 PM  
**To:** Chen, Hsiao-Ching  
**Cc:** Doudar, Phil  
**Subject:** FW: SCAG Draft Program EIR

Per our phone discussion, DPW has no comments on the SCGAG Draft Program EIR. Any impacts resulting from projects included in the RTP will be evaluated in the future when an EIR is prepared specifically for this project.

1

Thx.

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From: Park, Dorothea [mailto:dpark@ceo.lacounty.gov]  
Sent: Thursday, January 17, 2008 7:23 PM  
To: Hsiaoching Chen  
Cc: Doudar, Phil; Janet Comey; Debbie Aguirre (Fire); Richard Martinez; Mika Yamamoto; Tajima, Jason; Herzog, Tina; Santos, Marjorie; Gentry, Angela; Sheehan, Lari  
Subject: SCAG Draft Program EIR

Please coordinate the review and response to SCAGs draft PEIR, SCH# 20077061126 for the Regional Transportation Plan from the County departments, including DPW, Public Health, CDC, Fire, and Parks.

Significant impacts to land use, open space, population, employment and housing, transportation, air quality, noise aesthetic resources, biological resources, cultural resources, geology, hazardous materials, energy, water resources and public services and utilities have been identified.

The draft PEIR is available on SCAGs website [www.scag.ca.gov/environment/eir.htm](http://www.scag.ca.gov/environment/eir.htm). A public hearing is scheduled on February 7th. DRP should plan on attending the public hearing. Written comments will be accepted until 5:00 pm on February 18, 2008.

Please copy the CEO on the final response that is submitted to SCAG from the County departments. If you have any questions, please contact me via e-mail or at 213-974-4283. Thanks!

COMMENT LETTER 24



ORANGE COUNTY COUNCIL OF GOVERNMENTS

Cities

- Aliso Viejo
- Anaheim
- Brea
- Buena Park
- Costa Mesa
- Cypress
- Dana Point
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- Irvine
- La Habra
- La Palma
- Laguna Beach
- Laguna Hills
- Laguna Niguel
- Laguna Woods
- Lake Forest
- Los Alamitos
- Mission Viejo
- Newport Beach
- Orange
- Placentia
- Rancho Santa Margarita
- San Clemente
- San Juan Capistrano
- Santa Ana
- Seal Beach
- Stanton
- Tustin
- Villa Park
- Westminster
- Yorba Linda

County of Orange

Agencies

- Costa Mesa Sanitary District
- East Orange Water District
- El Toro Water District
- Irvine Ranch Water District
- OC Sanitation District
- OC Transportation Authority
- OC Water District
- Transportation Corridor Agencies

February 19, 2008

The Honorable Gary Ovitt  
 President, SCAG Regional Council  
 Southern California Association of Governments  
 818 West Seventh Street, 12<sup>th</sup> Floor  
 Los Angeles, California 90017

**RE: SCAG Draft 2008 Regional Transportation Plan Growth Forecasts;  
 SCAG Draft 2008 Regional Transportation Program Environmental Impact  
 Report; Comments from Individual Board Members of the Orange County  
 Council of Governments:**

Dear President Ovitt:

On January 24, 2008, eleven members of the Orange County Council of Governments board of directors reviewed, discussed and wished to convey two key policy-level comments relating to the draft 2008 SCAG Regional Transportation Plan growth forecasts and the draft 2008 Regional Transportation Plan Program Environmental Impact Report mitigation measures. Although the OCCOG Board of Directors was unable to reach a quorum at the January 24, 2008 meeting, the eleven individual members found it important to convey their separate concerns by way of this letter.

Thus, on behalf of these eleven individual members of the OCCOG board of directors, I am transmitting policy-level comments for consideration by SCAG policy committees and its Regional Council, as they review public comments received on the draft 2008 RTP components and consider subsequent revisions to the draft RTP documents and components.

As a preface, it is important to establish that the OCCOG supports the timely adoption of the 2008 RTP. SCAG adoption of the 2008 RTP is essential and critical to enable the Southern California region to proceed forth with the planning, environmental clearance, and delivery of regionally significant transportation projects. Further, OCCOG recognizes that SCAG must approve the 2008 RTP and establish air quality conformity, before the region's current conformity expires on June 7, 2008.

The two policy-level comments discussed below, would ensure that the planning of transportation improvements conforms with local plans for growth; and further, that the delivery of transportation improvements be environmentally sensitive yet implement EIR mitigation measures that are reasonable, within the purview of SCAG responsibility, and do not duplicate existing state law.

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Southern California Association of Governments  
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The two policy-level comments endorsed by consensus of the eleven individual members of the OCCOG board are as follows:

- 1) ***That SCAG use the Orange County Projections-2006 (OCP-2006) in any adopted growth forecast for the 2008 Regional Transportation Plan, consistent with adopted policy directive from the boards of directors of the Orange County Transportation Authority and the OCCOG.***
- 2) ***That SCAG remove mitigation measures in the draft 2008 RTP Program EIR that are not related to transportation project delivery and implementation, and remove or revise mitigation measures that impose questionable requirements.***

2 cont.

3

Clarifying justification for these two policy-level recommendations are detailed below.

SCAG 2008 RTP Growth Forecast Alternatives:

- 1) ***That SCAG use the Orange County Projections-2006 (OCP-2006) in any adopted growth forecast for the 2008 Regional Transportation Plan, consistent with adopted policy directive from the boards of directors of the Orange County Transportation Authority and the OCCOG.***

4

SCAG has released two alternative growth forecasts for public comment, to be considered for adoption as the regional forecast for the 2008 RTP:

- A Baseline Growth Forecast, which represents the input of SCAG jurisdictions and subregions; and,
- A Policy Growth Forecast that proposes to re-distribute growth and shift the amount of growth in each SCAG county, to promote growth principles that would intensify future growth near existing transportation facilities and employment areas.

***The eleven individual members of the OCCOG board of directors opined that:***

- a) Orange County’s adopted growth forecast is reflected in Orange County Projections-2006 (OCP-2006), a database of projections of future population, households and employment that was approved by the Orange County Council of Governments Board of Directors on November 30, 2006, and transmitted to SCAG as Orange County’s official growth forecast to be used for the 2008 Regional Transportation Plan. OCP-2006 was developed through a “bottoms-up process” with Orange County jurisdictions and major land use owners, and coordinated by the Center for Demographic Research.

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b) At present, only the RTP Baseline Growth Forecast recognizes Orange County local plans and incorporates the OCP-2006 projections. OCP-2006 is consistent with the RTP Baseline Growth Forecast down to the census tract level.

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c) In contrast, the RTP Policy Growth Forecast contains significant errors in its representation of Year 2035 planned growth for Orange County, and a listing of the errors in the SCAG Policy Growth Forecast is detailed in a Center for Demographic Research analysis and letter of comment dated February 14, 2008, attached hereto as Exhibit 1 and incorporated herein by this reference.

In summary, the CDR analysis in Exhibit 1 identifies that countywide, the Policy Growth Forecast proposes 45,000 more people, 15,000 more households and 9,500 more jobs in Orange County in Year 2035 than OCP-2006 and the RTP Baseline Growth Forecast.

6

Further, the CDR analysis in Exhibit 1 identifies that the Policy Growth Forecast significantly shifts the location of future growth within Orange County, and places future population, households and employment in areas throughout Orange County that are inconsistent with local plans, inconsistent and contrary to approved entitlements and development agreements, and inconsistent with areas designated for historic preservation, open space preservation, and restricted areas of the John Wayne Airport flight path.

Any consideration by the SCAG Regional Council to adopt the RTP Policy Growth Forecast as the SCAG regional forecast, must first recognize and implement significant corrections to reconcile all identified errors and inconsistencies identified in Exhibit 1, and use the OCP-2006 database of projections for Orange County as Orange County's forecast.

d) Individual Orange County jurisdictions and agencies have also submitted letters of comment identifying errors with the SCAG Policy Growth Forecast and recommending that any adopted growth forecast for the SCAG region incorporate the OCP-2006 projections, which at present, is the RTP Baseline Growth Forecast. Letters of comment received by OCCOG to date from Orange County cities, the Orange County Transportation Authority, and the Transportation Corridor Agencies, are included in Exhibit 2 and incorporated herein by this reference. It should be noted that the letters of comments in Exhibit 2 represent those letters received at the time of this transmittal and that additional letters may be submitted to SCAG by individual Orange County jurisdictions and agencies.

7

e) The use of OCP-2006 as the growth forecast for SCAG's 2008 RTP is a policy directive of the Orange County Council of Governments Board of Directors (November 30, 2006 action) and a policy directive of the Orange County Transportation Authority Board of Directors (November 27, 2006 action). At

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present, the only 2008 RTP growth forecast that incorporates the OCP-2006 projections and is consistent with OCCOG and OCTA policy directives, is the SCAG 2008 RTP Baseline Growth Forecast.

8 cont.

- f) Any regional growth forecast adopted by SCAG in conjunction with the 2008 RTP, must demonstrate a realistic consideration of local plans, to ensure that transportation needs and projects correlate with local plans for future growth. At present, the only SCAG RTP growth forecast that demonstrates a realistic consideration of local plans for Orange County, is the RTP Baseline Growth Forecast, which fully incorporates OCP-2006.

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SCAG 2008 RTP Draft Program EIR:

- 2) ***That SCAG remove mitigation measures in the draft 2008 RTP Program EIR that are not related to transportation project delivery and implementation, and remove or revise mitigation measures that impose questionable requirements.***

10a

The draft Program Environmental Impact Report for the 2008 SCAG Regional Transportation Plan includes more than 60 pages of mitigation measures that would be applied to and be binding upon transportation agencies and local governments responsible for implementing the transportation projects in the adopted 2008 RTP. Many of these mitigation measures are appropriate for transportation project mitigation.

The Draft EIR, however, also contains mitigation measures that have no bearing on the mitigation of transportation project delivery. Many of the mitigation measures of concern are similar to or promote SCAG Regional Comprehensive Plan policies, which has just been released for public review and which are proposed as voluntary and elective policies for local jurisdictions to consider, as they update General Plans, municipal code amendments, design guidelines and other actions.

***The eleven individual members of the OCCOG board of directors opined that:***

- a) The draft EIR presents a framework of mitigation measures that implementing agencies and local Lead Agencies such as cities, would be responsible for ensuring adherence, as specific RTP transportation projects are considered for approval.

10b

- b) The draft RTP EIR states that Lead Agencies such as cities and county transportation agencies shall provide SCAG with documentation of compliance with RTP EIR mitigation measures, as conducted through SCAG's Intergovernmental Review (IGR) process.

10c

- c) Included in the listing of draft RTP mitigation measures are mitigation measures relating to housing need, land use and re-zoning strategies to promote mixed use

10d

## COMMENT LETTER 24

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Southern California Association of Governments  
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- and compact growth patterns; solid waste requirements and programs, school capacity analyses and recreation and open space planning, among others. 10d cont.
- d) Certifying an RTP EIR that includes the types of mitigation measures as identified above, would complicate and delay transportation project environmental clearances, by requiring local agencies to respond to and comply with mitigation measures beyond the scope of transportation project delivery and which are more suited for consideration and implementation as local governments update their General Plans. 10e
- e) The Policy Growth Principles identified in the RTP are specifically identified as voluntary for local governments. As such, the mitigation measures directly mitigating the growth that would result from the Policy Growth Principles should also be considered voluntary in nature and should apply only if the mitigation measure is practical and feasible. 10f
- f) Mitigation measures recommended for deletion and for revision are presented in Exhibit 3. Further, two over-arching comments that preface the listing of mitigation measures in Exhibit 3, are that: 10g
- (1) The mitigation measures need to clarify and define the entity or entities that would be responsible for implementing each mitigation measure. Also, several of the mitigation measures identify entities that do not have authority to implement the measure. 10h
- (2) The mitigation measures need to reference consistent terminology to identify the responsible entities. For example, the terms “project sponsor” and “project implementation agency” are used interchangeably, but not consistently, in the mitigation measures. 10i

The eleven members of the OCCOG Board of Directors appreciate the opportunity to review the draft RTP growth forecasts and the draft RTP Environmental Impact Report, and respectfully offer this letter of comments for consideration in SCAG’s adoption of growth forecasts for the 2008 RTP and in the certification of a Final Program EIR for the 2008 RTP.

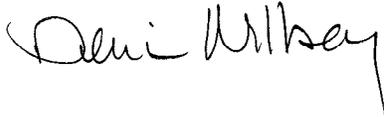
Respectfully submitted on behalf of:

- The Honorable Art Brown, Council member, City of Buena Park:  
OCCOG Board Chair and OCTA representative;
- The Honorable Cheryl Brothers, Council member, City of Fountain Valley:  
OCCOG Board Vice-Chair and District 15 Representative;
- The Honorable Lou Bone, Council member, City of Tustin:  
OCCOG Board member: District 17 Representative;

## COMMENT LETTER 24

- The Honorable Christine Barnes, Mayor Pro Tem, City of La Palma:  
OCCOG Board member: District 18 Representative;
- The Honorable Robert Hernandez, Mayor Pro Tem, City of Anaheim:  
OCCOG Board member: District 19 Representative;
- The Honorable Troy Edgar, Council member, City of Los Alamitos:  
OCCOG Board member: District 20 Representative;
- The Honorable John Beaman, Mayor Pro Tem, City of Brea:  
OCCOG Board member: District 22 Representative;
- The Honorable Bob Ring, Mayor Pro Tem, City of Laguna Woods:  
OCCOG Board member: Cities At-Large Representative;
- The Honorable Phil Anthony, President, Orange County Water District:  
OCCOG Board member: Independent Special Districts of Orange County Representative;
- The Honorable Peter Herzog, Mayor Pro Tem, City of Lake Forest:  
OCCOG Board member: League of California Cities, Orange County Division Representative;
- The Honorable Bert Hack, Mayor, City of Laguna Woods:  
OCCOG Board member: Transportation Corridor Agencies Representative.

By Dennis R. Wilberg,



Orange County Council of Governments Interim Executive Director

- Exhibit 1: CDR letter of comment to Ms. Jessica Meaney, dated 2/14/2008.  
Exhibit 2: Orange County cities and agencies letters of comment received as of 2/18/2008.  
Exhibit 3: Technical comments on draft RTP EIR mitigation measures proposed for deletion/revision

cc: OCCOG Board of Directors  
Orange County Cities and County of Orange:  
• City Managers, County Executive Officer, Planning Directors and Planning Staff  
Mr. Hasan Ikhata, SCAG Executive Director  
Mr. Arthur Leahy, OCTA Chief Executive Director  
Ms. Lacy Kelly, League of California Cities, Orange County Division  
Ms. Deborah Diep, CDR Director  
Ms. Tracy Sato, OCCOG TAC Chair  
Mr. Fred Galante, OCCOG Legal Counsel  
Mr. William Curley, City of Mission Viejo City Attorney  
Ms. Karen Hamman, OCCOG Interim Clerk of the Board  
Ms. Jessica Kirchner, SCAG  
Mr. Ryan Kuo, SCAG (RTP)  
Ms. Jessica Meaney, SCAG  
Dr. Frank Wen, SCAG (Growth Forecasts)

Sponsors:

California State University, Fullerton

Clerk-Recorder Department, County of Orange

County of Orange

Municipal Water District of Orange County

Orange County Council of Governments

Orange County Sanitation District

Orange County Transportation Authority

Orange County Water District

Transportation Corridor Agencies

February 14, 2008

Southern California Association of Governments  
Attn: Jessica Meany  
meaney@scag.ca.gov  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**SUBJECT: COMMENTS ON THE DRAFT 2008 REGIONAL TRANSPORTATION PLAN, DRAFT BASELINE GROWTH FORECAST AND DRAFT POLICY GROWTH FORECAST**

Dear Ms. Meany,

The Center for Demographic Research at Cal State Fullerton has reviewed the Draft 2008 Regional Transportation Plan, its associated reports, the 2008 RTP Draft Baseline Forecast, and the Draft Policy Growth Forecast. We appreciate the opportunity to do so.

First, we would like to express support of recommendations by the Orange County Transportation Authority, the Orange County Council of Governments and other Orange County agencies whose comments also request the approval of the Baseline forecast, which includes the 2006 Orange County Projections as Orange County's local input, in the 2008 RTP.

Our comments are grouped as follows:

1. Adopt the local input, currently contained in the Baseline forecast, as the growth forecast in the 2008 RTP
2. Baseline forecast (local input) is not "business as usual"
3. County and small area comments on the Growth Forecasts
4. Other Comments on the Draft 2008 RTP documents

**1. Adopt the local input, currently contained in the Baseline forecast, as the growth forecast in the 2008 RTP**

The growth forecast which contains local input, for Orange County this is the 2006 Orange County Projections currently contained in the Baseline forecast, should be adopted at the regional and subregional levels as the growth forecast for use in the 2008 RTP and for findings of air quality conformity.

We strongly encourage, along with Orange County agencies, that the staff recommendation to the Community, Economic and Human Development Committee (CEHD) and Regional Council be to adopt the Baseline forecast which contains the local input for Orange County, was created through a bottoms-up process, is based on local land uses, and already incorporates regional principles and policies.

At the November 1, 2007 meeting of the CEHD, the committee approved the release of the 2008 RTP draft baseline and draft policy growth forecasts for public review and comment. The staff report for this item stated the following:

- "The draft baseline growth forecast for the 2008 RTP represents the most likely growth distribution"

- “The proposed draft baseline growth forecast reflects local jurisdiction/subregion projections and vision, while there is room on an advisory and volunteer basis for a regional land use strategy, or vision to bring additional mobility benefits, relief congestion, and improve quality of life throughout the region.”
- “The draft policy growth forecast for 2008 RTP calls for an advisory redistribution of growth at the county, subregion, city, and TAZ levels from the baseline growth forecast.”
- “This advisory policy growth forecast utilizing Compass Blueprint land use strategies and principles, focuses on geographic specific locations with transportation/transit advantage, including the interaction between transit network and employment centers.”
- “This policy growth forecast, consistent with Compass Blueprint land use principles is advisory; its implementation would be voluntary and compliment to the baseline growth forecasts based on local jurisdiction/subregional input.”

SCAG staff’s report supports the use of the Policy forecast/Plan scenario in an advisory capacity. Adoption of the Policy growth forecast (Plan scenario) for use in the RTP would result in mandating the “Plan” policies. Therefore, the only way to retain the Plan scenario as advisory and voluntary would be to adopt the Baseline forecast for use in the 2008 RTP.

**TABLE 1**

<b>TOPIC</b>	<b>PAGE REFERENCE</b>	<b>RTP NARRATIVE, COMMENT &amp; RECOMMENDATION</b>
Adoption of Baseline forecast (local input)	RTP p. 55; Integrated Growth Forecast & Regional Land Use Policies Report p. 11	<p><u>RTP NARRATIVE:</u> “The policy growth forecast calls for an advisory redistribution of growth at the county, subregion, city, and transportation analysis zone (TAZ) levels. The implementation of the policy growth forecast would be voluntary and it complements the baseline growth forecast.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> The RTP document states the policy growth forecast or “Plan” forecast would be advisory and voluntary. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP.</p>
Adoption of Baseline forecast (local input)	RTP p. 86	<p><u>RTP NARRATIVE:</u> “In order to yield transportation model performance that legitimately account for the resulting air quality benefits, the assumptions must be: 1) reasonable and realistic; 2) based on the best and most up-to-date information; and 3) must be consistent with planned transportation infrastructure.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> The Baseline forecast is based on local input from all SCAG subregions and supports these assumptions. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP.</p>
Adoption of Baseline forecast (local input)	RTP p. 86	<p><u>RTP NARRATIVE:</u> “assumptions are consistent with planned transportation infrastructure”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> The local input contained in the Baseline forecast is consistent with what CTCs used in planning their transportation projects. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP.</p>

<p>Adoption of Baseline forecast (local input)</p>	<p>RTP p. 89; Integrated Growth Forecast &amp; Regional Land Use Policies Report p. 45</p>	<p><u>RTP NARRATIVE:</u> “implementation efforts are ultimately in the hands of local governments ... While local land use decisions are outside of its purview, SCAG plans to influence growth patterns through a number of actions that will require collaboration at all levels of both public and private entities.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> If implementation of the Plan scenario/Policy forecast is up to the local governments, this implies the Policy forecast is voluntary and the local input (Baseline forecast) should be used within the RTP rather than mandating policies in the “Plan”/policy forecast. If SCAG does not have local land use authority and supports jurisdictions’ local control, then the Policy forecast should continue to be advisory and the Baseline forecast should be adopted as the growth forecast for the 2008 RTP.</p>
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**2. Baseline is Not “business as usual”**

The Draft 2008 RTP, the Environmental Justice Report and the Integrated Growth Forecast and Regional Land Use Report state the Baseline forecast is “business as usual”. The reports further discuss that the Baseline forecast, which includes local input from all six counties, is similar to the status quo and is not influenced by regional policies. This is not the case. Rather, Orange County jurisdictions have made significant efforts since the 2004 RTP to include projects that are consistent with regional policies and principles endorsed by SCAG. In the Baseline forecast, Orange County shows:

- 91% of the household growth in Orange County will be focused into 14% of its land area
- Almost half (48%) of the job growth will be concentrated into 5% of the land area
- 70% of the household growth will be multi-family
- The county’s distribution of single-family detached to multi-family will decline from 51% to 49%.

**TABLE 2**

<p><b>TOPIC</b></p>	<p><b>PAGE REFERENCE</b></p>	<p><b>RTP NARRATIVE, COMMENT &amp; RECOMMENDATION</b></p>
<p>Business as Usual</p>	<p>RTP p. 62, 161 Integrated Growth Forecast &amp; Regional Land Use Policies Report p. 11, 25, 28</p>	<p><u>RTP NARRATIVE:</u> “It [Baseline scenario] would yield a growth scenario very similar to the status quo, taking a somewhat “business as usual” approach”  “The Baseline represents “business as usual” ”  “The Modified 2004 RTP Growth Scenario represents one possible version of the region’s growth between 2005 and 2035 based on the previously adopted 2004 RTP forecast distribution.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> Page 88 of the RTP states “the [Plan] policies reflect current development patterns in some portions of the region and nascent planning strategies in others.” Page 40 of the Integrated Growth Forecast report states “with most cities that are undertaking General Plan updates moving towards</p>

		<p>adopting similar policies and zoning ordinances consistent with the Compass Principles and Growth Vision.”</p> <p>Since the 2004 RTP, many Orange County jurisdictions have approved projects that are consistent with Compass Principles which are the foundation of the Plan forecast. These projects deviate from the long-time pattern of “urban sprawl” which is how the Baseline forecast is described. The characterization of the Baseline forecast as “business as usual” is misleading and should be removed.</p> <p>The Modified 2004 RTP, which is an extension of the 2004 RTP growth forecast out to Year 2035 (the horizon year for the 2008 RTP), is a more appropriate characterization of business as usual.</p>
<p>Business as Usual</p>	<p>RTP p. 87; Integrated Growth Forecast &amp; Regional Land Use Policies Report p. 41</p>	<p><u>RTP NARRATIVE:</u> “Based on the land use assumptions developed by SCAG and its local partners, the Regional Council adopted the following set of policies to be incorporated into Compass Blueprint and used in developing the 2008 RTP Policy Growth Alternative”</p> <p>“These policies were founded upon the Compass Principles developed through the regional growth visioning efforts in preparation for the 2004 RTP.</p> <ul style="list-style-type: none"> <li>• [1] Identify regional strategic areas for infill and investment. <ul style="list-style-type: none"> <li>○ Transit Oriented Development</li> <li>○ Existing and emerging centers</li> <li>○ Small mixed use areas</li> </ul> </li> <li>• [2] Structure the future plan on a three-tiered system of centers development: Existing, Planned, Potential</li> <li>• [3] Develop “complete communities”</li> <li>• [4] Develop nodes on a corridor</li> <li>• [5] Plan for additional housing and jobs near transit</li> <li>• [6] Plan for a changing demand in types of housing</li> <li>• [7] Continue to protect stable existing single family areas</li> <li>• [8] Ensure adequate access to open space and preservation of habitat</li> <li>• [9] Incorporate local input and feedback on future growth</li> <li>• [10] Promote land use patterns supportive of goods movement and logistics industries”</li> </ul> <p>“A summary of the primary tenets include:</p> <ul style="list-style-type: none"> <li>• [A] Improve the localized balance between jobs and housing</li> <li>• [B] Increase potential transit ridership by focusing growth to transit supportive areas – LRT, BRT, Metrolink</li> <li>• [C] Enhance existing and emerging employment and residential centers</li> <li>• [D] Shift the balance of new development from low density single-family housing to mixed-use and higher density housing</li> <li>• [E] Maintain stable single-family areas</li> <li>• [F] Minimize new separate use commercial or residential</li> </ul>

		<p>development in outlying areas</p> <ul style="list-style-type: none"> <li>[G] Minimize very high density development in areas that are not effectively served by transit or are not within identified employment centers”</li> </ul> <p><u>COMMENT &amp; RECOMMENDATION:</u> Table 3 below contains an abbreviated list of projects contained within the Baseline forecast which serve as examples of implementation of the policies and tenets labeled above. The characterization of the Baseline scenario as “business as usual” should be removed.</p>
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11 cont.

**TABLE 3**

Jurisdiction	Project	Consistent with Compass Policies and Tenets
Aliso Viejo	Vantis Multi-family residential project	6,9,F
Anaheim	Platinum Triangle	1,2,3,4,5,6,9,A,B,C,F,G
Brea	South Brea Lofts	3,4,6,9,A,F
Buena Park	Founder's Walk/Buenaterra Transit Oriented Development	4,5,6,9,B,C,F
Costa Mesa	North Costa Mesa High-Rise projects	1,2,3,4,6,9,A,B,C,F
Fountain Valley	SAFECO condo & hotel project	3,5,6,9,A,C,F
Fullerton	Cal State Fullerton staff & student housing project	1,2,3,4,5,6,9,A,B,C,F
Garden Grove	Chapman Commons	3,4,6,9,A,C,F
Huntington Beach	Redevelopment old school sites	6,7,9,E,F
Irvine	Residential units into Irvine Business Complex	1,2,3,4,6,9,A,B,C,F,G
Laguna Niguel	Courthouse expansion	7,9,A,B,E,F
Laguna Woods	Garden Center apartments	3,6,C,F
La Palma	Crescent/Moody infill housing	7,9,E,F
Newport Beach	Nov. 2006 General Plan Amendment	3,9,A,C,F
Orange	Bowling alley site reuse for townhomes	4,6,9,A,B,C,F
Placentia	Metrolink station & Transit Oriented Development	2,3,4,5,6,9,A,B,C,F
Santa Ana	MacArthur Place	2,3,4,5,6,9,A,B,C,F
Stanton	Beach Blvd mixed use	3,4,5,6,9,A,B,F
Tustin	Tustin Legacy	1,2,3,4,5,8,9,A,B,C,F
Unincorporated County	Ranch Plan	1,2,3,6,8,9A,C

**3. County and small area comments on the Growth Forecasts**

The Baseline growth forecast contains local input from all counties within the SCAG region, including the 2006 Orange County Projections. The Baseline forecast was drafted from a bottoms-up process which utilized information based on local land use, current trends and long-term plans. This forecast represents the most likely pattern and distribution of growth envisioned by local governments in the SCAG region.

The Policy growth forecast, referred to in the draft 2008 RTP as the “Plan” forecast, represents SCAG’s vision of how growth could be re-distributed in the SCAG region from the local input reflected in the draft Baseline growth forecast.

The Plan scenario/Policy forecast calls for 45,000 people, 9,500 jobs and 15,000 households to be removed from Imperial, Riverside and San Bernardino Counties and placed into Orange County. This

additional growth is beyond what is forecasted by Orange County jurisdictions. In addition, the distribution of housing, population, and employment in the Policy forecast is contrary to many planned developments already approved and underway in and outside of Orange County.

The map in Attachment 1 provides a county-level view of the differences between the Baseline and Policy forecasts and how job growth was redistributed at the census tract level throughout Orange County. The Policy forecast adds 9,500 more jobs into the County over the growth projected by local jurisdictions based on General Plans, and approved and proposed developments. As can be seen by the grey shaded areas throughout the county, job growth was reduced in the majority of the county and refocused into areas near freeways, train stations and employment centers. Full size wall maps may also be provided upon request.

The map in Attachment 2 also shows the redistribution of households in Orange County between the Baseline and Policy forecasts. In addition to the 137,000 households planned in Orange County, the Policy forecast increases the projected growth by over 15,000 households. The grey shaded areas seen throughout the county represent areas where household growth was reduced and then refocused into areas near freeways, train stations and employment centers represented by shades of green.

**TABLE 4**

<b>TOPIC</b>	<b>PAGE REFERENCE</b>	<b>RTP NARRATIVE, COMMENT &amp; RECOMMENDATION</b>
Policy growth forecast errors	Integrated Growth Forecast & Regional Land Use Policies Report p. 1	<p><u>RTP NARRATIVE:</u>                      “Using an integrated growth forecasting approach and consensus-built growth visioning process ...The growth assumptions, vision and policies were all developed in coordination with technical analyses, local input, land use and growth experts, and on-the-ground “reality checks.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u>                      The above narrative describes the process that created the Policy forecast/Plan scenario. Review of the Policy forecast dataset at the TAZ/Census tract level (released on November 1) shows the Policy forecast contains errors.                      Suggested corrections to these errors are contained in Attachment 3 (an Excel data file containing corrections to geographic areas within the Plan forecast). The following are examples of specific errors:</p> <ul style="list-style-type: none"> <li>• San Clemente: 7,621 jobs and 3,278 additional households placed into city where restrictions such as historical preservation districts, the Coastal Commission and topology would prevent this magnitude of additional growth (CT 421.06, 421.08)</li> <li>• Huntington Beach: 8,660 jobs and 2,843 households placed into city where growth is unlikely to occur, including wetlands areas.</li> <li>• Rossmoor, an unincorporated community in west Orange County: additional 1,288 jobs and 824 households into 1.6 square mile built-out community</li> <li>• Residential development in restricted areas within John Wayne Airport flight path</li> </ul>

<p>Policy growth forecast land use assumptions</p>	<p>Integrated Growth Forecast &amp; Regional Land Use Policies Report p. 18</p>	<p><u>RTP NARRATIVE:</u> “Prior to formulating the 2008 Plan Alternative and assessing its transportation benefits, the appropriate land use assumptions were established.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> Review of the land use maps associated with the Policy growth forecast has identified key problem areas. Examples are:</p> <ul style="list-style-type: none"> <li>• CT 866.01- fully built tract available only for reuse. Policy plan shows 562 additional households with main street uses, city residential, and city neighborhood. Uses are highly unlikely due to existing regional hospital, supporting medical offices, and high density residential (36 units/acre). Reuse to achieve +562 households would require densities greater than 36 units/acre or demolition of hospital and medical office site, both unlikely for area.</li> </ul> <p>In Irvine:</p> <ul style="list-style-type: none"> <li>• Approved General Plan Amendment has residential and mixed use in Spectrum, maps show only Office Park use</li> <li>• Great Park and Heritage Field have designated open space areas not listed</li> <li>• Woodbury should be all residential and open space reserve, not office park</li> <li>• IBC is high end office and going for town center; Policy shows all industrial and decreases in jobs that are unlikely.</li> </ul>
<p>Policy growth forecast errors</p>	<p>RTP p.41</p>	<p><u>RTP NARRATIVE:</u> Development of the 2008 Policy Growth Forecast began with the Workshop Scenario, which represented the closest representation available of regional consensus on how and where growth should occur.</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> Orange County workshop input overall reflected and requested the inclusion of the 2006 Orange County Projections. The Workshop Scenario does not reflect the feedback provided by the Orange County jurisdictions. For Orange County, the Workshop Scenario should be identical to the Baseline forecast.</p>
<p>Policy growth forecast errors</p>	<p>RTP p. 41</p>	<p><u>RTP NARRATIVE:</u> “...the land use distribution [of the Plan forecast] is also informed by the results of research performed at a local scale during 2006 and 2007. The primary sources of this research include dozens of Compass Demonstration Projects, where SCAG supported local planning initiatives consistent with these regional goals, and a “reality check” process to explore, in depth, the relationship between local general plans, the RTP and recent demographic trends.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> One of the reality checks performed was on an Orange County jurisdiction: Anaheim city. Review of the policy forecast dataset</p>

		shows a number of errors in growth projected. Attachment 3 contains an Excel data file highlighting significant differences between the local input (Baseline forecast) and the Plan's Policy forecast. Please change Policy forecast to reflect Baseline projections.
Policy growth forecast errors	RTP p. 42	<p><u>RTP NARRATIVE:</u> "The local knowledge was critical in documenting so called "pipeline" development that is either already underway or has gone significant distance toward entitlement. These pipeline projects are all but guaranteed to happen."</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> The Plan scenario/Policy forecast used portions of the TOD/Centers and Envision growth alternatives yet in doing so, redistributed growth throughout the region such that the following approved and currently under development projects were significantly altered:</p> <ul style="list-style-type: none"> <li>• Large portions of growth in the adopted Ranch Plan (Rancho Mission Viejo) in unincorporated south county were relocated (320.23 &amp; 320.56) to other Orange County locations:             <ul style="list-style-type: none"> <li>○ 11,300 jobs moved from the Ranch Plan into Irvine, Laguna Beach, Newport Beach, San Clemente, San Juan Capistrano</li> <li>○ 8,914 households moved from the Ranch Plan into Irvine, Lake Forest, Laguna Hills, Mission Viejo, Laguna Niguel, San Juan Capistrano, Dana Point, San Clemente</li> </ul> </li> <li>• Irvine: approximately an additional 11,000 jobs and 6,600 households added into the city in areas under current development, planned through development agreements, or open space.</li> <li>• Anaheim's Platinum Triangle: Plan forecast has over 2,200 fewer households than projected in local plans; City expects significant increase in housing and employment as a result of recent amendment to Platinum Triangle Master Land Use Plan</li> </ul>

Detailed review of the Policy forecast dataset generated the site specific comments and errors listed below. Please adjust Policy forecast to correct these. See also Attachment 3 for corrected dataset.

**Table 5**

<b>Census Tract</b>	<b>Policy forecast total over Baseline's local input</b>	<b>Jurisdiction comments</b>
12.02	-21 housing	Should be +91. Laing under construction.
13.01	-10 housing	Should be +111 units. Shea Homes; in final phase.
15.04	+650 housing +2,282 jobs	Area contains Brea Mall which has no plans for this magnitude of additional housing and job growth.
15.05	+112 housing -204 jobs	Area contains Brea Mall which has no plans for this magnitude of additional housing and job growth.
219.12	-25 housing	Area contains approved Irvine Company development, housing reduction is unlikely.
218.15	-366 housing	PepperTree 795 households; La Floresta 1,088 households.
219.14	-9 jobs	Lower job projections in this area are unlikely.

219.18	-19 jobs	Lower job projections in this area are unlikely.
219.24	-640 housing -27 jobs	Lower job projections in this area are unlikely. Area contains approved Irvine Company development, housing reduction unlikely.
524.20	-37 housing	Area contains approved Irvine Company development, housing reduction is unlikely.
758.05	-84 jobs	Lower job projections in this area are unlikely.
758.06	-41 jobs	Lower job projections in this area are unlikely.
758.11	+31 units	Shouldn't be much housing growth here. Area is built out with SFR.
758.12	+161 housing +1,012 jobs	East of freeway with established Single-Family homes. Growth is high for the character and size of parcels.
758.13	+75 housing +1,335 jobs	Shouldn't be much housing growth here. Area is built out with SFR.
758.16	-35 jobs	Lower job projections in this area are unlikely.
759.01	+1,875 housing +4,400 jobs	Too high. Protected Old Town Historic District listed in National Register of Historic Places which greatly constrains future development and infill.
759.02	+712 housing +1,525 jobs	Too high. Protected Old Town Historic District listed in National Register of Historic Places which greatly constrains future development and infill.
760.00	-1,217 jobs	Expansion of St. Joseph Hospital and CHOC along with demand for additional medical office space, lower job growth is unlikely.
761.01	-1,124 +5,351 jobs	Area contains approved Platinum Triangle development; reduction in housing is unlikely as well as job increase is too high.
761.02	-640 housing -974 jobs	This contains UCI medical center, The Block at Orange and criminal justice facilities. It is unlikely that growth will be reduced or fewer than what was projected in Baseline.
762.05	+149 housing +1,020 jobs	Largely built out with SFR. Additional job growth is unlikely.
762.06	+447 housing	Largely built out with SFR. Additional job growth is unlikely.
762.08	+409 housing +732 jobs	Seems too high. This area is a combo of built out SFR and commercial.
882.01	+489 housing	existing SFD neighborhood with no future housing project proposed, should be OCP-2006 #
882.02	+101 housing	existing SFD neighborhood with no future housing project proposed, should be OCP-2006 #
992.20	+220 housing +910 jobs	Only vacant land left is either wetlands or landfill anticipated to be developed for open space use only
992.42	+169 housing	Only vacant land left is designated in General Plan for commercial use.
993.05	+177 housing	Only vacant land left is designated in General Plan for commercial use.
993.07	+495 housing +3,619 jobs	Area has recently redeveloped and not likely to change any time soon. No vacant land left.
994.02	+483 housing +1,002 jobs	Maximum build out of vacant land left pursuant to General Plan designation will result in the addition of maximum 62,500 s.f. of commercial building, 8,000 s.f of industrial building, and zero dwelling units.

11 cont.

994.11	+260 housing +759 jobs	No vacant land left.
994.13	+1,039 housing +2,360 jobs	Area has recently redeveloped as part of a master plan and not likely to change any time soon. Maximum build out of vacant land left pursuant to General Plan designation will result in the addition of max. 62 dwelling units, 17,200 s.f commercial and 130,000 s.f. of industrial
995.04	+399 housing	Area contains existing, stable, single family residential area, public facilities and a recently approved business park. Is built out and all remaining undeveloped areas are deed restricted by Coastal Development Permits to only allowing for wetland and upland habitat restoration projects.
995.04	-49 jobs	Contains new business park development recently completed; the 182 jobs allocated to CT995.10 should be allocated here.
995.10	+182 jobs	Area is 99% developed as a senior retirement living community. Jobs should be allocated to Census Tract 995.04.

11 cont.

**5. Other Comments on the 2008 RTP**

**TABLE 6**

<b>TOPIC</b>	<b>PAGE REFERENCE</b>	<b>RTP NARRATIVE, COMMENT &amp; RECOMMENDATION</b>
Citation	RTP p. 10 RTP p.70	<u>RTP NARRATIVE:</u> 5,400 premature deaths  <u>COMMENT &amp; RECOMMENDATION:</u> Please city the study.
Citation	RTP p. 11	<u>RTP NARRATIVE:</u> “Mixed land uses (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation have been shown to save consumers up to 512 gallons of gasoline per year.”  <u>COMMENT &amp; RECOMMENDATION:</u> Please city the study.
CTC authority does not include implementing Compass Blueprint	RTP p. 91; Integrated Growth Forecast & Regional Land Use Policies Report p. 47	<u>RTP NARRATIVE:</u> “Strategic Initiative: ... SCAG and County Transportation Commissions should initiate a program to secure significant resources for implementing Compass Blueprint.”  <u>COMMENT &amp; RECOMMENDATION:</u> In Orange County, OCTA Board approval would be required before OCTA could spend transportation dollars on development projects that support the Compass Blueprint Program, and there is no precedent for OCTA funding such projects. Please delete reference to County Transportation Commissions.

Citation/ Clarification	RTP p. 104	<p><u>RTP NARRATIVE:</u> “The changes in land use patterns around our transit investments, referred to transit oriented development (TOD), indicate a result that leads to less auto trips and reduced vehicles miles traveled (VMT) through greater transit use, increased substitution of walk trips, and improved access to local jobs and services.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> The statement above should be clarified to state where this conclusion comes from: whether from modeling results of existing TOD or modeling results of future growth scenarios.</p>
Move project to Strategic Plan	RTP p. 117	<p><u>RTP NARRATIVE:</u> Orangeline High-Speed Transit</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> Per recommendation of the OCTA Board on 1/28/2008 and subsequent RTP comment letter, remove this project from Constrained Plan and place in Strategic Plan.</p>
RCP mitigation measures	RTP p. 132	<p><u>RTP NARRATIVE:</u> “The RCP details ... these recommendations are included in the EIR as mitigation measures.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> The Regional Comprehensive Plan has not been adopted by the Regional Council nor has the public comment period been completed. Mitigation measures based on the RCP that are included in the RTP should be removed.</p>
Equal comparisons for accurate conclusions	RTP p. 27	<p><u>RTP NARRATIVE:</u> “• Baseline 2035 scenario–Future conditions in 2035 based on the existing transportation system and near-term constrained projects • Plan 2035 scenario–Future conditions in 2035 based on the existing transportation system, near-term constrained projects, and long-term constrained projects In every category, the Plan 2035 scenario shows improvement over the Baseline 2035 scenario.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> In order to make accurate comparisons of the outcomes between the Baseline and Plan scenarios, the Baseline scenario should include long-term constrained projects.</p>
Equal comparisons for accurate conclusions	RTP p. 167	<p><u>RTP NARRATIVE:</u> “This improvement in accessibility is primarily due to the Land Use Integration strategy”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> In order to arrive at the stated conclusion, the Baseline and Plan transportation projects would have to be identical. Page 27 of the RTP (see comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The models must be rerun with the Baseline scenario including the long-term constrained projects in order to properly evaluate the differences between the two scenarios.</p>

Equal comparisons for accurate conclusions	RTP p. 170	<p><u>RTP NARRATIVE:</u> “For each of these categories, models are used to estimate the benefits of the Plan compared to Baseline.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> In order to compare the Baseline and Plan scenarios, the list of constrained projects would have to be identical. Page 27 of the RTP (see comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The Baseline scenario must include the long-term constrained projects (which the Plan scenario includes) in order to properly evaluate the differences between the two scenarios.</p>
Equal comparisons for accurate conclusions	RTP p. 170	<p><u>RTP NARRATIVE:</u> “The comparison of the transportation modeling results between the Baseline Growth Forecast Alternative and the Policy Growth Forecast Alternative isolates the transportation benefits due to regional land use policy.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> In order to arrive at the stated conclusion, the Baseline and Plan transportation projects would have to be identical. Page 27 of the RTP (see comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The models must be rerun with the Baseline scenario including the long-term constrained projects in order to properly evaluate the differences between the two scenarios.</p>

Again, we thank you for your time and consideration of the comments above.

Sincerely,

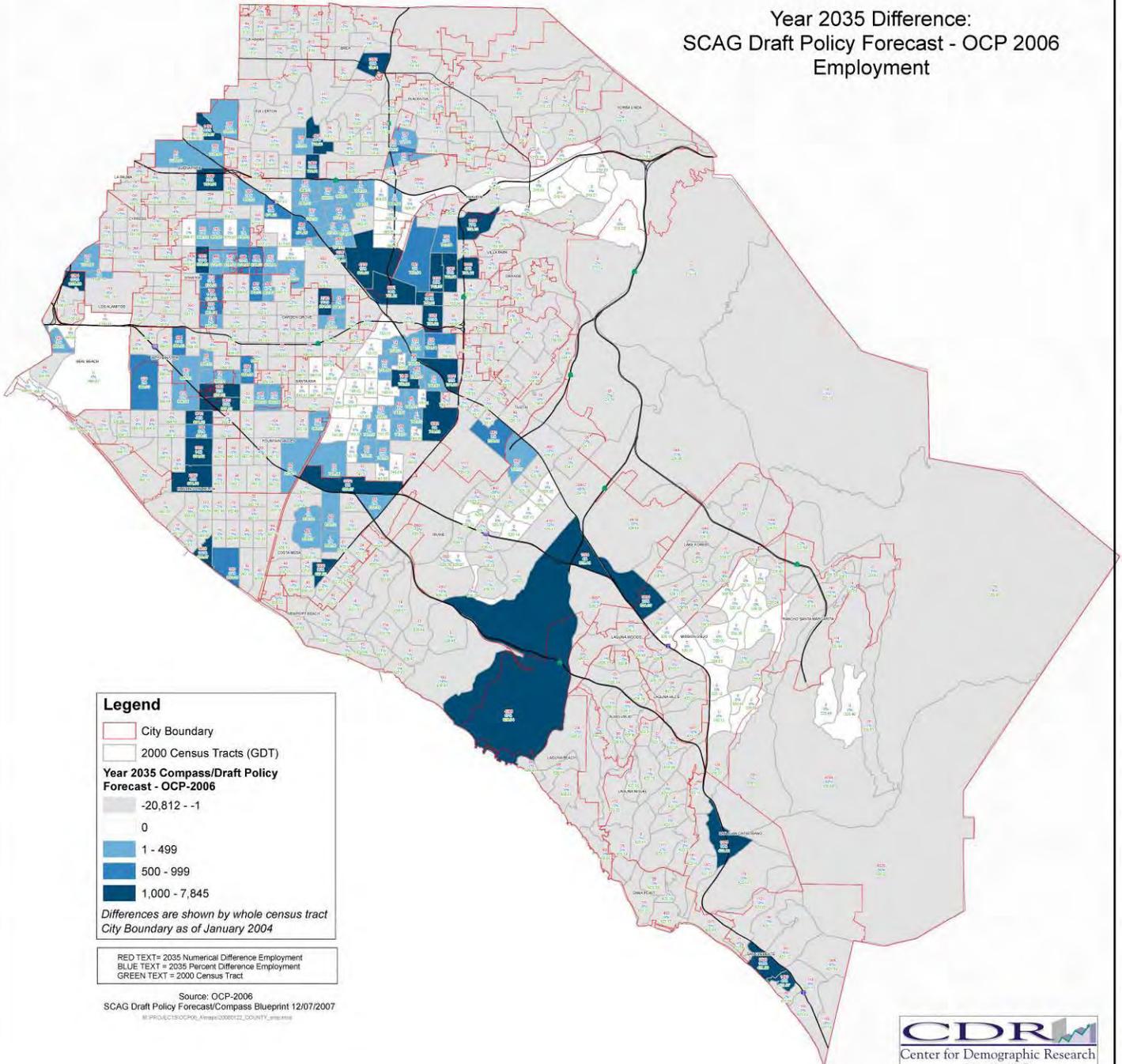


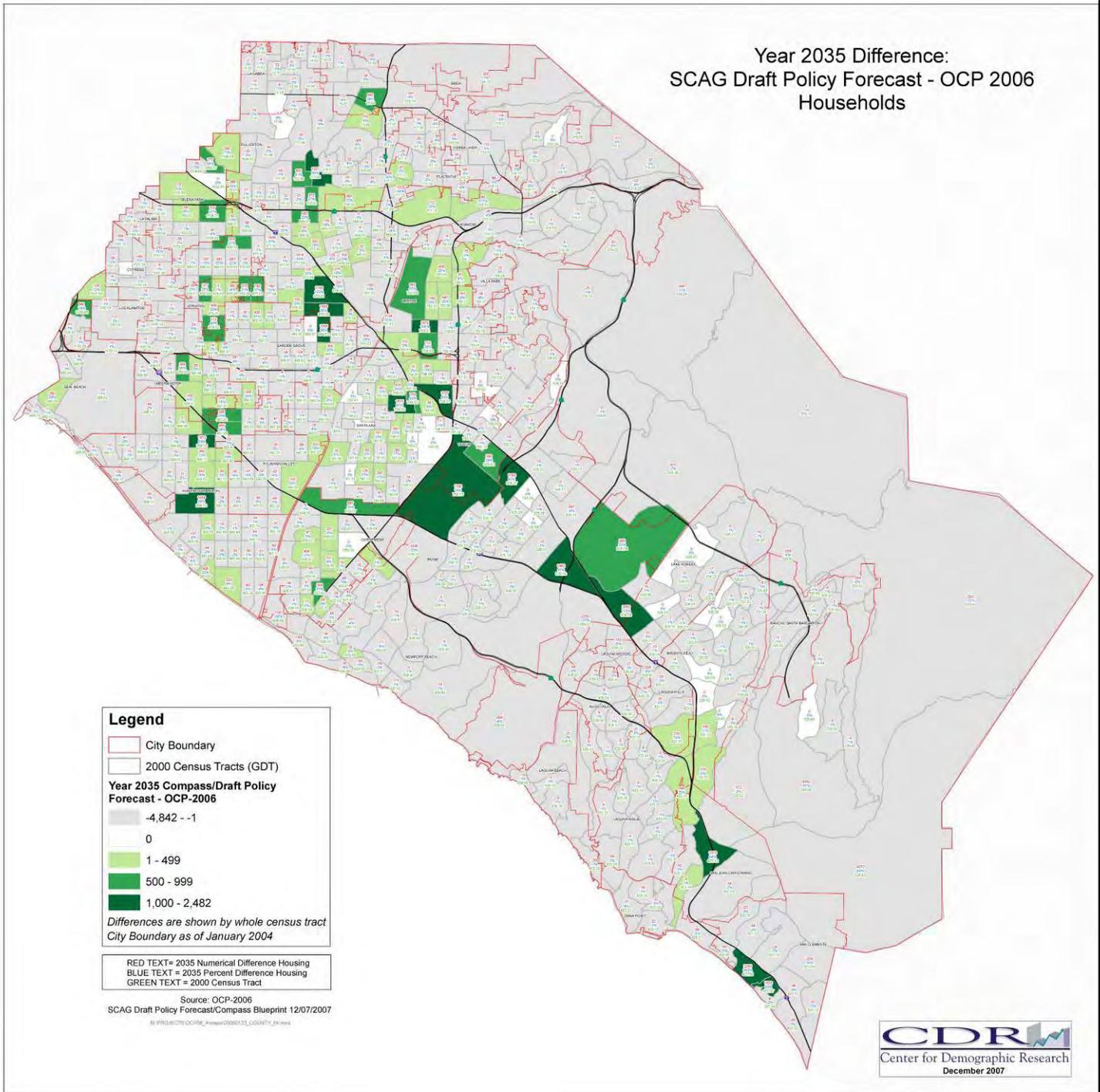
Deborah S. Diep  
CDR Director

- Attachments:
- 1) Year 2035 Differences Employment
  - 2) Year 2035 Differences Households
  - 3) Excel dataset: Differences Policy & Baseline forecasts

CC: CDR Management Oversight Committee  
CDR Technical Advisory Committee

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





Attachment 3:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG	SCAG	SCAG	SCAG	SCAG	SCAG	Difference	Difference	Difference	% Difference	% Difference	% Difference
	Baseline Forecast (OCP-2006) Population	Baseline Forecast (OCP-2006) Households	Baseline Forecast (OCP-2006) Employment	Policy Forecast Population	Policy Forecast Households	Policy Forecast Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment
11.01	4,726	1,514	1,198	4,686	1,510	1,141	-43	-4	-57	-1%	0%	-5%
11.02	3,485	1,094	808	3,458	1,092	759	-30	-2	-49	-1%	0%	-6%
11.03	5,097	1,442	1,411	5,101	1,434	1,311	34	-8	-100	1%	-1%	-7%
12.01	6,177	1,474	725	6,003	1,441	662	-181	-33	-63	-3%	-2%	-9%
12.02	4,179	1,012	1,476	4,068	991	1,416	-116	-21	-60	-3%	-2%	-4%
13.01	7,348	2,643	3,200	7,277	2,633	3,086	-80	-10	-114	-1%	0%	-4%
13.03	6,607	1,869	1,260	6,547	1,863	1,207	-68	-6	-53	-1%	0%	-4%
13.04	4,617	1,176	2,692	4,508	1,155	2,592	-115	-21	-100	-2%	-2%	-4%
14.01	6,394	1,784	1,741	6,315	1,773	1,673	-43	-11	-68	-1%	-1%	-4%
14.02	5,851	1,583	866	5,805	1,580	823	-53	-3	-43	-1%	0%	-5%
14.03	3,723	1,109	474	3,636	1,089	466	-87	-20	-8	-2%	-2%	-2%
14.04	4,269	1,039	8,908	4,191	1,026	8,295	-82	-13	-613	-2%	-1%	-7%
15.01	7,011	2,471	3,525	6,950	2,464	3,463	-62	-7	-62	-1%	0%	-2%
15.03	6,307	2,016	7,496	6,046	1,944	7,404	-265	-72	-92	-4%	-4%	-1%
15.04	5,082	1,815	6,662	6,861	2,465	8,944	1,777	650	2,282	35%	36%	34%
15.05	7,538	2,437	1,402	7,839	2,549	1,198	289	112	-204	4%	5%	-15%
15.06	5,013	1,670	1,163	4,812	1,607	1,068	-190	-63	-95	-4%	-4%	-8%
15.07	5,008	2,039	9,907	4,896	2,003	9,856	-111	-36	-51	-2%	-2%	-1%
16.01	8,256	2,912	8,784	8,003	2,813	8,667	-245	-99	-117	-3%	-3%	-1%
16.02	5,622	2,100	1,370	5,150	1,934	1,332	-482	-166	-38	-9%	-8%	-3%
17.04	7,044	2,295	3,419	6,834	2,240	3,378	-225	-55	-41	-3%	-2%	-1%
17.05	4,929	1,488	608	4,880	1,482	593	-56	-6	-15	-1%	0%	-2%
17.06	4,414	1,432	2,335	4,270	1,373	2,245	-135	-59	-90	-3%	-4%	-4%
17.07	9,044	3,095	1,553	8,776	3,017	1,481	-282	-78	-72	-3%	-3%	-5%
17.08	4,811	1,444	985	4,783	1,444	961	-35	0	-24	-1%	0%	-2%
18.01	5,988	1,628	4,276	7,041	1,926	4,087	1,042	298	-189	17%	18%	-4%
18.02	8,361	2,124	963	8,247	2,103	911	-124	-21	-52	-1%	-1%	-5%
19.01	3,105	811	590	3,041	799	552	-69	-12	-38	-2%	-1%	-6%
19.02	3,360	812	1,319	3,292	800	1,269	-39	-12	-50	-1%	-1%	-4%
19.03	3,428	954	628	3,326	931	593	-108	-23	-35	-3%	-2%	-6%
110.00	7,817	2,578	3,584	7,590	2,518	3,173	-240	-60	-411	-3%	-2%	-11%
111.01	4,525	1,295	791	4,422	1,273	752	-109	-22	-39	-2%	-2%	-5%
111.02	5,171	1,185	561	5,050	1,164	527	-125	-21	-34	-2%	-2%	-6%
112.00	4,534	1,602	2,435	6,280	2,254	2,573	1,752	652	138	39%	41%	6%
113.00	4,955	1,963	5,324	8,003	3,290	10,150	3,074	1,327	4,826	62%	68%	91%
114.01	2,514	799	2,733	2,407	766	2,669	-93	-33	-64	-4%	-4%	-2%
114.02	2,644	888	616	2,535	856	578	-110	-32	-38	-4%	-4%	-6%
114.03	6,466	1,921	2,574	6,329	1,886	2,494	-128	-35	-80	-2%	-2%	-3%
115.02	4,712	1,529	2,235	4,529	1,478	2,151	-188	-51	-84	-4%	-3%	-4%
115.03	2,034	590	689	2,001	580	638	-29	-10	-51	-1%	-2%	-7%
115.04	6,118	2,606	6,853	6,029	2,585	6,615	-11	-21	-238	0%	-1%	-3%
116.01	9,390	2,376	2,088	12,747	3,248	4,494	3,341	872	2,406	36%	37%	115%

11 cont.

Attachment 3:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
116.02	6,591	1,623	22,104	7,815	1,982	21,869	1,216	359	-235	18%	22%	-1%
117.07	5,791	2,280	2,171	5,668	2,245	2,069	-134	-35	-102	-2%	-2%	-5%
117.08	5,037	1,909	735	4,942	1,884	714	-96	-25	-21	-2%	-1%	-3%
117.09	5,095	1,506	3,899	4,961	1,475	3,498	-135	-31	-401	-3%	-2%	-10%
117.10	4,103	1,192	1,007	3,994	1,167	933	-105	-25	-74	-3%	-2%	-7%
117.11	8,204	2,624	1,498	8,085	2,594	1,431	-124	-30	-67	-2%	-1%	-4%
117.12	5,522	1,635	1,336	5,811	1,732	1,450	288	97	114	5%	6%	9%
117.14	654	391	39,730	846	503	34,081	192	112	-5,649	29%	29%	-14%
117.15	8,351	2,592	1,973	7,877	2,459	1,907	-475	-133	-66	-6%	-5%	-3%
117.16	5,542	1,684	675	5,427	1,659	669	-117	-25	-6	-2%	-1%	-1%
117.17	3,110	950	930	2,981	916	906	-130	-34	-24	-4%	-4%	-3%
117.18	3,882	1,141	748	3,761	1,111	714	-123	-30	-34	-3%	-3%	-5%
117.20	8,779	1,526	2,727	8,550	1,495	2,664	-231	-31	-63	-3%	-2%	-2%
117.21	5,426	1,535	910	7,003	1,993	1,583	1,575	458	673	29%	30%	74%
117.22	6,729	2,508	4,011	3,430	1,286	4,069	-3,300	-1,222	58	-49%	-49%	1%
218.02	8,340	2,741	3,791	7,949	2,628	3,627	-392	-113	-164	-5%	-4%	-4%
218.07	4,597	1,347	642	4,563	1,345	642	-34	-2	0	-1%	0%	0%
218.09	3,362	1,019	954	3,230	984	951	-130	-35	-3	-4%	-3%	0%
218.10	4,246	1,265	1,408	4,108	1,231	1,368	-139	-34	-40	-3%	-3%	-3%
218.12	7,490	2,274	1,230	7,249	2,214	1,212	-241	-60	-18	-3%	-3%	-1%
218.13	47	13	20,375	219	62	20,283	172	49	-92	366%	377%	0%
218.14	8,621	2,877	7,107	8,082	2,722	6,914	-543	-155	-193	-6%	-5%	-3%
218.15	17,072	5,368	4,014	15,854	5,001	3,815	-1,377	-366	-199	-8%	-7%	-5%
218.16	5,526	1,826	695	5,349	1,778	693	-177	-48	-2	-3%	-3%	0%
218.17	4,072	1,308	350	3,998	1,292	350	-74	-16	0	-2%	-1%	0%
218.20	5,210	1,529	480	4,949	1,461	437	-262	-68	-43	-5%	-4%	-9%
218.21	8,117	2,778	5,175	7,441	2,561	5,107	-678	-217	-68	-8%	-8%	-1%
218.22	6,900	2,554	1,044	6,553	2,440	1,018	-347	-114	-26	-5%	-4%	-2%
218.23	4,163	1,349	340	3,980	1,297	327	-182	-52	-13	-4%	-4%	-4%
218.24	3,215	859	710	3,196	859	704	-19	0	-6	-1%	0%	-1%
218.25	3,920	1,210	288	3,836	1,191	274	-84	-19	-14	-2%	-2%	-5%
218.26	2,964	1,081	2,412	2,857	1,048	2,404	-107	-33	-8	-4%	-3%	0%
218.27	3,367	1,094	304	3,252	1,063	298	-115	-31	-6	-3%	-3%	-2%
218.28	5,313	1,345	531	5,215	1,328	527	-98	-17	-4	-2%	-1%	-1%
218.29	6,616	1,825	719	6,483	1,799	712	-133	-26	-7	-2%	-1%	-1%
218.30	6,851	1,994	906	6,804	1,992	877	-47	-2	-29	-1%	0%	-3%
219.03	4,655	1,228	2,810	4,443	1,179	2,810	-212	-49	0	-5%	-4%	0%
219.05	6,305	1,797	2,037	6,247	1,791	2,037	-58	-6	0	-1%	0%	0%
219.12	9,603	2,689	773	9,454	2,663	766	-159	-25	-8	-2%	-1%	-1%
219.13	9,477	1,987	750	9,373	1,977	743	-122	-10	-7	-1%	-1%	-1%
219.14	4,799	1,344	1,012	4,746	1,337	1,003	-63	-7	-9	-1%	-1%	-1%
219.15	4,683	1,492	921	4,633	1,485	917	-50	-7	-4	-1%	0%	0%

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Attachment 3:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG	SCAG	SCAG	SCAG	SCAG	SCAG	Difference	Difference	Difference	% Difference	% Difference	% Difference
	Baseline Forecast (OCP-2006) Population	Baseline Forecast (OCP-2006) Households	Baseline Forecast (OCP-2006) Employment	Policy Forecast Population	Policy Forecast Households	Policy Forecast Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment
219.16	4,251	1,424	620	4,209	1,419	620	-38	-5	0	-1%	0%	0%
219.17	4,194	1,298	666	4,134	1,287	648	-66	-11	-18	-2%	-1%	-3%
219.18	5,620	1,817	1,264	5,562	1,805	1,245	-65	-12	-19	-1%	-1%	-2%
219.19	3,196	1,063	1,073	3,168	1,060	1,073	-27	-3	0	-1%	0%	0%
219.20	6,217	2,086	652	6,169	2,082	648	-47	-4	-4	-1%	0%	-1%
219.21	5,317	1,427	709	5,282	1,426	709	-35	-1	0	-1%	0%	0%
219.22	5,483	2,221	4,026	5,433	2,214	4,026	-50	-7	0	-1%	0%	0%
219.23	7,132	2,336	581	6,993	2,304	581	-139	-32	0	-2%	-1%	0%
219.24	17,020	5,851	5,027	14,986	5,211	5,000	-2,031	-640	-27	-12%	-11%	-1%
320.02	6,582	2,068	779	6,529	2,062	779	-52	-6	0	-1%	0%	0%
320.03	5,389	1,576	1,661	5,355	1,576	1,661	-28	0	0	-1%	0%	0%
320.11	1,860	753	165	1,845	751	161	-17	-2	-4	-1%	0%	-2%
320.12	3,987	1,277	1,294	3,963	1,277	1,294	-23	0	0	-1%	0%	0%
320.13	6,179	1,824	5,790	6,740	2,010	5,790	577	186	0	9%	10%	0%
320.14	6,393	1,939	2,617	6,404	1,927	2,617	-9	-12	0	0%	-1%	0%
320.15	7,307	1,968	1,806	7,244	1,964	1,806	-11	-4	0	0%	0%	0%
320.20	6,540	1,894	1,285	6,498	1,893	1,284	-49	-1	-1	-1%	0%	0%
320.22	6,911	2,215	9,545	7,424	2,394	9,417	507	179	-128	7%	8%	-1%
320.23	27,058	7,627	12,140	12,543	3,555	5,615	-14,511	-4,072	-6,525	-54%	-53%	-54%
320.27	6,702	2,038	1,436	6,646	2,033	1,369	-57	-5	-67	-1%	0%	-5%
320.28	3,719	1,445	5,716	3,687	1,441	5,707	-35	-4	-9	-1%	0%	0%
320.29	4,833	1,477	580	4,751	1,460	531	-79	-17	-49	-2%	-1%	-8%
320.30	4,105	1,251	643	4,080	1,251	643	-28	0	0	-1%	0%	0%
320.31	4,065	1,164	903	4,027	1,160	903	-43	-4	0	-1%	0%	0%
320.32	3,534	1,035	483	3,513	1,035	483	-23	0	0	-1%	0%	0%
320.33	3,830	1,475	303	3,797	1,471	303	-38	-4	0	-1%	0%	0%
320.34	7,131	1,842	475	7,077	1,839	474	-61	-3	-1	-1%	0%	0%
320.35	2,644	1,017	1,006	2,620	1,014	1,006	-25	-3	0	-1%	0%	0%
320.36	3,890	1,226	919	3,863	1,225	919	-24	-1	0	-1%	0%	0%
320.37	5,352	2,351	693	5,304	2,344	693	-55	-7	0	-1%	0%	0%
320.38	7,831	2,120	1,340	7,774	2,117	1,336	-66	-3	-4	-1%	0%	0%
320.39	7,763	2,226	779	7,698	2,220	779	-74	-6	0	-1%	0%	0%
320.40	3,221	899	193	3,202	899	193	-23	0	0	-1%	0%	0%
320.41	2,116	647	333	1,562	444	323	-509	-203	-10	-24%	-31%	-3%
320.42	8,288	2,082	627	7,634	1,928	622	-652	-154	-5	-8%	-7%	-1%
320.43	4,660	1,242	331	4,617	1,238	311	-43	-4	-20	-1%	0%	-6%
320.44	6,276	1,958	900	6,217	1,951	886	-57	-7	-14	-1%	0%	-2%
320.45	2,956	921	200	2,939	921	200	-16	0	0	-1%	0%	0%
320.46	5,791	1,763	521	5,737	1,757	521	-52	-6	0	-1%	0%	0%
320.47	4,537	1,941	1,042	3,934	1,693	1,040	-607	-248	-2	-13%	-13%	0%
320.48	6,492	2,243	263	6,439	2,238	262	-57	-5	-1	-1%	0%	0%
320.49	10,689	3,169	333	10,094	3,010	327	-628	-159	-6	-6%	-5%	-2%

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Attachment 3:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast  
**COMMENT LETTER 24**

2000 Census Tract	SCAG	SCAG	SCAG	SCAG	SCAG	SCAG	Difference	Difference	Difference	% Difference	% Difference	% Difference
	Baseline Forecast (OCP-2006) Population	Baseline Forecast (OCP-2006) Households	Baseline Forecast (OCP-2006) Employment	Policy Forecast Population	Policy Forecast Households	Policy Forecast Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment
320.50	5,743	1,730	609	5,702	1,728	567	-41	-2	-42	-1%	0%	-7%
320.51	5,143	1,996	663	5,097	1,990	655	-46	-6	-8	-1%	0%	-1%
320.52	29,769	9,136	5,408	29,034	8,963	5,078	-730	-173	-330	-2%	-2%	-6%
320.53	8,848	3,054	6,524	8,773	3,046	6,192	-75	-8	-332	-1%	0%	-5%
320.54	5,512	2,137	1,548	5,461	2,130	1,405	-51	-7	-143	-1%	0%	-9%
320.55	4,710	1,504	369	4,676	1,502	365	-34	-2	-4	-1%	0%	-1%
320.56	39,285	10,483	11,216	21,010	5,641	6,432	-18,263	-4,842	-4,784	-46%	-46%	-43%
421.03	9,305	3,213	2,400	9,055	3,145	2,300	-250	-68	-100	-3%	-2%	-4%
421.06	2,135	927	5,305	7,023	3,172	11,433	4,887	2,245	6,128	229%	242%	116%
421.07	5,746	1,639	3,111	9,302	2,672	4,604	3,556	1,033	1,493	62%	63%	48%
421.08	7,365	2,911	4,332	7,220	2,870	4,249	-145	-41	-83	-2%	-1%	-2%
421.09	6,773	2,421	6,483	5,826	2,095	6,095	-947	-326	-388	-14%	-13%	-6%
421.11	9,259	2,660	632	9,052	2,616	593	-206	-44	-39	-2%	-2%	-6%
421.12	7,587	2,263	1,742	7,445	2,234	1,686	-142	-29	-56	-2%	-1%	-3%
421.13	5,469	1,854	2,172	5,316	1,810	2,053	-154	-44	-119	-3%	-2%	-5%
421.14	4,578	1,608	1,255	4,446	1,571	1,150	-132	-37	-105	-3%	-2%	-8%
422.01	6,931	2,601	6,348	6,734	2,542	6,033	-198	-59	-315	-3%	-2%	-5%
422.03	10,025	3,767	1,366	9,826	3,713	1,291	-208	-54	-75	-2%	-1%	-5%
422.05	8,246	2,363	2,701	7,967	2,296	2,580	-276	-67	-121	-3%	-3%	-4%
422.06	4,035	1,470	1,292	3,929	1,430	1,215	-95	-40	-77	-2%	-3%	-6%
423.05	4,308	1,729	2,776	4,236	1,709	2,707	-73	-20	-69	-2%	-1%	-2%
423.07	8,525	2,299	3,083	8,352	2,264	3,010	-147	-35	-73	-2%	-2%	-2%
423.10	10,131	3,181	2,967	10,124	3,189	2,824	-3	8	-143	0%	0%	-5%
423.11	7,040	2,266	2,154	6,869	2,224	2,013	-170	-42	-141	-2%	-2%	-7%
423.12	9,658	2,172	8,054	15,875	3,545	9,319	6,228	1,373	1,265	64%	63%	16%
423.13	8,179	2,991	5,141	8,071	2,969	4,689	-113	-22	-452	-1%	-1%	-9%
423.15	6,715	2,186	3,879	8,165	2,676	3,848	1,449	490	-31	22%	22%	-1%
423.17	4,111	1,326	1,197	4,076	1,322	1,189	-16	-4	-8	0%	0%	-1%
423.19	3,869	1,139	2,354	3,825	1,133	2,344	-35	-6	-10	-1%	-1%	0%
423.20	5,945	2,559	6,355	5,847	2,532	6,165	-97	-27	-190	-2%	-1%	-3%
423.23	5,616	2,535	2,685	5,413	2,458	2,569	-207	-77	-116	-4%	-3%	-4%
423.24	4,918	2,191	717	4,791	2,147	688	-126	-44	-29	-3%	-2%	-4%
423.25	4,087	1,524	1,453	4,041	1,516	1,280	-49	-8	-173	-1%	-1%	-12%
423.26	5,108	1,766	767	5,060	1,760	760	-49	-6	-7	-1%	0%	-1%
423.27	5,423	1,745	1,621	5,329	1,725	1,431	-83	-20	-190	-2%	-1%	-12%
423.28	2,898	796	2,040	2,870	793	1,995	-21	-3	-45	-1%	0%	-2%
423.29	5,096	1,565	857	5,054	1,559	852	-39	-6	-5	-1%	0%	-1%
423.30	7,149	2,165	690	7,084	2,158	686	-70	-7	-4	-1%	0%	-1%
423.31	6,110	2,049	694	6,056	2,043	689	-58	-6	-5	-1%	0%	-1%
423.32	6,314	2,154	1,047	6,250	2,145	1,030	-68	-9	-17	-1%	0%	-2%
423.33	5,034	1,336	5,920	5,791	1,546	4,989	765	210	-931	15%	16%	-16%
423.34	5,865	2,187	1,760	5,814	2,181	1,739	-55	-6	-21	-1%	0%	-1%

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Attachment 3:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
423.35	6,364	2,405	331	6,305	2,397	319	-63	-8	-12	-1%	0%	-4%
423.36	5,119	1,545	945	5,079	1,542	934	-42	-3	-11	-1%	0%	-1%
423.37	4,353	1,373	630	4,305	1,366	619	-51	-7	-11	-1%	-1%	-2%
423.38	5,418	1,946	1,151	5,336	1,928	1,125	-85	-18	-26	-2%	-1%	-2%
423.39	3,962	1,449	844	3,852	1,417	835	-113	-32	-9	-3%	-2%	-1%
524.04	10,670	4,134	30,765	12,861	5,073	25,946	2,396	938	-4,819	22%	23%	-16%
524.08	6,670	2,136	13,295	6,584	2,121	12,693	-82	-15	-602	-1%	-1%	-5%
524.10	5,782	2,207	25,942	12,176	4,689	31,748	6,396	2,482	5,806	111%	112%	22%
524.11	5,365	1,346	3,518	5,277	1,331	3,491	-92	-15	-27	-2%	-1%	-1%
524.15	4,271	1,306	1,912	4,246	1,306	1,820	-23	0	-92	-1%	0%	-5%
524.16	4,217	1,258	1,034	4,185	1,256	1,001	-31	-2	-33	-1%	0%	-3%
524.17	8,985	2,622	1,194	8,901	2,613	1,162	-78	-9	-32	-1%	0%	-3%
524.18	21,738	9,070	31,734	20,449	8,583	10,922	-1,273	-487	-20,812	-6%	-5%	-66%
524.19	3,619	1,133	239	3,598	1,133	230	-20	0	-9	-1%	0%	-4%
524.20	30,146	10,847	3,798	29,867	10,810	3,743	-262	-37	-55	-1%	0%	-1%
524.21	11,590	3,815	1,368	11,482	3,802	1,343	-102	-13	-25	-1%	0%	-2%
524.22	4,393	1,463	26,882	4,367	1,463	26,036	-23	0	-846	-1%	0%	-3%
524.23	5,846	2,105	2,614	5,764	2,088	2,606	-79	-17	-8	-1%	-1%	0%
524.24	5,126	1,840	676	5,078	1,827	622	-49	-13	-54	-1%	-1%	-8%
524.25	6,300	2,317	1,992	6,206	2,296	1,897	-90	-21	-95	-1%	-1%	-5%
524.26	23,486	9,404	2,292	21,829	8,794	1,448	-1,655	-610	-844	-7%	-6%	-37%
524.27	5,358	1,728	6,618	5,317	1,722	6,456	-41	-6	-162	-1%	0%	-2%
524.28	6,730	2,181	2,191	6,653	2,165	1,647	-77	-16	-544	-1%	-1%	-25%
525.02	6,764	2,004	10,276	8,557	2,552	11,128	1,795	548	852	27%	27%	8%
525.05	5,853	1,907	664	5,809	1,904	664	-40	-3	0	-1%	0%	0%
525.06	2,903	821	597	2,886	821	597	-15	0	0	-1%	0%	0%
525.11	6,604	2,193	3,520	6,547	2,187	3,515	-52	-6	-5	-1%	0%	0%
525.13	6,517	2,307	2,169	6,459	2,300	2,169	-53	-7	0	-1%	0%	0%
525.14	6,130	2,056	899	6,076	2,050	899	-50	-6	0	-1%	0%	0%
525.15	8,900	3,059	1,136	8,821	3,050	734	-73	-9	-402	-1%	0%	-35%
525.17	10,040	3,934	13,139	9,948	3,921	8,948	-85	-13	-4,191	-1%	0%	-32%
525.18	6,058	3,113	35,254	8,812	4,555	36,478	2,758	1,442	1,224	46%	46%	3%
525.19	4,863	1,605	246	4,819	1,600	241	-40	-5	-5	-1%	0%	-2%
525.20	4,068	1,307	559	4,028	1,302	559	-37	-5	0	-1%	0%	0%
525.21	5,226	2,111	3,773	5,178	2,104	3,722	-44	-7	-51	-1%	0%	-1%
525.22	4,743	1,417	272	4,702	1,413	272	-38	-4	0	-1%	0%	0%
525.23	4,783	1,487	473	4,745	1,484	473	-35	-3	0	-1%	0%	0%
525.24	8,047	2,905	3,944	7,972	2,895	3,898	-73	-10	-46	-1%	0%	-1%
525.25	20,322	5,937	2,805	20,145	5,919	2,323	-162	-18	-482	-1%	0%	-17%
525.26	5,103	1,336	1,844	5,073	1,336	1,838	-26	0	-6	-1%	0%	0%
525.27	9,472	2,677	4,768	15,698	4,463	5,151	6,233	1,786	383	66%	67%	8%
525.28	3,935	1,221	816	3,905	1,219	811	-27	-2	-5	-1%	0%	-1%

11 cont.

Attachment 3:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast  
**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
626.04	20,993	7,737	6,433	19,303	7,141	10,699	-1,680	-594	4,266	-8%	-8%	66%
626.05	3,856	1,963	5,922	3,798	1,945	5,868	-54	-18	-54	-1%	-1%	-1%
626.10	18,002	8,211	83,473	15,137	6,325	73,913	-2,863	-1,886	-9,560	-16%	-23%	-11%
626.11	4,423	1,639	4,064	4,383	1,634	4,062	-37	-5	-2	-1%	0%	0%
626.12	8,282	2,735	694	8,206	2,726	692	-70	-9	-2	-1%	0%	0%
626.14	12,789	2,224	19,087	12,617	2,219	16,086	-315	-5	-3,001	-2%	0%	-16%
626.19	4,592	1,903	1,564	4,524	1,886	1,476	-64	-17	-88	-1%	-1%	-6%
626.20	5,828	2,445	831	5,748	2,426	800	-82	-19	-31	-1%	-1%	-4%
626.21	15,799	6,243	19,445	10,607	3,952	12,788	-5,179	-2,291	-6,657	-33%	-37%	-34%
626.22	4,995	2,906	10,514	4,740	2,774	9,705	-255	-132	-809	-5%	-5%	-8%
626.23	7,443	4,343	2,672	7,252	4,255	2,534	-194	-88	-138	-3%	-2%	-5%
626.25	5,358	2,160	458	5,287	2,144	435	-66	-16	-23	-1%	-1%	-5%
626.26	3,158	1,018	1,087	3,130	1,015	522	-26	-3	-565	-1%	0%	-52%
626.27	3,594	1,426	1,360	3,586	1,422	1,360	-5	-4	0	0%	0%	0%
626.28	3,975	998	981	3,934	995	873	-52	-3	-108	-1%	0%	-11%
626.29	3,183	901	254	3,153	898	254	-28	-3	0	-1%	0%	0%
626.30	2,308	870	690	2,265	859	687	-41	-11	-3	-2%	-1%	0%
626.31	4,191	1,254	728	4,153	1,250	727	-35	-4	-1	-1%	0%	0%
626.32	4,610	1,994	1,957	4,521	1,967	1,731	-92	-27	-226	-2%	-1%	-12%
626.33	5,223	1,716	575	5,174	1,710	569	-54	-6	-6	-1%	0%	-1%
626.34	5,785	2,033	3,965	5,734	2,027	3,940	-57	-6	-25	-1%	0%	-1%
626.35	4,372	1,709	144	4,305	1,693	143	-21	-16	-1	0%	-1%	-1%
626.36	3,807	1,483	385	3,774	1,479	378	-37	-4	-7	-1%	0%	-2%
626.37	5,387	2,224	3,290	5,338	2,217	3,144	-54	-7	-146	-1%	0%	-4%
626.38	6,177	2,686	3,029	6,120	2,677	3,024	-63	-9	-5	-1%	0%	0%
626.39	6,595	2,449	814	6,537	2,442	755	-65	-7	-59	-1%	0%	-7%
626.40	3,652	1,654	1,482	3,619	1,649	1,466	-37	-5	-16	-1%	0%	-1%
626.41	6,860	1,989	1,502	6,686	1,950	1,438	-180	-39	-64	-3%	-2%	-4%
626.42	3,346	1,307	521	3,311	1,302	517	-5	-5	-4	0%	0%	-1%
626.43	5,960	2,002	1,351	5,871	1,984	1,167	-92	-18	-184	-2%	-1%	-14%
626.44	8,371	3,056	1,286	8,289	3,044	1,274	-87	-12	-12	-1%	0%	-1%
626.45	6,564	2,404	695	6,501	2,395	690	-67	-9	-5	-1%	0%	-1%
626.46	4,374	2,876	1,119	4,292	2,839	984	-84	-37	-135	-2%	-1%	-12%
626.47	5,113	2,621	6,411	4,713	2,387	6,334	-473	-234	-77	-9%	-9%	-1%
627.01	3,091	1,536	1,793	2,997	1,498	1,777	-96	-38	-16	-3%	-2%	-1%
627.02	5,147	2,668	1,508	4,789	2,497	1,496	-360	-171	-12	-7%	-6%	-1%
628.00	4,875	2,678	1,679	4,698	2,596	1,673	-180	-82	-6	-4%	-3%	0%
629.00	1,872	848	467	1,848	842	464	-25	-6	-3	-1%	-1%	-1%
630.04	6,149	3,046	1,897	6,093	3,036	1,789	-60	-10	-108	-1%	0%	-6%
630.05	1,507	807	578	1,559	840	546	51	33	-32	3%	4%	-6%
630.06	3,316	1,826	1,045	3,135	1,736	1,030	-183	-90	-15	-6%	-5%	-1%
630.07	7,058	2,874	2,117	6,992	2,864	2,101	-70	-10	-16	-1%	0%	-1%

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Attachment 3:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG	SCAG	SCAG	SCAG	SCAG	SCAG	Difference	Difference	Difference	% Difference	% Difference	% Difference
	Baseline Forecast (OCP-2006) Population	Baseline Forecast (OCP-2006) Households	Baseline Forecast (OCP-2006) Employment	Policy Forecast Population	Policy Forecast Households	Policy Forecast Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment
630.08	1,763	992	17,167	1,617	915	16,953	-147	-77	-214	-8%	-8%	-1%
630.09	1,771	740	2,074	1,753	737	2,051	-19	-3	-23	-1%	0%	-1%
630.10	6,859	3,092	2,108	6,583	2,985	2,104	-279	-107	-4	-4%	-3%	0%
631.01	2,926	1,220	2,535	2,918	1,221	2,504	-2	1	-31	0%	0%	-1%
631.02	7,028	2,755	1,121	6,948	2,730	1,087	-94	-25	-34	-1%	-1%	-3%
631.03	2,900	1,119	482	2,776	1,077	477	-123	-42	-5	-4%	-4%	-1%
632.01	4,139	1,651	908	3,971	1,593	899	-178	-58	-9	-4%	-4%	-1%
632.02	3,941	1,485	1,763	3,842	1,456	1,758	-105	-29	-5	-3%	-2%	0%
633.01	3,317	1,490	2,418	3,417	1,544	2,382	91	54	-36	3%	4%	-1%
633.02	4,545	1,753	1,915	4,395	1,705	1,873	-161	-48	-42	-4%	-3%	-2%
634.00	5,436	2,165	4,909	5,191	2,079	4,768	-243	-86	-141	-4%	-4%	-3%
635.00	6,739	3,141	4,281	6,383	2,992	4,264	-356	-149	-17	-5%	-5%	0%
636.01	4,163	1,408	1,379	4,038	1,372	1,335	-135	-36	-44	-3%	-3%	-3%
636.03	9,776	4,462	7,662	7,393	3,321	6,972	-2,375	-1,141	-690	-24%	-26%	-9%
636.04	4,447	1,430	5,990	4,408	1,426	5,541	-54	-4	-449	-1%	0%	-7%
636.05	6,298	1,419	3,441	6,586	1,490	3,381	280	71	-60	4%	5%	-2%
637.01	7,530	1,693	1,535	7,456	1,687	1,511	-66	-6	-24	-1%	0%	-2%
637.02	6,315	2,244	3,545	7,882	2,832	5,475	1,568	588	1,930	25%	26%	54%
638.02	3,293	1,073	1,715	3,416	1,120	1,726	115	47	11	3%	4%	1%
638.03	5,350	1,718	439	5,152	1,661	435	-211	-57	-4	-4%	-3%	-1%
638.05	2,621	898	437	2,584	890	434	-44	-8	-3	-2%	-1%	-1%
638.06	4,127	1,430	950	4,048	1,411	948	-91	-19	-2	-2%	-1%	0%
638.07	6,275	2,086	3,899	7,512	2,522	4,380	1,320	436	481	21%	21%	12%
638.08	7,739	1,606	540	7,494	1,563	535	-218	-43	-5	-3%	-3%	-1%
639.02	7,558	2,662	5,516	8,116	2,883	5,939	538	221	423	7%	8%	8%
639.03	4,660	1,191	1,759	4,500	1,156	1,737	-166	-35	-22	-4%	-3%	-1%
639.04	5,556	1,332	2,693	5,521	1,332	2,680	-38	0	-13	-1%	0%	0%
639.05	4,796	1,843	936	5,104	1,974	937	296	131	1	6%	7%	0%
639.06	7,749	2,395	1,707	7,762	2,414	1,610	96	19	-97	1%	1%	-6%
639.07	8,370	3,632	37,692	9,401	4,329	41,064	1,005	697	3,372	12%	19%	9%
639.08	6,429	2,575	5,917	6,270	2,524	6,001	-176	-51	84	-3%	-2%	1%
740.03	6,474	1,825	24,636	6,315	1,790	24,390	-253	-35	-246	-4%	-2%	-1%
740.04	8,152	2,106	563	8,088	2,102	563	-68	-4	0	-1%	0%	0%
740.05	8,657	1,470	1,440	10,043	1,717	1,695	1,421	247	255	16%	17%	18%
740.06	6,214	1,915	1,098	6,158	1,909	1,098	-58	-6	0	-1%	0%	0%
741.02	8,191	1,292	796	8,504	1,350	823	298	58	27	4%	4%	3%
741.03	5,745	914	1,330	5,692	911	1,330	-57	-3	0	-1%	0%	0%
741.06	6,107	1,855	17,104	6,050	1,849	17,127	-70	-6	23	-1%	0%	0%
741.07	6,070	2,776	3,411	5,615	2,583	3,378	-457	-193	-33	-8%	-7%	-1%
741.08	5,863	880	7,461	5,958	898	7,461	89	18	0	2%	2%	0%
741.09	4,462	658	753	4,422	656	753	-43	-2	0	-1%	0%	0%
741.10	4,305	944	110	4,279	944	110	-30	0	0	-1%	0%	0%

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Attachment 3:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
741.11	6,661	1,363	1,683	7,221	1,487	1,796	552	124	113	8%	9%	7%
742.00	10,082	1,730	887	11,699	2,020	1,233	1,611	290	346	16%	17%	39%
743.00	4,649	786	215	4,604	783	215	-47	-3	0	-1%	0%	0%
744.03	6,930	1,302	24,202	6,889	1,302	25,994	-43	0	1,792	-1%	0%	7%
744.05	9,713	1,779	2,122	13,667	2,532	2,582	3,983	753	460	41%	42%	22%
744.06	5,106	1,011	6,107	5,264	1,050	6,190	130	39	83	3%	4%	1%
744.07	8,558	1,816	550	8,475	1,809	542	-83	-7	-8	-1%	0%	-1%
744.08	6,075	1,604	1,015	6,024	1,600	1,007	-50	-4	-8	-1%	0%	-1%
745.01	8,659	1,365	500	8,583	1,361	500	-78	-4	0	-1%	0%	0%
745.02	6,606	1,007	321	6,567	1,007	323	-41	0	2	-1%	0%	1%
746.01	9,315	1,653	970	11,371	2,033	1,430	2,041	380	460	22%	23%	47%
746.02	10,143	1,670	393	10,294	1,705	433	148	35	40	1%	2%	10%
747.01	9,546	1,402	245	9,456	1,397	245	-93	-5	0	-1%	0%	0%
747.02	7,044	1,089	861	8,204	1,276	1,076	1,158	187	215	16%	17%	25%
748.01	6,640	993	739	6,593	992	739	-69	-1	0	-1%	0%	0%
748.02	6,411	1,092	1,991	6,349	1,088	1,991	-90	-4	0	-1%	0%	0%
748.03	9,946	1,800	1,317	9,876	1,798	1,317	-74	-2	0	-1%	0%	0%
748.05	7,115	1,113	234	7,047	1,109	234	-70	-4	0	-1%	0%	0%
748.06	6,534	907	267	6,495	907	267	-44	0	0	-1%	0%	0%
749.01	10,676	1,901	2,499	10,601	1,899	2,499	-83	-2	0	-1%	0%	0%
749.02	7,640	1,178	385	7,569	1,174	385	-76	-4	0	-1%	0%	0%
750.02	11,555	2,522	15,304	18,967	4,197	23,149	7,396	1,675	7,845	64%	66%	51%
750.03	9,093	1,750	3,120	11,204	2,170	3,120	2,109	420	0	23%	24%	0%
750.04	6,163	1,302	1,259	6,475	1,377	1,335	299	75	76	5%	6%	6%
751.00	11,583	1,991	5,113	13,169	2,244	5,340	1,979	253	227	17%	13%	4%
752.01	6,335	1,095	1,297	6,298	1,095	1,271	-39	0	-26	-1%	0%	-2%
752.02	6,501	1,166	3,064	6,439	1,162	3,064	-83	-4	0	-1%	0%	0%
753.01	6,625	1,719	755	6,599	1,713	755	-8	-6	0	0%	0%	0%
753.02	5,185	1,110	1,839	5,147	1,106	1,839	-31	-4	0	-1%	0%	0%
753.03	4,267	1,302	1,595	4,229	1,298	1,669	-51	-4	74	-1%	0%	5%
754.01	4,326	1,252	685	4,355	1,268	1,060	28	16	375	1%	1%	55%
754.03	7,916	2,644	11,763	11,122	3,771	13,138	3,202	1,127	1,375	40%	43%	12%
754.04	6,817	2,118	2,397	7,619	2,382	3,015	797	264	618	12%	12%	26%
754.05	3,004	975	2,247	3,014	972	2,246	35	-3	-1	1%	0%	0%
755.04	4,613	1,601	6,480	4,577	1,598	6,399	-35	-3	-81	-1%	0%	-1%
755.05	4,133	1,423	6,388	4,091	1,417	6,316	-41	-6	-72	-1%	0%	-1%
755.06	3,650	1,193	1,546	3,628	1,193	1,528	-21	0	-18	-1%	0%	-1%
755.07	6,593	2,072	1,454	6,487	2,051	1,433	-105	-21	-21	-2%	-1%	-1%
755.12	4,080	1,162	424	4,042	1,158	414	-37	-4	-10	-1%	0%	-2%
755.13	5,429	1,524	316	5,379	1,519	306	-49	-5	-10	-1%	0%	-3%
755.14	4,558	1,230	497	4,517	1,226	487	-42	-4	-10	-1%	0%	-2%
755.15	22,738	8,442	130,796	25,159	9,574	129,084	2,416	1,132	-1,711	11%	13%	-1%

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Attachment 3:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
756.03	4,031	1,442	754	3,996	1,438	744	-34	-4	-10	-1%	0%	-1%
756.04	8,269	2,654	1,171	8,146	2,630	1,128	-128	-24	-43	-2%	-1%	-4%
756.05	6,566	2,178	1,136	6,494	2,167	1,132	-81	-11	-4	-1%	-1%	0%
756.06	7,317	2,194	725	7,240	2,184	692	-90	-10	-33	-1%	0%	-5%
756.07	6,567	2,869	594	6,510	2,861	576	-56	-8	-18	-1%	0%	-3%
757.01	7,216	2,199	2,352	7,156	2,194	2,335	-67	-5	-17	-1%	0%	-1%
757.02	3,331	1,123	1,216	3,313	1,123	1,194	-38	0	-22	-1%	0%	-2%
757.03	4,149	1,375	911	4,114	1,371	883	-34	-4	-28	-1%	0%	-3%
758.05	4,602	1,410	1,901	4,552	1,403	1,817	-57	-7	-84	-1%	0%	-4%
758.06	6,712	2,140	1,617	6,644	2,131	1,576	-80	-9	-41	-1%	0%	-3%
758.07	5,327	1,251	1,390	5,276	1,246	1,375	-51	-5	-15	-1%	0%	-1%
758.08	3,594	1,147	415	3,548	1,139	410	-51	-8	-5	-1%	-1%	-1%
758.09	3,428	1,090	1,595	3,308	1,058	1,586	-122	-32	-9	-4%	-3%	-1%
758.10	3,371	1,049	368	3,243	1,015	363	-127	-34	-5	-4%	-3%	-1%
758.11	3,764	809	1,004	3,885	840	956	113	31	-48	3%	4%	-5%
758.12	7,647	1,951	2,471	8,228	2,112	3,483	566	161	1,012	7%	8%	41%
758.13	6,173	1,801	1,749	6,389	1,876	3,084	206	75	1,335	3%	4%	76%
758.14	4,025	1,166	191	3,967	1,156	182	-67	-10	-9	-2%	-1%	-5%
758.15	5,583	1,621	281	5,526	1,614	277	-68	-7	-4	-1%	0%	-1%
758.16	4,270	1,222	1,727	4,186	1,205	1,692	-92	-17	-35	-2%	-1%	-2%
759.01	5,314	1,741	4,270	10,913	3,616	8,670	5,591	1,875	4,400	105%	108%	103%
759.02	7,939	2,814	1,524	9,829	3,526	3,049	1,885	712	1,525	24%	25%	100%
760.00	12,216	4,123	26,253	12,627	4,235	25,036	338	112	-1,217	3%	3%	-5%
761.01	17,110	7,555	19,802	13,217	6,431	25,153	-3,912	-1,124	5,351	-23%	-15%	27%
761.02	9,644	2,483	17,982	4,798	1,843	17,008	-4,688	-640	-974	-49%	-26%	-5%
761.03	9,682	2,410	1,649	9,588	2,401	1,603	-105	-9	-46	-1%	0%	-3%
762.01	8,220	2,489	1,106	8,145	2,481	1,092	-91	-8	-14	-1%	0%	-1%
762.02	6,541	1,988	1,980	6,476	1,980	1,961	-74	-8	-19	-1%	0%	-1%
762.04	6,692	1,432	35,371	9,555	2,035	36,212	2,855	603	841	43%	42%	2%
762.05	7,665	1,838	1,199	8,128	1,987	2,219	508	149	1,020	7%	8%	85%
762.06	5,057	1,611	2,421	6,414	2,058	3,686	1,347	447	1,265	27%	28%	52%
762.08	5,551	1,689	3,314	6,839	2,098	4,046	1,279	409	732	23%	24%	22%
863.01	8,094	1,790	2,270	8,196	1,822	2,260	100	32	-10	1%	2%	0%
863.03	17,876	8,519	33,131	16,923	7,333	37,907	-952	-1,186	4,776	-5%	-14%	14%
863.04	5,458	1,794	1,000	5,130	1,696	1,000	-328	-98	0	-6%	-5%	0%
863.05	4,217	1,130	438	4,181	1,127	438	-36	-3	0	-1%	0%	0%
863.06	4,039	1,270	675	4,002	1,266	675	-37	-4	0	-1%	0%	0%
864.02	6,031	1,383	731	5,982	1,380	731	-49	-3	0	-1%	0%	0%
864.04	7,056	1,496	677	6,991	1,491	680	-65	-5	3	-1%	0%	0%
864.05	7,992	1,781	1,315	7,917	1,775	1,356	-74	-6	41	-1%	0%	3%
864.06	6,895	2,031	414	4,592	1,359	416	-2,303	-672	2	-33%	-33%	0%
864.07	6,805	2,061	1,199	6,745	2,055	1,199	-60	-6	0	-1%	0%	0%

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Attachment 3:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
865.01	5,414	1,146	2,504	6,208	1,322	2,643	794	176	139	15%	15%	6%
865.02	7,550	1,376	1,736	7,483	1,372	1,806	-67	-4	70	-1%	0%	4%
866.01	11,292	2,322	2,325	13,613	2,824	2,812	2,319	502	487	21%	22%	21%
866.02	6,985	1,733	1,787	7,313	1,823	2,026	325	90	239	5%	5%	13%
867.01	11,447	2,978	2,113	10,491	2,741	1,879	-957	-237	-234	-8%	-8%	-11%
867.02	9,538	2,354	748	7,566	1,877	748	-1,972	-477	0	-21%	-20%	0%
868.01	3,512	976	3,260	3,823	1,069	2,045	308	93	-1,215	9%	10%	-37%
868.02	8,438	2,025	1,616	7,980	1,926	1,975	-457	-99	359	-5%	-5%	22%
868.03	8,721	2,687	1,832	10,435	3,241	1,822	1,715	554	-10	20%	21%	-1%
869.01	10,125	2,671	1,160	10,086	2,664	1,160	-38	-7	0	0%	0%	0%
869.02	8,451	2,257	1,967	7,390	1,922	2,170	-1,080	-335	203	-13%	-15%	10%
869.03	8,606	2,488	632	6,695	1,946	794	-1,911	-542	162	-22%	-22%	26%
870.01	7,918	2,131	741	6,162	1,668	741	-1,756	-463	0	-22%	-22%	0%
870.02	7,753	2,294	737	7,539	2,244	738	-214	-50	1	-3%	-2%	0%
871.01	4,583	1,667	2,016	4,542	1,662	1,911	-41	-5	-105	-1%	0%	-5%
871.02	11,304	2,859	3,138	7,117	1,810	3,729	-4,187	-1,049	591	-37%	-37%	19%
871.03	8,563	2,336	1,400	8,503	2,330	1,400	-61	-6	0	-1%	0%	0%
871.05	10,165	2,846	1,609	5,134	1,432	2,193	-5,029	-1,414	584	-49%	-50%	36%
871.06	5,630	1,293	489	6,145	1,422	554	513	129	65	9%	10%	13%
872.00	8,202	2,532	2,173	9,118	2,837	2,360	918	305	187	11%	12%	9%
873.00	12,743	3,316	5,977	12,625	3,305	6,207	-117	-11	230	-1%	0%	4%
874.01	6,983	1,735	862	6,426	1,606	919	-557	-129	57	-8%	-7%	7%
874.03	6,683	1,391	385	5,438	1,134	1,511	-1,243	-257	1,126	-19%	-18%	292%
874.04	4,223	785	314	4,812	900	384	589	115	70	14%	15%	22%
874.05	8,894	1,808	2,784	9,894	2,022	3,049	997	214	265	11%	12%	10%
875.01	6,657	1,421	32,706	14,239	3,161	32,054	7,582	1,740	-652	114%	122%	-2%
875.03	8,008	1,858	5,034	14,311	3,343	5,017	6,302	1,485	-17	79%	80%	0%
875.04	9,643	1,979	1,046	9,723	2,007	1,029	80	28	-17	1%	1%	-2%
876.01	5,839	1,441	898	5,802	1,436	898	-40	-5	0	-1%	0%	0%
876.02	8,397	2,185	1,847	8,940	2,338	1,884	540	153	37	6%	7%	2%
877.01	5,329	1,587	1,258	5,284	1,583	1,227	-47	-4	-31	-1%	0%	-2%
877.03	6,316	1,405	507	9,789	2,197	1,101	3,452	792	594	55%	56%	117%
877.04	6,251	1,626	573	5,457	1,427	755	-794	-199	182	-13%	-12%	32%
878.01	5,936	1,708	1,160	5,801	1,679	1,136	-136	-29	-24	-2%	-2%	-2%
878.02	8,569	2,612	989	10,400	3,189	2,864	1,824	577	1,875	21%	22%	190%
878.03	8,856	1,761	2,825	8,829	1,766	3,274	-34	5	449	0%	0%	16%
878.05	8,227	2,111	1,408	9,234	2,391	1,753	1,020	280	345	12%	13%	25%
878.06	7,007	1,877	886	9,077	2,447	1,782	2,063	570	896	29%	30%	101%
879.01	4,494	1,301	1,181	6,143	1,790	1,853	1,645	489	672	37%	38%	57%
879.02	7,177	1,509	546	10,500	2,222	1,345	3,316	713	799	46%	47%	146%
880.01	5,348	1,263	400	5,266	1,251	379	-80	-12	-21	-1%	-1%	-5%
880.02	4,120	1,118	477	3,965	1,082	448	-157	-36	-29	-4%	-3%	-6%

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Attachment 3:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
881.01	2,500	746	15,790	2,480	722	15,530	-20	-24	-260	-1%	-3%	-2%
881.04	5,464	1,764	1,984	7,041	2,300	2,497	1,597	536	513	29%	30%	26%
881.05	4,541	1,063	510	4,500	1,060	499	-38	-3	-11	-1%	0%	-2%
881.06	5,318	1,825	1,942	5,341	1,844	1,963	17	19	21	0%	1%	1%
881.07	6,506	1,715	781	6,214	1,634	770	-276	-81	-11	-4%	-5%	-1%
882.01	4,130	1,075	852	5,744	1,514	1,459	1,620	439	607	39%	41%	71%
882.02	3,229	866	399	3,577	967	665	349	101	266	11%	12%	67%
882.03	5,253	1,456	1,439	5,223	1,450	1,411	-19	-6	-28	0%	0%	-2%
883.01	6,753	1,708	1,252	6,700	1,705	1,234	-50	-3	-18	-1%	0%	-1%
883.02	6,241	1,754	1,016	6,186	1,749	988	-60	-5	-28	-1%	0%	-3%
884.01	5,534	1,300	314	5,501	1,300	309	-39	0	-5	-1%	0%	-2%
884.02	5,575	1,260	2,407	10,740	2,464	5,199	5,171	1,204	2,792	93%	96%	116%
884.03	8,445	1,954	1,058	8,369	1,948	1,073	-81	-6	15	-1%	0%	1%
885.01	7,456	1,812	944	7,387	1,806	918	-79	-6	-26	-1%	0%	-3%
885.02	6,381	1,526	2,656	7,587	1,826	3,141	1,215	300	485	19%	20%	18%
886.01	6,819	2,026	1,427	6,491	1,938	1,383	-317	-88	-44	-5%	-4%	-3%
886.02	5,389	1,633	2,205	5,003	1,525	2,168	-394	-108	-37	-7%	-7%	-2%
887.01	7,500	2,019	2,893	7,165	1,940	2,860	-340	-79	-33	-5%	-4%	-1%
887.02	6,876	1,630	1,543	6,334	1,510	1,513	-549	-120	-30	-8%	-7%	-2%
888.01	10,232	2,798	879	9,445	2,597	855	-795	-201	-24	-8%	-7%	-3%
888.02	6,825	1,528	619	6,408	1,443	603	-425	-85	-16	-6%	-6%	-3%
889.01	7,697	1,683	1,688	7,582	1,668	1,617	-92	-15	-71	-1%	-1%	-4%
889.02	5,851	1,192	1,063	5,796	1,188	1,040	-53	-4	-23	-1%	0%	-2%
889.03	9,611	1,923	3,223	9,529	1,918	3,179	-106	-5	-44	-1%	0%	-1%
889.04	6,636	1,447	1,252	6,478	1,421	1,218	-161	-26	-34	-2%	-2%	-3%
889.05	5,717	1,308	1,561	7,352	1,692	2,515	1,631	384	954	29%	29%	61%
890.01	8,172	1,641	380	8,119	1,640	377	-57	-1	-3	-1%	0%	-1%
890.03	4,302	846	3,328	4,261	843	3,258	-48	-3	-70	-1%	0%	-2%
890.04	8,225	1,745	1,412	8,153	1,740	1,412	-77	-5	0	-1%	0%	0%
891.02	7,723	1,592	2,454	7,709	1,588	2,415	14	-4	-39	0%	0%	-2%
891.04	6,709	1,329	1,050	6,654	1,326	1,048	-62	-3	-2	-1%	0%	0%
891.05	7,213	1,123	958	7,283	1,141	958	53	18	0	1%	2%	0%
891.06	4,426	941	1,077	4,324	914	1,036	-84	-27	-41	-2%	-3%	-4%
891.07	6,513	1,290	691	6,454	1,286	682	-66	-4	-9	-1%	0%	-1%
992.02	9,905	2,032	3,938	9,471	1,954	3,936	-438	-78	-2	-4%	-4%	0%
992.03	6,868	1,546	592	6,735	1,525	559	-140	-21	-33	-2%	-1%	-6%
992.04	5,002	1,408	1,251	4,828	1,367	1,502	-176	-41	251	-4%	-3%	20%
992.12	5,755	1,725	1,919	5,881	1,764	1,872	130	39	-47	2%	2%	-2%
992.14	3,895	1,432	1,170	3,834	1,418	1,138	-62	-14	-32	-2%	-1%	-3%
992.15	6,513	1,979	953	6,200	1,895	923	-313	-84	-30	-5%	-4%	-3%
992.16	4,925	1,564	825	4,718	1,507	771	-207	-57	-54	-4%	-4%	-7%
992.17	2,902	985	1,213	2,712	926	1,169	-191	-59	-44	-7%	-6%	-4%

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Attachment 3:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG	SCAG	SCAG	SCAG	SCAG	SCAG	Difference	Difference	Difference	% Difference	% Difference	% Difference
	Baseline Forecast (OCP-2006) Population	Baseline Forecast (OCP-2006) Households	Baseline Forecast (OCP-2006) Employment	Policy Forecast Population	Policy Forecast Households	Policy Forecast Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment	Policy - Baseline Population	Policy - Baseline Households	Policy - Baseline Employment
992.20	6,745	2,638	1,132	7,264	2,858	2,042	518	220	910	8%	8%	80%
992.22	5,252	1,484	1,585	5,214	1,482	1,552	-39	-2	-33	-1%	0%	-2%
992.23	6,001	1,751	1,714	5,800	1,702	2,109	-203	-49	395	-3%	-3%	23%
992.24	4,048	1,133	1,138	3,918	1,103	1,067	-132	-30	-71	-3%	-3%	-6%
992.25	3,820	1,065	1,712	3,768	1,039	1,548	-53	-26	-164	-1%	-2%	-10%
992.26	4,782	1,260	720	4,512	1,196	695	-273	-64	-25	-6%	-5%	-3%
992.27	7,178	2,091	2,061	8,264	2,422	2,339	1,084	331	278	15%	16%	13%
992.29	7,335	2,496	16,928	7,650	2,631	16,989	313	135	62	4%	5%	0%
992.30	5,049	1,602	1,579	4,808	1,534	1,518	-242	-68	-61	-5%	-4%	-4%
992.31	6,556	1,888	1,092	6,211	1,799	1,044	-346	-89	-48	-5%	-5%	-4%
992.32	6,347	2,082	3,055	6,023	1,987	2,943	-324	-95	-112	-5%	-5%	-4%
992.33	3,987	1,126	981	3,806	1,081	932	-182	-45	-49	-5%	-4%	-5%
992.34	3,692	1,283	2,071	3,536	1,236	2,010	-157	-47	-61	-4%	-4%	-3%
992.35	5,630	2,020	1,517	5,503	1,986	1,451	-128	-34	-66	-2%	-2%	-4%
992.37	4,080	1,282	860	3,936	1,244	830	-145	-38	-30	-4%	-3%	-3%
992.38	4,772	1,475	824	4,581	1,424	804	-192	-51	-20	-4%	-3%	-2%
992.39	4,689	1,433	834	4,456	1,370	796	-234	-63	-38	-5%	-4%	-5%
992.40	6,223	2,282	772	5,959	2,198	690	-264	-84	-82	-4%	-4%	-11%
992.41	4,867	1,665	1,888	4,771	1,642	1,832	-97	-23	-56	-2%	-1%	-3%
992.42	4,256	1,139	1,220	4,859	1,308	1,143	602	169	-77	14%	15%	-6%
992.43	4,941	1,844	621	4,837	1,816	606	-102	-28	-15	-2%	-2%	-2%
992.44	4,397	1,921	592	4,303	1,891	582	-95	-30	-10	-2%	-2%	-2%
992.45	3,499	1,111	1,529	3,419	1,092	1,486	-81	-19	-43	-2%	-2%	-3%
992.46	4,286	1,247	1,304	4,237	1,240	1,272	-50	-7	-32	-1%	-1%	-2%
992.47	3,629	790	321	3,598	788	321	-32	-2	0	-1%	0%	0%
992.48	5,926	1,376	370	5,874	1,372	370	-54	-4	0	-1%	0%	0%
992.49	4,771	814	725	4,731	812	725	-41	-2	0	-1%	0%	0%
992.50	3,431	1,120	1,653	3,267	1,070	1,554	-141	-50	-99	-4%	-4%	-6%
992.51	6,241	2,248	5,055	5,975	2,165	4,858	-269	-83	-197	-4%	-4%	-4%
993.05	8,809	3,230	2,395	9,237	3,407	2,268	426	177	-127	5%	5%	-5%
993.06	7,086	2,887	1,016	6,839	2,803	982	-248	-84	-34	-3%	-3%	-3%
993.07	3,995	2,003	2,262	4,952	2,498	5,881	956	495	3,619	24%	25%	160%
993.08	6,356	2,205	752	6,298	2,198	747	-59	-7	-5	-1%	0%	-1%
993.09	4,992	1,986	2,362	4,697	1,879	2,230	-296	-107	-132	-6%	-5%	-6%
993.10	5,291	2,183	401	5,209	2,162	391	-83	-21	-10	-2%	-1%	-2%
993.11	4,694	2,090	2,211	4,518	2,023	2,087	-173	-67	-124	-4%	-3%	-6%
994.02	10,021	2,098	7,523	12,255	2,581	8,525	2,232	483	1,002	22%	23%	13%
994.04	5,378	1,775	664	5,274	1,751	643	-105	-24	-21	-2%	-1%	-3%
994.05	4,831	1,693	1,133	4,749	1,674	1,076	-83	-19	-57	-2%	-1%	-5%
994.06	5,004	1,713	875	4,948	1,704	824	-56	-9	-51	-1%	-1%	-6%
994.07	2,809	966	1,146	2,784	963	1,108	-26	-3	-38	-1%	0%	-3%
994.08	4,503	1,619	1,015	4,446	1,608	984	-57	-11	-31	-1%	-1%	-3%

11 cont.

Attachment 3:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast  
**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
994.10	4,836	1,606	3,981	7,836	2,619	5,693	2,999	1,013	1,712	62%	63%	43%
994.11	6,338	2,078	3,496	7,089	2,338	4,255	750	260	759	12%	13%	22%
994.12	5,313	1,914	895	5,207	1,887	830	-106	-27	-65	-2%	-1%	-7%
994.13	9,842	3,594	5,512	12,288	4,633	7,872	2,460	1,039	2,360	25%	29%	43%
994.15	6,556	2,029	636	6,357	1,979	623	-200	-50	-13	-3%	-2%	-2%
994.16	5,224	2,259	640	5,163	2,246	629	-62	-13	-11	-1%	-1%	-2%
994.17	5,829	2,448	480	5,510	2,328	472	-320	-120	-8	-5%	-5%	-2%
995.02	782	195	213	732	183	213	-47	-12	0	-6%	-6%	0%
995.04	2,997	1,040	4,355	4,115	1,439	4,306	1,118	399	-49	37%	38%	-1%
995.06	1,430	701	916	1,415	698	832	-15	-3	-84	-1%	0%	-9%
995.08	5,340	2,165	1,052	5,208	2,124	1,026	-133	-41	-26	-2%	-2%	-2%
995.09	4,170	2,686	843	4,178	2,677	843	31	-9	0	1%	0%	0%
995.10	4,735	3,288	1,297	4,691	3,277	1,479	-50	-11	182	-1%	0%	14%
995.11	3,850	1,909	885	3,813	1,902	885	-42	-7	0	-1%	0%	0%
995.12	3,158	1,478	1,326	3,116	1,467	1,326	-46	-11	0	-1%	-1%	0%
995.13	2,626	1,244	900	2,598	1,238	801	-28	-6	-99	-1%	0%	-11%
995.14	6,595	2,380	587	6,523	2,368	572	-73	-12	-15	-1%	-1%	-3%
996.01	8,435	2,039	8,116	8,945	2,238	8,466	511	199	350	6%	10%	4%
996.02	3,700	1,065	1,800	3,644	1,053	1,743	-52	-12	-57	-1%	-1%	-3%
996.03	7,195	2,382	31,484	7,015	2,336	32,062	-183	-46	578	-3%	-2%	2%
996.04	4,216	1,212	876	4,163	1,204	835	-52	-8	-41	-1%	-1%	-5%
996.05	4,733	1,589	3,229	4,711	1,591	3,542	-23	2	313	0%	0%	10%
997.01	6,093	1,638	1,313	7,198	1,948	1,387	1,088	310	74	18%	19%	6%
997.02	9,062	2,519	2,322	11,126	3,114	3,983	2,041	595	1,661	23%	24%	72%
997.03	5,216	1,654	4,473	7,947	2,539	6,906	2,730	885	2,433	52%	54%	54%
998.01	6,487	1,553	2,250	6,363	1,521	2,173	-108	-32	-77	-2%	-2%	-3%
998.02	4,902	1,407	2,159	5,222	1,510	2,249	325	103	90	7%	7%	4%
998.03	6,552	1,717	2,203	6,328	1,668	2,140	-226	-49	-63	-3%	-3%	-3%
999.02	5,415	1,361	1,004	5,245	1,326	957	-173	-35	-47	-3%	-3%	-5%
999.03	6,448	1,500	1,150	9,952	2,339	1,844	3,507	839	694	54%	56%	60%
999.04	7,839	2,186	1,618	7,891	2,214	1,529	53	28	-89	1%	1%	-6%
999.05	3,768	1,389	1,648	3,638	1,349	1,612	-132	-40	-36	-4%	-3%	-2%
999.06	5,484	1,693	627	5,416	1,682	593	-72	-11	-34	-1%	-1%	-5%
1100.01	5,177	1,546	735	5,112	1,536	717	-58	-10	-18	-1%	-1%	-2%
1100.03	3,592	1,130	818	3,561	1,127	796	-36	-3	-22	-1%	0%	-3%
1100.04	5,282	1,695	1,343	5,220	1,685	1,314	-69	-10	-29	-1%	-1%	-2%
1100.05	3,628	1,164	551	3,576	1,154	543	-57	-10	-8	-2%	-1%	-1%
1100.06	3,044	1,090	803	5,361	1,931	2,097	2,318	841	1,294	76%	77%	161%
1100.07	4,901	1,679	481	4,840	1,668	478	-66	-11	-3	-1%	-1%	-1%
1100.08	4,436	1,709	1,873	4,394	1,703	1,870	-42	-6	-3	-1%	0%	0%
1100.10	5,198	1,430	481	5,131	1,420	466	-64	-10	-15	-1%	-1%	-3%
1100.11	3,089	1,098	5,490	3,062	1,095	4,996	-25	-3	-494	-1%	0%	-9%

11 cont.

Attachment 3:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
1100.12	5,853	1,847	1,006	5,787	1,837	1,006	-74	-10	0	-1%	-1%	0%
1100.14	5,589	1,940	3,784	5,558	1,925	3,799	-23	-15	15	0%	-1%	0%
1100.15	3,983	1,230	3,298	3,918	1,217	3,185	-79	-13	-113	-2%	-1%	-3%
1101.02	6,504	1,931	857	6,325	1,889	807	-181	-42	-50	-3%	-2%	-6%
1101.04	6,930	2,279	4,424	6,563	2,171	3,813	-364	-108	-611	-5%	-5%	-14%
1101.06	4,052	1,234	412	4,015	1,230	361	-35	-4	-51	-1%	0%	-12%
1101.08	3,192	1,030	7,605	3,554	1,150	7,840	370	120	235	12%	12%	3%
1101.09	5,697	1,924	1,714	5,637	1,915	1,455	-57	-9	-259	-1%	0%	-15%
1101.10	7,223	2,196	5,811	6,506	1,981	4,870	-741	-215	-941	-10%	-10%	-16%
1101.11	6,844	2,202	2,088	6,169	1,996	1,790	-672	-206	-298	-10%	-9%	-14%
1101.13	2,766	837	19,319	2,695	821	17,495	-71	-16	-1,824	-3%	-2%	-9%
1101.14	5,479	1,511	1,904	5,425	1,505	1,644	-51	-6	-260	-1%	0%	-14%
1101.15	4,005	1,152	5,205	3,971	1,149	4,938	-35	-3	-267	-1%	0%	-5%
1101.16	5,666	1,517	1,648	5,603	1,507	1,574	-61	-10	-74	-1%	-1%	-4%
1101.17	6,380	2,127	1,749	6,265	2,101	1,458	-112	-26	-291	-2%	-1%	-17%
1101.18	3,134	760	84	3,115	760	83	-17	0	-1	-1%	0%	-1%
1102.01	8,286	2,728	1,425	8,119	2,689	1,368	-174	-39	-57	-2%	-1%	-4%
1102.02	8,749	2,426	1,302	8,693	2,410	1,270	-24	-16	-32	0%	-1%	-2%
1102.03	6,151	1,780	629	6,070	1,767	611	-82	-13	-18	-1%	-1%	-3%
1103.01	7,504	2,204	1,115	7,405	2,188	1,073	-105	-16	-42	-1%	-1%	-4%
1103.02	6,659	1,680	4,048	7,007	1,779	3,972	342	99	-76	5%	6%	-2%
1103.03	5,450	1,527	531	5,411	1,525	508	-41	-2	-23	-1%	0%	-4%
1103.04	5,492	1,395	456	5,438	1,389	439	-46	-6	-17	-1%	0%	-4%
1104.01	5,242	1,408	3,946	7,820	2,115	5,036	2,572	707	1,090	49%	50%	28%
1104.02	6,273	1,460	6,619	6,075	1,413	6,415	-180	-47	-204	-3%	-3%	-3%
1105.00	9,822	2,538	12,602	9,808	2,550	12,667	-4	12	65	0%	0%	1%
1106.03	9,705	2,607	2,926	9,647	2,607	3,289	-64	0	363	-1%	0%	12%
1106.04	8,781	2,630	1,455	9,617	2,899	1,751	828	269	296	9%	10%	20%
1106.05	7,733	2,274	1,723	7,559	2,236	1,711	-189	-38	-12	-2%	-2%	-1%
1106.06	5,606	1,332	1,876	5,447	1,302	1,827	-168	-30	-49	-3%	-2%	-3%
1106.07	4,729	1,463	1,801	7,193	2,240	3,292	2,459	777	1,491	52%	53%	83%
Total	3,653,984	1,118,493	1,981,902	3,699,217	1,133,563	1,991,722	45,229	15,073	9,821	1%	1%	0%

11 cont.

Letters of Comment:  
SCAG Regional Transportation Plan

Orange County Jurisdictions  
Orange County Agencies  
(as of 2-18-2008)



City of Anaheim  
**PLANNING DEPARTMENT**

February 15, 2008

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

**RE: DRAFT 2008 REGIONAL TRANSPORTATION  
PLAN, DRAFT PROGRAM ENVIRONMENTAL  
IMPACT REPORT, AND DRAFT GROWTH  
FORECASTS**

12

Dear Mr. Ovitt:

Thank you for the opportunity to review and comment on the above-referenced documents. City of Anaheim staff offers the following comments:

**Growth Forecast Comments:**

Upon review of the Policy and Envision Growth Forecasts, staff has identified significant inconsistencies between these projections and the local input that the City of Anaheim ("City") has previously provided to SCAG. This local input is accurately reflected in the OCP-2006 and incorporated into the Baseline Growth Forecast. As described in detail in Attachment 1, the land uses and distribution of growth for the City that are reflected in the Policy and Envision Growth Forecasts vary greatly from the OCP-2006 and are unlikely to occur.

The OCP-2006 was developed through a "bottom-up" process that involved substantial input from all local governments in Orange County, including Anaheim. It represents the most likely growth projection for the County and accurately reflects growth opportunity areas and growth influencing factors such as sensitive habitat areas, flight path-restricted development zones, and approved development agreements. Staff believes that the OCP-2006 also represents a growth forecast consistent with the growth principles outlined in the RTP.

Generally, the inconsistencies between the OCP-2006 and the Policy Growth Forecast are as follows:

1. The Policy and Envision Growth Forecasts significantly differ from local input and the City's General Plan. Most notably, these forecasts are inconsistent with the growth anticipated for the City's Downtown, Platinum Triangle, and Anaheim Resort areas.

2. The Policy and Envision Growth Forecasts were developed following minimal consultation with local jurisdictions. The projected land uses and development intensities were finalized prior to review by local governments, resulting in land use assumptions that are in direct conflict with the growth distribution planned by the City.
3. The benefits of the Policy Growth Forecast, as identified in the RTP and the PEIR, are minimal with respect to Orange County while the impacts to the County's arterial highway speeds, which are reduced by this forecast, may be substantial.

Given that the Regional Transportation Plan establishes numerous regional policies that local agencies must address in their project and environmental reviews, staff cannot support or accept the distribution of growth included in the Policy and Envision Growth Forecasts. We, therefore, request that SCAG use the 2006 Orange County Projection (OCP-2006) as the growth forecast in adopted in the RTP for the Orange County sub-region and as the basis for all associated environmental and air quality determinations. Please consider these comments applicable to both the RTP and the PEIR.

**Regional Transportation Plan ("RTP") Comments:**

1. Pages 47 through 62 of the RTP offer an extensive description of the future growth anticipated in the region based on the Policy Growth Forecast. The interrelationship between growth (population, housing, and employment) and the transportation system is fully recognized; however, the forecast used in the RTP must acknowledge the realities of land use planning and take into consideration various constraints on growth and intensification of uses based on infrastructure capacities and environmental concerns. As discussed in the previous section, upon review of the Policy Growth Forecast, staff has identified numerous significant inconsistencies between the forecast and the City's adopted General Plan and other planning documents and programs. These inconsistencies render the Policy Growth Forecast unreasonable, unrealistic and inconsistent with planned local transportation infrastructure. This situation is in direct conflict with the wording contained on Page 86 of the document which states that the forecast adopted as part of the RTP must be reasonable, realistic and consistent with the planned transportation infrastructure. Because the data in the OCP-2006 represents the most likely future growth pattern in the City and Orange County, staff requests that the OCP-2006, developed cooperatively amongst all Orange County jurisdictions, represent the preferred growth projection used as the basis for the RTP.
2. Page 62 refers to the growth identified in the Baseline Forecast, which incorporates the OCP-2006, as "supporting urban sprawl" and representing a growth scenario that is:

*"...very similar to the status quo, taking a somewhat "business as usual" approach that is not steered by regional policies. Thus, for example, fast-growing suburban cities would likely continue to grow primarily through auto-oriented single family housing with commercial activities focused toward the*

*highway system. The baseline growth distributions would result in severe traffic congestion and vehicle emission. The baseline land use could be tempered, and in some cases bolstered, by policies and programs designed to improve future travel patterns and vehicle emissions."*

The statement does not recognize that significant land use changes have taken place in Anaheim and much of Orange County. It also does not recognize the fact that the majority of growth in Orange County and in the City will consist of higher density, infill development. For example, the City's 2004 General Plan update and subsequent Platinum Triangle Master

Land Use Plan resulted in the redesignation of hundreds of acres of land for high density residential and mixed-use development while largely utilizing existing infrastructure and focusing on access to transit. As such, the above listed statements should be deleted from the document or changed to reflect that many regions and cities have changed their local general plans and are practicing growth principles consistent with those identified in the RTP.

3. The City of Anaheim has partnered with the Orange County Transportation Authority (OCTA) to study new transit connections between major employment and activity centers in the City and its two Metrolink station facilities as part of OCTA's Go Local Program. The City's initiative is consistent with OCTA's Project S (High Capacity Transit Extensions to Metrolink), which earmarked up to \$1 billion as part of Orange County's voter approved Renewed Measure M half-cent sales tax program. In December 2007, the Anaheim City Council adopted a Transit Master Plan which identified a number of new high-capacity transit systems in the City. Among those systems contemplated in the Plan is a proposed 3.4-mile elevated fixed-guideway system that would connect the Anaheim Regional Transportation Intermodal Center (ARTIC), The Platinum Triangle, and the Anaheim Resort. This system is anticipated to begin revenue operations by year 2015. The City anticipates conducting a federally defined Alternatives Analysis/Environmental Document/Preliminary Engineering as part of the next phase in Summer 2008. Therefore, the City requests that the proposed elevated fixed-guideway system be added to Table 3.5 Transit Corridor Projects on Page 108.
4. The City also requests that the planned ARTIC facility be added to Table 3.5 Transit Corridor Projects on Page 108. Located adjacent to the Orange (SR-57) Freeway in the Platinum Triangle area, ARTIC will be a gateway station connecting Metrolink commuter rail service, Amtrak, BRT, fixed-route bus service, an elevated fixed-guideway system connecting with the Anaheim Resort. The City is partnering with OCTA to solicit a private partner to help build, finance and maintain ARTIC. The facility is planned to build upon OCTA's Metrolink Expansion and Bus Rapid Transit (BRT) programs and is envisioned to become the transportation hub of Orange County. ARTIC will offer direct baggage check-in and express service to local airports, and potentially high-speed train service connecting Orange County to other regions within California and beyond. Moreover, ARTIC is planned to be integrated into a mixed-use development in a manner consistent with SCAG's Compass Blueprint Implementation Strategy of focusing high density development and growth around

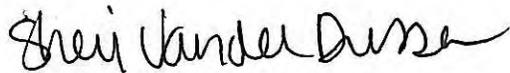
major transportation corridors and centers. ARTIC is also consistent with OCTA's Project T (Convert Metrolink Station(s) to Regional Gateways that Connect Orange County with High Speed Rail Systems) and up to \$226.6 million has been allocated as part of the Renewed Measure M. The interim phase of ARTIC is expected to be build by 2015 with full build-out expected by 2030.

**Draft Program Environmental Impact Report Comments:**

The Policy Growth Principles outlined in the RTP are specifically identified as voluntary for local governments. As such, the mitigation measures in the PEIR directly mitigating the growth that would result from the Policy Growth Principles (as depicted in the Policy Growth Forecast) should also be considered voluntary in nature and should apply only if the measure is practical and feasible for the implementing agency. Further, the growth scenario preferred by Anaheim and embodied in the OCP-2006 and Baseline Forecast of the RTP, is or will be mitigated through existing or future mitigation programs. Attachment 2 contains specific comments and recommendations regarding the mitigation measures included in the PEIR.

We would again like to thank you for the opportunity to comment on these items. Please forward any subsequent public notices and/or environmental documents regarding the projects discussed in the Regional Transportation Plan and/or Program Environmental Impact Report to Tracy Sato, AICP, Senior Planner at the address listed at the bottom of the first page of this letter. If you have any questions regarding these comments, please do not hesitate to contact me at (714) 765-5010.

Sincerely,



Sheri Vander Dussen, AICP  
Planning Director

svd:ts:sr

Enclosures 2

By e-mail

cc: Hasan Ikhata, Southern California Association of Governments  
Ryan Kuo, Southern California Association of Governments  
Jessica Meaney, Southern California Association of Governments  
Jessica Kirchner, Southern California Association of Governments  
Frank Wen, Southern California Association of Governments  
Dennis Wilberg, Orange County Council of Government  
Natalie Meeks, City of Anaheim Public Works Department  
Marty DeSollar, City of Anaheim External Affairs  
Danny Wu, City of Anaheim Public Works Department

**COMMENT LETTER 24**

**Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)**

Overall Comments:

12 cont.

1. The City of Anaheim has actively participated in the development of the OCP-2006 and believes that it is the growth forecast that most accurately reflects the land uses anticipated in the City. The City, therefore, requests that any growth forecast adopted as part of the 2008 Regional Transportation Plan be fully consistent with the OCP-2006.
  
2. Specific comments are only provided for Census Tracts that had differences of greater than 100 residential units or employment totals when comparing the Policy Growth Forecast and the OCP-2006. However, nearly all Census Tracts in the City indicated differences between the two forecasts. Through preparation of the OCP-2006, staff anticipated and projected increases and decreases in both housing units and employment in Census Tracts throughout the City. These figures were based on local knowledge of pending development plans and available development sites. The majority of development projected within Anaheim is expected to occur on sites that are currently developed with other uses. The alternative Policy Growth Forecast is not representative of this anticipated growth.

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
116.02	359	-235	The majority of this census tract is within the City of Fullerton. For the portion within Anaheim, the existing industrial and commercial areas are not anticipated to convert to residential uses. Further, the City has no reason to anticipate that there will be any reduction in the employment projected.
117.22	-1,222	58	The majority of these census tracts are in the City of Placentia. The area within Anaheim is fully developed with stable, single-family neighborhoods with some commercial uses. No land uses changes are anticipated in this area.
218.21	-217	-68	
219.24	-640	-27	Only a portion of this tract is within Anaheim. This portion is planned to develop per an approved specific plan and development agreement with the landowner, The Irvine Company. Plans for the development, known as Mountain Park, include 2,500 residential units. The City does not anticipate any reduction in the number of units planned for this area.

**Attachment 1: Comments Regarding Differences between the City's Forecast and the Orange County Projection of 2006 (OCP-2006)**

12 cont.

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
117.14	112	-5,649	<p>This census tract is located in the Canyon business area of the City. A small portion is located in the City of Placentia. The intensification of currently developed sites is occurring and further anticipated in this area. This will result in a significant increase in employment. Two on-going re-use projects are of particular note. The first is the redevelopment of a previously underutilized industrial site to a new, 360-bed, regional Kaiser Permanente hospital and medical center. This project is under construction. The second site is currently occupied by Boeing, who in the past decade had significantly reduced their workforce at the location. However, the site recently sold to a developer who intends to redevelop the site with an office and research park. These new uses are expected to be fully occupied in the future resulting in a net gain in employment.</p> <p>While there is potential for additional residential development, it is unlikely to occur to the extent identified. The majority of this area is already developed with industrial uses and a small amount of commercial and office that are anticipated to remain in place. Residential development was anticipated in the OCP-2006 at appropriate locations. Additional residential development, while possible, is not currently anticipated to exceed what was anticipated by staff. The Policy Growth Forecast is in direct conflict with the City's land use assumptions for this area.</p>
758.13	75	1,335	<p>Only two portions of this tract are within Anaheim. The portion within the City is developed with stable, single-family residential neighborhoods and a water tower. It is unlikely that these uses will change. The City of Anaheim does not anticipate any additional employment or housing in this area.</p>
761.02	-640	-974	<p>Only a portion of this census tract is within Anaheim. The portion within the City is currently developed with institutional and residential uses. One planned project is anticipated to increase the overall number of residential units in the area by 450. This reuse does not appear to have been incorporated in the Policy Growth Forecast. The City does not anticipate a change in employment.</p>

**COMMENT LETTER 24**

**Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)**

12 cont.

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
761.01 and 863.03	-1,124 -1,186	5,351 4,776	<p>These two tracts encompass an area of the City referred to as the Platinum Triangle. Other portions of the tracts also extend into the City of Orange (tract 761.01) and into another area of Anaheim (tract 863.03). The areas outside of the Platinum Triangle, but still within the City, are currently developed with stable, residential and industrial uses that are not anticipated to significantly change.</p> <p>The area within the Platinum Triangle is currently undergoing significant transformation from a largely industrial area into a new residential mixed-use and office district. While a recently approved amendment to the Platinum Triangle Land Use Plan could accommodate additional employment, the City does not anticipate any decreases in the amount of housing identified in the OCP-2006. In fact, there are currently more residential units under construction or entitled under development agreements than indicated in the Policy Growth Forecast. At this time, the City requests that the OCP-2006 be used as the forecast in the 2008 RTP.</p>
864.06	-672	2	The area encompassed by this census tract contains a variety of residential and commercial uses. While the single-family neighborhoods are stable and not anticipated to change, there is the potential for some commercial sites to convert to residential uses. These potential changes in use were anticipated to result in an increase of 704 residential units, as reflected in the OCP 2006. This reuse does not appear to have been incorporated in the Policy Growth Forecast.
865.01	176	139	The area encompassed by this census tract contains a variety of residential, commercial, office and industrial uses. Several sites are anticipated to redevelop by 2035. While there is potential for the redevelopment of this area to include increases in both the residential units and employment, the redevelopment is most accurately reflected in the OCP-2006. The increases in both housing units and employment shown in the Policy Growth Forecast are not consistent with the development currently anticipated in this area.
866.01	502	487	The area encompassed by this census tract is currently a mix of higher density and stable, single-family residential neighborhoods with some strip commercial and existing medical facilities. While some reuse of existing sites is possible, the City does not anticipate significant changes in the land use. The increases in both housing units and employment shown in the Policy Growth Forecast are not consistent with the development currently anticipated in this area.

**COMMENT LETTER 24**

**Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)**

12 cont.

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
866.02	90	239	The area encompassed by this census tract is currently a mix of existing stable, single-family neighborhoods, higher density residential, and fully occupied regional and general commercial uses. Additional residential and employment development indicated by the Policy Growth Forecast is not anticipated.
867.01	-237	-234	The area encompassed by this census tract is currently a mix of higher density and stable, single-family residential neighborhoods and some strip commercial uses. A vacated hospital site is anticipated to be redeveloped with residential mixed-use development. This reuse was reflected in the OCP-2006. The decreases in residential and employment growth shown in the Policy Growth Forecast are not consistent with the probable development of the site.
867.02	-477	0	The area encompassed by this census tract is a mix of existing stable, single-family neighborhoods, higher density residential, and general commercial uses. The conversion of some of the commercial sites to residential mixed use is anticipated in the future. This reuse was reflected in the OCP-2006. The decrease in residential growth shown in the Policy Growth Forecast is not consistent with the probable development of these sites.
868.01	93	-1,215	Only a portion of this census tract is within Anaheim. The area within the City is currently developed with underutilized industrial uses and a stable, single-family neighborhood. It is anticipated that the industrial area will redevelop with a mix of office and industrial uses. It is anticipated that the reuse of the site will result in a significant increase in employment. The decreases in residential and employment growth shown in the Policy Growth Forecast are not consistent with the probable development of the site.
868.02	-99	359	The area encompassed by this census tract contains existing commercial and industrial uses. There is the potential for some areas to convert from their existing uses to residential uses, as is reflected in the OCP-2006. The decrease in residential units and increase in employment in this area shown in the Policy Growth Forecast is not consistent with these anticipated changes in use.
868.03	554	-10	The area encompassed by this census tract consists of stable, single-family neighborhoods, higher density residential, and both regional and general commercial uses. The City is anticipating the conversion of some existing strip commercial to residential development as reflected in the OCP-2006. The city does not anticipate the changes in land use that would accommodate the significant increase in housing units as shown in the Policy Growth Forecast.

**COMMENT LETTER 24**

**Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)**

12 cont.

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
869.02, 869.03, 870.01, 871.02 And 871.05	-335 -542 -463 -1,049 -1,414	203 162 0 591 584	The areas encompassed by these census tracts are fully developed and consist of a mix of stable, single-family neighborhoods, higher density residential, and commercial and industrial uses. The overall area is currently undergoing significant reuse of underutilized sites, as was reflected in the OCP-2006. Residential infill projects are being built on several underutilized strip commercial and industrial sites, resulting in the increases in residential units and decreases in employment. The conversion of these sites from commercial and employment uses to residential uses is not reflected in the Policy Growth Forecast.
871.06	129	65	The area encompassed by this census tract consists of existing higher density residential and visitor-serving commercial uses (hotels and restaurants). While the additional employment shown in the Policy Growth Forecast is possible, no additional residential development is anticipated in this area.
872.00 and 873.00	305 -11	187 230	The areas encompassed by these census tracts are within the Downtown and Colony Historic District areas of the City. These areas are currently developed with existing, stable-single family residential neighborhoods and some higher density residential and strip commercial uses. Significant office and commercial uses also exist Downtown. The conversion of existing underutilized sites to residential mixed use, much of which is already under construction, was incorporated in the OCP-2006. The increases in employment and overall increase in the number of housing units identified in the Policy Growth Forecast is not consistent with the redevelopment anticipated by the City.
874.01, 874.03, 874.04 and 874.05	-129 -257 115 214	57 1,126 70 265	The areas encompassed by these census tracts are currently undergoing significant redevelopment and land use change. While much of the area consists of stable, single-family neighborhoods, several sites include underutilized industrial and commercial uses. The redevelopment of these underutilized sites, as anticipated by the City and incorporated into the OCP 2006, was carefully considered on a site specific basis. The Policy Growth Forecast, which alternatively increases and decreases residential units and significantly increases employment, is inconsistent with both the existing development as well as the new uses anticipated in the area.

**COMMENT LETTER 24**

**Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)**

12 cont.

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
875.01 and 875.03	1,740 1,485	-652 -17	The majority of the area encompassed by these census tracts is within Anaheim with a small portion in the City of Garden Grove. The area is currently developed with two theme parks (Disneyland and California Adventure); the Anaheim Convention Center; visitor-serving commercial uses that include hotels, restaurants, and other entertainment venues; and along the west side of the area, stable, single-family and high density residential uses. Much of the area is located within the boundaries of the Anaheim Resort Specific Plan area. The significant increase in housing units and decrease in employment identified in the Policy Growth Forecast are not anticipated for this area. While a few specific sites could accommodate some additional residential development, these sites are not expected to develop with residential uses within the Forecast’s timeframe nor could they develop at the intensities projected in the Forecast due to the limited infrastructure capacity.
876.02	153	37	The area encompassed by this census tract consists of stable, single-family neighborhoods, higher density residential, and general commercial uses. The City does not anticipate the increase in housing units included in the Policy Growth Forecast.
877.03	792	594	Areas of this census tract are within Anaheim, the County of Orange (unincorporated), and the City of Garden Grove. However, the unincorporated area is within Anaheim’s sphere of influence. The area is developed with stable, single-family residential neighborhoods and some general commercial uses. While the conversion of some of the commercial uses is not unreasonable, the significant increases in both the number of residential units and employment could not be accommodated without redeveloping the existing single-family residential neighborhoods. The City does not anticipate the changes in land use that would be necessary to accommodate the increase in housing units included in the Policy Growth Forecast.
877.04	-199	182	The area encompassed by this census tract is developed with stable, single-family neighborhoods, some underutilized strip commercial and some higher density residential uses. Some conversion underutilized commercial sites to residential uses is anticipated in the future and is reflected in the OCP-2006. However, the conversion of these sites from commercial and employment-generating uses to residential uses is not reflected in the Policy Growth Forecast.

**COMMENT LETTER 24**

**Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)**

12 cont.

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
878.02, 878.03, 878.05 And 878.06	577 5 280 570	1,875 449 345 896	The majority of these census tracts are located within the City of Stanton with only minimal areas in Anaheim. For those areas within Anaheim, the existing uses are comprised primarily of higher density residential and commercial with some stable, single-family neighborhoods. Reuse of several commercial sites for residential and mixed-use residential is anticipated in the future and is reflected in the OCP-2006. Only minor increases in employment are anticipated. The significant increases in both housing units and employment shown in the Policy Growth Forecast are not expected within Anaheim.
884.02	1,204	2,792	The majority of the area of this census tract is within the City of Garden Grove. The small portion within Anaheim is located within the Anaheim Resort. The area is largely developed with visitor-serving commercial uses. There is the potential for a small amount of residential development, however, at this time it is not anticipated to occur within the time frame of the Policy Growth Forecast. The City also does not anticipate the significant increases in employment anticipated in the Forecast.
1104.01 and 1104.02	707 -47	1,090 -204	Only a very small portion of the area is within Anaheim. Increases to the number of housing units and employment are not anticipated.

## COMMENT LETTER 24

### Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Overall comments on the mitigation measures:

1. Please clarify and define the entity or entities that would be responsible for each mitigation measure. Several of the measures include entities that do not have authority to implement the measure.
2. Please use consistent language to identify responsible entities. It appears that the term “Project sponsor” and “Project Implementation Agency,” among other terms are used interchangeably but not consistently in the mitigation measures.

12 cont.

Mitigation Measure	Comments and Recommendations
<b>Energy</b>	
MM-EN.15: Local agencies should streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.	It is unclear which local agencies would be required to implement this measure. The term “local agencies” should be clearly defined and be used consistently throughout the document and in the mitigation measures. Recommended language: <i>MM-EN.15: Local <del>agencies</del> <b>governments</b> should, <u>as practical and feasible</u>, streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.</i>
MM-EN.16: Local agencies should adopt a “Green Building Program” to promote green building standards. Green buildings can reduce local environmental impacts, regional air pollutant emissions and global greenhouse gas emissions. Green building standards involve everything from energy efficiency, usage of renewable resources and reduced waste generation and water usage. For example, water-related energy use consumes 19 percent of the state’s electricity. The residential sector accounts for 48 percent of both the electricity and natural gas consumption associated with urban water use. While interest in green buildings has been growing for some time, cost has been a main consideration as it may cost more up front to provide energy-efficient building components and systems. Initial costs can be a hurdle even when the installed systems will save money over the life of the building. Energy efficiency measures can reduce initial costs, for example, by reducing the need for over-sized air conditioners to keep buildings comfortable. Undertaking a more comprehensive design approach to building sustainability can also save initial costs through reuse of building materials and other means.	All text beyond the first sentence of the mitigation measure is narrative and should be included in the body of the PEIR. It is unnecessary to include it in the measure. The following language is requested: <i>MM-EN.16: Local <del>agencies</del> <b>governments</b> should <del>adopt</del> <u>develop</u> a “Green Building Program” to promote green building standards.</i>

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

Mitigation Measure	Comments and Recommendations
<p>A comprehensive study of the value of green building savings is the 2003 report to California’s Sustainable Building Task Force. In the words of the report: “While the environmental and human health benefits of green building have been widely recognized, this comprehensive report confirms that minimal increases in upfront costs of about 2% to support green design would, on average, result in life cycle savings of 20% of total construction costs -- more than ten times the initial investment. For example, an initial upfront investment of up to \$100,000 to incorporate green building features into a \$5 million project would result in a savings of \$1 million in today’s dollars over the life of the building.”</p>	<p>This is a statement and not a mitigation measure. It should be moved into the body of the PEIR and removed from the mitigation monitoring program.</p>
<p>MM-EN.17: Local governments should alter zoning to improve jobs/housing balance and creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel. Creating walkable, transit oriented nodes would generally reduce energy use and greenhouse gas emissions. Residential energy use (electricity and natural gas) accounts for 14 percent of California’s greenhouse gas emissions. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods. In addition, mixed land uses (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation have been shown to save consumers up to 512 gallons of gasoline per year. Furthermore, studies have shown that the type of housing (such as multi-family) and the size of a house have strong relationships to residential energy use. Residents of single family detached housing consume over 20 percent more primary energy than those of multifamily housing and 9 percent more than those of single-family attached housing.</p>	<p>Because all of the text following the first sentence is descriptive, it should be moved to the body of the PEIR. It is not necessary to include it in the mitigation monitoring program. The following is requested language for the mitigation measure: <i>MM-EN.17: Local governments should <del>alter zoning to improve</del> <b>consider jobs/housing balance, to the extent practical and feasible, and encourage the development of</b> <del>creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel.</del></i></p>
<p>MM-EN.23: Project sponsors should consider the most cost-effective alternative and renewable energy generation facilities.</p>	<p>Please clarify under what circumstances project sponsors should be considering these facilities.</p>

12 cont.

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

Mitigation Measure	Comments and Recommendations
<p>MM-EN.24: Project sponsors should ensure that new buildings incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.</p>	<p>Not all project sponsors, such as county transportation commissions, have the ability or means to do this. Please clarify who would be responsible for this and to what types of projects this would apply. Also, please add the following text: <i>MM-EN.24: Project sponsors should ensure that <u>encourage, to the extent practical and feasible</u>, new buildings to incorporate solar panels in roofing and <del>tap</del> <u>utilize</u> other renewable energy sources to offset new demand on conventional power sources.</i></p>
<p>MM-EN.25: Project sponsors should require energy efficient design for buildings. This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.</p>	<p>The following language is requested: <i>MM-EN.25: Project sponsors should <del>require</del> <u>encourage</u>, energy efficient design for buildings. <del>This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.</del></i></p>
<p>MM-EN.26: Project sponsors should fund and schedule energy efficiency “tune-ups” of existing buildings by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, hot water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.)</p>	<p>This measure should be directed towards utility agencies. However, SCAG does not have the authority through the RTP to direct the actions of utility agencies. As such, this measure should be deleted as it cannot be implemented and therefore would not result in any measurable mitigation of the impact. Further, should this measure not be removed from the PEIR, please note that not all project sponsors, such as county transportation commissions, have the ability or tools to do this. Please clarify who would be responsible for this and on what projects it would apply. The following language is offered for clarification: <i>MM-EN.26: <del>Project sponsors</del> <u>Local governments</u> <del>should fund and schedule</del> <u>encourage</u> energy efficiency “tune-ups” of existing buildings, <del>by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, hot water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.)</del></i></p>
<p>MM-EN.27: Project sponsors should provide individualized energy management services for large energy users.</p>	<p>This type of action does not fall under the purview of SCAG, transportation agencies, or local governments. This would need to be a requirement of local electric utility providers. As such, this measure should be deleted.</p>

12 cont.

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

Mitigation Measure	Comments and Recommendations
MM-EN.28: Project sponsors should require the use of energy efficient appliances and office equipment.	Please clarify what is meant by “project sponsors.” Additionally, the following clarifications are requested: <i>MM-EN.28: Project sponsors should <del>require</del> <b>encourage</b> the-use of energy efficient appliances and office equipment.</i>
MM-EN.32: Project sponsors should incorporate on-site renewable energy production (through, e.g., participation in the California Energy Commission’s New Solar Homes Partnership). Require project proponents to install solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.	This measure should specify the types of projects it applies to. All development and redevelopment projects are currently subject to Title 24 requirements for energy efficiency. The following clarification is requested: <i>MM-EN.32: Project sponsors should incorporate, <b>where practical and feasible</b>, on-site renewable energy production (through, e.g., participation in the California Energy Commission’s New Solar Homes Partnership). Require project proponents to <b>such as the installation of</b> solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.</i>
MM-EN.34: Project sponsors should provide public education and publicity about energy efficiency programs and incentives.	Not all project sponsors, such as county transportation commissions, have the ability or tools to do this. The following clarifications are offered: <i>MM-EN.34: <del>Project sponsors</del> <b>Local governments</b> should provide public education and publicity about energy efficiency programs and incentives <b>in cooperation with local utility providers</b>.</i>

12 cont.

COMMENT LETTER 24

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
<p>MM-EN.35: In some instances, a project sponsor may find that measures that will directly reduce a project’s greenhouse gas emissions are insufficient. A lead agency may consider whether carbon offsets would be appropriate. The project proponent could, for example, fund off-site projects (e.g., alternative energy projects) that will reduce carbon emissions, or could purchase “credits” from another entity that will fund such projects. The lead agency should ensure that any mitigation taking the form of carbon offsets is specifically identified and that such mitigation will in fact occur.</p>	<p>Implementation of this measure would require that a "carbon trading" system be established in the region or state. Additionally, much of the text in this measure is narrative and can be deleted. The following clarification is offered: <i>MM-EN.35: <del>In some instances, a project sponsor may find that measures that will directly reduce a project’s greenhouse gas emissions are insufficient.</del> <u>If a regional carbon trading system is established, a</u> <del>A</del> <u>lead agency may consider whether carbon offsets would be <u>an</u> appropriate <u>means of project mitigation.</u> The project proponent could, for example, fund off-site projects (e.g., alternative energy projects) that will reduce carbon emissions, or could purchase “credits” from another entity that will fund such projects. The lead agency should ensure that any mitigation taking the form of carbon offsets is specifically identified and that such mitigation will in fact occur.</u></i></p>

12 cont.

COMMENT LETTER 24

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
<p>MM-EN.36: Project sponsors should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> <li>• Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure</li> <li>• Land use and planning strategies to increase biking and walking trips</li> </ul>	<p>Land use strategies such as those indicated are the responsibility of local governments and not the responsibility of all project sponsors, such as county transportation commissions. Please remove the language relating to "Project sponsors" from the mitigation measure as it does not apply to all project sponsors. Additionally, it is not currently possible to fully "eliminate pollution." However, local governments could encourage the minimization of pollution to the extent practical and feasible. The following is offered for clarification: <i>MM-EN.36: <del>Project sponsors should incorporate and</del> Local governments should <u>include consider</u> the following land use principles that use resources efficiently, <u>and to the extent practical and feasible eliminate minimize</u> pollution and significantly reduce waste <u>generation:</u> into their projects, zoning codes and other implementation mechanisms</i></p> <ul style="list-style-type: none"> <li>• <i>Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure</i></li> <li>• <i>Land use and planning strategies to increase biking and walking trips</i></li> </ul>
<p>MM-EN.37: Project sponsors and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p>	<p>Land use strategies are the responsibility of local governments. Please remove the language relating to "Project sponsors" from the mitigation measure as it does not apply to all project sponsors. Additionally, the following clarifications are offered: <i>MM-EN.37: <del>Project sponsors and local</del> Local governments should <u>encourage the integration of</u> integrate green building measures into project design <del>and zoning</del> such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures <del>that should be explored</del> for new and remodeled buildings <u>could include the following examples:....</u></i></p>

12 cont.

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

Mitigation Measure	Comments and Recommendations
<b>Land Use</b>	
<p>MM-LU.11: Local governments should adopt and implement General Plan Housing Elements that accommodate the housing need identified through the RHNA process. Affordable housing should be provided consistent with the RHNA income category distribution adopted for each jurisdiction.</p>	<p>This measure is not necessary as it duplicates the mitigation stated in MM-LU.10. As such, we request that it be deleted.</p>
<p>MM-LU.13: Local governments and subregional organizations should develop ordinance and other programs which will enable and assist in the cleanup and redevelopment of brownfield sites.</p>	<p>Subregional organizations do not have the authority to develop ordinances. The following language is offered for clarification: <i>MM-LU.13: Local governments and subregional organizations should develop <del>ordinances and other programs which will enable and assist in</del> <u>encourage</u> the cleanup and redevelopment of brownfield sites.</i></p>
<p>MM-LU.14: Local governments and subregional organizations should develop adaptive reuse ordinances and other programs that will enable the conversion of vacant or aging commercial, office and some industrial properties to housing and mixed-use housing.</p>	<p>Subregional organizations do not have the authority to develop ordinances. Additionally, local governments should determine the best use of such sites based on conditions and constraints present. Not all underutilized sites are appropriate for residential uses. The following language is offered for clarification: <i>MM-LU.14: <u>Where practical and feasible, local governments and subregional organizations should develop adaptive reuse ordinances and other programs that will to enable the reuse of conversion of vacant or aging underutilized commercial, office and/or industrial properties for housing or mixed use housing and mixed-use housing.</u></i></p>
<b>Open Space</b>	
<p>MM-OS.23: Project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth that accompanies transportation projects/improvements.</p>	<p>This measure appears to duplicate measure MM-OS.15, which requires the mitigation of impacts that transportation projects may have on open space. Moreover, growth induced by transportation projects is impossible to accurately quantify. CEQA requires that mitigation measures included in a PEIR be possible to implement and to be quantifiable. This measure is neither. Since other mitigation measures appear to adequately address open space impacts, it is requested that this measure be deleted.</p>

12 cont.

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

Mitigation Measure	Comments and Recommendations
<p>The Mitigation measures listed above for impacts 3.10-1 through 3.10-3 shall be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.</p>	<p>Please further clarify what is meant by Tier 2 projects and how and when these measures would be applied. Would these be offered as suggested mitigation measures by SCAG when it reviews CEQA documents through the existing intergovernmental review process? Additionally, the following changes are requested: <i>The <del>Mitigation</del> <u>mitigation</u> measures listed above for impacts 3.10-1 through 3.10-3 shall <u>would</u> be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.</i></p>
<p>MM-OS.34: Project level mitigation for significant cumulative and growth inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG.</p>	<p>At this time, SCAG does not have the authority to facilitate compacts or agreements regarding open space. Such language should be removed from the measure. The following changes are requested: <i>MM-OS.34: Project level mitigation for significant cumulative and growth inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region <del>or through multi-party conservation compacts facilitated by SCAG.</del></i></p>

12 cont.

COMMENT LETTER 24

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
<p>MM-OS.35: Local governments should establish transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands. Local governments should also consider the following:</p> <ul style="list-style-type: none"> <li>• Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land.</li> <li>• Easing restrictions on farmer’s markets and encourage cooperative farming initiatives to increase the availability of locally grown food.</li> <li>• Considering partnering with school districts to develop farm-to-school programs.</li> </ul>	<p>Transfer of development rights programs are complex and costly to implement. While they are a valuable tool for the preservation of open space, they are not the only tool available, as indicated by the list of options in the measure. The following changes are requested: <i>MM-OS.35: Local governments should establish <u>programs to transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure, <u>where possible</u>, the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands. Local governments should also consider the</u></i> <u>The following are offered as examples of programs:</u></p> <ul style="list-style-type: none"> <li>• <u>The development or participation in transfer of development rights programs to encourage the preservation of agricultural lands</u> <ul style="list-style-type: none"> <li>• Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land.</li> <li>• Easing restrictions on farmer’s markets and encourage cooperative farming initiatives to increase the availability of locally grown food.</li> <li>• Considering partnering with school districts to develop farm-to-school programs.</li> </ul> </li> </ul>

12 cont.

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

<b>Mitigation Measure</b>	<b>Comments and Recommendations</b>
<p>MM-OS.41: Project sponsors and local governments should increase the accessibility to natural areas lands for outdoor recreation.</p>	<p>This measure does not appear to mitigate the impact under which it is listed. Additionally, implementation of this measure could result in unintended impacts on natural areas, such as increased pollution or damage to sensitive habitat areas. Finally, some project sponsors will not have the ability to increase accessibility to natural areas. As such, it is requested that this measure be deleted. However, if the measure is not deleted, we agree that project sponsors should <u>consider</u> accessibility to natural areas in their construction projects. The following changes are requested: <i>MM-OS.41: <u>Where practical and feasible, project sponsors should consider</u> and local governments should increase, the accessibility to natural areas <u>and</u> lands for outdoor recreation. Such measures should be coordinated <u>with local and regional open space planning or management agencies.</u></i></p>
<p>MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p>It is not clear how this will mitigate the impact. The following is offered as clarification: <i>MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to <del>revitalize existing communities</del> <u>encourage the efficient use of land and minimize the development of agricultural and open space lands.</u></i></p>

12 cont.

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

12 cont.

Mitigation Measure	Comments and Recommendations
<p>MM-OS.43: Project sponsors should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.</p>	<p>It is not clear how this measure mitigates the stated impacts and this measure duplicates MM-EN.36. As such, it is requested that the measure be deleted. However, if the measure is not deleted, the same comments as provided on MM-EN.36 apply. Specifically, the following clarification is requested: <i>Project sponsors should incorporate and</i> <del>Local governments should include</del> <b><u>consider</u></b> <i>the following land use principles that use resources efficiently, <b><u>and to the extent practical and feasible</u></b> eliminate <b><u>minimize</u></b> pollution and significantly reduce waste <b><u>generation</u></b>: into their projects, zoning codes and other implementation mechanisms:</i></p> <ul style="list-style-type: none"> <li>• <i>Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure</i></li> <li>• <i>Land use and planning strategies to increase biking and walking trips</i></li> </ul>
<p>MM-OS.45: Project sponsors and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.</p>	<p>This measure is most applicable to local governments as many project sponsors will have minimal, if any, ability to implement land use policy. The following clarification is offered: <i>MM-OS.45: Project sponsors and</i> <del>Local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.</del></p>
<p><b>Public Services</b></p>	
<p>General comments on MM-PS.8 through MM-PS.14 and MM-PS.21 through MM-PS.24</p>	<p>These measures are taken from the draft Regional Comprehensive Plan (RCP) which is still going through the public review process. The measures listed represent significant regional policy that has yet to be adopted by the region. As such, it is not appropriate to include the measures as mitigation in this document and it is requested that they be deleted. However, if the measures are not deleted, please incorporate the text changes below to reflect that the measures have not received regional approval and reflect the voluntary nature of the RCP.</p>

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

12 cont.

Mitigation Measure	Comments and Recommendations
<p>MM-PS.7: Project implementation agencies shall integrate green building measures into project design such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures would include the following: ...</p>	<p>The following changes are requested: <i>MM-PS.7: Project implementation agencies <del>shall</del> <u>should</u> integrate green building measures into project design such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures <del>would</del> <u>could</u> include the following: ...</i></p>
<p>MM-PS.8: Project implementation agencies shall discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, landfills should be sited with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.</p>	<p>Most project implementation agencies, including most local governments and county transportation commissions, do not have authority or purview over the siting of new landfills. This measure should be applicable only to the appropriate agency. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and change the word “shall” in the first sentence to “should.”</p>
<p>MM-PS.9: Project implementation agencies shall discourage exporting of locally generated waste outside of the SCAG region. Disposal within the county where the waste originates shall be encouraged as much as possible. Green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMP and RTP policies should be required.</p>	<p>Please clarify who would be responsible for this measure, ensuring that it is an appropriate agency and change the word “shall” in the first sentence to “should.”</p>
<p>MM-PS.10: Project implementation agencies shall adopt Zero Waste goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.</p>	<p>Zero waste policies are very controversial and should only be recommended if regional consensus and support are achieved. Additionally, please clarify who would be responsible for this measure ensuring that it is an appropriate agency. The following changes are recommended: <i>MM-PS.10: Project implementation agencies <del>shall adopt</del> <u>should encourage</u> <del>Zero Waste</del> <u>waste reduction</u> goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.</i></p>

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

Mitigation Measure	Comments and Recommendations
MM-PS.11: Project implementation agencies shall build local markets for waste prevention, reduction, and recycling practices.	Many project implementation agencies do not have the means to build local markets for waste prevention. As such, the following changes are requested: <i>MM-PS.11: <del>Project implementation agencies shall</del> <b>Waste management agencies and companies should encourage</b> build <u>the development of</u> local markets for waste prevention, reduction, and recycling practices.</i>
MM-PS.12: Project implementation agencies shall develop ordinances that promote waste prevention and recycling such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and instituting ordinances to divert food waste away from landfills and toward food banks and composting facilities.	Please clarify who would be responsible for this measure, ensuring that it is an appropriate agency and the following changes are requested: <i>MM-PS.12: Project implementation agencies shall develop ordinances that promote <b>should encourage</b> waste prevention and recycling <u>activities</u> <del>such as:</del> <b>requiring such as developing programs for</b> waste prevention and recycling efforts at all large events and venues; <del>implementing</del> <b>implementation of</b> recycled content procurement programs; and <del>instituting ordinances to</del> <b>developing opportunities to</b> divert food waste away from landfills <del>and toward food banks and composting facilities.</del></i>
MM-PS.13: Project implementation agencies shall develop environmentally friendly alternative waste management strategies such as composting, recycling, and conversion technologies.	Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and change the word “shall” to “should.”
MM-PS.14: Project implementation agencies shall develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and the following changes are requested: <i>MM-PS.14: <b>Where practical and feasible, project implementation agencies shall should, in coordination with waste management agencies,</b> develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.</i>
MM-PS.21: Project implementation agencies shall coordinate regional approaches and strategic siting of waste management facilities.	Per the discussion on MM-PS.8, please clarify who would be responsible for this measure, ensuring that it is an appropriate agency and change the word “shall” to “should.”

12 cont.

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

12 cont.

Mitigation Measure	Comments and Recommendations
<p>MM-PS.22: Project implementation agencies shall facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity’s waste stream becomes another entity’s raw material by making priority funding available for projects that involve co-location of facilities.</p>	<p>Please clarify who would be responsible for this measure, ensuring that it is an appropriate agency: <i>MM-PS.22: Project implementation agencies shall <b><u>should encourage and, where practical and feasible,</u></b> facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity’s waste stream becomes another entity’s raw material. <del>by making priority funding available for projects that involve co-location of facilities</del></i></p>
<p>MM-PS.23: Project implementation agencies shall prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities in conjunction with existing waste management or material recovery facilities.</p>	<p>Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and change the word “shall” to “should.”</p>
<p>MM-PS.24: Project implementation agencies shall increase programs to educate the public and increase awareness of reuse, recycling, composting, and green building benefits and raise consumer education issues at the county and city level, as well as at local school districts and education facilities.</p>	<p>Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and change the word “shall” to “should.”</p>
<b>Water</b>	
<p>MM-W.20: Local governments should encourage Low Impact Development and natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments.</p>	<p>The following text changes are requested: <i>MM-W.20: Local governments should encourage <del>Low Impact Development</del> <b><u>low impact development</u></b> and <b><u>encourage the incorporation of</u></b> natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, <b><u>where practical and feasible.</u></b></i></p>
<p>MM-W.21: Local governments should implement green infrastructure and water-related green building practices through incentives and ordinances. Green building resources include the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.</p>	<p>The following text changes are requested: <i>MM-W.21: Local governments should implement, <b><u>where practical and feasible,</u></b> green infrastructure and water-related green building practices through incentives and ordinances. Green building resources include the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.</i></p>

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

Mitigation Measure	Comments and Recommendations
<p>MM-W.23: Developers, local governments, and water agencies should maximize permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</p>	<p>The following text changes are requested: <i>MM-W.23: Developers, local governments, and water agencies should maximize, <u>where practical and feasible</u>, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</i></p>
<p>MM-W.24: SCAG shall continue to work with local jurisdictions and water quality agencies, through its Water Policy Task Force and other means, to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur during as part of SCAG’s ongoing regional planning efforts.</p>	<p>SCAG should recognize and incorporate existing regional water planning efforts and not duplicate existing efforts. SCAG is encouraged to coordinate with these existing programs and processes. The following text changes are requested: <i>MM-W.24: SCAG shall continue to work with local jurisdictions and water quality agencies, through its Water Policy Task Force and other means, to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided, <u>to the extent practical and feasible</u>, through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur <u>as part of current and existing regional coordination efforts and</u> <del>during as part of</del> <u>with additional coordination opportunities provided through</u> SCAG’s ongoing regional planning efforts.</i></p>
<p>MM-W.25: SCAG shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge. Future adverse impacts shall be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region. Meetings of SCAG’s Water Policy Task Force and Regional Council offer an opportunity for local jurisdictions and water agencies to share information and strategies for improving regional performance in these efforts.</p>	<p>The following text changes are requested: <i>MM-W.25: SCAG shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge, <u>including consideration of alternative recharge technologies</u>. Future adverse impacts shall be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region. Meetings of SCAG’s Water Policy Task Force and Regional Council offer an opportunity for local jurisdictions and water agencies to share information and strategies for improving regional performance in these efforts.</i></p>

12 cont.

**COMMENT LETTER 24**

**Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report**

<b>Mitigation Measure</b>	<b>Comments and Recommendations</b>
<p>MM-W.30: Project developers and agencies should consider potential climate change hydrology and attendant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.</p>	<p>The methodology and base data necessary for these analyses are still being developed. Further, local water agencies and project developers must rely on regional water agencies to establish the analysis such that they can incorporate it into the water plans. As such, the following text changes are requested. <i>MM-W.30: <u>Project developers and Regional water agencies should consider, to the extent feasible,</u> potential climate change hydrology and attendant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.</i></p>
<p>MM-W.33: SCAG shall encourage the kind of regional coordination throughout California and the Colorado River Basin that develops and supports sustainable policies in accommodating growth.</p>	<p>Because existing regional programs currently exist to address these issues, the following change to the text is requested: <i>MM-W.33: SCAG, <u>in coordination with regional water agencies,</u> shall encourage the kind of regional coordination throughout California and the Colorado River Basin that develops and supports sustainable policies in accommodating growth.</i></p>
<p>MM-W.34: SCAG shall facilitate information sharing about the management and status of the Sacramento River Delta, the Colorado River Basin, and other water supply source areas of importance to local water supply.</p>	<p>Because existing regional programs currently existing to address these issues, the following change to the text is requested: <i>MM-W.34: SCAG, <u>in coordination with regional water agencies,</u> shall facilitate information sharing about the management and status of the Sacramento River Delta, the Colorado River Basin, and other water supply source areas of importance to local water supply.</i></p>

12 cont.

COMMENT LETTER 24

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
<p>MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG’s ongoing regional planning efforts. SCAG’s Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions:</p> <ul style="list-style-type: none"> <li>• Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand.</li> <li>• Involve the region’s water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions.</li> <li>• Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects.</li> <li>• Promote water-efficient land use development.</li> <li>• The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region’s water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.</li> </ul>	<p>Because existing regional programs currently existing to address these issues, the following change to the text is requested: <i>MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG’s ongoing regional planning efforts <u>in coordination with regional water agencies</u>. SCAG’s Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions:</i></p> <ul style="list-style-type: none"> <li>• <i>Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand.</i></li> <li>• <i>Involve the region’s water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions.</i></li> <li>• <i>Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects.</i></li> <li>• <i>Promote water-efficiency <u>in land</u> <del>land use</del> development.</i></li> <li>• <i>The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region’s water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.</i></li> </ul>

12 cont.



## City of Brea

13

February 7, 2008

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

**SUBJECT: DEIR COMMENTS FOR THE 2008 REGIONAL  
 TRANSPORTATION PLAN**

Dear Ms. Kirchner:

I am writing in regard to the subject DEIR and to provide the City of Brea's comments on this document. Our comments are as follows:

1. It is the City's recommendation that SCAG use the 2006 Orange County Projections (OCP) in its environmental analysis and within any adopted RTP growth forecast. The 2006 OCP was developed by the Center for Demographic Research (CDR) and is the official dataset used by the Orange County Transportation Agency (OCTA) as well as the Orange County Coalition of Governments (OCCOG). The OCP provides Orange County agencies a consistent set of projections for population, housing, and employment developed through a bottoms-up process with cities within the County. Brea has provided valuable input into these projections and, consistent with OCTA policy and funding, use them for our infrastructure planning and implementation. As such, it would be the City's recommendation that the RTP analysis and final plan incorporate this valuable data. Please provide confirmation on how the RTP analysis incorporates the OCP data.
2. In order to clarify our concern with the proposed Policy Growth Forecast of the RTP (covered in pages 1-3, 2-11, and 4-1 to 4-39 of the DEIR), we would like to make the follow tract-specific comments:
  - a. The household and job projections for Census Tract 15.04 and 15.05 (the area that generally surrounds the Brea Mall) are significantly higher with 2,282 more jobs and 762 additional households than anticipated by OCP 2006.

**City Council**     **Don Schweitzer**     **John Beaman**     **Ron Garcia**     **Roy Moore**     **Marty Simonoff**  
                          Mayor                           Mayor Pro Tem                           Councilmember                           Councilmember                           Councilmember

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## COMMENT LETTER 24

Both the employment and household projections are a major concern for Brea and we find that the Policy Growth Forecast would not accurately convey the true growth conditions for this area of Brea in the future. We recommend that they be reduced to the projections of OCP 2006.

13 cont.

The City of Brea appreciates the opportunity to provide these comments on the DEIR and RTP. Please feel free to reach me at (714) 990-7689 if you should have any questions.

Sincerely,



Charles View, AICP  
Development Services Director

cc: Honorable Mayor and City Council  
Tim O'Donnell, City Manager  
John Beaman, Member, SCAG Regional Council  
Tracy Sato, Senior Planner, City of Anaheim/Chair OCCOG TAC  
Deborah Stickley-Diep, Director, Center for Demographic Research



Sponsors:

California State University, Fullerton

Clerk-Recorder Department, County of Orange

County of Orange

Municipal Water District of Orange County

Orange County Council of Governments

Orange County Sanitation District

Orange County Transportation Authority

Orange County Water District

Transportation Corridor Agencies

February 14, 2008

Southern California Association of Governments

Attn: Jessica Kirchner  
 kirchner@scag.ca.gov  
 818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
 Los Angeles, CA 90017

**SUBJECT: COMMENTS ON THE DRAFT 2008 REGIONAL TRANSPORTATION PLAN PROGRAM ENVIRONMENTAL IMPACT REPORT**

Dear Ms. Kirchner,

The Center for Demographic Research has reviewed the Draft 2008 RTP PEIR. We thank you for the opportunity and ask for your consideration and response to the following comments.

The listing of Mitigation Measures identified in the Draft Program EIR would be applied to and be binding upon transportation agencies and local governments which are responsible for implementing the transportation projects included in the adopted 2008 Regional Transportation Plan. The CDR would like to express support of comments and recommendations on the Draft 2008 RTP PEIR by the Orange County Transportation Authority and the Orange County Council of Governments. These comments include:

- 1) Requests to remove mitigation measures within the PEIR that are not related to Transportation Product delivery and implementation,
- 2) Requests to remove mitigation measures that were derived from the Regional Comprehensive Plan which has not completed its public review nor received approval by the Regional Council, and
- 3) Other comments on the PEIR document.

Tables 1 and 2 include specific comments regarding the PEIR document.

**Table 1**

TOPIC	PAGE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
Move project to Strategic Plan	PEIR 1-4 3.1-12 3.11-11	<u>PEIR NARRATIVE:</u> Orangeline High-Speed Transit  <u>COMMENT &amp; RECOMMENDATION:</u> Per recommendation of the OCTA Board on 1/28/2008 and subsequent RTP /PEIR comment letter, remove this project from Constrained Plan and place in Strategic Plan.

**Table 1** (continued)

14 cont.

TOPIC	PAGE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
Reality checks for Policy growth forecast	PEIR Ch. 2 Page 11 (2-11)	<p><u>PEIR NARRATIVE:</u> “The growth assumptions, vision, and policies were all developed in coordination with technical analyses, local input, land use and growth experts, and on-the-ground “reality checks.” ”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> One of the reality checks performed was on an Orange County jurisdiction: Anaheim city. Review of the Policy forecast dataset shows a number of errors in growth projected based on approved plans, development agreements and projects under development. Attachment 2 contains an Excel data file highlighting significant differences between the Baseline forecast (local input) and the Plan’s Policy forecast. Please change Policy forecast to reflect Baseline projections.</p>
Characterization of Baseline as business as usual and not including land use strategies	PEIR Ch. 2 Page 11 (2-11)	<p><u>PEIR NARRATIVE:</u> “SCAG prepared two growth forecasts in preparation of the 2008 RTP, a “baseline” growth forecast that does not include land use strategies and a “policy growth alternative” (used in the Plan)”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> The statement above should be removed.</p> <p>Page 88 of the RTP states “the [Plan] policies reflect current development patterns in some portions of the region and nascent planning strategies in others.”</p> <p>Page 40 of the Integrated Growth Forecast report states “with most cities that are undertaking General Plan updates moving towards adopting similar policies and zoning ordinances consistent with the Compass Principles and Growth Vision.”</p> <p>Page 2-11 of the PEIR states “Compass Blueprint Growth Vision ...Developed in close collaboration with cities throughout the region, the policies of the Vision are:</p> <ul style="list-style-type: none"> <li>• [1] Identify regional strategic areas for infill and investment</li> <li>• [2] Structure the future plan on a three-tiered system of centers development</li> <li>• [3] Develop “complete communities”</li> <li>• [4] Develop nodes on a corridor</li> <li>• [5] Plan for additional housing and jobs near transit</li> <li>• [6] Plan for a changing demand in types of housing</li> <li>• [7] Continue to protect stable existing single-family areas</li> <li>• [8] Ensure adequate access to open space and preservation of habitat</li> <li>• [9] Incorporate local input and feedback on future growth”</li> </ul> <p>Since the 2004 RTP, many Orange County jurisdictions have approved projects that are consistent with Compass Principles, the foundation of the Plan forecast, and deviate from the long-time pattern of urban sprawl. In addition, the Baseline forecast is developed through an iterative process, building upon</p>

		<p>the last round of projections from the 2004 RTP which includes Compass Blueprint principles. To characterize the Baseline as not including land use strategies is inaccurate.</p> <p>Table 2 below contains an abbreviated list of projects contained within the Baseline forecast which serve as examples of implementation of the policies labeled above.</p>
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**TABLE 2**

Jurisdiction	Project	Consistent with Compass Policies
Aliso Viejo	Vantis Multi-family residential project	6,9
Anaheim	Platinum Triangle	1,2,3,4,5,6,9
Brea	South Brea Lofts	3,4,6,9
Buena Park	Founder's Walk/Buenaterra Transit Oriented Development	4,5,6,9
Costa Mesa	North Costa Mesa High-Rise projects	1,2,3,4,6,9
Fountain Valley	SAFECO condo & hotel project	3,5,6,9
Fullerton	Cal State Fullerton staff & student housing project	1,2,3,4,5,6,9
Garden Grove	Chapman Commons	3,4,6,9
Huntington Beach	Redevelopment old school sites	6,7,9
Irvine	Residential units into Irvine Business Complex	1,2,3,4,6,9
Laguna Niguel	Courthouse expansion	7,9
Laguna Woods	Garden Center apartments	3,6
La Palma	Crescent/Moody infill housing	7,9
Newport Beach	Nov. 2006 General Plan Amendment	3,9
Orange	Bowling alley site reuse for townhomes	4,6,9
Placentia	Metrolink station & Transit Oriented Development	2,3,4,5,6,9
Santa Ana	MacArthur Place	2,3,4,5,6,9
Stanton	Beach Blvd mixed use	3,4,5,6,9
Tustin	Tustin Legacy	1,2,3,4,5,8,9
Unincorporated County	Ranch Plan	1,2,3,6,8,9

**Table 1 (continued)**

TOPIC	PAGE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
Equal comparisons for accurate conclusions	PEIR Ch. 2 Page 12 (2-12)	<p><u>PEIR NARRATIVE:</u> “The comparison of the transportation modeling results between the “baseline growth alternative” and the “policy growth forecast” isolates the transportation benefits due to regional land use policy.”</p> <p><u>COMMENT &amp; RECOMMENDATION:</u> Page 27 of the RTP states:  <ul style="list-style-type: none"> <li>• Baseline 2035 scenario–Future conditions in 2035 based on the existing transportation system and near-term constrained projects</li> <li>• Plan 2035 scenario–Future conditions in 2035 based on the existing transportation system, near-term constrained projects, and long-term constrained projects”</li> </ul> <p>In order to isolate regional land use policy as the cause of transportation benefits in the Plan scenario, the transportation systems modeled must be</p> </p>

	<p>identical.</p> <p>The models must be rerun with the Baseline scenario including the long-term constrained projects, which the Policy forecast includes, in order to properly evaluate and possibly conclude that benefits are due to land use policy, OR delete statement: "The comparison of the transportation modeling results between the "baseline growth alternative" and the "policy growth forecast" isolates the transportation benefits due to regional land use policy."</p>
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**14 cont.**

Thank you again for your consideration.

Sincerely,



Deborah S. Diep  
CDR Director

Attachments: 1) Excel dataset: Differences Policy & Baseline forecasts

CC: CDR Management Oversight Committee  
CDR Technical Advisory Committee

Attachment 1:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
11.01	4,726	1,514	1,198	4,686	1,510	1,141	-43	-4	-57	-1%	0%	-5%
11.02	3,485	1,094	808	3,458	1,092	759	-30	-2	-49	-1%	0%	-6%
11.03	5,097	1,442	1,411	5,101	1,434	1,311	34	-8	-100	1%	-1%	-7%
12.01	6,177	1,474	725	6,003	1,441	662	-181	-33	-63	-3%	-2%	-9%
12.02	4,179	1,012	1,476	4,068	991	1,416	-116	-21	-60	-3%	-2%	-4%
13.01	7,348	2,643	3,200	7,277	2,633	3,086	-80	-10	-114	-1%	0%	-4%
13.03	6,607	1,869	1,260	6,547	1,863	1,207	-68	-6	-53	-1%	0%	-4%
13.04	4,617	1,176	2,692	4,508	1,155	2,592	-115	-21	-100	-2%	-2%	-4%
14.01	6,394	1,784	1,741	6,315	1,773	1,673	-43	-11	-68	-1%	-1%	-4%
14.02	5,851	1,583	866	5,805	1,580	823	-53	-3	-43	-1%	0%	-5%
14.03	3,723	1,109	474	3,636	1,089	466	-87	-20	-8	-2%	-2%	-2%
14.04	4,269	1,039	8,908	4,191	1,026	8,295	-82	-13	-613	-2%	-1%	-7%
15.01	7,011	2,471	3,525	6,950	2,464	3,463	-62	-7	-62	-1%	0%	-2%
15.03	6,307	2,016	7,496	6,046	1,944	7,404	-265	-72	-92	-4%	-4%	-1%
15.04	5,082	1,815	6,662	6,861	2,465	8,944	1,777	650	2,282	35%	36%	34%
15.05	7,538	2,437	1,402	7,839	2,549	1,198	289	112	-204	4%	5%	-15%
15.06	5,013	1,670	1,163	4,812	1,607	1,068	-190	-63	-95	-4%	-4%	-8%
15.07	5,008	2,039	9,907	4,896	2,003	9,856	-111	-36	-51	-2%	-2%	-1%
16.01	8,256	2,912	8,784	8,003	2,813	8,667	-245	-99	-117	-3%	-3%	-1%
16.02	5,622	2,100	1,370	5,150	1,934	1,332	-482	-166	-38	-9%	-8%	-3%
17.04	7,044	2,295	3,419	6,834	2,240	3,378	-225	-55	-41	-3%	-2%	-1%
17.05	4,929	1,488	608	4,880	1,482	593	-56	-6	-15	-1%	0%	-2%
17.06	4,414	1,432	2,335	4,270	1,373	2,245	-135	-59	-90	-3%	-4%	-4%
17.07	9,044	3,095	1,553	8,776	3,017	1,481	-282	-78	-72	-3%	-3%	-5%
17.08	4,811	1,444	985	4,783	1,444	961	-35	0	-24	-1%	0%	-2%
18.01	5,988	1,628	4,276	7,041	1,926	4,087	1,042	298	-189	17%	18%	-4%
18.02	8,361	2,124	963	8,247	2,103	911	-124	-21	-52	-1%	-1%	-5%
19.01	3,105	811	590	3,041	799	552	-69	-12	-38	-2%	-1%	-6%
19.02	3,360	812	1,319	3,292	800	1,269	-39	-12	-50	-1%	-1%	-4%
19.03	3,428	954	628	3,326	931	593	-108	-23	-35	-3%	-2%	-6%
110.00	7,817	2,578	3,584	7,590	2,518	3,173	-240	-60	-411	-3%	-2%	-11%
111.01	4,525	1,295	791	4,422	1,273	752	-109	-22	-39	-2%	-2%	-5%
111.02	5,171	1,185	561	5,050	1,164	527	-125	-21	-34	-2%	-2%	-6%
112.00	4,534	1,602	2,435	6,280	2,254	2,573	1,752	652	138	39%	41%	6%
113.00	4,955	1,963	5,324	8,003	3,290	10,150	3,074	1,327	4,826	62%	68%	91%
114.01	2,514	799	2,733	2,407	766	2,669	-93	-33	-64	-4%	-4%	-2%
114.02	2,644	888	616	2,535	856	578	-110	-32	-38	-4%	-4%	-6%
114.03	6,466	1,921	2,574	6,329	1,886	2,494	-128	-35	-80	-2%	-2%	-3%
115.02	4,712	1,529	2,235	4,529	1,478	2,151	-188	-51	-84	-4%	-3%	-4%
115.03	2,034	590	689	2,001	580	638	-29	-10	-51	-1%	-2%	-7%
115.04	6,118	2,606	6,853	6,029	2,585	6,615	-11	-21	-238	0%	-1%	-3%
116.01	9,390	2,376	2,088	12,747	3,248	4,494	3,341	872	2,406	36%	37%	115%

14 cont.

Attachment 1:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
116.02	6,591	1,623	22,104	7,815	1,982	21,869	1,216	359	-235	18%	22%	-1%
117.07	5,791	2,280	2,171	5,668	2,245	2,069	-134	-35	-102	-2%	-2%	-5%
117.08	5,037	1,909	735	4,942	1,884	714	-96	-25	-21	-2%	-1%	-3%
117.09	5,095	1,506	3,899	4,961	1,475	3,498	-135	-31	-401	-3%	-2%	-10%
117.10	4,103	1,192	1,007	3,994	1,167	933	-105	-25	-74	-3%	-2%	-7%
117.11	8,204	2,624	1,498	8,085	2,594	1,431	-124	-30	-67	-2%	-1%	-4%
117.12	5,522	1,635	1,336	5,811	1,732	1,450	288	97	114	5%	6%	9%
117.14	654	391	39,730	846	503	34,081	192	112	-5,649	29%	29%	-14%
117.15	8,351	2,592	1,973	7,877	2,459	1,907	-475	-133	-66	-6%	-5%	-3%
117.16	5,542	1,684	675	5,427	1,659	669	-117	-25	-6	-2%	-1%	-1%
117.17	3,110	950	930	2,981	916	906	-130	-34	-24	-4%	-4%	-3%
117.18	3,882	1,141	748	3,761	1,111	714	-123	-30	-34	-3%	-3%	-5%
117.20	8,779	1,526	2,727	8,550	1,495	2,664	-231	-31	-63	-3%	-2%	-2%
117.21	5,426	1,535	910	7,003	1,993	1,583	1,575	458	673	29%	30%	74%
117.22	6,729	2,508	4,011	3,430	1,286	4,069	-3,300	-1,222	58	-49%	-49%	1%
218.02	8,340	2,741	3,791	7,949	2,628	3,627	-392	-113	-164	-5%	-4%	-4%
218.07	4,597	1,347	642	4,563	1,345	642	-34	-2	0	-1%	0%	0%
218.09	3,362	1,019	954	3,230	984	951	-130	-35	-3	-4%	-3%	0%
218.10	4,246	1,265	1,408	4,108	1,231	1,368	-139	-34	-40	-3%	-3%	-3%
218.12	7,490	2,274	1,230	7,249	2,214	1,212	-241	-60	-18	-3%	-3%	-1%
218.13	47	13	20,375	219	62	20,283	172	49	-92	366%	377%	0%
218.14	8,621	2,877	7,107	8,082	2,722	6,914	-543	-155	-193	-6%	-5%	-3%
218.15	17,072	5,368	4,014	15,854	5,001	3,815	-1,377	-366	-199	-8%	-7%	-5%
218.16	5,526	1,826	695	5,349	1,778	693	-177	-48	-2	-3%	-3%	0%
218.17	4,072	1,308	350	3,998	1,292	350	-74	-16	0	-2%	-1%	0%
218.20	5,210	1,529	480	4,949	1,461	437	-262	-68	-43	-5%	-4%	-9%
218.21	8,117	2,778	5,175	7,441	2,561	5,107	-678	-217	-68	-8%	-8%	-1%
218.22	6,900	2,554	1,044	6,553	2,440	1,018	-347	-114	-26	-5%	-4%	-2%
218.23	4,163	1,349	340	3,980	1,297	327	-182	-52	-13	-4%	-4%	-4%
218.24	3,215	859	710	3,196	859	704	-19	0	-6	-1%	0%	-1%
218.25	3,920	1,210	288	3,836	1,191	274	-84	-19	-14	-2%	-2%	-5%
218.26	2,964	1,081	2,412	2,857	1,048	2,404	-107	-33	-8	-4%	-3%	0%
218.27	3,367	1,094	304	3,252	1,063	298	-115	-31	-6	-3%	-3%	-2%
218.28	5,313	1,345	531	5,215	1,328	527	-98	-17	-4	-2%	-1%	-1%
218.29	6,616	1,825	719	6,483	1,799	712	-133	-26	-7	-2%	-1%	-1%
218.30	6,851	1,994	906	6,804	1,992	877	-47	-2	-29	-1%	0%	-3%
219.03	4,655	1,228	2,810	4,443	1,179	2,810	-212	-49	0	-5%	-4%	0%
219.05	6,305	1,797	2,037	6,247	1,791	2,037	-58	-6	0	-1%	0%	0%
219.12	9,603	2,689	773	9,454	2,663	766	-159	-25	-8	-2%	-1%	-1%
219.13	9,477	1,987	750	9,373	1,977	743	-122	-10	-7	-1%	-1%	-1%
219.14	4,799	1,344	1,012	4,746	1,337	1,003	-63	-7	-9	-1%	-1%	-1%
219.15	4,683	1,492	921	4,633	1,485	917	-50	-7	-4	-1%	0%	0%

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Attachment 1:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
219.16	4,251	1,424	620	4,209	1,419	620	-38	-5	0	-1%	0%	0%
219.17	4,194	1,298	666	4,134	1,287	648	-66	-11	-18	-2%	-1%	-3%
219.18	5,620	1,817	1,264	5,562	1,805	1,245	-65	-12	-19	-1%	-1%	-2%
219.19	3,196	1,063	1,073	3,168	1,060	1,073	-27	-3	0	-1%	0%	0%
219.20	6,217	2,086	652	6,169	2,082	648	-47	-4	-4	-1%	0%	-1%
219.21	5,317	1,427	709	5,282	1,426	709	-35	-1	0	-1%	0%	0%
219.22	5,483	2,221	4,026	5,433	2,214	4,026	-50	-7	0	-1%	0%	0%
219.23	7,132	2,336	581	6,993	2,304	581	-139	-32	0	-2%	-1%	0%
219.24	17,020	5,851	5,027	14,986	5,211	5,000	-2,031	-640	-27	-12%	-11%	-1%
320.02	6,582	2,068	779	6,529	2,062	779	-52	-6	0	-1%	0%	0%
320.03	5,389	1,576	1,661	5,355	1,576	1,661	-28	0	0	-1%	0%	0%
320.11	1,860	753	165	1,845	751	161	-17	-2	-4	-1%	0%	-2%
320.12	3,987	1,277	1,294	3,963	1,277	1,294	-23	0	0	-1%	0%	0%
320.13	6,179	1,824	5,790	6,740	2,010	5,790	577	186	0	9%	10%	0%
320.14	6,393	1,939	2,617	6,404	1,927	2,617	-9	-12	0	0%	-1%	0%
320.15	7,307	1,968	1,806	7,244	1,964	1,806	-11	-4	0	0%	0%	0%
320.20	6,540	1,894	1,285	6,498	1,893	1,284	-49	-1	-1	-1%	0%	0%
320.22	6,911	2,215	9,545	7,424	2,394	9,417	507	179	-128	7%	8%	-1%
320.23	27,058	7,627	12,140	12,543	3,555	5,615	-14,511	-4,072	-6,525	-54%	-53%	-54%
320.27	6,702	2,038	1,436	6,646	2,033	1,369	-57	-5	-67	-1%	0%	-5%
320.28	3,719	1,445	5,716	3,687	1,441	5,707	-35	-4	-9	-1%	0%	0%
320.29	4,833	1,477	580	4,751	1,460	531	-79	-17	-49	-2%	-1%	-8%
320.30	4,105	1,251	643	4,080	1,251	643	-28	0	0	-1%	0%	0%
320.31	4,065	1,164	903	4,027	1,160	903	-43	-4	0	-1%	0%	0%
320.32	3,534	1,035	483	3,513	1,035	483	-23	0	0	-1%	0%	0%
320.33	3,830	1,475	303	3,797	1,471	303	-38	-4	0	-1%	0%	0%
320.34	7,131	1,842	475	7,077	1,839	474	-61	-3	-1	-1%	0%	0%
320.35	2,644	1,017	1,006	2,620	1,014	1,006	-25	-3	0	-1%	0%	0%
320.36	3,890	1,226	919	3,863	1,225	919	-24	-1	0	-1%	0%	0%
320.37	5,352	2,351	693	5,304	2,344	693	-55	-7	0	-1%	0%	0%
320.38	7,831	2,120	1,340	7,774	2,117	1,336	-66	-3	-4	-1%	0%	0%
320.39	7,763	2,226	779	7,698	2,220	779	-74	-6	0	-1%	0%	0%
320.40	3,221	899	193	3,202	899	193	-23	0	0	-1%	0%	0%
320.41	2,116	647	333	1,562	444	323	-509	-203	-10	-24%	-31%	-3%
320.42	8,288	2,082	627	7,634	1,928	622	-652	-154	-5	-8%	-7%	-1%
320.43	4,660	1,242	331	4,617	1,238	311	-43	-4	-20	-1%	0%	-6%
320.44	6,276	1,958	900	6,217	1,951	886	-57	-7	-14	-1%	0%	-2%
320.45	2,956	921	200	2,939	921	200	-16	0	0	-1%	0%	0%
320.46	5,791	1,763	521	5,737	1,757	521	-52	-6	0	-1%	0%	0%
320.47	4,537	1,941	1,042	3,934	1,693	1,040	-607	-248	-2	-13%	-13%	0%
320.48	6,492	2,243	263	6,439	2,238	262	-57	-5	-1	-1%	0%	0%
320.49	10,689	3,169	333	10,094	3,010	327	-628	-159	-6	-6%	-5%	-2%

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2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
320.50	5,743	1,730	609	5,702	1,728	567	-41	-2	-42	-1%	0%	-7%
320.51	5,143	1,996	663	5,097	1,990	655	-46	-6	-8	-1%	0%	-1%
320.52	29,769	9,136	5,408	29,034	8,963	5,078	-730	-173	-330	-2%	-2%	-6%
320.53	8,848	3,054	6,524	8,773	3,046	6,192	-75	-8	-332	-1%	0%	-5%
320.54	5,512	2,137	1,548	5,461	2,130	1,405	-51	-7	-143	-1%	0%	-9%
320.55	4,710	1,504	369	4,676	1,502	365	-34	-2	-4	-1%	0%	-1%
320.56	39,285	10,483	11,216	21,010	5,641	6,432	-18,263	-4,842	-4,784	-46%	-46%	-43%
421.03	9,305	3,213	2,400	9,055	3,145	2,300	-250	-68	-100	-3%	-2%	-4%
421.06	2,135	927	5,305	7,023	3,172	11,433	4,887	2,245	6,128	229%	242%	116%
421.07	5,746	1,639	3,111	9,302	2,672	4,604	3,556	1,033	1,493	62%	63%	48%
421.08	7,365	2,911	4,332	7,220	2,870	4,249	-145	-41	-83	-2%	-1%	-2%
421.09	6,773	2,421	6,483	5,826	2,095	6,095	-947	-326	-388	-14%	-13%	-6%
421.11	9,259	2,660	632	9,052	2,616	593	-206	-44	-39	-2%	-2%	-6%
421.12	7,587	2,263	1,742	7,445	2,234	1,686	-142	-29	-56	-2%	-1%	-3%
421.13	5,469	1,854	2,172	5,316	1,810	2,053	-154	-44	-119	-3%	-2%	-5%
421.14	4,578	1,608	1,255	4,446	1,571	1,150	-132	-37	-105	-3%	-2%	-8%
422.01	6,931	2,601	6,348	6,734	2,542	6,033	-198	-59	-315	-3%	-2%	-5%
422.03	10,025	3,767	1,366	9,826	3,713	1,291	-208	-54	-75	-2%	-1%	-5%
422.05	8,246	2,363	2,701	7,967	2,296	2,580	-276	-67	-121	-3%	-3%	-4%
422.06	4,035	1,470	1,292	3,929	1,430	1,215	-95	-40	-77	-2%	-3%	-6%
423.05	4,308	1,729	2,776	4,236	1,709	2,707	-73	-20	-69	-2%	-1%	-2%
423.07	8,525	2,299	3,083	8,352	2,264	3,010	-147	-35	-73	-2%	-2%	-2%
423.10	10,131	3,181	2,967	10,124	3,189	2,824	-3	8	-143	0%	0%	-5%
423.11	7,040	2,266	2,154	6,869	2,224	2,013	-170	-42	-141	-2%	-2%	-7%
423.12	9,658	2,172	8,054	15,875	3,545	9,319	6,228	1,373	1,265	64%	63%	16%
423.13	8,179	2,991	5,141	8,071	2,969	4,689	-113	-22	-452	-1%	-1%	-9%
423.15	6,715	2,186	3,879	8,165	2,676	3,848	1,449	490	-31	22%	22%	-1%
423.17	4,111	1,326	1,197	4,076	1,322	1,189	-16	-4	-8	0%	0%	-1%
423.19	3,869	1,139	2,354	3,825	1,133	2,344	-35	-6	-10	-1%	-1%	0%
423.20	5,945	2,559	6,355	5,847	2,532	6,165	-97	-27	-190	-2%	-1%	-3%
423.23	5,616	2,535	2,685	5,413	2,458	2,569	-207	-77	-116	-4%	-3%	-4%
423.24	4,918	2,191	717	4,791	2,147	688	-126	-44	-29	-3%	-2%	-4%
423.25	4,087	1,524	1,453	4,041	1,516	1,280	-49	-8	-173	-1%	-1%	-12%
423.26	5,108	1,766	767	5,060	1,760	760	-49	-6	-7	-1%	0%	-1%
423.27	5,423	1,745	1,621	5,329	1,725	1,431	-83	-20	-190	-2%	-1%	-12%
423.28	2,898	796	2,040	2,870	793	1,995	-21	-3	-45	-1%	0%	-2%
423.29	5,096	1,565	857	5,054	1,559	852	-39	-6	-5	-1%	0%	-1%
423.30	7,149	2,165	690	7,084	2,158	686	-70	-7	-4	-1%	0%	-1%
423.31	6,110	2,049	694	6,056	2,043	689	-58	-6	-5	-1%	0%	-1%
423.32	6,314	2,154	1,047	6,250	2,145	1,030	-68	-9	-17	-1%	0%	-2%
423.33	5,034	1,336	5,920	5,791	1,546	4,989	765	210	-931	15%	16%	-16%
423.34	5,865	2,187	1,760	5,814	2,181	1,739	-55	-6	-21	-1%	0%	-1%

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2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
423.35	6,364	2,405	331	6,305	2,397	319	-63	-8	-12	-1%	0%	-4%
423.36	5,119	1,545	945	5,079	1,542	934	-42	-3	-11	-1%	0%	-1%
423.37	4,353	1,373	630	4,305	1,366	619	-51	-7	-11	-1%	-1%	-2%
423.38	5,418	1,946	1,151	5,336	1,928	1,125	-85	-18	-26	-2%	-1%	-2%
423.39	3,962	1,449	844	3,852	1,417	835	-113	-32	-9	-3%	-2%	-1%
524.04	10,670	4,134	30,765	12,861	5,073	25,946	2,396	938	-4,819	22%	23%	-16%
524.08	6,670	2,136	13,295	6,584	2,121	12,693	-82	-15	-602	-1%	-1%	-5%
524.10	5,782	2,207	25,942	12,176	4,689	31,748	6,396	2,482	5,806	111%	112%	22%
524.11	5,365	1,346	3,518	5,277	1,331	3,491	-92	-15	-27	-2%	-1%	-1%
524.15	4,271	1,306	1,912	4,246	1,306	1,820	-23	0	-92	-1%	0%	-5%
524.16	4,217	1,258	1,034	4,185	1,256	1,001	-31	-2	-33	-1%	0%	-3%
524.17	8,985	2,622	1,194	8,901	2,613	1,162	-78	-9	-32	-1%	0%	-3%
524.18	21,738	9,070	31,734	20,449	8,583	10,922	-1,273	-487	-20,812	-6%	-5%	-66%
524.19	3,619	1,133	239	3,598	1,133	230	-20	0	-9	-1%	0%	-4%
524.20	30,146	10,847	3,798	29,867	10,810	3,743	-262	-37	-55	-1%	0%	-1%
524.21	11,590	3,815	1,368	11,482	3,802	1,343	-102	-13	-25	-1%	0%	-2%
524.22	4,393	1,463	26,882	4,367	1,463	26,036	-23	0	-846	-1%	0%	-3%
524.23	5,846	2,105	2,614	5,764	2,088	2,606	-79	-17	-8	-1%	-1%	0%
524.24	5,126	1,840	676	5,078	1,827	622	-49	-13	-54	-1%	-1%	-8%
524.25	6,300	2,317	1,992	6,206	2,296	1,897	-90	-21	-95	-1%	-1%	-5%
524.26	23,486	9,404	2,292	21,829	8,794	1,448	-1,655	-610	-844	-7%	-6%	-37%
524.27	5,358	1,728	6,618	5,317	1,722	6,456	-41	-6	-162	-1%	0%	-2%
524.28	6,730	2,181	2,191	6,653	2,165	1,647	-77	-16	-544	-1%	-1%	-25%
525.02	6,764	2,004	10,276	8,557	2,552	11,128	1,795	548	852	27%	27%	8%
525.05	5,853	1,907	664	5,809	1,904	664	-40	-3	0	-1%	0%	0%
525.06	2,903	821	597	2,886	821	597	-15	0	0	-1%	0%	0%
525.11	6,604	2,193	3,520	6,547	2,187	3,515	-52	-6	-5	-1%	0%	0%
525.13	6,517	2,307	2,169	6,459	2,300	2,169	-53	-7	0	-1%	0%	0%
525.14	6,130	2,056	899	6,076	2,050	899	-50	-6	0	-1%	0%	0%
525.15	8,900	3,059	1,136	8,821	3,050	734	-73	-9	-402	-1%	0%	-35%
525.17	10,040	3,934	13,139	9,948	3,921	8,948	-85	-13	-4,191	-1%	0%	-32%
525.18	6,058	3,113	35,254	8,812	4,555	36,478	2,758	1,442	1,224	46%	46%	3%
525.19	4,863	1,605	246	4,819	1,600	241	-40	-5	-5	-1%	0%	-2%
525.20	4,068	1,307	559	4,028	1,302	559	-37	-5	0	-1%	0%	0%
525.21	5,226	2,111	3,773	5,178	2,104	3,722	-44	-7	-51	-1%	0%	-1%
525.22	4,743	1,417	272	4,702	1,413	272	-38	-4	0	-1%	0%	0%
525.23	4,783	1,487	473	4,745	1,484	473	-35	-3	0	-1%	0%	0%
525.24	8,047	2,905	3,944	7,972	2,895	3,898	-73	-10	-46	-1%	0%	-1%
525.25	20,322	5,937	2,805	20,145	5,919	2,323	-162	-18	-482	-1%	0%	-17%
525.26	5,103	1,336	1,844	5,073	1,336	1,838	-26	0	-6	-1%	0%	0%
525.27	9,472	2,677	4,768	15,698	4,463	5,151	6,233	1,786	383	66%	67%	8%
525.28	3,935	1,221	816	3,905	1,219	811	-27	-2	-5	-1%	0%	-1%

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Attachment 1:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
626.04	20,993	7,737	6,433	19,303	7,141	10,699	-1,680	-594	4,266	-8%	-8%	66%
626.05	3,856	1,963	5,922	3,798	1,945	5,868	-54	-18	-54	-1%	-1%	-1%
626.10	18,002	8,211	83,473	15,137	6,325	73,913	-2,863	-1,886	-9,560	-16%	-23%	-11%
626.11	4,423	1,639	4,064	4,383	1,634	4,062	-37	-5	-2	-1%	0%	0%
626.12	8,282	2,735	694	8,206	2,726	692	-70	-9	-2	-1%	0%	0%
626.14	12,789	2,224	19,087	12,617	2,219	16,086	-315	-5	-3,001	-2%	0%	-16%
626.19	4,592	1,903	1,564	4,524	1,886	1,476	-64	-17	-88	-1%	-1%	-6%
626.20	5,828	2,445	831	5,748	2,426	800	-82	-19	-31	-1%	-1%	-4%
626.21	15,799	6,243	19,445	10,607	3,952	12,788	-5,179	-2,291	-6,657	-33%	-37%	-34%
626.22	4,995	2,906	10,514	4,740	2,774	9,705	-255	-132	-809	-5%	-5%	-8%
626.23	7,443	4,343	2,672	7,252	4,255	2,534	-194	-88	-138	-3%	-2%	-5%
626.25	5,358	2,160	458	5,287	2,144	435	-66	-16	-23	-1%	-1%	-5%
626.26	3,158	1,018	1,087	3,130	1,015	522	-26	-3	-565	-1%	0%	-52%
626.27	3,594	1,426	1,360	3,586	1,422	1,360	-5	-4	0	0%	0%	0%
626.28	3,975	998	981	3,934	995	873	-52	-3	-108	-1%	0%	-11%
626.29	3,183	901	254	3,153	898	254	-28	-3	0	-1%	0%	0%
626.30	2,308	870	690	2,265	859	687	-41	-11	-3	-2%	-1%	0%
626.31	4,191	1,254	728	4,153	1,250	727	-35	-4	-1	-1%	0%	0%
626.32	4,610	1,994	1,957	4,521	1,967	1,731	-92	-27	-226	-2%	-1%	-12%
626.33	5,223	1,716	575	5,174	1,710	569	-54	-6	-6	-1%	0%	-1%
626.34	5,785	2,033	3,965	5,734	2,027	3,940	-57	-6	-25	-1%	0%	-1%
626.35	4,372	1,709	144	4,305	1,693	143	-21	-16	-1	0%	-1%	-1%
626.36	3,807	1,483	385	3,774	1,479	378	-37	-4	-7	-1%	0%	-2%
626.37	5,387	2,224	3,290	5,338	2,217	3,144	-54	-7	-146	-1%	0%	-4%
626.38	6,177	2,686	3,029	6,120	2,677	3,024	-63	-9	-5	-1%	0%	0%
626.39	6,595	2,449	814	6,537	2,442	755	-65	-7	-59	-1%	0%	-7%
626.40	3,652	1,654	1,482	3,619	1,649	1,466	-37	-5	-16	-1%	0%	-1%
626.41	6,860	1,989	1,502	6,686	1,950	1,438	-180	-39	-64	-3%	-2%	-4%
626.42	3,346	1,307	521	3,311	1,302	517	-5	-5	-4	0%	0%	-1%
626.43	5,960	2,002	1,351	5,871	1,984	1,167	-92	-18	-184	-2%	-1%	-14%
626.44	8,371	3,056	1,286	8,289	3,044	1,274	-87	-12	-12	-1%	0%	-1%
626.45	6,564	2,404	695	6,501	2,395	690	-67	-9	-5	-1%	0%	-1%
626.46	4,374	2,876	1,119	4,292	2,839	984	-84	-37	-135	-2%	-1%	-12%
626.47	5,113	2,621	6,411	4,713	2,387	6,334	-473	-234	-77	-9%	-9%	-1%
627.01	3,091	1,536	1,793	2,997	1,498	1,777	-96	-38	-16	-3%	-2%	-1%
627.02	5,147	2,668	1,508	4,789	2,497	1,496	-360	-171	-12	-7%	-6%	-1%
628.00	4,875	2,678	1,679	4,698	2,596	1,673	-180	-82	-6	-4%	-3%	0%
629.00	1,872	848	467	1,848	842	464	-25	-6	-3	-1%	-1%	-1%
630.04	6,149	3,046	1,897	6,093	3,036	1,789	-60	-10	-108	-1%	0%	-6%
630.05	1,507	807	578	1,559	840	546	51	33	-32	3%	4%	-6%
630.06	3,316	1,826	1,045	3,135	1,736	1,030	-183	-90	-15	-6%	-5%	-1%
630.07	7,058	2,874	2,117	6,992	2,864	2,101	-70	-10	-16	-1%	0%	-1%

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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
630.08	1,763	992	17,167	1,617	915	16,953	-147	-77	-214	-8%	-8%	-1%
630.09	1,771	740	2,074	1,753	737	2,051	-19	-3	-23	-1%	0%	-1%
630.10	6,859	3,092	2,108	6,583	2,985	2,104	-279	-107	-4	-4%	-3%	0%
631.01	2,926	1,220	2,535	2,918	1,221	2,504	-2	1	-31	0%	0%	-1%
631.02	7,028	2,755	1,121	6,948	2,730	1,087	-94	-25	-34	-1%	-1%	-3%
631.03	2,900	1,119	482	2,776	1,077	477	-123	-42	-5	-4%	-4%	-1%
632.01	4,139	1,651	908	3,971	1,593	899	-178	-58	-9	-4%	-4%	-1%
632.02	3,941	1,485	1,763	3,842	1,456	1,758	-105	-29	-5	-3%	-2%	0%
633.01	3,317	1,490	2,418	3,417	1,544	2,382	91	54	-36	3%	4%	-1%
633.02	4,545	1,753	1,915	4,395	1,705	1,873	-161	-48	-42	-4%	-3%	-2%
634.00	5,436	2,165	4,909	5,191	2,079	4,768	-243	-86	-141	-4%	-4%	-3%
635.00	6,739	3,141	4,281	6,383	2,992	4,264	-356	-149	-17	-5%	-5%	0%
636.01	4,163	1,408	1,379	4,038	1,372	1,335	-135	-36	-44	-3%	-3%	-3%
636.03	9,776	4,462	7,662	7,393	3,321	6,972	-2,375	-1,141	-690	-24%	-26%	-9%
636.04	4,447	1,430	5,990	4,408	1,426	5,541	-54	-4	-449	-1%	0%	-7%
636.05	6,298	1,419	3,441	6,586	1,490	3,381	280	71	-60	4%	5%	-2%
637.01	7,530	1,693	1,535	7,456	1,687	1,511	-66	-6	-24	-1%	0%	-2%
637.02	6,315	2,244	3,545	7,882	2,832	5,475	1,568	588	1,930	25%	26%	54%
638.02	3,293	1,073	1,715	3,416	1,120	1,726	115	47	11	3%	4%	1%
638.03	5,350	1,718	439	5,152	1,661	435	-211	-57	-4	-4%	-3%	-1%
638.05	2,621	898	437	2,584	890	434	-44	-8	-3	-2%	-1%	-1%
638.06	4,127	1,430	950	4,048	1,411	948	-91	-19	-2	-2%	-1%	0%
638.07	6,275	2,086	3,899	7,512	2,522	4,380	1,320	436	481	21%	21%	12%
638.08	7,739	1,606	540	7,494	1,563	535	-218	-43	-5	-3%	-3%	-1%
639.02	7,558	2,662	5,516	8,116	2,883	5,939	538	221	423	7%	8%	8%
639.03	4,660	1,191	1,759	4,500	1,156	1,737	-166	-35	-22	-4%	-3%	-1%
639.04	5,556	1,332	2,693	5,521	1,332	2,680	-38	0	-13	-1%	0%	0%
639.05	4,796	1,843	936	5,104	1,974	937	296	131	1	6%	7%	0%
639.06	7,749	2,395	1,707	7,762	2,414	1,610	96	19	-97	1%	1%	-6%
639.07	8,370	3,632	37,692	9,401	4,329	41,064	1,005	697	3,372	12%	19%	9%
639.08	6,429	2,575	5,917	6,270	2,524	6,001	-176	-51	84	-3%	-2%	1%
740.03	6,474	1,825	24,636	6,315	1,790	24,390	-253	-35	-246	-4%	-2%	-1%
740.04	8,152	2,106	563	8,088	2,102	563	-68	-4	0	-1%	0%	0%
740.05	8,657	1,470	1,440	10,043	1,717	1,695	1,421	247	255	16%	17%	18%
740.06	6,214	1,915	1,098	6,158	1,909	1,098	-58	-6	0	-1%	0%	0%
741.02	8,191	1,292	796	8,504	1,350	823	298	58	27	4%	4%	3%
741.03	5,745	914	1,330	5,692	911	1,330	-57	-3	0	-1%	0%	0%
741.06	6,107	1,855	17,104	6,050	1,849	17,127	-70	-6	23	-1%	0%	0%
741.07	6,070	2,776	3,411	5,615	2,583	3,378	-457	-193	-33	-8%	-7%	-1%
741.08	5,863	880	7,461	5,958	898	7,461	89	18	0	2%	2%	0%
741.09	4,462	658	753	4,422	656	753	-43	-2	0	-1%	0%	0%
741.10	4,305	944	110	4,279	944	110	-30	0	0	-1%	0%	0%

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2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
741.11	6,661	1,363	1,683	7,221	1,487	1,796	552	124	113	8%	9%	7%
742.00	10,082	1,730	887	11,699	2,020	1,233	1,611	290	346	16%	17%	39%
743.00	4,649	786	215	4,604	783	215	-47	-3	0	-1%	0%	0%
744.03	6,930	1,302	24,202	6,889	1,302	25,994	-43	0	1,792	-1%	0%	7%
744.05	9,713	1,779	2,122	13,667	2,532	2,582	3,983	753	460	41%	42%	22%
744.06	5,106	1,011	6,107	5,264	1,050	6,190	130	39	83	3%	4%	1%
744.07	8,558	1,816	550	8,475	1,809	542	-83	-7	-8	-1%	0%	-1%
744.08	6,075	1,604	1,015	6,024	1,600	1,007	-50	-4	-8	-1%	0%	-1%
745.01	8,659	1,365	500	8,583	1,361	500	-78	-4	0	-1%	0%	0%
745.02	6,606	1,007	321	6,567	1,007	323	-41	0	2	-1%	0%	1%
746.01	9,315	1,653	970	11,371	2,033	1,430	2,041	380	460	22%	23%	47%
746.02	10,143	1,670	393	10,294	1,705	433	148	35	40	1%	2%	10%
747.01	9,546	1,402	245	9,456	1,397	245	-93	-5	0	-1%	0%	0%
747.02	7,044	1,089	861	8,204	1,276	1,076	1,158	187	215	16%	17%	25%
748.01	6,640	993	739	6,593	992	739	-69	-1	0	-1%	0%	0%
748.02	6,411	1,092	1,991	6,349	1,088	1,991	-90	-4	0	-1%	0%	0%
748.03	9,946	1,800	1,317	9,876	1,798	1,317	-74	-2	0	-1%	0%	0%
748.05	7,115	1,113	234	7,047	1,109	234	-70	-4	0	-1%	0%	0%
748.06	6,534	907	267	6,495	907	267	-44	0	0	-1%	0%	0%
749.01	10,676	1,901	2,499	10,601	1,899	2,499	-83	-2	0	-1%	0%	0%
749.02	7,640	1,178	385	7,569	1,174	385	-76	-4	0	-1%	0%	0%
750.02	11,555	2,522	15,304	18,967	4,197	23,149	7,396	1,675	7,845	64%	66%	51%
750.03	9,093	1,750	3,120	11,204	2,170	3,120	2,109	420	0	23%	24%	0%
750.04	6,163	1,302	1,259	6,475	1,377	1,335	299	75	76	5%	6%	6%
751.00	11,583	1,991	5,113	13,169	2,244	5,340	1,979	253	227	17%	13%	4%
752.01	6,335	1,095	1,297	6,298	1,095	1,271	-39	0	-26	-1%	0%	-2%
752.02	6,501	1,166	3,064	6,439	1,162	3,064	-83	-4	0	-1%	0%	0%
753.01	6,625	1,719	755	6,599	1,713	755	-8	-6	0	0%	0%	0%
753.02	5,185	1,110	1,839	5,147	1,106	1,839	-31	-4	0	-1%	0%	0%
753.03	4,267	1,302	1,595	4,229	1,298	1,669	-51	-4	74	-1%	0%	5%
754.01	4,326	1,252	685	4,355	1,268	1,060	28	16	375	1%	1%	55%
754.03	7,916	2,644	11,763	11,122	3,771	13,138	3,202	1,127	1,375	40%	43%	12%
754.04	6,817	2,118	2,397	7,619	2,382	3,015	797	264	618	12%	12%	26%
754.05	3,004	975	2,247	3,014	972	2,246	35	-3	-1	1%	0%	0%
755.04	4,613	1,601	6,480	4,577	1,598	6,399	-35	-3	-81	-1%	0%	-1%
755.05	4,133	1,423	6,388	4,091	1,417	6,316	-41	-6	-72	-1%	0%	-1%
755.06	3,650	1,193	1,546	3,628	1,193	1,528	-21	0	-18	-1%	0%	-1%
755.07	6,593	2,072	1,454	6,487	2,051	1,433	-105	-21	-21	-2%	-1%	-1%
755.12	4,080	1,162	424	4,042	1,158	414	-37	-4	-10	-1%	0%	-2%
755.13	5,429	1,524	316	5,379	1,519	306	-49	-5	-10	-1%	0%	-3%
755.14	4,558	1,230	497	4,517	1,226	487	-42	-4	-10	-1%	0%	-2%
755.15	22,738	8,442	130,796	25,159	9,574	129,084	2,416	1,132	-1,711	11%	13%	-1%

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2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
756.03	4,031	1,442	754	3,996	1,438	744	-34	-4	-10	-1%	0%	-1%
756.04	8,269	2,654	1,171	8,146	2,630	1,128	-128	-24	-43	-2%	-1%	-4%
756.05	6,566	2,178	1,136	6,494	2,167	1,132	-81	-11	-4	-1%	-1%	0%
756.06	7,317	2,194	725	7,240	2,184	692	-90	-10	-33	-1%	0%	-5%
756.07	6,567	2,869	594	6,510	2,861	576	-56	-8	-18	-1%	0%	-3%
757.01	7,216	2,199	2,352	7,156	2,194	2,335	-67	-5	-17	-1%	0%	-1%
757.02	3,331	1,123	1,216	3,313	1,123	1,194	-38	0	-22	-1%	0%	-2%
757.03	4,149	1,375	911	4,114	1,371	883	-34	-4	-28	-1%	0%	-3%
758.05	4,602	1,410	1,901	4,552	1,403	1,817	-57	-7	-84	-1%	0%	-4%
758.06	6,712	2,140	1,617	6,644	2,131	1,576	-80	-9	-41	-1%	0%	-3%
758.07	5,327	1,251	1,390	5,276	1,246	1,375	-51	-5	-15	-1%	0%	-1%
758.08	3,594	1,147	415	3,548	1,139	410	-51	-8	-5	-1%	-1%	-1%
758.09	3,428	1,090	1,595	3,308	1,058	1,586	-122	-32	-9	-4%	-3%	-1%
758.10	3,371	1,049	368	3,243	1,015	363	-127	-34	-5	-4%	-3%	-1%
758.11	3,764	809	1,004	3,885	840	956	113	31	-48	3%	4%	-5%
758.12	7,647	1,951	2,471	8,228	2,112	3,483	566	161	1,012	7%	8%	41%
758.13	6,173	1,801	1,749	6,389	1,876	3,084	206	75	1,335	3%	4%	76%
758.14	4,025	1,166	191	3,967	1,156	182	-67	-10	-9	-2%	-1%	-5%
758.15	5,583	1,621	281	5,526	1,614	277	-68	-7	-4	-1%	0%	-1%
758.16	4,270	1,222	1,727	4,186	1,205	1,692	-92	-17	-35	-2%	-1%	-2%
759.01	5,314	1,741	4,270	10,913	3,616	8,670	5,591	1,875	4,400	105%	108%	103%
759.02	7,939	2,814	1,524	9,829	3,526	3,049	1,885	712	1,525	24%	25%	100%
760.00	12,216	4,123	26,253	12,627	4,235	25,036	338	112	-1,217	3%	3%	-5%
761.01	17,110	7,555	19,802	13,217	6,431	25,153	-3,912	-1,124	5,351	-23%	-15%	27%
761.02	9,644	2,483	17,982	4,798	1,843	17,008	-4,688	-640	-974	-49%	-26%	-5%
761.03	9,682	2,410	1,649	9,588	2,401	1,603	-105	-9	-46	-1%	0%	-3%
762.01	8,220	2,489	1,106	8,145	2,481	1,092	-91	-8	-14	-1%	0%	-1%
762.02	6,541	1,988	1,980	6,476	1,980	1,961	-74	-8	-19	-1%	0%	-1%
762.04	6,692	1,432	35,371	9,555	2,035	36,212	2,855	603	841	43%	42%	2%
762.05	7,665	1,838	1,199	8,128	1,987	2,219	508	149	1,020	7%	8%	85%
762.06	5,057	1,611	2,421	6,414	2,058	3,686	1,347	447	1,265	27%	28%	52%
762.08	5,551	1,689	3,314	6,839	2,098	4,046	1,279	409	732	23%	24%	22%
863.01	8,094	1,790	2,270	8,196	1,822	2,260	100	32	-10	1%	2%	0%
863.03	17,876	8,519	33,131	16,923	7,333	37,907	-952	-1,186	4,776	-5%	-14%	14%
863.04	5,458	1,794	1,000	5,130	1,696	1,000	-328	-98	0	-6%	-5%	0%
863.05	4,217	1,130	438	4,181	1,127	438	-36	-3	0	-1%	0%	0%
863.06	4,039	1,270	675	4,002	1,266	675	-37	-4	0	-1%	0%	0%
864.02	6,031	1,383	731	5,982	1,380	731	-49	-3	0	-1%	0%	0%
864.04	7,056	1,496	677	6,991	1,491	680	-65	-5	3	-1%	0%	0%
864.05	7,992	1,781	1,315	7,917	1,775	1,356	-74	-6	41	-1%	0%	3%
864.06	6,895	2,031	414	4,592	1,359	416	-2,303	-672	2	-33%	-33%	0%
864.07	6,805	2,061	1,199	6,745	2,055	1,199	-60	-6	0	-1%	0%	0%

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2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
865.01	5,414	1,146	2,504	6,208	1,322	2,643	794	176	139	15%	15%	6%
865.02	7,550	1,376	1,736	7,483	1,372	1,806	-67	-4	70	-1%	0%	4%
866.01	11,292	2,322	2,325	13,613	2,824	2,812	2,319	502	487	21%	22%	21%
866.02	6,985	1,733	1,787	7,313	1,823	2,026	325	90	239	5%	5%	13%
867.01	11,447	2,978	2,113	10,491	2,741	1,879	-957	-237	-234	-8%	-8%	-11%
867.02	9,538	2,354	748	7,566	1,877	748	-1,972	-477	0	-21%	-20%	0%
868.01	3,512	976	3,260	3,823	1,069	2,045	308	93	-1,215	9%	10%	-37%
868.02	8,438	2,025	1,616	7,980	1,926	1,975	-457	-99	359	-5%	-5%	22%
868.03	8,721	2,687	1,832	10,435	3,241	1,822	1,715	554	-10	20%	21%	-1%
869.01	10,125	2,671	1,160	10,086	2,664	1,160	-38	-7	0	0%	0%	0%
869.02	8,451	2,257	1,967	7,390	1,922	2,170	-1,080	-335	203	-13%	-15%	10%
869.03	8,606	2,488	632	6,695	1,946	794	-1,911	-542	162	-22%	-22%	26%
870.01	7,918	2,131	741	6,162	1,668	741	-1,756	-463	0	-22%	-22%	0%
870.02	7,753	2,294	737	7,539	2,244	738	-214	-50	1	-3%	-2%	0%
871.01	4,583	1,667	2,016	4,542	1,662	1,911	-41	-5	-105	-1%	0%	-5%
871.02	11,304	2,859	3,138	7,117	1,810	3,729	-4,187	-1,049	591	-37%	-37%	19%
871.03	8,563	2,336	1,400	8,503	2,330	1,400	-61	-6	0	-1%	0%	0%
871.05	10,165	2,846	1,609	5,134	1,432	2,193	-5,029	-1,414	584	-49%	-50%	36%
871.06	5,630	1,293	489	6,145	1,422	554	513	129	65	9%	10%	13%
872.00	8,202	2,532	2,173	9,118	2,837	2,360	918	305	187	11%	12%	9%
873.00	12,743	3,316	5,977	12,625	3,305	6,207	-117	-11	230	-1%	0%	4%
874.01	6,983	1,735	862	6,426	1,606	919	-557	-129	57	-8%	-7%	7%
874.03	6,683	1,391	385	5,438	1,134	1,511	-1,243	-257	1,126	-19%	-18%	292%
874.04	4,223	785	314	4,812	900	384	589	115	70	14%	15%	22%
874.05	8,894	1,808	2,784	9,894	2,022	3,049	997	214	265	11%	12%	10%
875.01	6,657	1,421	32,706	14,239	3,161	32,054	7,582	1,740	-652	114%	122%	-2%
875.03	8,008	1,858	5,034	14,311	3,343	5,017	6,302	1,485	-17	79%	80%	0%
875.04	9,643	1,979	1,046	9,723	2,007	1,029	80	28	-17	1%	1%	-2%
876.01	5,839	1,441	898	5,802	1,436	898	-40	-5	0	-1%	0%	0%
876.02	8,397	2,185	1,847	8,940	2,338	1,884	540	153	37	6%	7%	2%
877.01	5,329	1,587	1,258	5,284	1,583	1,227	-47	-4	-31	-1%	0%	-2%
877.03	6,316	1,405	507	9,789	2,197	1,101	3,452	792	594	55%	56%	117%
877.04	6,251	1,626	573	5,457	1,427	755	-794	-199	182	-13%	-12%	32%
878.01	5,936	1,708	1,160	5,801	1,679	1,136	-136	-29	-24	-2%	-2%	-2%
878.02	8,569	2,612	989	10,400	3,189	2,864	1,824	577	1,875	21%	22%	190%
878.03	8,856	1,761	2,825	8,829	1,766	3,274	-34	5	449	0%	0%	16%
878.05	8,227	2,111	1,408	9,234	2,391	1,753	1,020	280	345	12%	13%	25%
878.06	7,007	1,877	886	9,077	2,447	1,782	2,063	570	896	29%	30%	101%
879.01	4,494	1,301	1,181	6,143	1,790	1,853	1,645	489	672	37%	38%	57%
879.02	7,177	1,509	546	10,500	2,222	1,345	3,316	713	799	46%	47%	146%
880.01	5,348	1,263	400	5,266	1,251	379	-80	-12	-21	-1%	-1%	-5%
880.02	4,120	1,118	477	3,965	1,082	448	-157	-36	-29	-4%	-3%	-6%

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Attachment 1:  
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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
881.01	2,500	746	15,790	2,480	722	15,530	-20	-24	-260	-1%	-3%	-2%
881.04	5,464	1,764	1,984	7,041	2,300	2,497	1,597	536	513	29%	30%	26%
881.05	4,541	1,063	510	4,500	1,060	499	-38	-3	-11	-1%	0%	-2%
881.06	5,318	1,825	1,942	5,341	1,844	1,963	17	19	21	0%	1%	1%
881.07	6,506	1,715	781	6,214	1,634	770	-276	-81	-11	-4%	-5%	-1%
882.01	4,130	1,075	852	5,744	1,514	1,459	1,620	439	607	39%	41%	71%
882.02	3,229	866	399	3,577	967	665	349	101	266	11%	12%	67%
882.03	5,253	1,456	1,439	5,223	1,450	1,411	-19	-6	-28	0%	0%	-2%
883.01	6,753	1,708	1,252	6,700	1,705	1,234	-50	-3	-18	-1%	0%	-1%
883.02	6,241	1,754	1,016	6,186	1,749	988	-60	-5	-28	-1%	0%	-3%
884.01	5,534	1,300	314	5,501	1,300	309	-39	0	-5	-1%	0%	-2%
884.02	5,575	1,260	2,407	10,740	2,464	5,199	5,171	1,204	2,792	93%	96%	116%
884.03	8,445	1,954	1,058	8,369	1,948	1,073	-81	-6	15	-1%	0%	1%
885.01	7,456	1,812	944	7,387	1,806	918	-79	-6	-26	-1%	0%	-3%
885.02	6,381	1,526	2,656	7,587	1,826	3,141	1,215	300	485	19%	20%	18%
886.01	6,819	2,026	1,427	6,491	1,938	1,383	-317	-88	-44	-5%	-4%	-3%
886.02	5,389	1,633	2,205	5,003	1,525	2,168	-394	-108	-37	-7%	-7%	-2%
887.01	7,500	2,019	2,893	7,165	1,940	2,860	-340	-79	-33	-5%	-4%	-1%
887.02	6,876	1,630	1,543	6,334	1,510	1,513	-549	-120	-30	-8%	-7%	-2%
888.01	10,232	2,798	879	9,445	2,597	855	-795	-201	-24	-8%	-7%	-3%
888.02	6,825	1,528	619	6,408	1,443	603	-425	-85	-16	-6%	-6%	-3%
889.01	7,697	1,683	1,688	7,582	1,668	1,617	-92	-15	-71	-1%	-1%	-4%
889.02	5,851	1,192	1,063	5,796	1,188	1,040	-53	-4	-23	-1%	0%	-2%
889.03	9,611	1,923	3,223	9,529	1,918	3,179	-106	-5	-44	-1%	0%	-1%
889.04	6,636	1,447	1,252	6,478	1,421	1,218	-161	-26	-34	-2%	-2%	-3%
889.05	5,717	1,308	1,561	7,352	1,692	2,515	1,631	384	954	29%	29%	61%
890.01	8,172	1,641	380	8,119	1,640	377	-57	-1	-3	-1%	0%	-1%
890.03	4,302	846	3,328	4,261	843	3,258	-48	-3	-70	-1%	0%	-2%
890.04	8,225	1,745	1,412	8,153	1,740	1,412	-77	-5	0	-1%	0%	0%
891.02	7,723	1,592	2,454	7,709	1,588	2,415	14	-4	-39	0%	0%	-2%
891.04	6,709	1,329	1,050	6,654	1,326	1,048	-62	-3	-2	-1%	0%	0%
891.05	7,213	1,123	958	7,283	1,141	958	53	18	0	1%	2%	0%
891.06	4,426	941	1,077	4,324	914	1,036	-84	-27	-41	-2%	-3%	-4%
891.07	6,513	1,290	691	6,454	1,286	682	-66	-4	-9	-1%	0%	-1%
992.02	9,905	2,032	3,938	9,471	1,954	3,936	-438	-78	-2	-4%	-4%	0%
992.03	6,868	1,546	592	6,735	1,525	559	-140	-21	-33	-2%	-1%	-6%
992.04	5,002	1,408	1,251	4,828	1,367	1,502	-176	-41	251	-4%	-3%	20%
992.12	5,755	1,725	1,919	5,881	1,764	1,872	130	39	-47	2%	2%	-2%
992.14	3,895	1,432	1,170	3,834	1,418	1,138	-62	-14	-32	-2%	-1%	-3%
992.15	6,513	1,979	953	6,200	1,895	923	-313	-84	-30	-5%	-4%	-3%
992.16	4,925	1,564	825	4,718	1,507	771	-207	-57	-54	-4%	-4%	-7%
992.17	2,902	985	1,213	2,712	926	1,169	-191	-59	-44	-7%	-6%	-4%

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**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
992.20	6,745	2,638	1,132	7,264	2,858	2,042	518	220	910	8%	8%	80%
992.22	5,252	1,484	1,585	5,214	1,482	1,552	-39	-2	-33	-1%	0%	-2%
992.23	6,001	1,751	1,714	5,800	1,702	2,109	-203	-49	395	-3%	-3%	23%
992.24	4,048	1,133	1,138	3,918	1,103	1,067	-132	-30	-71	-3%	-3%	-6%
992.25	3,820	1,065	1,712	3,768	1,039	1,548	-53	-26	-164	-1%	-2%	-10%
992.26	4,782	1,260	720	4,512	1,196	695	-273	-64	-25	-6%	-5%	-3%
992.27	7,178	2,091	2,061	8,264	2,422	2,339	1,084	331	278	15%	16%	13%
992.29	7,335	2,496	16,928	7,650	2,631	16,989	313	135	62	4%	5%	0%
992.30	5,049	1,602	1,579	4,808	1,534	1,518	-242	-68	-61	-5%	-4%	-4%
992.31	6,556	1,888	1,092	6,211	1,799	1,044	-346	-89	-48	-5%	-5%	-4%
992.32	6,347	2,082	3,055	6,023	1,987	2,943	-324	-95	-112	-5%	-5%	-4%
992.33	3,987	1,126	981	3,806	1,081	932	-182	-45	-49	-5%	-4%	-5%
992.34	3,692	1,283	2,071	3,536	1,236	2,010	-157	-47	-61	-4%	-4%	-3%
992.35	5,630	2,020	1,517	5,503	1,986	1,451	-128	-34	-66	-2%	-2%	-4%
992.37	4,080	1,282	860	3,936	1,244	830	-145	-38	-30	-4%	-3%	-3%
992.38	4,772	1,475	824	4,581	1,424	804	-192	-51	-20	-4%	-3%	-2%
992.39	4,689	1,433	834	4,456	1,370	796	-234	-63	-38	-5%	-4%	-5%
992.40	6,223	2,282	772	5,959	2,198	690	-264	-84	-82	-4%	-4%	-11%
992.41	4,867	1,665	1,888	4,771	1,642	1,832	-97	-23	-56	-2%	-1%	-3%
992.42	4,256	1,139	1,220	4,859	1,308	1,143	602	169	-77	14%	15%	-6%
992.43	4,941	1,844	621	4,837	1,816	606	-102	-28	-15	-2%	-2%	-2%
992.44	4,397	1,921	592	4,303	1,891	582	-95	-30	-10	-2%	-2%	-2%
992.45	3,499	1,111	1,529	3,419	1,092	1,486	-81	-19	-43	-2%	-2%	-3%
992.46	4,286	1,247	1,304	4,237	1,240	1,272	-50	-7	-32	-1%	-1%	-2%
992.47	3,629	790	321	3,598	788	321	-32	-2	0	-1%	0%	0%
992.48	5,926	1,376	370	5,874	1,372	370	-54	-4	0	-1%	0%	0%
992.49	4,771	814	725	4,731	812	725	-41	-2	0	-1%	0%	0%
992.50	3,431	1,120	1,653	3,267	1,070	1,554	-141	-50	-99	-4%	-4%	-6%
992.51	6,241	2,248	5,055	5,975	2,165	4,858	-269	-83	-197	-4%	-4%	-4%
993.05	8,809	3,230	2,395	9,237	3,407	2,268	426	177	-127	5%	5%	-5%
993.06	7,086	2,887	1,016	6,839	2,803	982	-248	-84	-34	-3%	-3%	-3%
993.07	3,995	2,003	2,262	4,952	2,498	5,881	956	495	3,619	24%	25%	160%
993.08	6,356	2,205	752	6,298	2,198	747	-59	-7	-5	-1%	0%	-1%
993.09	4,992	1,986	2,362	4,697	1,879	2,230	-296	-107	-132	-6%	-5%	-6%
993.10	5,291	2,183	401	5,209	2,162	391	-83	-21	-10	-2%	-1%	-2%
993.11	4,694	2,090	2,211	4,518	2,023	2,087	-173	-67	-124	-4%	-3%	-6%
994.02	10,021	2,098	7,523	12,255	2,581	8,525	2,232	483	1,002	22%	23%	13%
994.04	5,378	1,775	664	5,274	1,751	643	-105	-24	-21	-2%	-1%	-3%
994.05	4,831	1,693	1,133	4,749	1,674	1,076	-83	-19	-57	-2%	-1%	-5%
994.06	5,004	1,713	875	4,948	1,704	824	-56	-9	-51	-1%	-1%	-6%
994.07	2,809	966	1,146	2,784	963	1,108	-26	-3	-38	-1%	0%	-3%
994.08	4,503	1,619	1,015	4,446	1,608	984	-57	-11	-31	-1%	-1%	-3%

14 cont.

Attachment 1:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
994.10	4,836	1,606	3,981	7,836	2,619	5,693	2,999	1,013	1,712	62%	63%	43%
994.11	6,338	2,078	3,496	7,089	2,338	4,255	750	260	759	12%	13%	22%
994.12	5,313	1,914	895	5,207	1,887	830	-106	-27	-65	-2%	-1%	-7%
994.13	9,842	3,594	5,512	12,288	4,633	7,872	2,460	1,039	2,360	25%	29%	43%
994.15	6,556	2,029	636	6,357	1,979	623	-200	-50	-13	-3%	-2%	-2%
994.16	5,224	2,259	640	5,163	2,246	629	-62	-13	-11	-1%	-1%	-2%
994.17	5,829	2,448	480	5,510	2,328	472	-320	-120	-8	-5%	-5%	-2%
995.02	782	195	213	732	183	213	-47	-12	0	-6%	-6%	0%
995.04	2,997	1,040	4,355	4,115	1,439	4,306	1,118	399	-49	37%	38%	-1%
995.06	1,430	701	916	1,415	698	832	-15	-3	-84	-1%	0%	-9%
995.08	5,340	2,165	1,052	5,208	2,124	1,026	-133	-41	-26	-2%	-2%	-2%
995.09	4,170	2,686	843	4,178	2,677	843	31	-9	0	1%	0%	0%
995.10	4,735	3,288	1,297	4,691	3,277	1,479	-50	-11	182	-1%	0%	14%
995.11	3,850	1,909	885	3,813	1,902	885	-42	-7	0	-1%	0%	0%
995.12	3,158	1,478	1,326	3,116	1,467	1,326	-46	-11	0	-1%	-1%	0%
995.13	2,626	1,244	900	2,598	1,238	801	-28	-6	-99	-1%	0%	-11%
995.14	6,595	2,380	587	6,523	2,368	572	-73	-12	-15	-1%	-1%	-3%
996.01	8,435	2,039	8,116	8,945	2,238	8,466	511	199	350	6%	10%	4%
996.02	3,700	1,065	1,800	3,644	1,053	1,743	-52	-12	-57	-1%	-1%	-3%
996.03	7,195	2,382	31,484	7,015	2,336	32,062	-183	-46	578	-3%	-2%	2%
996.04	4,216	1,212	876	4,163	1,204	835	-52	-8	-41	-1%	-1%	-5%
996.05	4,733	1,589	3,229	4,711	1,591	3,542	-23	2	313	0%	0%	10%
997.01	6,093	1,638	1,313	7,198	1,948	1,387	1,088	310	74	18%	19%	6%
997.02	9,062	2,519	2,322	11,126	3,114	3,983	2,041	595	1,661	23%	24%	72%
997.03	5,216	1,654	4,473	7,947	2,539	6,906	2,730	885	2,433	52%	54%	54%
998.01	6,487	1,553	2,250	6,363	1,521	2,173	-108	-32	-77	-2%	-2%	-3%
998.02	4,902	1,407	2,159	5,222	1,510	2,249	325	103	90	7%	7%	4%
998.03	6,552	1,717	2,203	6,328	1,668	2,140	-226	-49	-63	-3%	-3%	-3%
999.02	5,415	1,361	1,004	5,245	1,326	957	-173	-35	-47	-3%	-3%	-5%
999.03	6,448	1,500	1,150	9,952	2,339	1,844	3,507	839	694	54%	56%	60%
999.04	7,839	2,186	1,618	7,891	2,214	1,529	53	28	-89	1%	1%	-6%
999.05	3,768	1,389	1,648	3,638	1,349	1,612	-132	-40	-36	-4%	-3%	-2%
999.06	5,484	1,693	627	5,416	1,682	593	-72	-11	-34	-1%	-1%	-5%
1100.01	5,177	1,546	735	5,112	1,536	717	-58	-10	-18	-1%	-1%	-2%
1100.03	3,592	1,130	818	3,561	1,127	796	-36	-3	-22	-1%	0%	-3%
1100.04	5,282	1,695	1,343	5,220	1,685	1,314	-69	-10	-29	-1%	-1%	-2%
1100.05	3,628	1,164	551	3,576	1,154	543	-57	-10	-8	-2%	-1%	-1%
1100.06	3,044	1,090	803	5,361	1,931	2,097	2,318	841	1,294	76%	77%	161%
1100.07	4,901	1,679	481	4,840	1,668	478	-66	-11	-3	-1%	-1%	-1%
1100.08	4,436	1,709	1,873	4,394	1,703	1,870	-42	-6	-3	-1%	0%	0%
1100.10	5,198	1,430	481	5,131	1,420	466	-64	-10	-15	-1%	-1%	-3%
1100.11	3,089	1,098	5,490	3,062	1,095	4,996	-25	-3	-494	-1%	0%	-9%

14 cont.

Attachment 1:  
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

**COMMENT LETTER 24**

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
1100.12	5,853	1,847	1,006	5,787	1,837	1,006	-74	-10	0	-1%	-1%	0%
1100.14	5,589	1,940	3,784	5,558	1,925	3,799	-23	-15	15	0%	-1%	0%
1100.15	3,983	1,230	3,298	3,918	1,217	3,185	-79	-13	-113	-2%	-1%	-3%
1101.02	6,504	1,931	857	6,325	1,889	807	-181	-42	-50	-3%	-2%	-6%
1101.04	6,930	2,279	4,424	6,563	2,171	3,813	-364	-108	-611	-5%	-5%	-14%
1101.06	4,052	1,234	412	4,015	1,230	361	-35	-4	-51	-1%	0%	-12%
1101.08	3,192	1,030	7,605	3,554	1,150	7,840	370	120	235	12%	12%	3%
1101.09	5,697	1,924	1,714	5,637	1,915	1,455	-57	-9	-259	-1%	0%	-15%
1101.10	7,223	2,196	5,811	6,506	1,981	4,870	-741	-215	-941	-10%	-10%	-16%
1101.11	6,844	2,202	2,088	6,169	1,996	1,790	-672	-206	-298	-10%	-9%	-14%
1101.13	2,766	837	19,319	2,695	821	17,495	-71	-16	-1,824	-3%	-2%	-9%
1101.14	5,479	1,511	1,904	5,425	1,505	1,644	-51	-6	-260	-1%	0%	-14%
1101.15	4,005	1,152	5,205	3,971	1,149	4,938	-35	-3	-267	-1%	0%	-5%
1101.16	5,666	1,517	1,648	5,603	1,507	1,574	-61	-10	-74	-1%	-1%	-4%
1101.17	6,380	2,127	1,749	6,265	2,101	1,458	-112	-26	-291	-2%	-1%	-17%
1101.18	3,134	760	84	3,115	760	83	-17	0	-1	-1%	0%	-1%
1102.01	8,286	2,728	1,425	8,119	2,689	1,368	-174	-39	-57	-2%	-1%	-4%
1102.02	8,749	2,426	1,302	8,693	2,410	1,270	-24	-16	-32	0%	-1%	-2%
1102.03	6,151	1,780	629	6,070	1,767	611	-82	-13	-18	-1%	-1%	-3%
1103.01	7,504	2,204	1,115	7,405	2,188	1,073	-105	-16	-42	-1%	-1%	-4%
1103.02	6,659	1,680	4,048	7,007	1,779	3,972	342	99	-76	5%	6%	-2%
1103.03	5,450	1,527	531	5,411	1,525	508	-41	-2	-23	-1%	0%	-4%
1103.04	5,492	1,395	456	5,438	1,389	439	-46	-6	-17	-1%	0%	-4%
1104.01	5,242	1,408	3,946	7,820	2,115	5,036	2,572	707	1,090	49%	50%	28%
1104.02	6,273	1,460	6,619	6,075	1,413	6,415	-180	-47	-204	-3%	-3%	-3%
1105.00	9,822	2,538	12,602	9,808	2,550	12,667	-4	12	65	0%	0%	1%
1106.03	9,705	2,607	2,926	9,647	2,607	3,289	-64	0	363	-1%	0%	12%
1106.04	8,781	2,630	1,455	9,617	2,899	1,751	828	269	296	9%	10%	20%
1106.05	7,733	2,274	1,723	7,559	2,236	1,711	-189	-38	-12	-2%	-2%	-1%
1106.06	5,606	1,332	1,876	5,447	1,302	1,827	-168	-30	-49	-3%	-2%	-3%
1106.07	4,729	1,463	1,801	7,193	2,240	3,292	2,459	777	1,491	52%	53%	83%
Total	3,653,984	1,118,493	1,981,902	3,699,217	1,133,563	1,991,722	45,229	15,073	9,821	1%	1%	0%

14 cont.



COMMENT LETTER 24  
**CITY OF COSTA MESA**

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92628-1200

DEVELOPMENT SERVICES DEPARTMENT

15

February 14, 2008

Mr. Frank Wen  
Planning and Policy Department  
Southern California Association of Governments  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**SUBJECT: FEEDBACK ON POLICY GROWTH FORECAST MAPS, ASSUMPTIONS  
AND METHODOLOGY**

Dear Mr. Wen:

The City of Costa Mesa has reviewed the Growth Forecast Maps provided by SCAG and the Center for Demographic Research and has concerns with regard to the distribution of households. The following are the City's comments on the Policy Growth Forecast Maps (Please see attached for specific recommended numeric adjustments).

**HOUSEHOLDS**

**Census Tracts 633.01, 638.03, 638.08, 639.02, and 639.05:** These tracts are predominantly established single-family residential neighborhoods, as well as commercial properties along Harbor Boulevard. Therefore, a decrease in tracts 638.03 and 638.08, and significant increase of households in tracts 633.01 639.02 and 639.05 is unlikely.

**Census Tracts 636.01, 636.04, 637.01, and 639.08 :** In 2004, the City adopted Urban Plans that encourage residential, live/work, and mixed-use developments mainly in the southwestern portion of the City. With the potential of households in these Urban Plan areas and projects currently submitted to the City, a slight increase in projected households would be accurate.

**Census Tract 637.02:** This tract consists of commercial properties and residential neighborhoods that are built-out and anticipate minimal growth. Currently, there is a planning application at the City for a mid-rise located at Triangle Square for only 120 residential units. Therefore, the additional 588 households shown on the forecast map is unlikely.

**Census Tract 638.07:** This tract is primarily zoned Institutional & Recreational and contains a golf course and the Fairview Developmental Center. The State is considering residential development on the Shannon's Mountain area on a 10-acre

COMMENT LETTER 24

surplus parcel. With a required General Plan Amendment and Rezone, approximately 300-units are being considered for the site. Therefore, an increase of 436 households is unlikely.

15 cont.

**Census Tract 639.07:** The majority of this tract is within the North Costa Mesa Specific Plan. Development Agreements within this specific plan area have an option to allow for high-rise residential projects. In addition, Irvine Apartment Communities has a project currently under construction for an 890-unit apartment complex. Therefore, the forecast numbers should include a higher distribution of households in the 639.07 census tract.

The City of Costa Mesa is very interested in the Policy Growth Forecast and RTP and we look forward to future dialogue. We hope to share information on the projected distribution of growth, so that we can all gain a better understanding of possible future connections between land use and transportation. If you have any questions or need additional information, please contact me at (714) 754-5604.

Sincerely, -



KIMBERLY BRANDT, AICP  
Assistant Dev. Svs. Director

cc: Donald D. Lamm, Deputy City Mgr., Dev. Svs. Director  
Claire Flynn, AICP, Principal Planner  
✓ Gail Shiomoto-Lohr, Contract Planner, City of Mission Viejo/OCCOG TAC

COMMENT LETTER 24

**Policy Growth Forecast Maps**  
**Recommended Adjustments for the City of Costa Mesa**

2000 Census Tract	Provided Housing Forecast	Proposed Housing Forecast
633.01	54	18
636.01	-36	10
636.04	-4	185
636.05	71	42
637.01	-6	40
637.02	588	275
638.03	-57	-16
638.07	436	337
638.08	-43	-3
639.08	-51	46
639.02	221	26
639.05	131	24
639.07	697	1017
<b>Totals in tracts recommended for adjustment</b>	<b>2001</b>	<b>2001</b>

15 cont.



# CITY of CYPRESS

5275 Orange Avenue, Cypress, California 90630

Phone 714-229-6700 www.ci.cypress.ca.us

16

February 15, 2008

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

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

Dear Ms. Meaney:

The City of Cypress staff has reviewed the subject RTP and PEIR documents that were prepared by the Southern California Association of Governments (SCAG) and released for public review on January 4, 2008. The City offers the following comments and recommended changes to these documents:

1. It is our understanding that SCAG Policy Growth Forecast for the 2008 RTP would incorporate the 2008 Compass Blueprint Program. As previously described by SCAG, the Compass Blueprint Program focuses growth on key opportunity areas that would target the growth within two percent of the SCAG Region. Specifically, the Compass Blueprint Program redistributes projected jobs and housing into major transit centers and employment centers, as well as shifting planned growth out of areas with long commute times. When the City of Cypress participated in the review of the Compass Blueprint Program and the associated land use maps, we were told that the Program would be voluntary. We are concerned that the incorporation of the Program's growth projections into a regulatory document like the RTP would change its nature from voluntary to required - especially in light of the RTP consistency finding that is required to qualify for transportation funding.
2. As previously mentioned in our feedback to SCAG at the Compass Blueprint Program map workshops, Cypress recommends the use of the 2006 Orange County Projections (OCP) as the most accurate growth forecast. The OCP incorporates extensive research and comments from the Orange County jurisdictions with regard to the land use designations and planned growth areas set forth in the adopted General Plans and Development Agreements, including the 2001 Cypress General Plan. Therefore, the City of Cypress recommends that the growth projections from the 2006 OCP be used for the purposes of transportation and air quality conformity in the RTP instead of SCAG's Compass Blueprint Program projections.
3. If SCAG does not use the 2006 OCP for the RTP growth projections, then the City recommends that the Compass Blueprint Program projections for the City of Cypress be revised to reflect the detailed revisions requested in the City's letter to Frank Wen at SCAG (dated February 14, 2008, under separate cover). The

**Todd W. Seymore, Mayor**

**Leroy Mills, Mayor Pro Tem**

**Phil Luebben, Council Member**

**Doug Bailey, Council Member**

**Prakash Narain, M.D., Council Member**

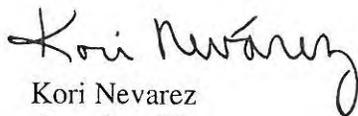
**COMMENT LETTER 24**

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requested changes would correct inconsistencies between the SCAG growth forecast assumptions and the City's adopted zoning and land use patterns.

4. It appears that many of the mitigation measures from SCAG Draft Regional Comprehensive Plan (RCP) that address growth impacts (not just transportation and road project impacts) have been incorporated into the draft RTP Program EIR. Since the Draft RCP has not gone through a complete public review, these measures may not be appropriate in the RTP EIR. Additionally, the City's General Plan EIR already addresses growth inducing impacts with mitigation measures for projects constructed within our jurisdiction. Therefore, we recommend the removal of mitigation measures in the draft RTP Program EIR that are not related to transportation project implementation, as well as the removal or revision of mitigation measures with questionable growth related requirements (i.e. provisions for open space, green building, and solid waste facilities).
5. If some of the growth related mitigation measures for the RTP are necessary to address State requirements regarding greenhouse gases, we recommend that the measures contain the term "should" (recommended) rather than "shall" (required).
6. Many of the RTP EIR mitigation measures (i.e. solid waste) list requirements that would not apply to projects conducted by regional transportation agencies, such as the Orange County Transportation Authority (OCTA). For example, OCTA has no influence regarding the siting of new landfills, the building of local markets for waste reduction, or the development of waste reduction facilities (MM-PS.8 through 14). In these cases we recommend that SCAG staff consider whether the listed impact is appropriate or correctly worded for transportation projects. Accordingly, such measures should be deleted or revised to designate an appropriate responsible agency for the measures.

Sincerely,



Kori Nevarez  
Associate Planner  
Community Development Department

KN/nv

cc: John Bahorski, City Manager  
Ted Commerdinger, Director of Community Development  
Leroy Mills, Mayor Pro Tem  
Christine Barnes, OCCOG Board Representative for SCAG District 18  
Tracy Sato, Senior Planner, City of Anaheim/ OCCOG TAC  
Gail Shiimoto-Lohr, Contract Planner, City of Mission Viejo, OCCOG TAC  
Deborah Diep, CSUF Center for Demographic Research

## COMMENT LETTER 24

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

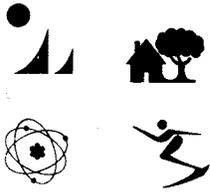
Census Tract	SCAG Policy Forecast Households 2035	Expected Households within Garden Grove Boundries 2035	Difference between SCAG and GG	Comments
881.01	722	0	722	The portion of tract 881.01 in Garden Grove is entirely industrial, and we do not foresee any land use change to residential in the future.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

## COMMENT LETTER 24

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

Census Tract	SCAG Policy Forecast Employment 2035	Expected Employment within Garden Grove Boundries 2035 (CDR's OC Projections 2006)	Difference between SCAG and GG	Comments
882.01	1459	852	607	Tract 882.01 is a fully built out single-family residential area with some commercial use. Given we do not see any major changes in land use in the foreseeable future, we do not expect any major growth in employment.
882.02	665	399	266	Tract 882.02 is a fully built out single-family residential area with some commercial use. Given we do not see any major changes in land use in the foreseeable future, we do not expect any major growth in employment.
884.02	5199	2244	2,955	Given that only part of Tract 884.02 is in the International West resort area (with the rest being mostly single-family residential areas), and the average amount of jobs created by hotels, restaurants, etc., it is unlikely that this tract will see as much growth as projected by SCAG.
884.03	1073	647	426	Given that only part of Tract 884.03 is in the International West resort area (with the rest being mostly single-family residential areas), and the average amount of jobs created by hotels, restaurants, etc., it is unlikely that this tract will see as much growth as projected by SCAG.
885.02	3141	3700	-559	Because of expected future growth in the International West resort area, we expect a larger growth in employment in Tract 885.02.
891.06	1036	1200	-164	Because of expected future growth in the International West resort area, we expect a larger growth in employment in Tract 891.06.
891.02	2415	1699	716	Because of expected future growth in the International West resort area, we expect the growth in employment in the Tract 891.02 that was projected by the Center for Demographic Research.

17 cont.



COMMENT LETTER 24  
**City of Huntington Beach**

2000 MAIN STREET

CALIFORNIA 92648

**DEPARTMENT OF PLANNING**

18

Phone 536-5271  
Fax 374-1540

December 21, 2007

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

**Subject: Draft 2008 SCAG Policy Forecast**

Dear Dr. Wen:

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

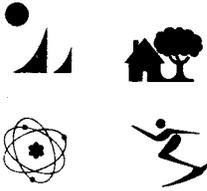
<b>Household Growth (Census Tracts)</b>	<b>Employment Growth (Census Tracts)</b>
992.20	992.20
992.42	993.07
993.05	994.02
993.07	994.11
994.02	994.13
994.11	
994.13	

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

Sincerely,

  
Ricky Ramos  
Associate Planner

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



COMMENT LETTER 24  
**City of Huntington Beach**

2000 MAIN STREET

CALIFORNIA 92648

**DEPARTMENT OF PLANNING**

19

Phone 536-5271  
 Fax 374-1540

January 17, 2008

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

**Subject: Draft 2008 SCAG Policy Forecast**

Dear Dr. Wen:

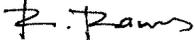
Last month the City of Huntington Beach provided comments on the Draft 2008 SCAG Policy Forecast. In our letter we identified census tracts located in the City of Huntington Beach where we believe the SCAG Policy Forecast for additional household and/or employment growth beyond what is identified in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

Census Tract	Growth Type	Basis For City of Huntington Beach Comment
992.20	Both	Only vacant land left is either wetlands or landfill anticipated to be developed for open space use only.
992.42	Household	Only vacant land left is designated in General Plan for commercial use.
993.05	Household	Only vacant land left is designated in General Plan for commercial use.
993.07	Both	Area has recently redeveloped and not likely to change anytime soon. Also, no vacant land left.
994.02	Both	Maximum build out of vacant land left pursuant to General Plan designation will result in the addition of maximum 62,500 s.f. of commercial building, 8,000 s.f. of industrial building, and zero dwelling units.  SCAG forecast is for additional 483 households and 1,002 jobs.
994.11	Both	No vacant land left.
994.13	Both	Area has recently redeveloped as part of a master plan and not likely to change anytime soon. Maximum build out of vacant land left pursuant to General Plan designation will result in the addition of maximum 62 dwelling units, 17,200 s.f. of commercial building, and 130,000 s.f. of industrial building.  SCAG forecast is for additional 1,039 households and 2,360 jobs.

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

Sincerely,



Ricky Ramos  
Associate Planner

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

19 cont.



# City of Mission Viejo

Office of the City Manager

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

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February 18, 2008

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

Dear Mr. Ikhata:

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

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

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

The City's comments focus on two key areas:

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

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

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

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

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

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



## COMMENT LETTER 24

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

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

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

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

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

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

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

## COMMENT LETTER 24

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

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

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

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

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

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

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

## COMMENT LETTER 24

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

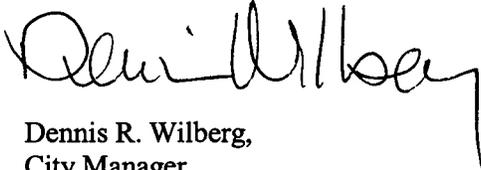
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In closing, the City of Mission Viejo supports the timely adoption of the 2008 RTP to enable critical transportation improvements to proceed forward in their future environmental clearances and project delivery. The policy-level recommendations identified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

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

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

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



Dennis R. Wilberg,  
City Manager  
City of Mission Viejo

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

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

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

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

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<b><i>SCAG Draft EIR Mitigation Measure</i></b>	<b><i>Issue of Concern</i></b>	<b><i>Recommendation</i></b>
<b>MM-OS.11:</b> Developers and local governments should submit for IGR review projects with potentially significant impacts to important farmlands. Projects should include mitigation measures to reduce impacts and demonstrate project alternatives that avoid or lessen impact to agricultural lands. Mitigation should occur at a 1:1 ratio.	This is almost identical to a proposed Regional Comprehensive Plan draft policy (Policy OSA-8, page 45) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.11
<b>MM-OS.23:</b> Project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth that accompanies transportation projects/improvements.	This is a component of a proposed Regional Comprehensive Plan draft policy (Policy OSN-14, page 34) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS-23
<b>MM-OS.31:</b> Local governments should prepare a Needs Assessment to determine the level of adequate community open space level for their areas.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-7, page 39) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS-31
<b>MM-OS.32:</b> Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-8, page 39) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.32
<b>MM-OS.33 and MM-POP-4:</b> SCAG's Compass Blueprint program and other on-going regional planning efforts will be used to build a consensus in the region to support changes in land use to accommodate future population growth while maintaining the quality of life in the region.	SCAG's Compass Blueprint program is an elective and voluntary set of principles to guide future development in the region. It is premature to include this policy as a mitigation measure in the 2008 RTP.	Delete MM-OS.33 and MM-POP-4.
<b>MM-OS.34:</b> Project level mitigation for significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG.	This is a component of a proposed Regional Comprehensive Plan draft policy (Policy OSN-14, page 34) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.34
<b>MM-OS.35:</b> Local governments should establish transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these	This is a proposed Regional Comprehensive Plan draft policy (Policy OSA-5, page 45) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.35

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

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<b><i>SCAG Draft EIR Mitigation Measure</i></b>	<b><i>Issue of Concern</i></b>	<b><i>Recommendation</i></b>
<b>MM-OS.44:</b> Project sponsors and local governments should promote water-efficient land use and development.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-12, page 39) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.44
<b>MM-OS.45:</b> Project sponsors and local governments should encourage multiple spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-13, page 39) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.45
<b>MM-PS.7:</b> Project implementation agencies shall integrate green building measures into project design such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures would include the following....	This is a proposed Regional Comprehensive Plan draft policy (Policy EN-10, page 74 and Policy SW-14, page 103) that has yet to be adopted by SCAG's Regional Council.	Delete MM-PS.7
<b>MM-PS.8:</b> Project implementation agencies shall discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, landfills should be sited with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-10, page 102) that has yet to be adopted by SCAG's Regional Council.	Delete MM-PS.8
<b>MM-PS.9:</b> Project implementation agencies shall discourage exporting locally generated waste outside the SCAG region. Disposal within the county where the waste originates shall be encouraged as much as possible. Green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMP and RTP policies should be required.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-11, page 103) that has yet to be adopted by SCAG's Regional Council.	Delete MM-PS.9
<b>MM-PS.10:</b> Project implementation agencies shall adopt Zero Waste goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-11, page 103) that has yet to be adopted by SCAG's Regional Council. Further, this mitigation measure seems to already be under the purview of requirements and programs established by the State of California Integrated Waste Management Act of 1989 (AB 939), and the California Integrated Waste Management Board.	Delete MM-PS.10

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

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<b><i>SCAG Draft EIR Mitigation Measure</i></b>	<b><i>Issue of Concern</i></b>	<b><i>Recommendation</i></b>
<b>MM-PS.21:</b> Project implementation agencies shall coordinate regional approaches and strategic siting of waste management facilities.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-18, page 103) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.21 is mandatory (shall).	Delete MM-PS.21
<b>MM-PS.22:</b> Project implementation agencies shall facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-19, page 103) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.22 is mandatory (shall).	Delete MM-PS.22
<b>MM-PS.23:</b> Project implementation agencies shall prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities in conjunction with existing waste management or material recovery facilities.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-20, page 104) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.23 is mandatory (shall).	Delete MM-PS.23
<b>MM-PS.24:</b> Project implementation agencies shall increase programs to educate the public and increase awareness of reuse, recycling, composting, and green building benefits and raise consumer education issues at the county and city level, as well as at local school districts and education facilities.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-21, page 104) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.24 is mandatory (shall).	Delete MM-PS.24
<b>MM-W.20:</b> Local governments should encourage Low Impact Development and natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-23, page 59) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.20
<b>MM-W.21:</b> Local governments should implement green infrastructure and water-related green building practices through incentives and ordinances. Green building resources include the U.S. Green Building Council's Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-25, page 60) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.21

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<b><i>SCAG Draft EIR Mitigation Measure</i></b>	<b><i>Issue of Concern</i></b>	<b><i>Recommendation</i></b>
<b>MM-W.22:</b> Local governments should integrate water resources planning with existing greening and revitalization initiatives, such as street greening, tree planting, development and restoration of public parks, and parking lot conversions, to maximize benefits and share costs.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-26, page 60) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.22
<b>MM-W.23:</b> Developers, local governments and water agencies should maximize permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-27, page 60) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.23
<b>MM-W.30:</b> Project developers and agencies should consider potential climate change hydrology and attendant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-9, page 58) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.30
<b>MM-W.32:</b> Developers, local governments and water agencies should include conjunctive use as a water management strategy when feasible.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-10, page 58) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.32
<b>MM-W.35:</b> Developers and local governments should reduce exterior uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-12, page 59) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.35
<b>MM-EN.17:</b> Local governments should alter zoning to improve jobs/housing balance and creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel.	This is a proposed Regional Comprehensive Plan draft policy (Policy EN-10S, page 76) that has yet to be adopted by SCAG's Regional Council.	Delete MM-EN.17

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## COMMENT LETTER 24

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### CHIEF EXECUTIVE OFFICE

*Arthur T. Leahy*  
Chief Executive Officer

February 15, 2008

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

Dear Mr. Ikhata:

Thank you for the opportunity to offer the Orange County Transportation Authority's (OCTA) comments on the Southern California Association of Government's (SCAG) draft 2008 Regional Transportation Plan (RTP). The 2008 RTP is a comprehensive document that reflects the many transportation and funding challenges the region will face in the next 25 years. OCTA appreciates the hard work and cooperation of SCAG staff throughout the RTP development process.

On January 28, 2008, the OCTA Board of Directors (Board) unanimously approved comments on several major policy issues related to the draft 2008 RTP. These policy issues are discussed below. In addition, OCTA staff has compiled a maxtix of technical corrections for 2008 RTP that should be incorporated in the final 2008 RTP.

### **Orangeline High-Speed Magnetic Levitation Project (Orangeline Maglev)**

The constrained plan of the draft 2008 RTP includes a \$23.6 billion project (HSRT0706) to construct the Orangeline Maglev between Orange County, Los Angeles, and Palmdale. The OCTA Board has serious concerns about the Orangeline Maglev's financial plan, operating scheme, ridership forecasts, right-of-way assumptions, schedule, technology preference, and level of community support. In particular, the assumption that OCTA-owned rights-of-way will be made available, at little or no cost, calls the Orangeline Maglev's financial plan into question.

On January 28, 2008, the OCTA Board unanimously approved the following recommendations related to the Orangeline Maglev project.

1. Request that SCAG remove the Orangeline Maglev from the financially constrained project listing of the 2008 RTP.
2. Request that SCAG include the Orangeline Maglev in the strategic plan of the 2008 RTP.

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3. Recommend that Orange County host cities and other local and regional jurisdictions work with OCTA to examine transit alternatives on the Pacific Electric (PE) Railroad right-of-way.
4. Inform the Orangeline Development Authority that the PE Railroad and Metrolink rights-of-way will not be made available for use by the Orangeline Maglev.
5. Consider use of the PE Railroad right-of-way as part of the Go Local project being considered by the cities of Santa Ana and Garden Grove, a use that is incompatible with the Orangeline Maglev.

21 cont.

As currently proposed, the Orangeline Maglev does not meet the financial constraint requirements necessary for inclusion in the constrained plan of the 2008 RTP. OCTA expects SCAG to concur with its request to remove the Orangeline Maglev from the financially constrained project listing in the final 2008 RTP.

### **Riverside County to Orange County Corridor**

The constrained plan of the draft 2008 RTP includes a \$26.3 billion project (3C01MA03) to construct two new intercounty transportation corridors between Riverside and Orange counties, called Corridors A and B.

The OCTA Board strongly supports further study of both corridors in cooperation with the Riverside County Transportation Commission (RCTC), but believes it is premature to include either project in the constrained plan of the 2008 RTP until feasibility studies are finished and a complete funding plan can be assembled. Moreover, OCTA would like to ensure that OCTA and RCTC remain eligible to continue planning work in this corridor, including ongoing studies of Corridor B, funded with a \$15.8 million federal earmark. OCTA firmly believes that federal regulations permit planning and preliminary environmental studies, such as those being conducted on Corridor B, to proceed before funding for the entire construction cost of a project must be programmed in a constrained RTP.

To remain consistent with OCTA's 2006 Long-Range Transportation Plan, Corridors A and B should be included in the strategic plan of SCAG's 2008 RTP rather than in the constrained plan. OCTA requests that SCAG make that change in the final 2008 RTP.

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### Growth Forecasts

21 cont.

The 2008 RTP includes discussion of two different demographic forecasts for the SCAG region: a baseline forecast and a policy growth forecast.

In November 2006 the OCTA Board requested that SCAG use the 2006 Orange County Projections (OCP-2006) as the basis for Orange County demographics in the 2008 RTP. The OCP-2006 is a countywide demographic dataset developed by the Center for Demographic Research with input from all 34 cities, the County of Orange, and supported by the Orange County Council of Governments. SCAG's baseline forecast is consistent with OCP-2006 in Orange County.

The policy growth forecast has not been reviewed by all local jurisdictions and, in many cases, differs significantly from demographic assumptions reflected in local general plans. It would add an additional 45,000 people, 15,000 households, and 9,500 jobs throughout Orange County between 2015 and 2035 compared with OCP-2006. OCTA believes the land-use strategies contained in the policy growth forecast should be shared with local jurisdictions on an advisory basis only, with implementation strictly voluntary.

The baseline forecast should be adopted as the official growth forecast for the 2008 RTP and for air quality modeling purposes because it reflects local input and the most likely growth scenario for Orange County at the current time. A consistent set of growth projections based on local input is critical for future planning studies, environmental documentation, and transportation modeling efforts. Adopting a dataset other than the baseline forecast could impact funding and environmental approval of future transportation projects.

Further, OCTA is concerned with language in the draft 2008 RTP that states, "SCAG and County Transportation Commissions should initiate a program to secure significant resources for implementing Compass Blueprint. The program would provide infrastructure funding for specific allowable costs of development projects that integrate land use and transportation planning" (page 91, draft 2008 RTP). It is unlikely that OCTA could spend transportation dollars on infrastructure associated with development projects supporting the Compass Blueprint Program. The definition of "specific allowable costs" is unclear, and there is no precedent for OCTA funding such projects. This language should be clarified or removed in the final 2008 RTP.

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The draft 2008 RTP also states, "SCAG shall use its intergovernmental review process to provide robust review and comment on large development projects and their consistency with the Compass Blueprint" (page 91, draft 2008 RTP). Such a process has implications for the timely approval of transportation and development projects under the California Environmental Quality Act. This language should be removed in the final 2008 RTP.

21 cont.

### **Emission Reductions from Freight Rail**

OCTA shares SCAG's view that goods movement and its related impacts on air quality, traffic congestion, and public health are significant issues that must be addressed; however, as noted in OCTA's October 3, 2007, letter signed by former OCTA Chairman Carolyn Cavecche, OCTA has concerns regarding the manner in which SCAG's \$13 billion "Rail Expansion, Emissions Reduction, and Grade Separation Project" is proposed to be financed.

Based on SCAG's business case for the project, OCTA and other county transportation commissions would be expected to pay a share of the proposed \$1 billion Metrolink revenue bond for rail capacity projects, as well as the associated debt service costs. These expenses are not included in OCTA's current financial plans.

While OCTA recognizes the benefits of the project, OCTA also foresees substantial funding challenges given the project's large price tag and the region's constrained resources. Much of OCTA's future funding has already been committed to voter-approved transportation projects through the Renewed Measure M program. OCTA requests that SCAG develop alternative funding sources to cover the \$1 billion contribution from Metrolink member agencies assumed for this program.

### **OCTA Project List for 2008 RTP**

Please ensure that SCAG's Project Listing Report for the final 2008 RTP reflects the revised data submitted by OCTA on November 9, 2007, as part of its approved project list for the 2008 RTP (attached). OCTA understands that this data was not incorporated in SCAG's Project Listing Report for the draft 2008 RTP due to time constraints.

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### **Regional Transportation Improvement Program (RTIP) Project Listing**

21 cont.

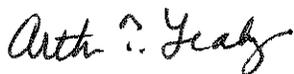
Please ensure that any projects submitted by OCTA for inclusion in the 2008 RTIP are appropriately represented in the final 2008 RTP. Also, please be aware that all projects submitted by OCTA for inclusion in the RTIP include costs inflated to year-of-expenditure; therefore, there is no need to further inflate the costs of these projects within the RTP. Furthermore, please ensure that the costs and completion dates for OCTA projects are consistent with the data OCTA submitted for inclusion in the 2008 RTIP.

### **Technical Corrections**

Attached is a matrix of technical corrections requested by OCTA in SCAG's draft 2008 RTP Project Listing Report and draft 2008 RTP list of modeled projects.

OCTA appreciates SCAG's work on the RTP to date and looks forward to the adoption of a complete and accurate 2008 RTP in April. If you have further questions, please contact Michael Litschi, Section Manger, Long-Range Strategies, at (714) 560-5581 or Gregory Nord, Transportation Analyst, at (714) 560-5885.

Sincerely,



Arthur T. Leahy  
Chief Executive Officer

ATL:ml  
Attachments

c: Alan Wapner, Chairman, SCAG Transportation Communication Committee  
OCTA Board of Directors  
Executive Staff



COMMENT LETTER 24

CITY OF ORANGE

DEPARTMENT OF COMMUNITY DEVELOPMENT

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January 29, 2008

Frank Wen  
Planning and Policy Department  
Southern California Association  
of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**Subject: Feedback on Policy Growth Forecast Maps, Assumptions and Methodology**

Dear Mr. Wen,

The City of Orange has significant concerns about the level and distribution of growth assumed in our community in SCAG's Policy Growth Forecast. After reviewing the maps provided by both SCAG and the Center for Demographic Research, we have widespread disagreement with the discrepancies between the Orange County Projections (OCP) 2006 and the Policy Growth Forecast pertaining to households and employment. Orange shares in SCAG's objective of concentrating growth in areas that are now, or in the future could be, transit and employment hubs for the purposes of creating more efficient relationships between land use and transportation; however, there are certain community realities that cannot be ignored in the Policy Growth Forecast.

During the City's review of the OCP 2006 data, great efforts were made to arrive at what we reasonably expected to occur in the way of growth in Orange based on our existing and possible future land use policies, level of development activity, and knowledge of our stable single-family residential and industrial areas. In a number of areas, what we now see represented in the Policy Growth Forecast has limited bearing on true conditions in the Orange of today and the future.

It should be noted that the City is in the midst of a comprehensive General Plan update, which proposes redesignation of certain historically commercial and industrial areas for different intensity mixed-use districts. In addition to the General Plan update, the City is updating its Santa Fe Depot Specific Plan, which applies to the area around the Orange Metrolink Station and OCTA Transportation Center. The proposed land use plan

associated with this update has a transit orientation, but is also highly constrained by the designated historic district that it is located within. Both the General Plan and Specific Plan updates consider concentrating new commercial and residential growth in areas of the City that are served by transit and are centers of employment. Much like SCAG's objective with the Policy Growth Forecast, the City intends to accommodate future growth and change in a logical way that promotes efficiency between land use and the transportation network. Our review and acceptance of the Center for Demographic Research's OCP 2006 data reflects this perspective.

This local familiarity, however, has become distorted through SCAG's Policy Growth Forecast. The manipulation of OCP data by SCAG to accommodate the Compass Blueprint Growth Vision results in a future growth distribution scenario for Orange that is inaccurate. Given that the Regional Transportation Plan (RTP) includes Implementation Programs, Strategic Initiatives and Monitoring Measures related to implementing Compass Blueprint, the City cannot accept the growth distribution of the Policy Growth Forecast. City staff is in the process of conducting a more detailed review of the RTP in order to provide comments prior to the close of the public review period for that document. Separate from that effort, we would like to provide the following feedback on the materials reviewed at recent Orange County Council of Governments (OCCOG) Technical Advisory Committee meetings.

### **Employment**

As a general comment, the Policy Growth Forecast shows a reduction in jobs from OCP 2006 in some Census tracts through which many of the City's major commercial corridors pass. These include Chapman Avenue, Tustin Street, and Main Street. The City considers these to be relatively stable commercial districts, and does not anticipate job loss over time in these corridors. There are also certain areas of the City that we know to be major employment centers with expanding employment opportunities where the Policy Growth Forecast assumes a lower level of employment than that which was accepted by the City through the OCP 2006 process. We would also like to make the following tract-specific comments:

- ***Census Tracts 759.01 and 759.02:*** These two tracts encompass the City's Old Towne Orange Historic District. The Historic District is listed on the National Register of Historic Places, and the City has strict development and design standards in place to ensure the long-term protection of historic buildings. Although it contains the Orange Metrolink station and OCTA Transportation Center, and the City is preparing a specific plan update for the area that encourages transit-oriented mixed-use development in the area around the station, any future development will be constrained by the extremely limited number of possible redevelopment sites, expectations for the adaptive reuse of historic buildings, and limitations on building heights and densities in order to ensure compatibility of new development with the historic urban fabric.

The number of jobs the City accepted in 2035 through the OCP process (191 more than existing) in Old Towne seemed reasonable in consideration of the work on the General Plan and Specific Plan updates. The City strongly objects to the identification of nearly 6,000 more jobs for Old Towne in the Policy Growth Forecast than what has been projected in OCP 2006.

- **Census Tracts 758.12:** This Census tract consists of an established single-family residential area on the east side of the 55 Freeway, and a mix of strip commercial and mutli-family residential development on the west side of the freeway. Therefore, it is unlikely that the 1,012 jobs above and beyond the OCP projection (additional 33 more than existing) will materialize. Existing development in this area is not expected to change significantly in the future due to size and character of land parcels west of the freeway.
- **Census Tract 758.13:** Because this Census tract is primarily an established single-family residential area, with the exception of limited strip commercial property on the east side of the 55 Freeway, and consists of a mix of strip commercial and mutli-family residential development on the west side of the freeway, the City believes that the 1,335 jobs above and beyond the OCP projection (additional 14 more than existing) for 2035 is unrealistic. While intensified commercial development would be possible in the future, it is unlikely to generate the additional jobs identified in the Policy Growth Forecast.
- **Census Tract 760.00:** The expanding St. Joseph Hospital and Children's Hospital of Orange County are located in this tract. Both of these hospitals are major medical centers in the region and are in the process of implementing or preparing master plans for significant future expansion. The Town and Country commercial area is also within this tract. This is an area of the City that is proposed through the pending comprehensive General Plan update to be redesignated from office professional to a higher intensity mixed-use land use classification. Furthermore, due to the area's proximity to the hospitals, there is ongoing demand for medical office space in this area, which is expected to result in site redevelopment and job creation in the future. Therefore, we disagree with the Policy Growth Forecast determination that there will be approximately 1,200 fewer jobs in this tract than what the City believes to be possible in 2035 as reflected in OCP 2006 (additional 483 more than existing).
- **Census Tract 761.01:** The level of job growth in this Census tract appears high with respect to the City of Orange. Presumably, much of the job growth identified in the Policy Growth Forecast relates to build out of Anaheim's Platinum Triangle area. We would like confirmation of that, particularly given the fact that the Policy Growth Forecast projects over 5,300 more jobs for the tract than accepted by the City in OCP 2006 (additional 27 more than existing). The portion of this tract that is located in Orange is a built out mix of single-family residential, light industrial, and strip

commercial development. While some intensification of non-residential uses could occur through redevelopment, it would not support the significant increase identified by SCAG.

- ***Census Tract 761.02:*** This Census tract is home to the expanding UCI Medical Center, major County of Orange criminal justice facilities, high-rise office development, and The Block at Orange. The proposed land use alternatives under consideration as part of the City's comprehensive General Plan update identify this area for a future higher density mixed-use district. This area not only is one of the City's major employment hubs, but is also served by transit with regional bus service as well as bus linkage to the Orange and Anaheim Metrolink stations. It is also easily accessible from both the Interstate 5 and State Route 22 Freeways. Therefore, it is unclear why the Policy Growth Forecast shows nearly 1,000 fewer jobs than the OCP for 2035 (additional 2,526 more than existing).
- ***Census Tracts 762.05 and 762.06:*** While a segment of the Tustin Street and Katella Avenue commercial corridors pass by and through these tracts, this is a largely single-family residential area. Therefore, the 2,285 additional number of jobs projected in the Policy Growth Forecast in relation to those identified in OCP 2006 (additional 201 more than existing) is unlikely.
- ***Tracts 758.05, 758.06, 768.07, 758.16, 219.14, 219.18, and 219.24:*** The City is concerned about the job reduction reflected in the Policy Growth Forecast for these tracts. Specifically, Chapman Avenue, one of the City's major commercial corridors, passes through the tracts. While we do not necessarily anticipate significant job growth along this corridor in the future, we also do not expect notable job loss.

With respect to Tract 219.24, the City expects recreation-oriented commercial development (e.g., golf resort) in the vicinity of Irvine Lake in the future. Therefore, the City does not believe that a reduction in the number of jobs below that anticipated in OCP 2006 is appropriate.

### **Households**

As a general comment, during the City's review and acceptance of the OCP 2006 data, careful consideration was given to reviewing the possibility for increasing housing units/households in established single-family neighborhoods through the construction of secondary living units (a.k.a., in-law units or granny flats). Because a significant portion of the City's planning area consists of established residential neighborhoods that are in good condition, and there are very few vacant residential sites available in these areas, the City does not anticipate any measurable growth or reduction of housing units. Therefore, the City requests that SCAG honor the OCP 2006 data that was accepted by the City, and not account for further reductions in the number of housing units in our established residential areas.

The only areas where growth can be expected are in East Orange in conjunction with the future construction of approved Irvine Company Project (Tracts 219.12, 219.24, and 524.20) and in areas where the City is considering redesignation of land from commercial or industrial to mixed-use (Tracts 754.01, 759.01, 759.02, 760.00, 761.02, and 762.04). Of these tracts, 759.01 and 759.02 fall within the Old Towne Historic District and even though infill development is being planned for, it is expected that this will occur in a careful and controlled manner. We would also like to make the following tract-specific comments:

- ***Census Tracts 759.01 and 759.02:*** As noted previously, these two tracts encompass the City's National Register listed Old Towne Orange Historic District and are subject to the same constraints related to the development of new housing units as they are to new employment. The number of housing units the City accepted through the OCP process in Old Towne considered the work on the General Plan and Santa Fe Depot Specific Plan updates. Therefore, the City objects to the identification of another 2,500 households projected in the Policy Growth Forecast for 2035 on top of the 114 additional households projected in OCP 2006 for Old Towne.
- ***Tracts 758.11 and 758.12:*** On the east side of the 55 Freeway, these tracts are built-out single-family residential neighborhoods. West of the freeway, a substantial portion of Tract 758.11 is taken up by a large Southern California Edison transmission facility. The remaining area of the two tracts consists of multi-family residential development, a mobile home park, strip commercial and shopping center development. These tracts are not expected or planned to redevelop with significant new residential development. Therefore, the 192 units identified in the Policy Growth Forecast above and beyond those expected in the OCP (additional five (5) more than existing) is unlikely.
- ***Census Tract 758.13:*** As noted above, the City had been considering re-designation of the portion of the Tustin Street corridor passing through this tract for a future mixed-use land use designation. Given that this is no longer the case, and the portion of the tract east of the freeway is an established single-family neighborhood, the 75 additional units anticipated in the Policy Growth Forecast beyond the OCP 2006 data are not likely to materialize.
- ***Census Tract 761.01:*** The City's OCP input reflected a slight increase in the number of housing units in this tract (additional 83 more than existing) by 2035 given the mix of single-family, multi-family, commercial, office, and industrial land use designations in the area. Because the portion of the tract that is within the City of Orange is built out, new housing would occur through redevelopment activity. It is unclear why the Policy Growth Forecast projects 1,124 fewer units than existing conditions, particularly given the City of Anaheim's plans for the Platinum Triangle.

- **Census Tract 761.02:** As noted in the comments on employment, this Census tract is expected to experience land use policy changes that would accommodate higher density mixed-use development in the future through the comprehensive General Plan update. Therefore, the City believes that the Policy Growth Forecast should reflect the housing data the City accepted in OCP 2006 (additional 418 more than existing) rather than a reduction in units (222 fewer units than exist today) identified by SCAG. Consistent with the Policy Growth Forecast objectives, the City would like to encourage the development of housing near employment and transportation facilities. As noted above, this area benefits from transit service, freeway proximity, and is a significant employment node.
- **Census Tracts 762.05, 762.06, and 762.08:** These tracts encompass a predominantly single-family residential area, as well as commercial properties on Tustin Street and Katella Avenue. Therefore, the additional number of households projected in the Policy Growth Forecast (1,005 more than existing) in relation to those identified in OCP 2006 (additional 10 more than existing) is unlikely.
- **Tracts 219.12, 219.24, and 524.20:** The City is concerned about the household reduction reflected in the Policy Growth Forecast for these tracts. These tracts encompass an approved approximately 3,900 unit Irvine Company development project. The City is currently processing tract maps for a portion of this development, and has no reason to believe that there will be fewer units constructed than those reflected in the OCP 2006 data. Therefore, we disagree with the Policy Growth Forecast's representation of approximately 700 fewer units than what is reflected in the OCP for these tracts.

We look forward to future dialogue with SCAG regarding these comments and hope that adjustments can be made and incorporated into the Policy Growth Forecast and RTP prior to its final adoption. Please contact me at (714) 744-7228 or [apehoushek@cityoforange.org](mailto:apehoushek@cityoforange.org) with any questions.

Sincerely,



Anna C. Pehoushek, AICP  
Principal Planner

c: John Sibley, City Manager  
Alice Angus, Community Development Director  
Ed Knight, Assistant Planning Director  
Tracy Sato, Senior Planner, City of Anaheim/OCCOG TAC  
Gail Shiimoto-Lohr, Contract Planner, City of Mission Viejo/OCCOG TAC

## COMMENT LETTER 24

San Joaquin Hills  
Corridor Agency

Chairman:  
Jim Dahl  
San Clemente



**TRANSPORTATION CORRIDOR AGENCIES**

Foothill/Eastern  
Corridor Agency

Chairman:  
Lance MacLean  
Mission Viejo

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January 22, 2008

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

**Subject: Draft Policy Forecast for South Orange County**

Dear Mr. Butala:

The Transportation Corridor Agencies (TCA) is writing this letter to alert SCAG to inconsistencies that must be fixed in the Draft Policy Growth Forecast contained in the Draft 2008 RTP. The draft Policy Forecast base maps and housing and employment forecasts for Census Tracts 320.23 and 320.56 in South Orange County do not accurately reflect the existence of SR 241, Foothill Transportation Corridor South (FTC-S), as included in the Regional Transportation Plan (RTP).

1. SR 241/FTC-S has been included SCAG's Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) since 1991 as a toll road project that will be constructed and operating before 2035.
2. SR 241/FTC-S is not depicted consistently on SCAG's draft 2035 Policy Forecast maps. For example, SR 241/FTC-S has been mistakenly left off "TAZs Showing Draft Policy Growth Forecast Greater Than Draft Baseline (Employment) Orange County Council of Governments" or on "TAZs Showing Draft Policy Growth Forecast Greater Than Draft Baseline (Housing) Orange County Council of Governments." Instead, the maps show SR 241 terminating at Oso Parkway. Both of these maps are used by SCAG in public presentations and are available on SCAG's website.  
([http://www.scag.ca.gov/forecast/downloads/maps/TAZ\\_GF\\_Employment\\_Orange.jpg](http://www.scag.ca.gov/forecast/downloads/maps/TAZ_GF_Employment_Orange.jpg)), and  
[http://www.scag.ca.gov/forecast/downloads/maps/TAZ\\_GF\\_Household\\_Orange.jpg](http://www.scag.ca.gov/forecast/downloads/maps/TAZ_GF_Household_Orange.jpg))

The SR 241/FTC-S project schedule calls for two lanes in each direction to open to traffic in 2013, with three lanes in each direction by 2030; this updated project schedule will be incorporated into the 2008 RTP and RTIP.

Thomas E. Margro, Chief Executive Officer

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COMMENT LETTER 24

Mr. Mark Butala.– SCAG  
January 22, 2008  
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3. SR 241/FTC-S is a key example in the SCAG region of a privately-financed toll road. Toll roads are a major feature in SCAG's forthcoming 2008 RTP. Toll road construction bonds must be repaid from toll revenue. SR 241/FTC-S is also a Transportation Control Measure in the RTP and South Coast Air Quality Management Plan (AQMP) that is supposed to receive priority for completion due to its air quality benefits to the transportation system. However, SCAG's draft Policy Forecast eliminates substantial revenue-producing resident and employment population on the corridor that has been projected since 1991. Thus, the draft Policy Forecast undercuts the air quality goals and Transportation Control Measures of the RTP and AQMP.

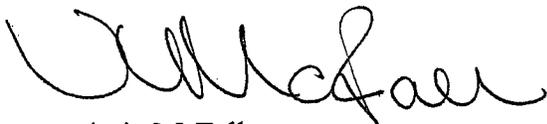
The TCA requests that SCAG remedy these South Orange County inconsistencies in the final 2008 RTP and Policy Forecast:

- We request that all RTP base maps, including the Policy Forecast base maps, accurately depict the SR 241/FTC-S alignment in South Orange County.
- We further request that SCAG convene a stakeholder meeting prior to the RTP comment deadline on February 18th to resolve this issue. The meeting should include representatives from TCA, the County of Orange, OCTA, the Orange County Council of Governments, and any other South Orange County jurisdictions affected by the redistribution of the draft Policy Forecast.

Thank you for your prompt attention to this matter. I look forward to your response at your earliest convenience. Please contact me at 949-754-3475 or at [mcfall@sjhtca.com](mailto:mcfall@sjhtca.com).

Sincerely,

TRANSPORTATION CORRIDOR AGENCIES



Valarie McFall  
Acting Deputy Director  
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## COMMENT LETTER 24

### OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Overall comments on the mitigation measures:

1. Please clarify and define the entity or entities that would be responsible for each mitigation measure. Several of the measures include entities that do not have authority to implement the measure.
2. Please use consistent language to identify responsible entities. It appears that the term “Project sponsor” and “Project Implementation Agency,” among other terms are used interchangeably but not consistently in the mitigation measures.

Mitigation Measure	Comments/Recommendations
<b>Energy</b>	
MM-EN.15: Local agencies should streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.	<ol style="list-style-type: none"> <li>1. Change language to: <i>MM-EN.15: Local <del>agencies</del> <u>governments</u> should, <u>as practical and feasible</u>, streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.</i></li> </ol>
MM-EN.16: Local agencies should adopt a “Green Building Program” to promote green building standards. Green buildings can reduce local environmental impacts, regional air pollutant emissions and global greenhouse gas emissions. Green building standards involve everything from energy efficiency, usage of renewable resources and reduced waste generation and water usage. For example, water-related energy use consumes 19 percent of the state’s electricity. The residential sector accounts for 48 percent of both the electricity and natural gas consumption associated with urban water use. While interest in green buildings has been growing for some time, cost has been a main consideration as it may cost more up front to provide energy-efficient building components and systems. Initial costs can be a hurdle even when the installed systems will save money over the life of the building. Energy efficiency measures can reduce initial costs, for example, by reducing the need for oversized air conditioners to keep buildings comfortable. Undertaking a more comprehensive design approach to building sustainability can also save initial costs through reuse of building materials and other means.	<ol style="list-style-type: none"> <li>1. More clearly define and clarify “local agencies”.</li> <li>2. Replace language with: <i>Local governments should develop programs to reduce overall energy consumption.</i></li> <li>3. Additional text in the mitigation measure after the first sentence should be included in the text of the document and it unnecessary in the mitigation measure.</li> </ol>

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Mitigation Measure	Comments/Recommendations
<p>A comprehensive study of the value of green building savings is the 2003 report to California’s Sustainable Building Task Force. In the words of the report: “While the environmental and human health benefits of green building have been widely recognized, this comprehensive report confirms that minimal increases in upfront costs of about 2% to support green design would, on average, result in life cycle savings of 20% of total construction costs -- more than ten times the initial investment. For example, an initial upfront investment of up to \$100,000 to incorporate green building features into a \$5 million project would result in a savings of \$1 million in today’s dollars over the life of the building.”</p>	<p>Statement is not a mitigation measure.</p> <ol style="list-style-type: none"> <li>1. Move text to the discussion section of the document and remove from the mitigation monitoring program.</li> </ol>
<p>MM-EN.17: Local governments should alter zoning to improve jobs/housing balance and creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel. Creating walkable, transit oriented nodes would generally reduce energy use and greenhouse gas emissions. Residential energy use (electricity and natural gas) accounts for 14 percent of California’s greenhouse gas emissions. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods. In addition, mixed land uses (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation have been shown to save consumers up to 512 gallons of gasoline per year. Furthermore, studies have shown that the type of housing (such as multi-family) and the size of a house have strong relationships to residential energy use. Residents of single family detached housing consume over 20 percent more primary energy than those of multifamily housing and 9 percent more than those of single-family attached housing.</p>	<ol style="list-style-type: none"> <li>1. Change language to: <i>MM-EN.17: Local governments should <del>alter zoning to improve</del> <u>consider</u> jobs/housing balance and, <u>to the extent practical and feasible,</u> <u>encourage the development of</u> <del>creating</del> communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel.</i></li> <li>2. All text after first sentence is descriptive not necessary to include it in the mitigation monitoring program as it is not an action placed on a responsible agency. Move to impact discussion and results sections</li> </ol>

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Mitigation Measure	Comments/Recommendations
MM-EN.23: Project sponsors should consider the most cost-effective alternative and renewable energy generation facilities.	<ol style="list-style-type: none"> <li>1. This is most applicable to energy providers and is outside the authority of SCAG. Therefore, please delete this measure.</li> </ol>
MM-EN.24: Project sponsors should ensure that new buildings incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	<ol style="list-style-type: none"> <li>1. More clearly define and clarify “Project sponsors”.</li> <li>2. Change text to: <i>MM-EN.24: Project sponsors should ensure that, <u>to the extent feasible</u>, new buildings incorporate solar panels in roofing and tap other ...</i></li> </ol>
MM-EN.25: Project sponsors should require energy efficient design for buildings. This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.	<ol style="list-style-type: none"> <li>1. More clearly define and clarify “Project sponsors”.</li> <li>2. Change text to: <i>MM-EN.25: Project sponsors should require <u>encourage</u> energy efficient design for buildings. This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.</i></li> </ol>
MM-EN.26: Project sponsors should fund and schedule energy efficiency “tune-ups” of existing buildings by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, hot water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.)	<p>Project sponsors do not have authority over existing buildings. This mitigation measure is not related to growth from transportation projects.</p> <ol style="list-style-type: none"> <li>1. This mitigation measure should be removed.</li> </ol>
MM-EN.27: Project sponsors should provide individualized energy management services for large energy users.	<p>This mitigation measure is not under the purview of SCAG, transportation agencies, or local governments. This would need to be a requirement of electric utility providers.</p> <ol style="list-style-type: none"> <li>1. This mitigation measure should be removed.</li> </ol>
MM-EN.28: Project sponsors should require the use of energy efficient appliances and office equipment.	<ol style="list-style-type: none"> <li>1. More clearly define and clarify “Project sponsors”.</li> <li>2. Change text to: <i>MM-EN.25: Project sponsors should require <u>encourage</u> the use of ...</i></li> </ol>

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Mitigation Measure	Comments/Recommendations
<p>MM-EN.32: Project sponsors should incorporate on-site renewable energy production (through, e.g., participation in the California Energy Commission’s New Solar Homes Partnership). Require project proponents to install solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.</p>	<p>This measure should be specific as to the types of projects it applies to. All development and redevelopment projects are currently subject to Title 24 requirements for energy efficiency.</p> <ol style="list-style-type: none"> <li>1. More clearly define and clarify “Project sponsors”.</li> <li>2. Change text to: <i>Project sponsors should <b>encourage</b> on-site renewable energy production (through, e.g., participation in the California Energy Commission’s New Solar Homes Partnership). Require project proponents to <u>such as the installation of</u> solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.</i></li> </ol>
<p>MM-EN.34: Project sponsors should provide public education and publicity about energy efficiency programs and incentives.</p>	<ol style="list-style-type: none"> <li>1. Change text to: <i>Project sponsors <b>Local governments</b> should <b>encourage</b> public education and publicity about energy efficiency programs and incentive <u>in cooperation with local utility providers.</u></i></li> </ol>
<p>MM-EN.35: In some instances, a project sponsor may find that measures that will directly reduce a project’s greenhouse gas emissions are insufficient. A lead agency may consider whether carbon offsets would be appropriate. The project proponent could, for example, fund off-site projects (e.g., alternative energy projects) that will reduce carbon emissions, or could purchase “credits” from another entity that will fund such projects. The lead agency should ensure that any mitigation taking the form of carbon offsets is specifically identified and that such mitigation will in fact occur.</p>	<ol style="list-style-type: none"> <li>1. Change text to: ... <b>If a regional carbon trading system is established a</b> <i>A lead agency may consider whether carbon offsets would be <u>an</u> appropriate <u>means of project mitigation.</u></i></li> </ol>

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Mitigation Measure	Comments/Recommendations
<p>MM-EN.36: Project sponsors should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> <li>• Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure</li> <li>• Land use and planning strategies to increase biking and walking trips</li> </ul>	<p>1. Please delete this measure as it is a duplicate of MM-EN.17.</p>
<p>MM-EN.37: Project sponsors and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p>	<p>Land use strategies are the responsibility of local governments.</p> <p>1. Change language to <i>Project sponsors and local governments should <u>encourage</u> green building measures into project design and zoning such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings <u>could include the following examples:</u>...</i></p>
<b>Land Use</b>	
<p>MM-LU.11: Local governments should adopt and implement General Plan Housing Elements that accommodate the housing need identified through the RHNA process. Affordable housing should be provided consistent with the RHNA income category distribution adopted for each jurisdiction.</p>	<p>This measure is not necessary as it duplicates the mitigation stated in MM-LU.10</p> <p>1. Please delete this duplicate measure.</p>
<p>MM-LU.13: Local governments and subregional organizations should develop ordinance and other programs which will enable and assist in the cleanup and redevelopment of brownfield sites.</p>	<p>Subregional organizations do not have the authority to develop ordinances.</p> <p>1. Change language to: <i>Local governments and subregional organizations should develop ordinances and other programs which will to enable and assist in <u>to encourage</u> the cleanup and redevelopment of brownfield sites.</i></p>

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Mitigation Measure	Comments/Recommendations
<p>MM-LU.14: Local governments and subregional organizations should develop adaptive reuse ordinances and other programs that will enable the conversion of vacant or aging commercial, office and some industrial properties to housing and mixed-use housing.</p>	<p>Subregional organizations do not have the authority to develop ordinances. Additionally, local governments should determine the best use of the site based on conditions and constraints present at the site.</p> <ol style="list-style-type: none"> <li>1. Change language to: <i>MM-LU.14: Local governments <del>and subregional organizations</del> should develop adaptive reuse ordinances and other programs, <u>where practical and feasible</u>, that will enable the conversion of <del>vacant or aging</del> <u>underutilized</u> commercial, office and/or industrial properties <del>for</del> <u>to</u> housing and <u>or</u> mixed-use <del>housing</del> <u>developments</u>.</i></li> </ol>
<b>Open Space</b>	
<p>MM-OS.23: Project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth that accompanies transportation projects/improvements.</p>	<p>This mitigation measure was derived from the Regional Comprehensive Plan which has not completed a public review process nor has the Regional Council approved the RCP or adopted all of the policies contained within.</p> <p>This measure is not necessary as it duplicates the mitigation stated in MM-O.15</p> <ol style="list-style-type: none"> <li>1. Please delete this duplicate measure.</li> </ol>
<p>The mitigation measures listed above for impacts 3.10-1 through 3.10-3 shall be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.</p>	<ol style="list-style-type: none"> <li>1. Please clarify what are Tier 2 projects</li> <li>2. Please clarify how these measures would be applied.</li> <li>3. Please change language to: <i>The Mitigation measures listed above for impacts 3.10-1 through 3.10-3 shall <u>would</u> be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.</i></li> </ol>

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Mitigation Measure	Comments/Recommendations
<p>MM-OS.34: Project level mitigation for significant cumulative and growth inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG.</p>	<p>At this time, SCAG does not have the authority to facilitate compacts or agreements regarding open space and, as such, the language should be removed from the measure.</p> <ol style="list-style-type: none"> <li>1. Please change language to: <i>Project level mitigation for significant cumulative and growth inducing impacts on open space resources will <b>should</b> include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG.</i></li> </ol>
<p>MM-OS.35: Local governments should establish transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands. Local governments should also consider the following:</p> <ul style="list-style-type: none"> <li>• Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land.</li> <li>• Easing restrictions on farmer’s markets and encourage cooperative farming initiatives to increase the availability of locally grown food.</li> <li>• Considering partnering with school districts to develop farm-to-school programs</li> </ul>	<p>Transfer of development rights programs are complex and costly to implement. While they are a valuable tool for the preservation of open space, they are not the only tool available, as indicated by the list of options in the measure.</p> <ol style="list-style-type: none"> <li>1. Please change language to: <i>MM-OS.35: Local governments should establish <b>programs to</b> transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure, <b>where possible,</b> the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands. Local governments should also consider the <b>The following are offered as examples of programs:</b></i> <ul style="list-style-type: none"> <li>• <i><b>The development or participation in transfer of</b></i></li> </ul> </li> </ol>

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Mitigation Measure	Comments/Recommendations
	<p align="center"><u><i>development rights programs to encourage the preservation of agricultural lands....(Include all other items listed</i></u></p> <ul style="list-style-type: none"> <li>• <i>Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land.</i></li> <li>• <i>Easing restrictions on farmer’s markets and encourage cooperative farming initiatives to increase the availability of locally grown food.</i></li> <li>• <i>Considering partnering with school districts to develop farm-to-school programs</i></li> </ul>
<p>MM-OS.41: Project sponsors and local governments should increase the accessibility to natural areas lands for outdoor recreation.</p>	<p>This mitigation measure was derived from the Regional Comprehensive Plan which has not completed a public review process nor has the Regional Council approved the RCP or adopted all of the policies contained within.</p> <p>This mitigation measure does not address the stated impact and could create additional impacts with implementation.</p> <ol style="list-style-type: none"> <li>1. Please remove per statements above.</li> </ol>
<p>MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p>It is not clear how this will mitigate the impact.</p> <ol style="list-style-type: none"> <li>1. More clearly define and clarify “Project sponsors”.</li> </ol> <p>From Anaheim: It is not clear how this will mitigate the impact. The following is offered as clarification: <i>MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to revitalize existing communities <u>encourage the efficient use of land and minimize the development of agricultural and open space lands.</u></i></p>

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<b>Mitigation Measure</b>	<b>Comments/Recommendations</b>
<p>MM-OS.43: Project sponsors should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.</p>	<p>This mitigation measure is not related to stated impact.</p> <p>This measure is not necessary as it duplicates the mitigation previously addressed in MM-EN.36</p> <ol style="list-style-type: none"> <li>1. Please delete this duplicate measure.</li> </ol>
<p>MM-OS.45: Project sponsors and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.</p>	<p>This measure is most applicable to local governments as many project sponsors will have minimal ability to affect land use.</p> <ol style="list-style-type: none"> <li>1. Please change language to: <i>MM-OS.45: Project sponsors and <del>the</del> local governments ...</i></li> </ol>
<p><b>Public Services</b></p>	
<p>Overall comments on MM-PS.8 through MM-PS.14 and MM-PS.21 through MM-PS.24</p>	<p>These measures are taken from the draft Regional Comprehensive Plan which has not yet completed its full public review process. The measures listed represent significant regional policy that has yet to be adopted by the region. As such, it is not appropriate to include the measures as mitigation in this document.</p> <ol style="list-style-type: none"> <li>1. Please delete these measures.</li> <li>2. If the measures are not deleted, please incorporate the text changes indicated below to reflect that the measures have not received regional approval.</li> </ol>

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Mitigation Measure	Comments/Recommendations
<p>MM-PS.7: Project implementation agencies shall integrate green building measures into project design such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures would include the following:</p> <ul style="list-style-type: none"> <li>• Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>• The inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>• Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.).</li> <li>• Reuse of existing structure and shell in renovation projects.</li> <li>• Design for deconstruction without compromising safety.</li> <li>• Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components.</li> <li>• Development of indoor recycling program and space.</li> </ul>	<p>1. Please change the language to: <i>MM-PS.7: Project implementation agencies <del>shall</del> <u>should</u> integrate green building measures into project design such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures <del>would</del> <u>could</u> include the following: ...</i></p>
<p>MM-PS.8: Project implementation agencies shall discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, landfills should be sited with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.</p>	<p>Most project implementation agencies, including most local governments and the county transportation commissions do not have authority or purview over the siting of new landfills. This measure would need to be applicable to the appropriate agency.</p> <ol style="list-style-type: none"> <li>1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency.</li> <li>2. Please change the word “shall” to “should.”</li> </ol>

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Mitigation Measure	Comments/Recommendations
<p>MM-PS.9: Project implementation agencies shall discourage exporting of locally generated waste outside of the SCAG region. Disposal within the county where the waste originates shall be encouraged as much as possible. Green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMP and RTP policies should be required.</p>	<ol style="list-style-type: none"> <li>1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency.</li> <li>2. In all locations, please change the word “shall” to “should.”</li> </ol>
<p>MM-PS.10: Project implementation agencies shall adopt Zero Waste goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.</p>	<ol style="list-style-type: none"> <li>1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency.</li> <li>2. Please change the language to: <i>MM-PS.10: Project implementation agencies shall adopt <u>should encourage Zero Waste waste reduction</u> goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.</i></li> </ol>
<p>MM-PS.11: Project implementation agencies shall build local markets for waste prevention, reduction, and recycling practices.</p>	<ol style="list-style-type: none"> <li>1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency.</li> <li>2. Please change the language to: <i>MM-PS.11: Project implementation agencies shall <u>Waste management agencies and companies should encourage build the development of</u> local markets for waste prevention, reduction, and recycling practices.</i></li> </ol>
<p>MM-PS.12: Project implementation agencies shall develop ordinances that promote waste prevention and recycling such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and instituting ordinances to divert food waste away from landfills and toward food banks and composting facilities.</p>	<ol style="list-style-type: none"> <li>1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency.</li> <li>2. Please change the language to: <i>MM-PS.12: Project implementation agencies shall develop ordinances that promote <u>should encourage</u> waste prevention and recycling such as: requiring <u>such as developing programs for</u> waste prevention and recycling efforts at all large events and venues; implementing <u>implementation of</u> recycled content procurement programs; and instituting ordinances to <u>developing opportunities to</u> divert food waste away from landfills and toward food banks and composting facilities.</i></li> </ol>

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<b>Mitigation Measure</b>	<b>Comments/Recommendations</b>
MM-PS.13: Project implementation agencies shall develop environmentally friendly alternative waste management strategies such as composting, recycling, and conversion technologies.	1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency.
MM-PS.14: Project implementation agencies shall develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. Please change the language to: <i>MM-PS.14: Project implementation agencies shall <u>should, where practical and feasible and in coordination with waste management agencies,</u> develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.</i>
MM-PS.21: Project implementation agencies shall coordinate regional approaches and strategic siting of waste management facilities.	1. Per the discussion on MM-PS.8, please clarify who would be responsible for this measure ensuring that it is an appropriate agency.
MM-PS.22: Project implementation agencies shall facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. Please change the language to: <i>MM-PS.22: Project implementation agencies shall <u>should encourage and, where practical and feasible,</u> facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material. <del>by making priority funding available for projects that involve co-location of facilities</del></i>

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<b>Mitigation Measure</b>	<b>Comments/Recommendations</b>
<p>MM-PS.23: Project implementation agencies shall prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities in conjunction with existing waste management or material recovery facilities.</p>	<ol style="list-style-type: none"> <li>1. Per the discussion on MM-PS.8, please clarify who would be responsible for this measure ensuring that it is an appropriate agency.</li> <li>2. Please change the language to: <i>MM-PS.23: Project implementation agencies shall <b>should</b> prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities in conjunction with existing waste management or material recovery facilities.</i></li> </ol>
<p>MM-PS.24: Project implementation agencies shall increase programs to educate the public and increase awareness of reuse, recycling, composting, and green building benefits and raise consumer education issues at the county and city level, as well as at local school districts and education facilities.</p>	<ol style="list-style-type: none"> <li>1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency.</li> <li>2. Please change the word “shall” to “should.”</li> </ol>
<b>Water</b>	
<p>MM-W.20: Local governments should encourage Low Impact Development and natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments.</p>	<ol style="list-style-type: none"> <li>2. Please change language to: <i>MM-W.20: Local governments should, <b>where practical and feasible,</b> encourage Low Impact Development and <b>the incorporation of</b> natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments.</i></li> </ol>
<p>MM-W.21: Local governments should implement green infrastructure and water-related green building practices through incentives and ordinances. Green building resources include the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.</p>	<ol style="list-style-type: none"> <li>1. Please change language to: <i>MM-W.21: Local governments should implement, <b>where practical and feasible,</b> green infrastructure and water-related green building <b>practices</b> through incentives and ordinances. Green building resources include the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.</i></li> </ol>

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<b>Mitigation Measure</b>	<b>Comments/Recommendations</b>
<p>MM-W.23: Developers, local governments, and water agencies should maximize permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</p>	<p>1. Please change language to: <i>MM-W.23: Developers, local governments, and water agencies should maximize, <u>where practical and feasible</u>, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</i></p>
<p>MM-W.24: SCAG shall continue to work with local jurisdictions and water quality agencies, through its Water Policy Task Force and other means, to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur during as part of SCAG’s ongoing regional planning efforts.</p>	<p>SCAG should recognize and incorporate existing regional water planning efforts and not duplicate existing efforts. SCAG is encouraged to coordinate with these existing programs and processes.</p> <p>1. Please change language to: <i>MM-W.24: SCAG shall continue to work with local jurisdictions and water quality agencies, through its Water Policy Task Force and other means, to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided, <u>to the extent practical and feasible</u>, through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur <u>as part of current and existing regional coordination efforts and during as part of with additional coordination opportunities provided through</u> SCAG’s ongoing regional planning efforts.</i></p>

24 cont.

**COMMENT LETTER 24**

**OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report**

Mitigation Measure	Comments/Recommendations
<p>MM-W.25: SCAG shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge. Future adverse impacts shall be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region. Meetings of SCAG’s Water Policy Task Force and Regional Council offer an opportunity for local jurisdictions and water agencies to share information and strategies for improving regional performance in these efforts.</p>	<p>1. Please change language to: <i>MM-W.25: SCAG shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge, <b><u>including consideration of alternative recharge technologies.</u></b> Future adverse impacts shall be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region. Meetings of SCAG’s Water Policy Task Force and Regional Council offer an opportunity for local jurisdictions and water agencies to share information and strategies for improving regional performance in these efforts.</i></p>
<p>MM-W.30: Project developers and agencies should consider potential climate change hydrology and attendant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.</p>	<p>The methodology and base data necessary for these analyses are still being developed. Further, local water agencies and project developers must rely on regional water agencies to establish the analysis such that they can incorporate it into the water plans.</p> <p>1. Please change language to: <i>MM-W.30: <del>Project developers and</del> <b><u>Regional water</u></b> agencies should consider, <b><u>to the extent feasible,</u></b> potential climate change hydrology and attendant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.</i></p>
<p>MM-W.33: SCAG shall encourage the kind of regional coordination throughout California and the Colorado River Basin that develops and supports sustainable policies in accommodating growth.</p>	<p>Because existing regional programs currently exist to address these issues,</p> <p>1. Please change language to: <i>MM-W.33: SCAG, <b><u>in coordination with regional water agencies,</u></b> shall encourage the kind of regional coordination throughout California and the Colorado River Basin that develops and supports sustainable policies in accommodating growth.</i></p>

24 cont.

COMMENT LETTER 24

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-W.34: SCAG shall facilitate information sharing about the management and status of the Sacramento River Delta, the Colorado River Basin, and other water supply source areas of importance to local water supply.	Because existing regional programs currently exist to address these issues, <i>1. Please change language to: MM-W.34: SCAG, <u>in coordination with regional water agencies</u>, shall facilitate information sharing about the management and status of the Sacramento River Delta, the Colorado River Basin, and other water supply source areas of importance to local water supply.</i>

24 cont.

COMMENT LETTER 24

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
<p>MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG’s ongoing regional planning efforts. SCAG’s Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions:</p> <ul style="list-style-type: none"> <li>• Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand.</li> <li>• Involve the region’s water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions.</li> <li>• Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects.</li> <li>• Promote water-efficient land use development.</li> <li>• The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region’s water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.</li> </ul>	<p>1. Because existing regional programs currently exist to address these issues, please change language to:</p> <p><i>MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG’s ongoing regional planning efforts <b><u>in coordination with regional water agencies</u></b>. SCAG’s Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions:</i></p> <ul style="list-style-type: none"> <li>• <i>Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand.</i></li> <li>• <i>Involve the region’s water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions.</i></li> <li>• <i>Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects.</i></li> <li>• <i>Promote water-efficiency <b><u>in land</u></b> <del>land use</del> development.</i></li> <li>• <i>The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region’s water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.</i></li> </ul>

24 cont.



COMMENT LETTER 25

ORANGELINE HIGH SPEED MAGLEV

The Orangeline Development Authority is a joint powers agency formed to pursue deployment of the Orangeline High Speed Maglev system in Southern California. The Authority is composed of the following public agencies:

- City of Artesia
- City of Bell
- City of Bellflower
- City of Cerritos
- City of Cudahy
- City of Downey
- City of Huntington Park
- City of Los Alamitos
- City of Maywood
- City of Palmdale
- City of Paramount
- City of Santa Ana\*
- City of Santa Clarita
- City of South Gate
- City of Vernon

February 19, 2008

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

Subject: COMMENTS ON THE DRAFT 2008 REGIONAL TRANSPORTATION PLAN AND PROGRAM ENVIRONMENTAL IMPACT REPORT

Dear Ms. Kirchner,

The Orangeline Development Authority appreciates the opportunity to provide comments on the Southern California Association of Governments Draft 2008 Regional Transportation Plan and on the Program Environmental Impact Report (PEIR).

You will find our comments in the attachment hereto. We request that the attached comments, in their entirety, be added to and included in the public record of comments submitted to SCAG on the Plan and on the Draft PEIR.

Sincerely,

Kirk Cartozian,  
Chair

C: Authority Board of Directors  
General Counsel  
Executive Director

**ATTACHMENT**

1. Orangeline Development Authority Comments on the Southern California Association of Governments Draft 2008 Regional Transportation Plan and Program Environmental Impact Report, February 19, 2008

Supporting Agencies

- Gateway Cities Council of Governments
- Southern California Association of Governments
- City of Garden Grove
- City of Huntington Beach
- City of Long Beach
- City of Stanton

\*City Council has approved City joining the Authority

Orangeline Development Authority  
16401 Paramount Boulevard • Paramount • California 90723 • USA • [www.orangeline.calmaglev.org](http://www.orangeline.calmaglev.org)  
[info@calmaglev.org](mailto:info@calmaglev.org) • Phone 310.871.1113 • Fax 562.924.0152

**Orangeline Development Authority**  
Comments on the  
Southern California Association of Governments  
Draft 2008 Regional Transportation Plan and  
Program Environmental Impact Report  
February 19, 2008

The Orangeline Development Authority, a joint powers authority of 14 cities in Los Angeles and Orange Counties, is pursuing development of a significant part of the High Speed Regional Transport (HSRT) system envisioned in the Draft 2008 Regional Transportation Plan (RTP). The RTP Draft Program Environmental Impact Report (DPEIR) identifies the Authority’s project as the “HSRT Orangeline” (Page 1-4).

The Authority was formed in March 2003 following completion of high-speed regional transport feasibility studies undertaken by the Southern California Association of Governments (SCAG) that confirmed the potential viability of several privately-funded high-speed maglev lines serving Southern California. This network of high-speed maglev lines is contained as an element of the 2004 Regional Transportation Plan. (See Chapter 4 – Maglev System, Exhibit 4-9.)

The Orangeline High Speed Maglev Corridor Development Project evolved from further planning studies pursuant to SCAG Regional Council policy adopted on December 5, 2002. The project entails a 108-mile transportation corridor from Irvine to Palmdale and includes implementation of high speed service for both passengers and freight using available and proven high speed maglev technology, combined with transit-oriented development centered on the proposed stations and feeder transit services.

The Draft PEIR indicates that the Orangeline was not included in the quantitative modeling for the 2008 RTP and that the addition of the project does not make a sufficient difference such that it would change any of SCAG’s conclusions presented in the Draft RTP PEIR. This may be true from a regional perspective. Never-the-less, a key objective and anticipated impact of the Orangeline is the reduction in auto dependence and vehicle miles traveled, which in turn will result in dramatic air quality, energy and other environmental benefits for the project corridor cities, including: Anaheim, Artesia, Bell, Bellflower, Buena Park, Burbank, Cerritos, Cudahy, Cypress, Downey, Garden Grove, Glendale, Huntington Park, Irvine, Los Alamitos, Los Angeles, La Palma, Maywood, Palmdale, Paramount, San Fernando, Santa Ana, Santa Clarita, South Gate, Stanton, Tustin and Vernon.

1

A number of these cities and others, particularly those located in the 27-member city Gateway Cities Council of Governments sub-region of southeast Los Angeles County, experience disproportionately high concentrations of harmful motor vehicle emissions and higher rates of asthma, heart disease, cancer and other adverse and life threatening impacts. For these cities, in particular, the addition of the Orangeline High Speed Maglev project does make a significant difference in the quality of life of the citizens who have few options but driving a car for mobility and access, and who are impacted by high concentrations of truck traffic tied to the movement of cargo through their communities. These cities are carrying a heavy burden for the benefit of the entire region and the nation. A high proportion of the population of these cities is comprised of lower-income residents and workers who are heavily dependent on public transit services that do not offer the higher level of regional access and mobility provided by the automobile. For this reason, the Orangeline is a key project for addressing the goals of environmental justice.

2

## COMMENT LETTER 25

Importantly, the Orangeline project's significant benefits rely primarily on private investment and not public tax expenditures. Thus, the Orangeline High Speed Maglev makes a significant difference in achieving positive air quality benefits in terms of the return on public investment in the Orangeline. The anticipated air quality, transportation and economic benefits are quantified in the Authority's preliminary engineering studies, which are documented and made available on the Orangeline High Speed Maglev website: [www.orangeline.calmaglev.org](http://www.orangeline.calmaglev.org).

2 cont.

The Authority conducted a maglev freight feasibility study in 2005, the first in the region, to assess the potential for carrying cargo containers from the San Pedro Bay ports to inland inter-modal facilities in Palmdale and Victorville using maglev technology that is currently proven and in commercial operation in Shanghai, China. Positive results of this study led the Authority to conclude that such a system is feasible and to include further development of a cargo freight component from the ports to an inland facility in Palmdale in the next project development phase. Inclusion of this component adds to the project's positive air quality impacts and other benefits by reducing truck traffic in the corridor and reducing diesel emissions, traffic congestion, delays and accidents.

In addition to the direct air quality benefits that are generated by implementation of Orangeline High Speed Maglev service, the project will create additional air quality benefits by creating higher-density, transit oriented development along the 108-mile corridor. The effect will be to reduce auto travel in the corridor and the pollution that would otherwise result from increased dependence on auto travel. As such, the project supports and is fully consistent with the SCAG COMPASS Program.

The Authority understands that the significant air quality benefits of the Orangeline High Speed Maglev are not accounted for in the DRAFT RTP or in the Draft PEIR. Actually, the Orangeline High Speed Maglev will enable the RTP to achieve a higher level of air quality benefits than is predicted in the Draft PEIR. This "surplus" benefit will help to counter the uncertainty of air quality improvements anticipated from various strategies contained in the Draft RTP – strategies that the Plan relies on to meet state and federal air quality mandates.

3

Inclusion of the Orangeline High Speed Maglev in the RTP reduces the risks of the region not being able to meet air quality requirements and the potential risk of state and federal sanctions that could jeopardize funding for the RTP program of projects.

## COMMENT LETTER 26

### SCAG Draft RTP PEIR

February 18, 2008

Comments by Tom Politeo  
Sierra Club Harbor Vision Task Force  
tom@politeo.net

The Southern California region will never solve its transportation problems until it manages to solve its problems with urban decay and blight. These problems in turn contribute to urban flight and sprawl.

All our efforts to reduce toxic and greenhouse gas emissions, noise, urban runoff, and time lost in traffic jams will be for naught if we do not deal with the root causes of high demand for transportation in Southern California.

So far, the primary strategy that the government has used to solve our transportation problem is to build more highways and freeways for commuters and goods movement and to work vigorously to reduce the adverse effects of transportation technology by seeking stricter mandates regarding tailpipe exhaust.

Though this strategy has had some success in the past half century, it has failed to bring us to attainment already and will fail to bring us to attainment by very reasonable, long term deadlines that are looming ahead of us.

Increasingly, a common response to this shortfall has been to weaken the objective to one that we might possibly be able to meet. To some, this may be a dose of realism. To others, who have lived an entire life in a polluted basin, this seems is an abdication of responsibility.

The approach we have taken, of building more highway capacity to deal with our transportation problems is like dealing with a drug problem by handing out more drugs. All we have done is feed an virtual addiction to an automobile-based lifestyle which is unhealthful in its sedentary nature. For every roadway we have built, all we have done is increase demand for more.

Virtually every freeway we have ever built has been filled to over capacity, either with commuters, shoppers, big-rig truck drivers or people going on a weekend jaunt. Over the years, it seems that the the useful life of a new roadway project or expansion has been getting shorter. Each expansion has simply fueled the fire for additional demand.

The rise in demand is not simply due to a population increase. Per-capita demand has risen dramatically as well. In 1950, as our region embarked on freeway construction, a one-car family comprised a typical household. Mom and dad might share a car. Teens were much less likely to be drivers, and annual milage was lower.

1

## COMMENT LETTER 26

In 1950, most Southern California communities had a functional downtown area, where people shopped and worked close to home.

By 1960, there were few one-car families left. Both mom and dad had a car, and teens were well on their way to having their own cars. Old downtown areas were beginning to collapse as national stores packed up their bags and moved to newly build regional shopping malls in our suburbs. These regional malls and the bedroom communities that went up around them (Lakewood being an early example), forced people to hop in their car to do anything—because anything you might want or need to do was too far from home to walk to, or too far to bicycle to, or too far to readily take a bus to.

1 cont.

Cul-de-sac neighborhoods further aggravated the problem by blocking shorter or more practical routes for pedestrians, cyclists and public transit. Building purely bedroom communities with isolated, sprawling shopping centers, isolated parks and schools further forced people in to their cars.

Urban decay and rising traffic also increased the perception (and often times the reality) that our streets were less safe, encouraging more parents to drive children to school, even when walking distances remained reasonable. Today, roughly a quarter of morning and afternoon traffic in many communities is generated by dropping off and picking up students from school.

As old downtowns lost business to regional malls, they decayed, generating longer shopping trips. As large bedroom communities were built in the suburbs, without adequate local employment, commute trips became longer. As schools further decayed in older urban areas and other urban problems expanded, urban flight was further encouraged, commutes to work became longer.

As a result of these types of changes and more, Southern Californians are driving more than ever. Not just because there are more of us and more of us have cars than ever. But because each of us is driving more than we ever drove before.

None of what I said here is new or revelatory with respect to what has happened in our cities, not just in Southern California, but around the nation.

That said, if we don't acknowledge and confront these issues head on as part of developing an RTP, we will never solve the transportation problems we have. Mobility will decline. Toxic, greenhouse gas and noise pollution will remain intractable problems.

With a rising number of drivers and a rising per-capita demand for transportation coupled to a rapidly growing goods movement industry, we will never build our way out of the problems we face today. Nor will we ever mandate our way to good clean air and noise standards in any reasonable timeframe.

We need to look at the root causes of our demand for transportation, which is the failure

## COMMENT LETTER 26

to have adequate development standards that would:

- 1) Build balanced-use neighborhoods that provide housing and employment for all the walks-of-life needed to make a community work, from doctors to janitors, from corporate executives to independent businessmen. We need to ensure that work for both mom and dad can be and *is* close to home, so that neither is forced into a long commute.
- 2) Make it easier to do redevelopment and infill development than it is to do new development in outlying areas.
- 3) Provide local schools, parks and shopping opportunities that are in walking distance of home. Better availability of local shopping, entertainment and recreation opportunities that (when out of walking distance) are only a short drive from home (less than 3 Km).
- 4) Roadway designs that do not create obstacles for public transit.

2

Nor will we succeed until we deal square on with the problems that contribute to urban flight. These include:

- 1) Provide for a livable wage and benefits employment based to provide the income necessary to support property (through rent or home purchasing) and support a local tax base. Large areas of sub-minimum wage employment locks in urban blight and perpetuates the problems we face.

3

It takes about \$22 an hour to provide a livable or family wage in Southern California. Too many families struggle on near-minimum wages jobs, which creates a cascading burden on the families and in turn local and county governments,

- 2) Use funds that might be spend on roadway transportation to build better schools and parks, improve police and emergency services as well as other necessary municipal services *rather* than building new roadways and freeways. We need to remove significant urban problems that contributes to urban flight, because we cannot build our way out of the problem.

4

This is a key point. If we improve roadway capacity, we reduce the hurtle people face in making an "urban flight" decision, so all we do is encourage urban flight and greater dependence on transportation. Instead of making urban flight easier by building new roadways, we need to use limited government funds to reduce the causes of urban flight and enable people to revitalize the neighborhoods they already live in.

A relatively minor holiday is sufficient to let most freeways move at or close to the speed limit. A school holiday can significantly reduce transit times in local communities. These differences show that we could gain substantial improvements

## COMMENT LETTER 26

Arguably, these issues are "not in the scope" of the RTP. However, if we can't form an RTP that can hope to meet transit and pollution reduction goals (including greenhouse gasses and noise) without dealing with these sort of issues, then we must conclude that the process is flawed and inadequate.

*I respectfully request that you withdraw this RTP* and begin a new report that looks comprehensively at our transportation issues using a systems approach and that is open to making necessary recommendations, even if acting on those recommendations is beyond the mandate for SCAG to be able to enact.

We can then compare what we are currently able to accomplish (under existing regulatory and planning mechanisms) to what we need to accomplish (to deal with transportation-related issues). Then, we can understand the shortcomings with current methodology so that we can correct it. But, if we work within the limited scope currently available, we'll never be able to confirm that the scope is sufficient nor find answers that might be a more effective use of our taxpayer dollars.

Avoiding the root causes of our transportation demand in this RTP (trip reduction goals and methods are weak) is perhaps the worst form of segmentation or piecemealing in which we could engage. It relieves every development project from a true assessment in their impacts on the transportation system and deprives of the analysis we need to solve the serious problems we face.

The result of this failure will continue to disadvantage the region with respect to air quality, noise, quality of life and economics. All we'll do is squander our public funds on projects that cannot succeed and give us a false sense of security that we are making progress.

Thank your for your time and effort,

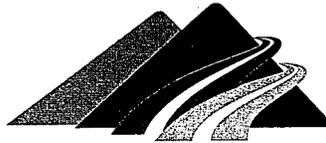
Tom Politeo  
tom@politeo.net

5

# COMMENT LETTER 27

San Joaquin Hills  
Corridor Agency

Chairman:  
Jim Dahl  
San Clemente



**TRANSPORTATION CORRIDOR AGENCIES**

Foothill/Eastern  
Corridor Agency

Chairman:  
Lance MacLean  
Mission Viejo

February 19, 2008

Jessica Meaney  
Southern California Association of Governments  
818 West Seventh Street  
Los Angeles, CA 90017-3435

**Subject: Comment on Draft 2008 Regional Transportation Plan**

Dear Ms. Meaney:

The Transportation Corridor Agencies (TCA) submits the following comments on the Draft 2008 Regional Transportation Plan (RTP) and Draft Program EIR.

TCA previously submitted comments pertaining to the regional growth forecast assumed in the Draft RTP, dated January 22, 2008. The comments and recommendations presented in that letter are incorporated by reference, and included as Attachment A to this letter.

In addition, we request the following revisions to the Draft RTP and corresponding sections of the Draft PEIR:

**1. RTP/RTIP Project Listing Clarifications**

**RTP Project Listing Report, page 96-99, and Modeled Projects List:** The project listings for the San Joaquin Hills Transportation Corridor (SR 73), Eastern Transportation Corridor (SR 241/261), Foothill Transportation Corridor-North (SR 241), and Foothill Transportation Corridor-South (SR 241) require updates as indicated in Attachment B in order to reflect the latest project information approved by the respective Boards' of Directors of the Foothill/Eastern Transportation Corridor Agency and the San Joaquin Hills Transportation Corridor Agency. These project description revisions must be reflected in the Project Listing Report appendix, which contains a comprehensive list of Orange County projects included in the RTP on pages 96 through 99.

Further, the updated project listings in Attachment B should be added to the Modeled Projects List in the Transportation Conformity Appendix of the RTP, and included in the final RTP conformity analysis.

**RTIP Project Listing Report, page 42:** Consistent with the revised project descriptions discussed above, improvements to the San Joaquin Hills, Eastern and Foothill-North

Thomas E. Margro, Chief Executive Officer

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**COMMENT LETTER 27**

Transportation Corridors are scheduled for the 2008/2009 through 2012/2013 timeframe. We request that these improvements, described in Attachment C, be listed in the Project Listing Report's Orange County RTIP section, starting on page 42. These near-term project improvements should also be referenced in SCAG's Timely Implementation report in the Transportation Conformity Report.

1 cont.

**2. Draft RTP, Page 55: Baseline Forecast as Basis for RTP.**

Consistent with our January 22, 2008, comment letter and federal requirements to base the RTP on the best available growth assumptions reflecting local plans and policies, we urge SCAG to base the final RTP upon the Baseline Forecast that reflects the latest approved development projects occurring in and around the SR 241 alignment. In light of project entitlements, a "Policy Forecast" distribution of growth in this area is both unlikely and at odds with the transportation and air quality strategy of the RTP which includes SR 241.

2

**3. Draft PEIR, Executive Summary, Mitigation Measures.**

We note that many mitigation measures proposed in the Draft PEIR are aimed mainly at impacts associated with the proposed "Policy Forecast" allocation of population, housing and employment growth, rather than transportation projects. Mitigation measures that do not address RTP transportation projects should be removed from the PEIR prior to certification.

3

For example, MM-EN.15 (local agencies should facilitate accelerated construction of solar and wind power), and MM-EN.34 (project sponsors should provide public education and publicity about energy efficiency programs), and MM-OS.23 (project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth) do not directly address transportation project impacts and are beyond the authority of transportation project sponsors.

Thank you for SCAG's written response to these comments. We look forward to amendments in the final Draft 2008 RTP and PEIR to make the recommended changes. Should you have any questions regarding these comments, please feel free to contact me at (949) 754.3475 or by e-mail at mcfall@sjhtca.com.

Sincerely,



Valarie McFall  
Acting Deputy Director  
Environmental Planning

cc: Jonathan Nadler, SCAG  
Philip Law, SCAG  
Rosemary Ayala, SCAG  
Tom Margro, TCA

San Joaquin Hills  
Corridor Agency

Chairman:  
Jim Dahl  
San Clemente



TRANSPORTATION CORRIDOR AGENCIES

Foothill/Eastern  
Corridor Agency

Chairman:  
Lance MacLean  
Mission Viejo

January 22, 2008

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

**Subject: Draft Policy Forecast for South Orange County**

Dear Mr. Butala:

The Transportation Corridor Agencies (TCA) is writing this letter to alert SCAG to inconsistencies that must be fixed in the Draft Policy Growth Forecast contained in the Draft 2008 RTP. The draft Policy Forecast base maps and housing and employment forecasts for Census Tracts 320.23 and 320.56 in South Orange County do not accurately reflect the existence of SR 241, Foothill Transportation Corridor South (FTC-S), as included in the Regional Transportation Plan (RTP). 4

1. SR 241/FTC-S has been included SCAG's Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) since 1991 as a toll road project that will be constructed and operating before 2035.
2. SR 241/FTC-S is not depicted consistently on SCAG's draft 2035 Policy Forecast maps. For example, SR 241/FTC-S has been mistakenly left off "TAZs Showing Draft Policy Growth Forecast Greater Than Draft Baseline (Employment) Orange County Council of Governments" or on "TAZs Showing Draft Policy Growth Forecast Greater Than Draft Baseline (Housing) Orange County Council of Governments." Instead, the maps show SR 241 terminating at Oso Parkway. Both of these maps are used by SCAG in public presentations and are available on SCAG's website.  
([http://www.scag.ca.gov/forecast/downloads/maps/TAZ\\_GF\\_Employment\\_Orange.jpg](http://www.scag.ca.gov/forecast/downloads/maps/TAZ_GF_Employment_Orange.jpg), and  
[http://www.scag.ca.gov/forecast/downloads/maps/TAZ\\_GF\\_Household\\_Orange.jpg](http://www.scag.ca.gov/forecast/downloads/maps/TAZ_GF_Household_Orange.jpg))

The SR 241/FTC-S project schedule calls for two lanes in each direction to open to traffic in 2013, with three lanes in each direction by 2030; this updated project schedule will be incorporated into the 2008 RTP and RTIP.

Thomas E. Margio, Chief Executive Officer

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COMMENT LETTER 27

Mr. Mark Butala.- SCAG  
January 22, 2008  
Page 2

- 3. SR 241/FTC-S is a key example in the SCAG region of a privately-financed toll road. Toll roads are a major feature in SCAG's forthcoming 2008 RTP. Toll road construction bonds must be repaid from toll revenue. SR 241/FTC-S is also a Transportation Control Measure in the RTP and South Coast Air Quality Management Plan (AQMP) that is supposed to receive priority for completion due to its air quality benefits to the transportation system. However, SCAG's draft Policy Forecast eliminates substantial revenue-producing resident and employment population on the corridor that has been projected since 1991. Thus, the draft Policy Forecast undercuts the air quality goals and Transportation Control Measures of the RTP and AQMP.

4 cont.

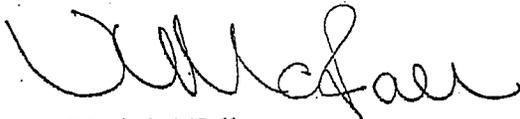
The TCA requests that SCAG remedy these South Orange County inconsistencies in the final 2008 RTP and Policy Forecast:

- We request that all RTP base maps, including the Policy Forecast base maps, accurately depict the SR 241/FTC-S alignment in South Orange County.
- We further request that SCAG convene a stakeholder meeting prior to the RTP comment deadline on February 18th to resolve this issue. The meeting should include representatives from TCA, the County of Orange, OCTA, the Orange County Council of Governments, and any other South Orange County jurisdictions affected by the redistribution of the draft Policy Forecast.

Thank you for your prompt attention to this matter. I look forward to your response at your earliest convenience. Please contact me at 949-754-3475 or at mcfall@sjhtca.com.

Sincerely,

TRANSPORTATION CORRIDOR AGENCIES



Valarie McFall  
Acting Deputy Director  
Environmental Planning

cc: Hassan Ihkrata, SCAG  
Lynn Harris, SCAG  
Frank Wen, SCAG

## COMMENT LETTER 27

### Attachment B RTP Project Descriptions, February 2008

5

The final phase of the San Joaquin Hills, Foothill-North and Eastern Transportation Corridors will be built segment by segment, in response to demand. The following project descriptions should be reflected in the RTP/RTIP project lists and transportation/conformity modeling:

#### **SCAG SR 73, San Joaquin Hills Transportation Corridor**

TCA 10254 SCAB 2022 CAR63 73 9.6 25.5 SJHTC, 15 MI TOLL RD BETWEEN I-5 IN SAN JUAN CAPISTRANO AND RTE 73 IN IRVINE, EXISTING 3 MF EA DIR. 1 ADD'L MF EA DIR, PLUS CLIMBING AND AUX LNS AS REQ, BY 2020 PER SCAG/TCA MOU 4/5/01. TCM.

Total Project Cost: \$343 million

#### **SCAG SR 241/261/133, Eastern Transportation Corridor**

TCA 0RA050 SCAB 2040 CAR62 241 12.4 38.8 ETC (RTE 241/261/133) (RTE 91 TO I-5/JAMBOREE) EXISTING 2 MF EA DIR, 2 ADD'L MF IN EA DIR, PLUS CLIMBING AND AUX LANES AS REQ BY 2020 PER SCAG/TCA MOU 4/05/01. TCM.

Total Project Cost: \$548 million

#### **SCAG SR 241, Foothill Corridor North**

TCA 0RA051 SCAB 2042 CAR62 241 13.8 26.4 (FTC-N) (OSO PKWY TO ETC) (13 MI) EXISTING 2 MF IN EA DIR, 2 ADDITIONAL MF LANES, PLS CLMBNG & AUX LANES AS REQ BY 2020 PER SCAG/TCA MOU 4/05/01. TCM.

Total Project Cost: \$118 million

#### **SCAG SR 241, Foothill Transportation Corridor South**

TCA 0RA052 SCAB 241 0 15.9 (FTC-S) TOLL RD (I-5 TO OSO PKWY) (15MI) 2 MF EA. DIR BY 2013; AND 1 ADDITIONAL MF EA. DIR. PLS CLMBNG & AUX LANES AS REQ BY 2030 PER SCAG/TCA MOU 4/05/01. 2013 (2+2) and 2030 (3+3) TCM.

Total Project Cost: \$ 705 million (SCAG portion only)

## COMMENT LETTER 27

### Attachment C RTIP Project Descriptions, February 2008

5 cont.

The following projects should be included in the RTIP listing of projects scheduled for 2008 through 2013. Budgets, schedules, and status of environmental documentation are included in TCA's Capital Improvement Plan summaries included in this attachment. This information should also be referenced in SCAG's Timely Implementation report in the Transportation Conformity report.

#### **SR 73, SJHTC**

6-mile segment of one additional MF in N/B direction by 2010.

#### **SR 241/261/133, ETC**

Windy Ridge FasTrak Lane project. Add 1 M/F lane for 2.4 miles N/B and 1.5 miles S/B by 2010.

5-mile Loma segment widening, 1 M/F in each direction, by 2015.

#### **SR 241, FTCN**

5-mile segment of 1 additional M/F lane SB; and 1-mile segment of 1 additional auxiliary lane NB; by 2015.

#### **SR 241, FTCS**

2 MF in each direction by 2013.

## COMMENT LETTER 27

**Foothill Transportation Corridor  
Near-Term Project No. 2  
Foothill-North Southbound Widening  
Revised August 9, 2007**

5 cont.

**Description** The Project provides a one lane widening for increased capacity of the existing two lane southbound SR 241 roadway from Bake Parkway PM 23.1 to the north, where the existing three lane roadway segment presently ends, to south of the Arroyo Trabuco Bridge at Santa Margarita Parkway PM 18.1 to the south, a distance of 5.0 miles. Two major twin bridges (Upper Oso Reservoir and Aliso Creek) within this segment are being widened in both the northbound and southbound directions to accommodate the added lanes plus the future full Ultimate Corridor widening. The Ultimate Corridor consists of four general purpose lanes, plus an auxiliary lane northbound.

**Purpose and Need** Traffic volumes on this roadway segment have increased steadily over the years to the present volume periodically exceeding 28,000 vehicles traveling southbound during weekdays, with up to 4,000 vehicles during the evening peak hour. This peak hour volume translates to a level of service (LOS) D. When Foothill-South opens, these volumes are expected to increase even faster than the current average of 5% per year, resulting in decreasing service levels if no lanes were added.

**Design** The first phase of the Project was completed in late 2005 by HDR Engineering, Inc. with the preparation of a PSR/PR (Project Study Report/Project Report). An engineering design proposal was approved at the April 12, 2007 F/ETCA Board meeting and design is proposed to be initiated in late FY 2007. This includes the preparation of preliminary and final design and construction contract documents for advertising and award.

**Construction Impacts** During the scheduled 24 month construction period, a temporary concrete barrier will be placed along the left mainline travel lane with construction activities occurring behind the rail. Lane closures will be required during certain daytime off-peak hours to remove bridge rails with some excessive noise resulting at each of the two bridge locations. Similarly, noise will be a factor during pile driving operations for structure foundations.

**Environmental** An Addendum to the Foothill Corridor Environmental Impact Report has been prepared for the Project. Environmental mitigation will be required to address riparian and coastal sage scrub impacts at the Aliso Creek Bridge construction site.

**Cost/Budget** The estimated \$55.1 million Project costs is listed below with the proposed fiscal year budget allocations shown:

Activity	FY 2007 and Prior	Proposed FY 2008	FY 2009 & Later	Total
Engineering Oversight	\$145,000	\$250,000	\$50,000	\$445,000
Project Study Report/Project Report	555,000	0	0	555,000
Design	200,000	2,500,000	0	2,700,000
Environmental Mitigation	0	230,000	170,000	400,000

**COMMENT LETTER 27**

Construction	0	0	43,500,000	43,500,000
Construction Engineering Management	0	0	3,000,000	3,000,000
Materials Testing	0	0	200,000	200,000
Contingency & Misc.	0	<b>320,000</b>	<u>4,000,000</u>	<u>4,320,000</u>
Total	\$900,000	<b>\$3,300,000</b>	\$50,920,000	\$55,120,000

5 cont.

**Schedule** Construction is proposed to begin in late 2008 under a 24 month schedule. The Project schedule proposes completion of construction and opening of the added lane near the end of 2010, prior to the timing of the projected opening of Foothill-South.

<b>RTIP</b>	<b>Prior</b>	<b>FY 07/08</b>	<b>FY 08/09</b>	<b>FY 09/10</b>	<b>FY 10/11</b>	<b>FY 11/12</b>	<b>Total</b>
Eng'r	700,000	1,850,000	1,570,000	1,300,000	1,300,000	600,000	7,320,000
ROW	0	0	0	0	0	0	0
Constr	0	<u>100,000</u>	<u>6,000,000</u>	<u>18,000,000</u>	<u>18,000,000</u>	<u>5,700,000</u>	<u>47,800,000</u>
<b>Total</b>	700,000	1,950,000	7,570,000	19,300,000	19,300,000	6,300,000	55,120,000

## COMMENT LETTER 27

**Eastern Transportation Corridor  
Near-Term Project No. 4  
SR 241 Loma Segment Widening  
Revised August 9, 2007**

5 cont.

**Description** The project comprises the addition of a completely new southbound roadway with three general purpose lanes on SR 241 between Chapman Ave. PM 32.3 and the East Leg (SR 133) PM 27.6. Presently both northbound and southbound roadways are utilizing the Ultimate Corridor northbound roadbed with two lanes in each direction plus a climbing lane northbound. The project would reconfigure the northbound travel way to add a third general purpose lane plus a climbing lane and full shoulders. The Loma Ridge Segment of the Eastern Corridor was initially constructed to a minimum cross section on a single northbound roadbed to reduce initial construction costs, with the intent of expanding the roadway in the future when traffic dictates and funding is available. Full width grading of this segment was accomplished during initial construction.

**Purpose and Need** Traffic on this segment is steadily increasing and with the opening of Foothill-South is projected to be at capacity during peak hours in 2011. The two lane roadway in each direction (plus a climbing lane northbound) has insufficient capacity for future traffic volumes and was planned for expansion through this proposed construction of additional lanes on the southbound roadbed.

**Project Status** Preparation of a PSR/PR (Project Study Report/Project Report) is proposed to be initiated early in FY 2008. RBF was selected for design of the project during the competitive consultant selection process of 2006. Conceptual plans of the proposed improvement have been developed by Agency staff for use by RBF in preparing an estimate of the time and cost required to prepare design and the PSR/PR. Upon approval of the PSR/PR by the Agency and Caltrans later this fiscal year, a design contract with RBF is planned for the preparation of construction contract documents.

**Environmental** An Addendum to FEIR No. 2-1 for the Eastern Corridor will be prepared during the design process.

**Construction Impacts** The areas adjacent to the proposed project are mostly rural and therefore noise from construction activities should cause few impacts. The construction area is separated from the existing roadway except at the project limits where K-rail will be used for positive traffic delineation.

**Cost/Budget** Construction costs are estimated at \$15.0 million and, when combined with engineering, environmental and contingency, the estimated project cost totals \$20.0 million.

Total Project Costs are estimated to be as follows:

COMMENT LETTER 27

5 cont.

Activity	Proposed FY 2008	FY 2009 & later	Total
Engineering oversight	\$60,000	\$100,000	\$160,000
Project Report	500,000	0	500,000
Design	300,000	1,500,000	1,800,000
Environmental	0	100,000	100,000
Construction	0	15,000,000	15,000,000
CEM	0	900,000	900,000
Materials Testing	0	100,000	100,000
Contingency & Miscellaneous	140,000	1,300,000	1,440,000
Total	\$1,000,000	\$19,000,000	\$20,000,000

**Schedule** The project has been forwarded from the Mid-Term Projects into the Near-Term category with construction planned to be complete for traffic opening near the end of 2011.

RTIP	Prior	FY 07/08	FY 08/09	FY 09/10	FY 10/11	FY 11/12	Total
Eng'r		1,000,000	1,200,000	1,000,000	500,000	200,000	3,900,000
ROW	0	0	0	0	0	0	0
Constr	0	0	600,000	7,000,000	7,500,000	1,000,000	16,100,000
Total	0	1,000,000	1,800,000	8,000,000	8,000,000	1,200,000	20,000,000

## COMMENT LETTER 27

**San Joaquin Hills Transportation Corridor  
Near-Term Project No. 8  
SR 73 Northbound Roadway Widening  
Revised August 9, 2007**

5 cont.

**Description** The project consists of adding a fourth general purpose lane in the northbound direction within the roadway median at two locations: 1) from the present large drop north of Aliso Viejo Parkway, PM 15.0 to north of the Laguna Canyon Road entrance ramp PM 17.7, a distance of 2.7 miles, and 2) from the Catalina View Toll Plaza cash lane merge PM 19.7, to the MacArthur Blvd. exit PM 23.0, a distance of 3.3 miles. To accomplish this, three bridges require widening (a single span wildlife crossing, a two span Newport Coast Drive undercrossing and a three-span Bonita Canyon Drive Undercrossing). An optional extension within location 1, 1.5 miles northerly to PM 17.7 was approved by the Agency Board of Directors on April 12, 2007.

**Purpose and Need** Approximately 70,000 vehicles use these segments of the SJH Corridor on a typical weekday with 36,500 or 52% traveling northbound. Of these 36,500 northbound vehicles, up to 6,900 use the facility during the morning peak hour from 7 – 8 am. This greatly exceeds the capacity of these 3-lane segments, producing a level of service F (very congested). Value pricing peak period toll adjustments were first made in February 2002 which, when combined with subsequent toll increases, have somewhat alleviated this condition. Slowdowns and stoppages, however, continue to occur periodically.

**Project Status** In response to an RFSOQ in early 2006, DMJM Harris was selected for the bridge design, while CDMG prepares the roadway design, Kleinfelder, Inc. the geotechnical and LSA the environmental. Board approval was given in August 2006, and these activities are well underway.

**Environmental** An environmental Addendum to the SJH FEIS/EIR is required for the project. This document is being prepared by LSA Associates and draft reports are currently under review by the Agency.

**Construction** During the 15 month construction period that is scheduled to begin in mid 2008, a temporary concrete barrier will be placed along the left mainline northbound travel lane with construction activities occurring behind the rail. Some short-term lane closures may be required during daytime off-peak hours to remove bridge rails with some excessive noise resulting at each of the three bridge locations during certain construction operations.

**Costs/Budget** Construction costs for the project including the optional segment are estimated at \$9.0 million. This amount combined with the Project Report preparation, design, CEM (Construction Engineering Management), materials testing, environmental documentation, environmental mitigation and contingency brings the total estimated project cost to \$12.0 million. The FY 2007 budget contained \$900,000 for preparation of the Project Report, preparation of design and associated activities.

**COMMENT LETTER 27**

5 cont.

Activity	FY 2007 Actual Plus Projected	Proposed FY 2008	FY 2009 & Later	Total
Engineering Oversight (CDMG)	\$40,000	\$50,000	\$-0-	\$90,000
Design	600,000	800,000	-0-	1,400,000
Environmental	106,000	100,000	-0-	206,000
Construction	-0-	3,000,000	6,000,000	9,000,000
Construction Engineering Management	-0-	200,000	400,000	600,000
Contingency & Misc.	54,000	250,000	400,000	704,000
Total	800,000	\$4,400,000	\$6,800,000	\$12,000,000

**Schedule** A 27 month period is estimated to complete the Project Report, design, obtain approvals, complete PS&E, bid and construct the project on an expedited schedule.

RTIP	Prior	FY 07/08	FY 08/09	FY 09/10	FY 10/11	FY 11/12	Total
Eng'r	540,000	960,000	540,000	160,000	0	0	2,200,000
ROW	0	0	0	0	0	0	0
Constr	0	3,440,000	5,460,000	900,000	0	0	9,800,000
Total	540,000	4,400,000	6,000,000	1,060,000	0	0	12,000,000

## COMMENT LETTER 27

**Eastern Transportation Corridor  
Near-Term Project No. 5  
Windy Ridge Toll Plaza FasTrak Lanes  
Revised August 9, 2007)**

5 cont.

**Description** The project consists of adding a third general purpose FasTrak lane in each direction within the SR 241 roadway median through the Windy Ridge Toll Plaza from south of the Southern California Edison wildlife undercrossing PM 35.1 to north of the Windy Ridge wildlife undercrossing PM 38.1, a distance of 3.0 miles. Also included is the reconfiguration of lane delineation in both directions at the exit from the mainline into the attended toll lanes to favor the predominant movement of FasTrak traffic and thereby improve traffic operations.

**Purpose and Need** This Windy Ridge segment of SR 241 carries approximately 59,000 vehicles on an average weekday split 49% northbound and 51% southbound. Of the nearly 30,000 vehicles traveling southbound, approximately 75% use FasTrak and almost 3,600 trips occur during the highest volume morning hour. This volume represents a Level of Service E at the point of exit. The project will add the third FasTrak lane through the toll plaza and reduce the number of lane changes required.

**Project Status** Design of the project is underway with Board approval of the selected design firm (Parsons Transportation Group) and its design contract in November 2006. Preparation of a Project Report and environmental documentation is also progressing under that contract. Once the Report is approved by the Agency and Caltrans, final design will be developed and PS&E will be prepared for construction of the project.

**Environmental** An environmental Addendum to the FEIR No. 2-1 is required for the project. This document has been initiated concurrently with project design.

**Construction Impacts** During the planned 16 month construction period, temporary concrete barriers will be placed along the left mainline travel lane with construction activities occurring behind. Some excessive noise will result from concrete removal and pile driving operations at the two bridge locations. This area is relatively isolated, therefore no significant impacts are anticipated.

**Costs/Budget** Construction costs for the project are estimated at \$6.5 million. This amount, combined with the costs of the Project Report, design, CEM (Construction Engineering Management), materials testing environmental documentation, environmental mitigation and contingency brings the total estimated cost to \$9.0 million. The FY 2007 budget included \$900,000 for the environmental documentation and design; however, \$300,000 is expected to remain at fiscal year end and will be available in FY 2008.

**COMMENT LETTER 27**

5 cont.

Activity	FY 2007 Actual Plus Projected	Proposed FY 2008	FY 2009 & Later	Total
Engineering Oversight	\$40,000	\$40,000	\$0	\$80,000
Design	500,000	500,000	0	1,000,000
Environmental	0.0	100,000	0	100,000
Construction	0.0	3,000,000	3,500,000	6,500,000
Construction Engineering Management	0.0	200,000	200,000	400,000
Materials Testing	0	30,000	30,000	60,000
Contingency & Misc.	60,000	130,000	670,000	860,000
Total	\$600,000	\$4,000,000	\$4,400,000	\$9,000,000

**Schedule** This project has been advanced from previous schedules due to the increased periods of operational constraints. A period of 1½ years is estimated to prepare the Project Report, design, obtain approvals and prepare PS&E. Upon completion of this process, construction will commence in the spring of 2008 and be completed in the fall of 2009.

RTIP	Prior	FY 07/08	FY 08/09	FY 09/10	FY 10/11	FY 11/12	Total
Eng'r	600,000	700,000	300,000	100,000	0	0	1,700,000
ROW	0	0	0	0	00	0	0
Constr	0	3,300,000	3,500,000	500,000	0	0	7,300,000
Total	600,000	4,000,000	3,800,000	600,000	0	0	9,000,000



## COMMENT LETTER 28

Office of the City Council

**City of Tustin**

300 Centennial Way  
Tustin, CA 92780  
(714) 573.3010

February 19, 2008

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

**SUBJECT: REVIEW DRAFT 2008 SCAG RTP AND DRAFT PROGRAM EIR**

Dear Ms. Kirchner:

Thank you for the opportunity to provide comments on the Draft 2008 Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and the Draft Program Environmental Impact Report (DPEIR) for the 2008 SCAG RTP.

The City of Tustin has prepared the following comments for your consideration at this time:

- SCAG should use the 2006 Orange County Projections (OCP-2006) for population, employment, and households in any adopted 2008 RTP growth forecast for the Orange County subregion. OCP-2006 was developed by gathering substantial input from all Orange County jurisdictions and considers important factors that influence future growth such as sensitive habitat areas, stable single family neighborhoods, approved development agreements, and historic districts. Presently, only the SCAG Baseline Growth Forecast incorporates local input. SCAG has proposed a Policy Growth Forecast which redirects growth in the region and proposes intensifying land use near transit stations and employment centers and reducing growth in outlying communities to achieve reduced congestion and vehicle miles traveled. The Policy Growth Forecast was developed with minimal input from local jurisdictions. In fact, Orange County jurisdictions provided input to SCAG at a workshop in Orange County in November of 2006, but this input was not incorporated into the Policy Growth Forecast using the consensus approach that SCAG refers to on page 41 of the Draft RTP. 1
- On page 55 of the Draft RTP, it is stated that "The implementation of the policy growth forecast would be voluntary and it complements the baseline growth forecast." However, adoption of the Policy Growth Forecast for use in the RTP would result in mandating the policies embodied in the Policy Growth Forecast. Thus, the SCAG should only adopt the Baseline Growth Forecast for use in the 2008 RTP. 2

**COMMENT LETTER 28**

- A statement is made on page 86 of the Draft RTP that:

*"In order to yield transportation model performance that legitimately account for the resulting air quality benefits, the assumptions must be: 1) reasonable and realistic; 2) based on the best and most up-to-date information; and 3) consistent with planned transportation infrastructure."*

3

The Baseline Growth Forecast is based on local input and supports these assumptions. SCAG should use the Baseline Growth Forecast as the adopted growth forecast for the 2008 RTP.

- On page 62 of the Draft RTP, a reference is made to the growth identified in the Baseline Forecast as "supporting urban sprawl" and representing a growth scenario that is:

*"...very similar to the status quo, taking a somewhat "business as usual" approach that is not steered by regional policies."*

4

This statement in the Draft RTP does not properly characterize the growth that is taking place and is projected throughout Orange County, including Tustin. For example, the Tustin Legacy project at the former Marine Corps Air Station Tustin is a significant infill project located in close proximity to transit and employment centers. Therefore, the mischaracterization of the Baseline Forecast should be deleted from the Draft RTP. Instead, examples should be provided of the many jurisdictions which are promoting growth principles consistent with those identified in the Draft RTP.

- SCAG should incorporate the Orange County Transportation Authority's list of transportation projects submitted to SCAG for incorporation into the 2008 RTP. These projects have already been included in OCTA's Long-Range Transportation Plan and the Renewed Measure M Major Investment Plan.

5

- SCAG should remove mitigation measures in the Draft RTP PEIR that are not related to transportation project delivery and implementation and those that were derived from the Draft 2008 Regional Comprehensive Plan which is still in the public review process and has not been approved by the SCAG Regional Council.

6

- The Policy Growth Principles outlined in the Draft RTP are specifically identified as voluntary for local governments. As such, the mitigation measures in the Draft PEIR directly mitigating the growth that would result from the Policy Growth Principles (as depicted in the Policy Growth Forecast) should also be considered voluntary in nature and should apply only if the measure is practical and feasible for the implementing agency.

7

**COMMENT LETTER 28**

- The City of Tustin supports the January 28, 2008, recommendation of the OCTA Board of Directors that Orange County host cities and other local and regional jurisdictions work with the OCTA to examine transit alternatives on the Pacific Electric (PE) Railroad right-of-way. The Orangeline Development Authority (OLDA) has proposed a high-speed magnetic levitation (Maglev) system from Palmdale to Irvine that would traverse the PE right-of-way, which is owned by the OCTA. However, the OCTA has not committed to making the right-of-way available for use by the OLDA. Therefore, SCAG should remove the Orangeline project from the RTP Constrained Plan. 8
  
- All Regional Transportation Improvement Program (RTIP) projects located in Tustin should be included in the 2008 RTP, including the following which may have been missed: 9
  - a. Modify Northbound SR 55 Ramps to connect to Newport Avenue Extension between Edinger Avenue and Valencia Avenue;
  - b. Tustin Ranch Road Extension from Walnut Avenue to Edinger Avenue, with new grade separation at Edinger Avenue; and
  - c. Red Hill Avenue Grade Separation at Edinger Avenue/railroad tracks.

Again, thank you for the opportunity to review and comment on the Draft 2008 Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and the Draft Program Environmental Impact Report (DPEIR) for the 2008 SCAG RTP. If you have any questions regarding the City's comments, please call Elizabeth Binsack, Community Development Director at (714) 573-3031.

Sincerely,



Jerry Amante  
Mayor

cc: Hasan Ikhata, SCAG  
Dennis Wilberg, OCCOG  
Tustin City Council  
William A. Huston  
Tim D. Serlet  
Elizabeth A. Binsack  
Dana Ogdon  
Scott Reekstin

SR:environmental etc\SCAG 2008 RTP and RTP PEIR Letter.doc



## COMMENT LETTER 29

1055 Wilshire Blvd., Suite 1660 Los Angeles, CA 90017-2499

T: (213)977-1035

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

February 19, 2008 FINAL

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

Re: Public Comments on SCAG RTP, Open Space, and Environmental Justice

Dear Mr. Ovitt and Mr. Ikhata:

### I. Overview

The City Project submits these public comments regarding the SCAG draft 2008 Regional Transportation Plan (RTP) (December 6, 2007); the draft 2008 RTP Environmental Justice Report (December 2007); and the Open Space Chapter 3.10 of the draft 2008 RTP Program Environmental Impact Report (PEIR). The City Project has previously raised many of these concerns through the SCAG open space work group.

We respectfully submit that the cited SCAG reports are not adequate to address the impact of the regional transportation plan on environmental justice communities including low income people, people of color, and Native Americans, on open space needs, and on the need for transit to trails. The reports need to be significantly revised, as discussed in the conclusion.

### II. Discussion

There are unfair inequities in the distribution of environmental benefits, including green space, and environmental burdens, including air and ground pollution, between more and less affluent communities in California.

Four of the six SCAG counties are among the eight counties in the state with the greatest need for green space – in combined terms of the fewest acres of green space per thousand residents, and highest levels of child obesity, youth, poverty, and people of color. These facts are illustrated and analyzed in the accompanying Policy Report by Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at pages 3-6, Map 1, and Tables 9A-9F.

County averages can mask dramatic disparities in access to green space within the county. As reported in the Los Angeles Times, for example, there are large disparities in the amount of park acreage for L.A. residents. *See generally* Robert García and Aubrey White, *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for the Los Angeles Region* at pages 3-5, 7-10, and Maps 101-102, 401, 402, 403, and Charts 401C and 1203C (2006); *see also* Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access*

## COMMENT LETTER 29

Gary C. Ovitt, President and Hasan Ikhata Executive Director  
Public Comments on SCAG RTP, Open Space, and Environmental Justice  
February 19, 2008  
Page 2 of 4

*and Equity for California at 5.*

In addition, California has the nation's highest concentration of people of color living near hazardous waste facilities. Statewide, 81% are people of color. Greater Los Angeles is the worst in the nation, with 1.2 million people living less than two miles from 17 hazardous waste facilities. 91%, or 1.1 million, are people of color. Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at 6-7.

Southern California should develop and implement a strategic plan for a "Transit to Trails" program to take people to parks, beaches, forests, lakes, and other public natural spaces. A Transit to Trails program would serve all the people of the region, but would be particularly useful to the working poor with limited or no access to cars, who are disproportionately people of color and low income. Transit to Trails would reduce traffic congestion and parking problems, improve air quality, and reduce run-off of polluted water into rivers and the ocean. It would also reduce dependency on the automobile and fossil fuels. Today, there is virtually no good way to reach the four Southern California forests using public transportation. Transit to beaches is limited, time-consuming, and expensive. Low cost transit service should link great urban parks with outlying green space. SCAG has the opportunity to include Transit to Trails in its next Regional Transportation Plan. The Olmsted Report envisioned a transportation system for people to reach natural public places. Robert García and Aubrey White, *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for the Los Angeles Region* at 14.

The values at stake in providing equitable transportation and land use planning for the region include promoting the simple joys of playing in the park; human health; youth development and academic performance; conservation values of clean air, water, and land, habitat protection, and climate justice; economic vitality for all; spiritual values in protecting people and the earth; cultural and historical values at parks such as San Onofre State Beach; and sustainable regional planning. Fundamental principles of equal justice and democracy underlie each of these other values. See Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at 7-9.

Providing equitable transportation and land use planning for the region is good policy – and good law. Federal and state laws prohibit both intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives in the provision of public resources. An important purpose of the statutory civil rights framework is to ensure that recipients of public funds do not maintain policies or practices that result in discrimination based on race or ethnicity. The SCAG RTP process can proactively achieve compliance with civil rights, environmental, and other laws. Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at 9-10.

Title VI of the Civil Rights of 1964 and its implementing regulations guard against both (1) intentional discrimination based on race, color or national origin, and (2) unjustified discriminatory impacts for which there are less discriminatory alternatives, by applicants for or recipients of federal funds. *Id.*

California laws also guard against intentional discrimination and unjustified discriminatory impacts by recipients of state funds under Government Code section 11135. In addition,

1 cont.

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California law defines environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” *Id.*

1 cont.

The California Coastal Commission adopted a local coastal plan requiring Malibu to maximize public access to the beach while ensuring the fair treatment of people of all races, cultures, and incomes in 2002. Commissioner Pedro Nava told the Los Angeles Times he hoped to set a precedent for other communities. *Id.*

California law also promotes respectful government to government consultation with California Indian tribes regarding land use planning that may impact traditional cultural properties. SB 18 and the tribal consultation guidelines published by the Office of Planning and Research require agencies to consult with Indian Tribes.

SCAG should be increasingly responsive to, and held accountable for, the impact of its plans on environmental justice communities, especially now that people of color are in the majority in California. *Id.*

### III. Conclusion

The SCAG RTP, EIR, and Open Space plans and Environmental Justice Report should present a region-wide vision and strategic plan for the investment of transportation resources to alleviate real and perceived inequities in access to green space and transportation. The principles below in many respects present the necessary framework.

*Principle 1.* Transportation resource decisions have widespread impacts on health, housing, development, investment patterns, climate justice, and quality of life. The process by which those decisions are reached, and the outcomes of those decisions, must be fair and beneficial to all.

*Principle 2.* Transportation investments should be guided by a regional vision that includes a comprehensive web of communities, parks, schools, beaches, forests, rivers, mountains, and transit to trails to achieve results that are equitable; promote human health, the environment, and economic vitality; and serve diverse community needs.

*Principle 3.* Infrastructure areas should be planned together in complementary rather than conflicting ways to serve health, education, human service, and environmental needs; to fulfill critical governmental and societal responsibilities; and to produce equitable results. For example, transit can provide access to trails.

*Principle 4.* Transportation priorities should be thoroughly assessed through an equity lens. For example, there are unfair disparities in transportation access, green space, and child obesity.

*Principle 5.* Employment, economic, and environmental benefits associated with building and maintaining transportation infrastructure should be distributed fairly among all communities. Local jobs with livable wages should go first to local residents. Job training should be provided for those who need it to qualify for jobs. There should be a level playing field for small, women, and minority business enterprises.

*Principle 6.* Revenues to support transportation improvements should be collected and allocated to distribute fairly the benefits and burdens of the projects. Resources should be targeted to the

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most underserved communities to overcome unfair disparities.

*Principle 7.* Transportation infrastructure decision-making should be transparent and include mechanisms for everyone to contribute to the planning and policymaking process.

*Principle 8.* Standards for measuring equity and progress should be articulated and implemented to guide planning and investments, and to hold agencies accountable.

*Principle 9.* In making transportation investments and decisions, recipients of federal and state funds including SCAG should proactively comply with federal and state laws designed to achieve equal access to public resources, including Title VI of the Civil Rights Act of 1964 and its implementing regulations, California Government Code 11135, and the California statutory definition of environmental justice. Compliance with civil rights, environmental, and other laws should be combined.

*Principle 10.* Government agencies including SCAG should dedicate resources to enable community based organizations to serve their communities and actively participate in infrastructure planning and investments.

We look forward to working with you to accomplish these goals.

Sincerely,

Robert García  
Executive Director and Counsel

Angela Mooney-D'Arcy  
Policy Director

Enclosures:

Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* (2007)

Robert García and Aubrey White, *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for the Los Angeles Region* (2006)

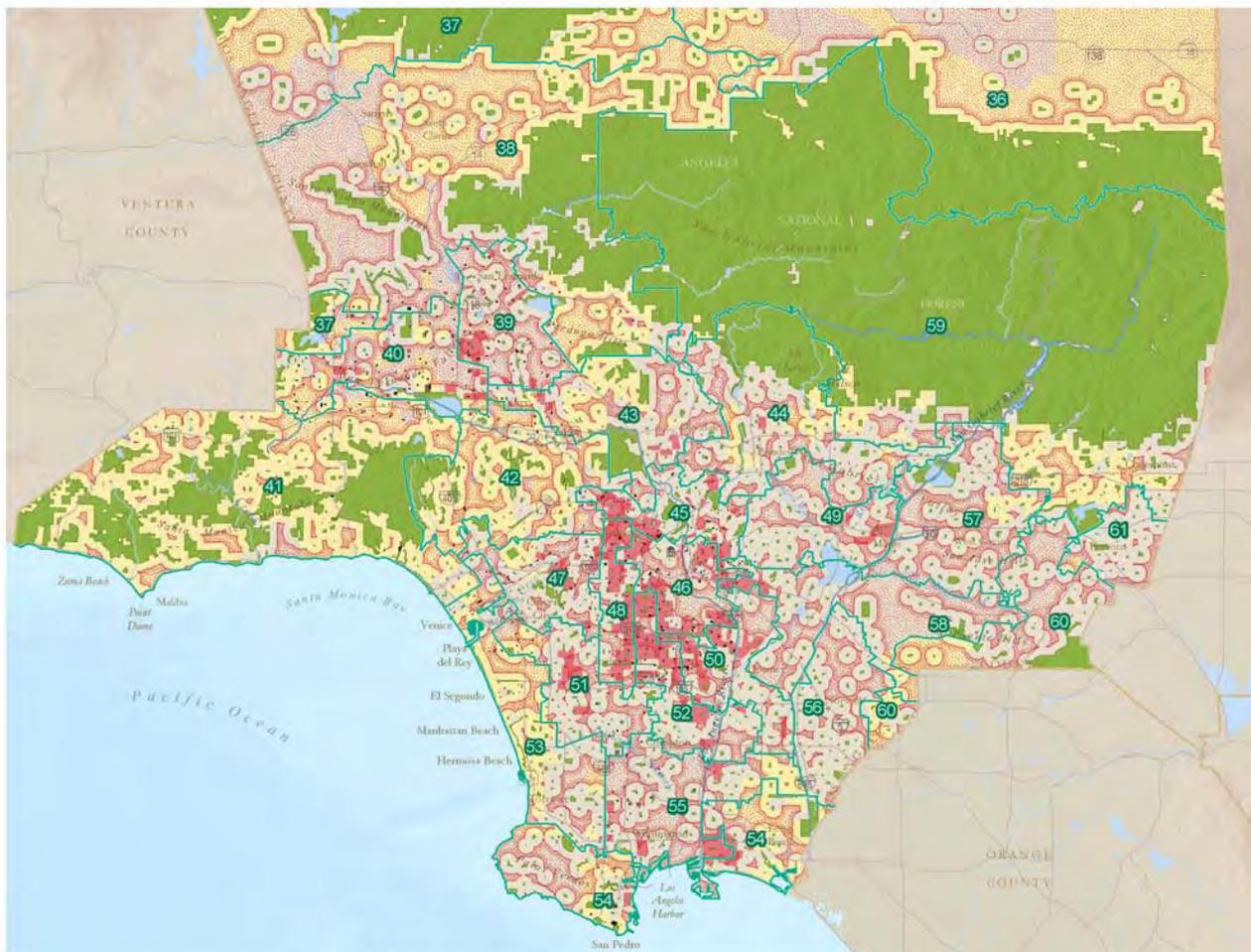
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The  
City  
Project

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## Healthy Parks, Schools, and Communities: Mapping Green Access and Equity For the Los Angeles Region



Policy Report

Robert García  
Aubrey White  
2006

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The mission of The City Project is to achieve equal justice, democracy, and livability by influencing the investment of public resources to achieve results that are equitable, enhance human health and the environment, and promote economic vitality for all communities. Focusing on parks and recreation, playgrounds, schools, health, and transit, we help bring people together to define the kind of community where they want to live and raise children. The City Project works with diverse coalitions in strategic campaigns to shape public policy and law, and to serve the needs of the community as defined by the community.

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The City Project is a project of Community Partners,  
a 501(c)(3) non-profit organization.  
All donations are tax deductible.  
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Healthy Parks, Schools, and Communities:  
Mapping Green Access and Equity  
for the Los Angeles Region

1 cont.

Robert García and Aubrey White

Abridged Edition 2006

\*\*This version contains text only. Please contact The City Project to obtain a complete version that includes maps discussed in the text.

**Healthy Parks, Schools and Communities:  
Mapping Green Access and Equity for the Los Angeles Region**

Robert García and Aubrey White<sup>1</sup>

Policy Report 2006

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### Preface

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This Policy Report *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for the Los Angeles Region* is a multimedia work consisting of several parts. The parts include this narrative text; an abridged hardcopy set of core maps, charts, and tables; and an unabridged hardcopy set of maps, charts, and tables. The text, core maps, and images are available on the web at [www.cityprojectca.org](http://www.cityprojectca.org). The text and maps are also available on compact disc.

A version of this Policy Report will appear in a forthcoming symposium on "The 1982 Warren County Protests: Environmental Justice 25 Years Later," in the *Golden Gate Environmental Law Journal*.

Professor Leo Estrada and J. Eric Lomeli of UCLA prepared the park layer for maps 401 to 1100 and for the park acreage statistics using geographic information system (GIS) software. We are grateful for their work. The following is a brief summary of the methods used to create this layer. Natural public spaces were digitized using several sources: Thomas Brothers digital edition, State of California data on parklands, data from Santa Monica Mountains National Recreation Area, and existing digitized data. The maps also include parks in process (e.g., the Los Angeles State Historic Park at the Cornfield and the Rio de Los Angeles State Park at Taylor Yard). The layers include all known local and regional parks, playgrounds, recreation areas/centers, state parklands and beaches, golf courses and country clubs.

Maps and spreadsheets were created by GreenInfo Network using ESRI software. Maps display the Olmsted parks and current parks layers created by Prof. Estrada and Mr. Lomeli, 2000 Census Demographics by block group ([factfinder.census.gov](http://factfinder.census.gov)), and child obesity statistics from the California Center for Public Health Advocacy.

### Acknowledgements

We dedicate this work to the memory of two civil rights heroes, Juanita Tate and Chi Mui.

The City Project gratefully acknowledges the following organizations and individuals. We have also learned tremendously from many individuals whose work we continue to rely on, and cite throughout this Policy Report.

This work is made possible in part by the generous support of the California Endowment, Ford Foundation, John Randolph Haynes and Dora Haynes Foundation, Resources Legacy Fund, Surdna Foundation, Whole Systems Foundation, and the Santa Monica Mountains Conservancy.

UCLA Prof. Judy Baca and SPARC (the Social and Public Art Resources Center) are working with The City Project to produce pilot projects of the Heritage Parkscape along the Los Angeles River, and to restore and extend the Great Wall of Los Angeles. UCLA Prof. Fabian Wagmister and REMAPPING - LA are working with The City Project to produce online editions of the Heritage Parkscape and other materials. USC Prof. Steve Koletty and generations of his students in the Department of Geography have provided invaluable research reports, many of which are cited throughout this Policy Report. Joe Linton, author of *Down by the Los Angeles River* (2005) and now Director of River Projects at The City Project, reviewed the final drafts.

James P. Allen and Eugene Turner inspired the mapping for this Policy Report through their two works, *The Ethnic Quilt: Population Diversity in Southern California* (1997), and *Changing Faces, Changing Places: Mapping Southern Californians* (2002).

The City Project looks forward to our continuing work with the Alianza de los Pueblos del Río, including Anahuak Youth Sports Association, the William C. Velasquez Institute, Mujeres de la Tierra, and REMAPPING - LA.

The City Project is a project of Community Partners. We gratefully acknowledge their support.

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HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

### I. INTRODUCTION

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The City Project supports a collective vision for a comprehensive and coherent web of parks, schools, rivers, beaches, mountains, forests, and transit to trails that promotes human health, a better environment, and economic vitality for all, and reflects the cultural diversity of Los Angeles.<sup>2</sup> This Policy Report, *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for the Los Angeles Region*, maps that vision against the reality of access to natural public places<sup>3</sup> in Los Angeles, using geographic information system (GIS) and 2000 census data. This Report presents policy and legal analyses to achieve healthy, livable communities for all.

Much of Los Angeles is park poor, and there are unfair park, school, and health disparities based on race, ethnicity, income, poverty, youth, and access to cars. Children of color disproportionately live in communities of concentrated poverty without enough places to play in parks and schools, and neither cars nor an adequate transit system to reach parks and school fields in other neighborhoods. The human health implications of the lack of physical activity are profound. These children disproportionately suffer from obesity, diabetes, and other diseases related to inactivity. This is the first generation in the history of this country in which children will have a lower life expectancy than their parents if present trends continue.

Los Angeles is facing a historic confluence of opportunities to address these concerns. Voters in November 2006 approved \$40 billion statewide in park and clean water, flood control, housing, and transportation bonds that can fund places for physical activity in parks and schools. Mayor Antonio Villaraigosa has vowed to make Los Angeles the greenest big city in America. City Controller Laura Chick has published an audit and blueprint for reform of parks and recreation in Los Angeles. The Los Angeles Unified School District is investing over \$20 billion to construct new public schools and modernize existing ones. Over 80 new parks are proposed along the Los Angeles River. The Integrated Regional Water Management Plan for the Los Angeles region provides opportunities for multiuse projects including parks in flood control basins like the Sepulveda Recreation Center. The Southern California Association of Governments is including green access in its forthcoming regional transportation plan.

Parks and other natural public places are not a luxury. Parks are a democratic commons that bring diverse people together as equals, in a space where they can encounter each other in an open and inviting atmosphere. Parks are important in themselves. They are also an important organizing tool to bring people together to create the kind of community where they want to live and raise children.<sup>4</sup>

Unfair disparities in safe places to play go well beyond Los Angeles. While 87% of non-Hispanic respondents reported that “there are safe places for children to play” in their neighborhood, only 68% of Hispanics, 71% of African Americans, and 81% of Asians agreed, according to the Census Bureau survey “A Child’s Day.”<sup>5</sup> Almost half (48%) of Hispanic children under 18 in central cities were kept inside as much as possible because their neighborhoods were perceived as dangerous. The same was true for more than 39% of black children, 25% of non-Hispanic white children, and 24% of Asian children.<sup>6</sup> Non-Hispanic White children and youth were most likely to participate in after school sports, with Hispanic children and children in poverty least likely.<sup>7</sup> Children involved in sports and extracurricular activities tend to score higher on standardized tests and are less likely to engage in antisocial behavior.<sup>8</sup>

The struggle to maximize public access to public lands while ensuring the fair treatment of people of all colors, cultures, and incomes can transform the Los Angeles region into a more livable, democratic, and just community, and provides a replicable advocacy model for community redevelopment. The values at stake

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include: providing children the simple joys of playing in parks and schools; human health; youth development and academic performance; equal justice and democracy; conservation values of clean air, water, and ground, and habitat restoration; economic vitality; spiritual values in protecting people and the earth; and sustainable regional planning.

The struggle that began as an effort to stop warehouses in favor of creating what is now the Los Angeles State Historic Park at the Cornfield in downtown Los Angeles is influencing other movements across the nation. The environmental justice movement is evolving beyond stopping toxics and bad things from happening in communities of color and low income communities, to affirmatively creating public goods including parks and schools. The Urban Park Movement is drawing national and international attention, buoyed by the victories in creating new great urban parks: at the Cornfield, the Río de Los Angeles State Park at Taylor Yard as part of the revitalization of the Los Angeles River, the Baldwin Hills Park in the historic African-American heart of Los Angeles, and Ascot Hills Park in Latino East L.A. A Latino-led environmental movement focused on the revitalization of the Los Angeles River is framing progressive and working class issues with traditional environmental concerns in a seamless narrative, as is a growing urban environmental movement. Traditional environmentalists are sitting up and listening now that people of color are responsible for passing multi-billion dollar resource bonds for parks, clean water, and clean air, and using those funds to create great urban parks in their neighborhoods. The struggle for the Cornfield led to the Latino Environmental Summit in November 2005, and the National Latino Congreso in 2006. The Congreso, the largest gathering of Latino leaders in over a generation, included a day long session on Latinos and the Environment.

The struggle for the Cornfield led to the formation of the Alianza de los Pueblos del Río. The Alianza is working to ensure that the Los Angeles River Revitalization Master Plan promotes democratic participation and equitable results in greening the river with healthy parks, schools, and communities. The Alianza seeks economic, environmental, equitable, and healthy development for all communities for generations to come. The Alianza formed when its leaders decided that the development of the river was a symbolic and literal convergence of a myriad of issues confronting L.A.'s Latino population and other communities of color and low income communities. To be left out of the discussion was to be left high and dry, as the river shifts directions into the future. The Alianza agenda is growing into a comprehensive new platform of urban and Latino environmentalism, or the "browning of the green movement."<sup>9</sup> Part legal strategy, part organizing principle, this "urban greening *con salsa* movement" has put people--immigrants and poor people, mostly (and many Latinos)--at the center of an issue that traditionally had focused on flora and fauna.<sup>10</sup>

This Report analyzes green access and equity for the Los Angeles region. Part II presents a vision for a comprehensive and coherent web of natural public spaces, including parks, school fields, rivers, beaches, mountains, and forests, that will enhance human health and economic vitality for all the people of the Southern California region, with lessons for regions across the country. Part III describes lessons learned from raising funds for parks through resource bonds. Part IV describes great urban park victories in Los Angeles. Part IV also describes struggles to keep public lands public for all in beaches, mountains, and forests. Part V presents original demographic research and analyses of park, school, and health disparities, and related equal access issues. Part VI explores the history and pattern of discriminatory land use, housing patterns, and access to parks, beaches, and forests. Part VII discusses the values at stake in natural public places. Part VIII presents policy and legal justifications for equal access to public lands. Part IX presents principles and recommendations for equitable infrastructure investments in natural public places.

### II. A COLLECTIVE VISION

People are greening Los Angeles, driven by a collective vision for a comprehensive and coherent web of parks, schools, rivers, beaches, mountains, forests, and transit to trails that promotes human health, a better environment, and economic vitality for all, and reflects the cultural diversity of Los Angeles.

This vision is inspired in part by the Olmsted Report of 1930. The firm started by the sons of Frederick

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### HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

Law Olmsted — the man who designed Central Park, invented landscape architecture, and was passionately committed to equal justice through the abolition of slavery—proposed a vision for a green, prosperous, and culturally rich Los Angeles that has yet to be realized. According to the Olmsted Report in words that remain true today:

Continued prosperity will depend on providing needed parks, because, with the growth of a great metropolis here, the absence of parks will make living conditions less and less attractive, less and less wholesome. . . . In so far, therefore, as the people fail to show the understanding, courage, and organizing ability necessary at this crisis, the growth of the Region will tend to strangle itself.<sup>11</sup>

The City Project has published a digital edition of the Olmsted plan to inspire and guide reform; see Maps 101, 102, and 103.

The Olmsted Report proposed the shared use of parks and schools to make optimal use of land and public resources. The Report recommended the greening of the Los Angeles and San Gabriel Rivers,<sup>12</sup> doubling public beaches, and integrating forests and mountains within the park system.<sup>13</sup> The Report advocated multiuse projects for park and flood control purposes.<sup>14</sup> The Report envisioned a transportation system for people to reach parks, school fields, rivers, beaches, mountains, and forests.<sup>15</sup> The Report recognized that people in lower income levels often live in less desirable areas, have fewer leisure opportunities, and should receive first consideration in parks and recreation.<sup>16</sup> The Report recognized that a balanced park and recreation system serves diverse needs, including active and passive recreation. The Report recommended creating a regional park authority with power to raise funds to acquire and develop parks and other natural public places.<sup>17</sup> Each of these recommendations remains valid today.

Implementing the Olmsted vision would have made Los Angeles one of the most beautiful and livable regions in the world. Powerful private interests and civic leaders demonstrated a tragic lack of vision and judgment when they killed the Olmsted Report. Politics, bureaucracy, and greed overwhelmed the Report in a triumph of private power over public space and social democracy.<sup>18</sup>

A diverse alliance of civil rights, community, environmental, civic, and political leaders is coming together to restore the lost beauty of Los Angeles and a part of the Olmsted vision.

### III. PARK BONDS: DIVERSIFYING SUPPORT FOR PARKS AND RECREATION

Recent park and resource bonds provide two important lessons. People of color and low income people make a difference in securing funds for parks, clean water, and clean air. Advocates and activists need to ensure that the benefits and burdens of these infrastructure investments are distributed fairly.

In 2002, California voters passed Proposition 40, at that time the largest resource bond in United States history, which provided \$2.6 billion for parks, clean water and clean air. Prop 40 passed with the support of 77% of Black voters, 74% of Latino voters, 60% of Asian voters, and 56% of non-Hispanic White voters. 75% of voters with an annual family income below \$20,000, and 61% with a high school diploma or less, supported Prop 40 – the highest among any income or education levels.<sup>19</sup> Prop 40 demolished the myth that a healthy environment is a luxury that communities of color and low-income communities cannot afford or are not willing to pay for.

In November 2006, California's Proposition 84, a \$5.4 billion park and water bond, was successful because of massive Latino support. Latino voters provided 85% support for Prop 84, or a margin of 770,000 votes. Prop 84 lost the non-Latino vote by 48% to 52%.<sup>20</sup>

There are important lessons to be learned from park and resource bonds. Prop 84 demonstrates that

1 cont.

communities of color can propel properly framed environmental initiatives to success even when the white vote is opposed. An equally important lesson is that advocates and activists must ensure that the benefits and burdens of park bonds and other public work investments are distributed fairly. A 2002 study found that the way local park bond funding was distributed exacerbated rather than alleviated unfair disparities in access to parks and recreation in Los Angeles.<sup>21</sup>

Despite their support for environmental public goods, communities of color and low income communities are disproportionately denied environmental benefits, including access to parks and recreation. Surveys in California and Los Angeles County echo the disparities reported in the national survey discussed above.

Most California residents believe there are environmental inequities between more and less affluent communities, according to a survey by the Public Policy Institute of California. 64% of Californians say that poorer communities have less than their fair share of well-maintained parks and recreational facilities. Latinos are far more likely than non-Hispanic Whites (72% to 60%) to say that poorer communities do not receive their fair share of parks and recreational facilities. A majority of residents (58%) agree that compared to wealthier neighborhoods, lower-income and minority neighborhoods have more than their fair share of toxic waste and polluting facilities.<sup>22</sup>

According to the 2006 Children's ScoreCard for Los Angeles County, residents in all parts of the county cited the importance of parks and recreation in helping their children grow and thrive.<sup>23</sup> Only 73% and 72% of parents in Central and South Los Angeles reported easy access to safe place to play, compared to 83% and higher in other parts of the county.<sup>24</sup>

#### IV. GREAT URBAN PARK VICTORIES

Advocates and activists have created great urban parks in Los Angeles, and are fighting to keep public lands public for all.

##### A. Great Urban Parks

The Chinatown Yard Alliance helped stop a proposal for warehouses by the city of Los Angeles and wealthy developers in favor of the 32 acre Los Angeles State Historic Park in the heart of Los Angeles. The Los Angeles Times called the victory "a heroic monument" and "a symbol of hope."<sup>25</sup> "Nothing like this has ever happened in Chinatown before," the late Chinatown activist Chi Mui said. "We've never had such a victory. And now, every time people walk with their children down to that park, they'll see that great things can happen when folks come together and speak up. We can renew our community one dream at a time."<sup>26</sup> The victory in the Cornfield required an administrative complaint on civil rights and environmental grounds before the United States Department of Housing and Urban Development (HUD) to cut off the federal subsidies for the warehouses, and a law suit under state environmental laws. Ultimately, however, the Cornfield will not be a park because of any court order, but because of a creative deal between Alliance members and the developers. The deal was this: if the Alliance could persuade the state to buy the site for the park, the developer would abandon from the warehouse proposal. The Alliance succeeded.

Advocates and activists helped stop a commercial development in favor of the 40 acre Río de Los Angeles State Park at Taylor Yard along the Los Angeles River in Northeast L.A. after trial on state environmental grounds. State park officials initially opposed active recreation at Taylor Yard, but relented in favor of a balanced park in light of community needs. "I am all for preserving rocks and trees and those things, but to me, it seems more important to help the children first," according to Raul Macias, a businessman and founder of the Anahuak Youth Association.<sup>27</sup> The balanced park will provide active recreation with soccer fields, courts, a running track, and bike paths, as well as passive recreation, natural parkland, and picnic areas.

A community alliance helped save the Baldwin Hills Park, a 2-square-mile park in the historic heart of African-American Los Angeles that is the largest urban park designed in the U.S. in over a century. Advocates

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and activists stopped a power plant there in 2001, stopped a garbage dump in 2003, and saved the Baldwin Hills Conservancy and its budget in 2005 after a governor's commission threatened to eliminate both. "People sometimes think they can do things like this, believing that this community won't have people to speak up for them, but they're wrong," Robert García told the Los Angeles Times. "This is a human rights issue and fundamentally an issue of equal justice."<sup>28</sup> Litigation was not required because in each instance public officials listened.

The community celebrated the groundbreaking of the next great urban park at Ascot Hills in East L.A. in November 2005. The largest green space in East L.A. until then was Evergreen Cemetery, which sent a message to children that if they wanted open space, they had to die first. The 140-acre park will provide passive recreation and green space in one of the most park poor areas in the City. The park was established through a creative partnership between the Santa Monica Mountains Conservancy and the City of Los Angeles acting in response to effective community organizing.<sup>29</sup>

The Heritage Parkscape will link the Los Angeles River, the Los Angeles State Historic Park at the Cornfield, El Río de Los Angeles State Park at Taylor Yard, El Pueblo Historic District, along with 100 other rich cultural, historical, recreational, educational, and environmental resources in the heart of Los Angeles. "They should not be treated as isolated, separate parks but as one continuous parkway system," Robert García told the Daily Breeze. "This is a wonderful opportunity. Los Angeles is hungry for its history."<sup>30</sup> The Heritage Parkscape is inspired in part by the Olmsted plan, by the Cornfield Advisory Committee Report calling for linked parks and resources, and by plans for a continuous greenway along the Los Angeles River.<sup>31</sup> See Map 104. The Heritage Parkscape reflects a frank recognition of the need to build great urban parks by linking smaller, non-contiguous parcels together because few large parcels are left in urban areas. This is the example set by the Gateway National Recreation Area linking the parks of New York Harbor, the Golden Gate National Recreation Area linking natural public places in the Bay Area in Northern California, and the Santa Monica Mountains National Recreation Area in Southern California.<sup>32</sup> UCLA Prof. Judy Baca and SPARC (the Social and Public Art Resources Center) are working with The City Project to produce pilot projects of the Heritage Parkscape along the Los Angeles River, and to restore and extend the Great Wall of Los Angeles. UCLA Prof. Fabian Wagmister and REMAPPING - LA are working with The City Project to produce Heritage Parkscape and other materials on the web.

### B. Keeping Public Lands Public for All

It is necessary to create public parks, and to keep public lands public for all.

Developers and wealthy property owners sought to block access to public trails in the Canyon Back area of the Santa Monica Mountains, one of the most precious natural resources in Southern California. "This is part of an overall trend by which wealthy enclaves think they can simply take over public parks, public beaches, public trails," Robert García told the Los Angeles Times. "We're not going to allow it."<sup>33</sup> Litigation settled in 2006 keeps the trails open for all.<sup>34</sup>

A wealthy gated enclave is seeking to cut off public access to trails that have been public for thousands of years in historic Millard Canyon, which begins in the Angeles National Forest and ends at the Arroyo Seco in Altadena, with stream water flowing to the Los Angeles River and the ocean. Property owners have posted "No Trespassing" signs and harass hikers and equestrians on the public trails. The county approved development of the gated enclave on the condition that the trails remain public. A Pasadena Star News editorial has urged the property owners to "live up to the original agreement" and keep public access open to

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the trails: “The situation is akin to those who live on the beach, public property, who want to fence it off from that very public owner. That’s just not right.”<sup>35</sup> Pending litigation seeks to keep the trails open, and to preserve the rich historical and cultural legacy of Millard Canyon and the beauty of the site for all, whether or not one can afford to live in a secluded gated enclave.

Beachfront property owners up and down the California coast – from Newport Beach to Malibu to Santa Barbara to Hollister Ranch to tiny Trinidad in Northern California -- are trying to cut off public access to public beaches and privatize public places.<sup>36</sup>

Malibu residents have been particularly aggressive in restricting access to beaches alongside multimillion dollar mansions. In June 2005, private property owners on Broad Beach in Malibu took the utterly astonishing step of bulldozing away the public beach. The beach bulldozing reduced public access, caused significant environmental and habitat destruction, and destroyed the beauty of the beach.<sup>37</sup> The California Attorney General sued the Trancas Property Owners Association, which represents property owners along Broad Beach, for violation of the Coastal Act, interference with public access to the beach, and theft (conversion) of beach minerals.<sup>38</sup>

Private property owners for years posted phony “private beach/no trespassing” signs on Malibu beaches that deterred innocent beach goers, and harassed beachgoers with security thugs on illegal all-terrain vehicles and calls to the county sheriff. The California Coastal Commission in August 2005 ordered an end to the phony signs and illegal vehicles.<sup>39</sup>

Media mogul David Geffen, joined by the City of Malibu, filed suit to cut off public access to the public beach alongside his beach front mansion. His suit was dismissed six times before he finally gave up and opened a nine-foot path from the highway to the beach.<sup>40</sup>

Not content to cut off public access to the beach, Malibu residents have also tried to cut off public access to public parks and trails in the Santa Monica Mountains along the coast.<sup>41</sup>

A property owner in Malibu’s Lechuza Beach recently complained to a state official that she opposes inner city youth coming to Lechuza Beach, after a hearing on improving public access there at which a non-profit representative spoke eloquently about teaching children of color life skills through outdoor activities.<sup>42</sup>

Today, Malibu is overwhelmingly white and wealthy. Malibu is 89% non-Hispanic white. Nearly 25% of Malibu households have an annual income over \$200,000. The median household annual income is \$102,031. In contrast, Los Angeles County is only 31% non-Hispanic white. Only 4% of households have an annual income of \$200,000 or more. The median household income is \$42,189.<sup>43</sup>

### V. PARK, SCHOOL, AND HEALTH DISPARITIES

In contrast to the positive vision for a regional web of natural public places discussed above, this Part presents the reality of unfair disparities in parks, school, and health.

#### A. Parks, Schools, and Obesity

*Children of Color.* Children of color living in poverty with no access to a car suffer from the worst access to parks, school fields, beaches, forests, and other natural public places, and suffer from the highest levels of child obesity. These children and their families and friends do not have access to cars or a decent transit system to take them to parks, schools, and other natural public places. Disproportionately white and wealthy people with fewer children than the county average enjoy the best access to parks, school fields, beaches, trails, mountains, forests, and transportation. In a cruel irony, the people who need the most have the least, while those who need less have the most. See Map 401.

The communities with the worst access to parks lie in Central and South Los Angeles, which have the lowest income levels and the highest concentrations of people of color. Fully 93% of households with children in Central Los Angeles and 85% in South Los Angeles fall below 300% of the federal poverty level. The

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### HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

annual income needed for a family of four to provide for its basic needs was slightly more than \$63,000 in 2005, more than three times the federal poverty level. Income disparities are most notable for Latino families, with 89% below three times the federal poverty level, compared to 34% for non-Hispanic white families.<sup>44</sup>

*Acres of Parks per Thousand Residents.* There are unfair disparities in access to parks and recreation measured by acres of parks per thousand residents in every political subdivision.<sup>45</sup> Thus, for example, State Assembly District 10 (Nuñez) in Central Los Angeles has only .51 net acres of urban parks per thousand residents, compared to 282.79 net acres in District 37 (Strickland) in the north part of the county. District 37 has as an astonishing 555 times more net acres of urban parks than District 10. The disparities are even more dramatic if total acres of parks including forests and other large natural public places are included. For example, there are .51 acres of total parks per thousand residents in District 10, and over 3,348 acres in District 27 – 6,566 times more total acres of park space. Districts 37 and 27 in the north county are disproportionately white and wealthy, compared to inner city District 10. *See* Map 401; Chart 401C, and Graph 401N.

*Child Obesity.* The levels of child obesity are intolerably high even for children in the best neighborhoods -- ranging from 23% to 40% throughout the Los Angeles region -- but children of color suffer first and worst. Children of color disproportionately live in the areas with the highest levels of child obesity and the worst access to parks and schools fields. *See* Map 403. Latino and black children are disproportionately overweight and unfit compared to non-Hispanic white and Asian children.

Overweight and Unfit Children in California<sup>46</sup>

Race/Ethnicity	Overweight	Unfit
Latino	34%	45%
African American	29%	46%
White	20%	34%
Asian	18%	36%

The health implications of the lack of places to play in parks and schools are profound. In California, 73% of fifth, seventh, and ninth graders did not achieve minimum physical fitness standards in 2004. In LAUSD, 87% of students were not physically fit.<sup>47</sup> Yet in 2006, 51% of school districts in California, including LAUSD, did not enforce statutory physical education requirements.<sup>48</sup> At LAUSD's South Gate High School, 1,600 children took the state Fitnessgram test and not one passed. Forty schools did not have a single physically fit student. Less than 10% of students were physically fit in nearly one-third of the 605 schools in LAUSD. Only eight schools had student populations that are more than 50% physically fit (see chart on next page).

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### MAPPING GREEN ACCESS AND EQUITY

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Percentage of Physically Fit Children in LAUSD Schools<sup>49</sup>

Percentage of Physically Fit Children	Number of Schools in LAUSD
0%	40
1-5%	58
6-10%	96
11-15%	123
16-20%	83
21-25%	75
26-30%	42
31-35%	38
36-40%	22
41-45%	16
46-50%	4
>50%	8

1 cont.

*Shared Use of Parks and Schools.* The shared use of parks and schools can alleviate the lack of places to play and recreate, while making optimal use of scarce land and public resources. Unfortunately, only 103 out of 605 LAUSD schools have five acres of more of playing fields, and those tend to be located in areas that are disproportionately white and wealthy and have greater access to parks. See Maps 401, 404.<sup>50</sup> LAUSD provides 71% more play acres for non-Hispanic white students than for Latino students in elementary schools.<sup>51</sup> There were only 30 joint use agreements between LAUSD and the City of Los Angeles Recreation and Parks Department as of April 2006.<sup>52</sup> The Olmsted Report and the Controller's audit of recreation and parks both call for the shared use of parks and schools.

#### B. River Revitalization

William Deverell has eloquently described the role of the Los Angeles River in the history of Los Angeles:

Were it not for the Los Angeles River, the city that shares its name would not be where it is today. Were it not for the Los Angeles River, Los Angeles would not be at all. The Los Angeles River has always been at the heart of whichever human community is in the basin: Gabrielino village, Spanish outpost, Mexican pueblo, American city. The river has been asked to play many roles. It has supplied the residents of the city and basin with water to drink and spread amidst their grapes, oranges, and other crops. It has been an instrument by which people could locate themselves on the landscape. It has been a critical dividing line, not only between east and west, north and south, but between races, classes, neighborhoods. . . . [T]he river has also been a place where ideas and beliefs about the past, present, and future of Los Angeles have been raised and contested.<sup>53</sup>

The Los Angeles River stretches 52 miles and crosses 13 cities, flowing through diverse communities from Canoga Park in the San Fernando Valley through downtown Los Angeles to the ocean in Long Beach. The City of Los Angeles has launched the Los Angeles River Revitalization Master Plan process to guide river revitalization for the next 20 years, focusing on the 32 miles of the river that flow through the city. However, children of color living in poverty without access to a car, and with the worst access to parks and to school fields of five acres or more, disproportionately live along the lower 20 miles of the river that lies within the county, but not within the city. See Map 1001 and Chart 1001C.<sup>54</sup>

The county, city, and other municipalities and agencies need to work together on a regional solution to ensure equitable distribution of the benefits and burdens of revitalizing the river. The County of Los Angeles

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adopted a Master Plan for the Los Angeles River in 1996.<sup>55</sup> The County also published a Master Plan for the San Gabriel River in 2006.<sup>56</sup> The Integrated Regional Water Management Plan for Greater Los Angeles County (IRWMP) covers the Los Angeles and San Gabriel Rivers. Planning for the full length of the Los Angeles River, the San Gabriel River, and other waterways should be coordinated to achieve compliance with clean water and civil rights laws and social justice concerns.<sup>57</sup> Communities of color have previously achieved compliance with clean water laws through major litigation against the City of Los Angeles.<sup>58</sup> The Olmsted Report also called for the greening of the Los Angeles and San Gabriel Rivers, and multiuse projects for parks, schools, and flood control.

Clean water compliance and flood control should be combined with healthy parks, schools, and communities through multipurpose projects. Green spaces in parks and schools can help clean water through natural filtration that can mitigate polluted storm water run-off to the rivers and the ocean. Flood control basins can provide green space for parks and playing fields, like the Sepulveda flood control basin recreation areas along the Los Angeles River do now. Recent state-wide resource bonds provide funding for clean water and flood control projects that can also be used for parks and school fields.

Latino support for community revitalization along the river is growing, and strong, based on recent polling and anecdotal evidence gathered by the William C. Velazquez Institute and the Alianza de los Pueblos del Río. When surveyed about what they would like to see on the river and its banks, Latinos showed significant support for parks and recreation: 48% said parks, 32% schools, 27% open green space, 21% California style trees and plants, and 20% said soccer and baseball fields. Latinos showed little support for “gentrification-oriented development,” with 25% supporting affordable housing and only 2% market rate housing, only 3% tourism-related development, and only 3% condominiums and penthouses.<sup>59</sup>

Latinos viewed revitalization priorities significantly differently than non-Hispanic whites. Latinos favor parks, schools, affordable housing, soccer and baseball fields, and businesses that create jobs by 10 points more than whites, on average. In contrast, whites favored open green space, California style trees and plants, and community gardens by 12 points more than Latinos, on average. Latinos and non-Hispanic whites were united in their opposition to gentrification, however.<sup>60</sup>

The three mile radius along the San Gabriel River is more complex demographically. *See* Map 1101 and Charts 1101C.<sup>61</sup> The San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy has jurisdiction over both rivers and can coordinate revitalization for both.

### C. Inequities in Urban Parks, Programs, and Funding

Unfair park, program, and funding disparities are documented by demographic maps of park access in the City of Los Angeles (Map 801, Chart 801C), an audit of the city Recreation and Parks Department, and an academic study showing that the allocation of park bond funds exacerbates park inequities.<sup>62</sup> Similar reports should be published of other park agencies and of recent resource bonds to see who benefits and who gets left behind by the investment of public funds, and to provide tools for reform.

The audit of recreation and parks by the Los Angeles City Controller documents systemic management failures, echoes the disparities discussed in the present Policy Report, and provides a blueprint for reform. For example, parks provide better programs in wealthy communities, and funding policies exacerbate rather than alleviate inequities. The audit highlights the need for: a strategic plan to improve parks and recreation programs in every neighborhood, and eliminate unfair disparities; standards to measure equity and progress in achieving reform; a community needs assessment now and every five years; a fair system of park financing

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and fees; shared use of parks and schools; and improved park safety.<sup>63</sup> One of the Controller's major recommendations is that the City "needs to strategically address issues of inequity regarding levels of service provided at parks citywide."<sup>64</sup>

The Controller's audit documents park inequities that city officials have known about for decades. The city of Los Angeles virtually abandoned parks, school construction, and public recreation in the wake of Proposition 13 in 1978, the taxpayers' revolt, which cut funding for local services, including parks and schools. In 1987 the Los Angeles Times reported that "[i]n scores of city parks across Los Angeles -- mostly cramped sites in poor neighborhoods -- fear is high. So pervasive are gangs, drug dealers and drunks, so limited are the programs and facilities, that the sites are known to parents and even some recreation directors as 'dead parks.'" Robin Kramer, then a city council deputy and now the mayor's chief of staff, acknowledged in that article that "there is tremendous under serving" of people in poor neighborhoods by the parks department.<sup>65</sup> In 1999, then-Mayor Richard Riordan told the Wall Street Journal that poorer communities have been short-changed by funding formulas for parks and recreation. "The way money is spread throughout the city has not been based on need as much as it has been about equally distributing funds" among the 15 council districts, according to the mayor.<sup>66</sup> Park officials concurred. "It's a pattern we all understand," according to the then-director of planning and development for Recreation and Parks. "The urban areas of Los Angeles have less park facilities than the new areas or outer lying areas, where ordinances require that parks be developed when housing developments go in."<sup>67</sup> "I think the mayor's sincere in his desire to address these inequities," Robert Garcia told the Wall Street Journal, but "I don't think the city is doing enough."<sup>68</sup>

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### D. Beaches<sup>69</sup>

An impressive nine in ten Californians say the quality of the beach and ocean is just as important to them personally as for the overall quality of life and economy in the state, according to a survey by the Public Policy Institute of California. Residents say the condition of the coast is very important (61%) or somewhat important (30%) on a personal level, very important (70%) or somewhat important (24%) to the state's quality of life, and very important (63%) or somewhat important (30%) to the economy.<sup>70</sup> Majorities agree across regions and political parties. "Californians treasure the ocean and the state's beaches," said survey director Mark Baldassare. "These attitudes run deep and wide across political parties, coastal and inland areas, and in the growing Latino population--to ignore them could be politically perilous."<sup>71</sup>

Beaches are among California's most valuable public assets. California has the largest ocean economy in the nation, a large portion revolving around the state's beaches. Ocean-related activities in California produced a gross state product (GSP) of \$42.9 billion and provided almost 700,000 jobs and more than \$11.4 billion in wages and salaries in 2000.<sup>72</sup>

The Olmsted Report called for the doubling of public beach frontage, as shown in Map 102 and Table 102T:

Public control of the ocean shore, especially where there are broad and satisfactory beaches, is one of the prime needs of the Region, chiefly for the use of throngs of people coming from inland. . . . [T]he public holdings should be very materially increased.<sup>73</sup>

Los Angeles beaches in 2005 are shown in Map 103. Not all beaches have public access, accurate public beach data is not available, and private property owners are trying to cut off public access to public beaches, as discussed above.<sup>74</sup>

While 80% of the 34 million people of California live within an hour of the coast,<sup>75</sup> low-income communities of color are disproportionately denied the benefit of beach access. Rio de Janeiro, like Los Angeles, is marked by some of the greatest disparities between wealth and poverty in the world. Yet Rio's famous beaches are open to all, rich and poor, black and white. The beach in Rio is the great equalizer. California's world famous beaches must also remain public for all, not the exclusive province of the rich and famous.

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People who live along the beach generally are disproportionately non-Hispanic white and wealthy. The non-Hispanic white population ranges from 89% to 58% in beachfront communities. In all coastal communities, the black population was too small to be significant.<sup>76</sup>

Long Beach is the only exception to the rule. There, the non-Hispanic white population of 47% is less than the state and county average, and the median household income is lower. This may be because Long Beach, unlike other coastal communities in Los Angeles, extends far inland and a good portion of the coastline is dedicated to the Port of Long Beach. Moreover, as is true for many port towns, Long Beach has historically been a working class town.<sup>77</sup>

Research suggests that different racial and ethnic groups in Southern California tend to visit different beaches, but conclusive data is not yet available.<sup>78</sup>

#### E. Forests and Mountains

Diversifying access to and support for the forests is an important part of achieving equal access to natural public places. Los Angeles County has 2,637,286 acres of land, and 807,731 total acres of parks. The total acres of parks includes large public spaces totaling 84,535 acres in the Angeles National Forest, Santa Monica Mountains National Recreation Area, Griffith Park, Elysian Park, and Baldwin Hills Parks.<sup>79</sup> Fully 25% of all land and 78% of all park space in Los Angeles County is in the Angeles National Forest. The Santa Monica Mountains National Recreation Area has 6% of all park space in the county. The county has 84.93 total acres of parks per thousand residents. Excluding those large public spaces, the county has 8.89 net acres of parks per thousand residents.<sup>80</sup> The stated averages mask the vast park, school, and health disparities based on race, ethnicity, income, poverty, and access to cars discussed above.

The Angeles National Forest provides far and away the most natural public space in the Los Angeles region, and lies within an hour's drive of most of Los Angeles, but few people of color go there. Recreation is the predominant use of the forests in Southern California.<sup>81</sup> Yet only 1% of the visitors to the forest are black, and only 11% are Hispanic. Zero percent of the visitors to the wilderness areas of the Angeles National Forest are black.

Angeles National Forest Visitors<sup>82</sup>

Race/Ethnicity	% of Visitors
Non-Hispanic White	79%
Latino	11%
Asian/Pacific Islander	7%
Black	1%
Native American	1%
Other	1%

The reasons for the low visitation rates by people of color include a history and pattern of employment discrimination by the Forest Service against people of color and women in the region, cultural differences in recreation, lack of transit, the privatization of public space, and a history of discriminatory land use and housing policies.<sup>83</sup>

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The Olmsted Report recommended integrate forests and mountains in the regional park system.<sup>84</sup>

#### F. Transit to Trails

Southern California should develop and implement a strategic plan for a “Transit to Trails” program to take people to parks, beaches, forests, lakes, and other public natural spaces. A Transit to Trails program would serve all the people of the region, but would be particularly useful to the working poor with limited or no access to cars, who are disproportionately people of color and low income.<sup>85</sup> Transit to Trails would reduce traffic congestion and parking problems, improve air quality, and reduce run-off of polluted water into rivers and the ocean. It would also reduce dependency on the automobile and fossil fuels. Today, there is virtually no good way to reach the four Southern California forests using public transportation.<sup>86</sup> Transit to beaches is limited, time-consuming, and expensive.<sup>87</sup> Low cost transit service should link parks like the Cornfield and Taylor Yard as part of the Heritage Parkscape. SCAG has the opportunity to include Transit to Trails in its next Regional Transportation Plan. The Olmsted Report envisioned a transportation system for people to reach natural public places.<sup>88</sup>

#### G. Cultural Diversity in Parks and Recreation

People are entitled to parks and natural public places that serve the diverse needs of diverse users.<sup>89</sup>

People from different racial and ethnic groups use parks differently, constructing meanings for natural space based on their own values, cultures, histories, and traditions. According to a UCLA study of cultural differences in the use of urban parks, parks are primarily social gathering places for Hispanics. African Americans, more than any other racial group, tend to engage in sports in parks. Non-Hispanic whites tend to value a park solely for its passive qualities—its greenness, landscaping, and natural elements. They tend, as a result, to engage in solitary, self-oriented uses. Asian-American (specifically, Chinese) families were rare in parks studied. This does not mean that Asians do not value parks; this may reflect the failure of the parks to meet the needs of the Asian-American community.<sup>90</sup> Most studies on leisure and urban recreation have focused on non-Hispanic whites.<sup>91</sup> Other studies have reached similar conclusions about how Hispanics use forests and other natural public places differently.<sup>92</sup>

Research suggests two potential explanations for differences in ethnic and racial recreation patterns. The *ethnicity hypothesis* posits that participation patterns result from culturally based differences in value systems and leisure socialization. Even when variables such as income, gender, area of residence, and household size are statistically controlled, ethnic and racial differences in participation patterns persist. The *marginality hypothesis* suggests that under-participation of ethnic and racial groups results primarily from limited economic resources and historical and ongoing patterns of discrimination.<sup>93</sup> Because people of color often occupy a subordinate position and hold a low station in the status hierarchy, they are less desired as leisure companions, leading to the creation of leisure spaces that are identified as non-Hispanic white or otherwise.<sup>94</sup>

Park and recreation plans, programs, and funding need to serve the diverse interests of diverse users in a balanced park and recreation system that includes, for example, places for physical activity to improve health, active recreation, passive recreation, and wilderness places.

#### H. Measuring Green Access and Equity

##### 1. Patterns of Racial and Ethnic Disparities

This Policy Report *Healthy Parks, Schools, and Communities* measures access to parks and other natural public places a number of ways. Acres of parks per thousand residents, half-mile access, access to school fields, levels of child obesity – the pattern is the same: people of color suffer first and worst. Non-Hispanic white people enjoy better access to natural public places compared to people of color collectively, and

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### HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

compared to other individual racial or ethnic groups. The distribution of parks and recreation is not random with respect to race and ethnicity.

This section discusses the relevant comparison pool for assessing disparities in access to natural public places based on race and ethnicity for both policy and legal analyses. The Controller's audit of recreation and parks calls for standards to measure equity and progress in improving parks and recreation in every neighborhood. Disparate impact is relevant to evaluate equal access to public resources including natural public places under federal and state civil rights laws (as discussed below). This section compares two statistical approaches. The first is appropriate and is used in this Policy Report. The second is not appropriate and is discussed here to guard against its use elsewhere.<sup>95</sup>

First, this Policy Report uses county averages to evaluate access to natural public places. Appropriate measures include whether people of color collectively, or an individual racial or ethnic group, in a geographic area exceed county averages, and are disadvantaged in access to natural public places, compared to non-Hispanic whites, the privileged group.

The second approach is inappropriate, but it is used elsewhere and should not be. Majority or supermajority representation in a community is inappropriate to evaluate access to parks and public resources. One academic study, for example, evaluates park and funding disparities using areas in which a racial or ethnic group constitutes a majority (50% to 75% African-American) or supermajority (75% or higher).<sup>96</sup> Both majority and supermajority measures create too high a statistical hurdle to evaluate equal access to natural public places. Both measures are underinclusive in guarding against discrimination. Both measures can provide evidence of discrimination in extreme cases. However, both measures fail to cover significant cases in which people of color are above the county average in a community, but below 50% of the population. Neither majority nor supermajority representation is justified on policy or legal grounds. Disproportionate population compared to county population averages is an appropriate standard. Majority or supermajority representation is not.

This Report uses disproportionate population compared to county averages to evaluate access to natural public places in the following ways.

Map 308 depicts park access by people of color in block groups that exceed the Los Angeles County average in four categories: no racial or ethnic group exceeds the average, one group exceeds the average, two groups exceed the average, and three groups exceed the average.

Map 307 presents four categories for people of color collectively: the population of people of color is under half the county average (under 34.5%); half the county average to the average (34.5% to 68.9%); over the county average (68.9% to 90.0%), and over 90.0%.

For Latinos, Map 310 presents four similar categories: under half the county average (under 22.3%); half the county average to the average (22.3% to 44.6%); county average up to twice the average (44.6% to 89.2%), and over twice the county average (over 89.2%).

For African Americans, Map 311 presents four slightly different categories: under the county average (under 9.8%), county average to twice the county average (9.8% to 19.6%), twice the county average to three times the county average (19.6% to 29.4%), and over three times the county average (over 29.4%). Map 312 presents similar categories for Asians/Pacific Islanders, and Map 306 for non-Hispanic Whites.

A significantly wider area raises significant concerns about racial and ethnic disparities in access to natural park places using county averages compared to the majority or supermajority standard. The following maps illustrate the difference. Map 309 depicts park access for areas in which each racial or ethnic group constitutes a majority (50 to 75%) or supermajority (75% and higher). These areas for African-Americans in Map 309 are

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a fraction of the significantly broader areas in which African-Americans are above the county average in Map 311. The same is true for Asian-Pacific Islanders, as illustrated by comparing Maps 309 and 312. The same is true where one, two, or three communities of color exceed the county average, as illustrated by comparing Maps 309 and 308.

Similar disproportionate population measures of green access and equity are depicted for the city of Los Angeles in Maps 803-806, along the Los Angeles River in Maps 1003-1009, and along the San Gabriel River in Maps 1103-1109.

To reiterate: Policy and legal analyses should use county averages to evaluate access to natural public places. Appropriate measures include whether people of color collectively, or an individual racial or ethnic group, in a geographic area exceeds county averages, and are disadvantaged in access to natural public places compared to non-Hispanic whites. Appropriate measures include whether the parks and recreation adequately serve the people with the greatest needs--children of color living in poverty with no access to a car, for example (Map 401). These measures are relevant to assess discriminatory impacts under civil rights laws, to define equity standards to implement the Controller's audit of recreation and parks, and to determine whether the benefits and burdens of park and resource bonds are distributed fairly.

### 2. Distance to the Park

There is no "correct" distance to evaluate fair access to parks. The optimal distance depends on the needs of the community, the type of park, and access to cars and transit. Map 402 shows the areas in Los Angeles that lie more than half a mile from the nearest park, but any distance in the abstract can be arbitrary and misleading – half mile or quarter mile access, walking distance, driving distance, etc.

The important concern is not distance alone but whether the park and recreation programs meet the needs of the community. If physical activity is a goal, for example, people can get physically active by walking half a mile or a mile to the park. With the shared use of parks and schools, the relevant distance is to the park or the school, not one or the other. If residents have access to a car or an affordable and reliable transit system, the distance to the park can be greater. Smaller parks and elementary school playgrounds within walking distance can serve the needs of younger children. Larger parks, and playing fields at middle and high schools, can provide places for physical activity and team sports for older children and adults, and can be within driving or busing rather than walking distance. In a high income community with large house lots, and ready access to cars and places like the Santa Monica Mountains, there is no need for a park within a quarter mile. A pocket park within walking distance may not adequately serve the needs of the community if there is no place to play in the park or any other nearby place. Even a large park may not adequately serve the community if the population and use density is so high that demand exceeds available park space.

The Olmsted Report suggested half a mile or more as a rule of thumb for distance to the park depending on the locality and other factors.<sup>97</sup>

One traditional environmental organization, Trust for Public Land, advocates a park within a quarter mile of each residence, and equates walking distance with a quarter mile, but it is difficult to consider this a serious policy proposal. The quarter mile or walking distance standard obscures the important considerations discussed above. Bus stops in Los Angeles are generally more than a quarter mile from most people. It is unrealistic to expect more parks than bus stops.

## VI. THE HISTORY OF DISCRIMINATORY ACCESS TO PARKS AND RECREATION

The fact that low-income people of color are disproportionately denied equal access to parks, school fields, beaches, trails, and forests is not an accident of unplanned growth, and not the result of an efficient free market distribution of land, but the result of a continuing history and pattern of discriminatory land use and economic policies and practices. The history of Los Angeles is relevant to understand how the Los Angeles region came

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to be the way it is, and how it could be better. Park and recreation resources must be allocated to overcome the legacy of unfair park, school, and health disparities.

The area surrounding the new Los Angeles State Historic Park at the Cornfield illustrates this history. El Pueblo de Los Angeles was founded in 1781 near the Native American Tongva village of Yangna, near the Cornfield. The first settlers, the Pobladores, were Spaniards, Catholic missionaries, Native Americans, and Blacks. Mexicans and Californios further established the city before statehood. Chinese began arriving in 1850 in search of gold but were restricted to working on the railroad and in domestic jobs. They were forced to live on the wrong side of the tracks in Old Chinatown, across "Calle de los Negros" ("Nigger Alley") from the Plaza. The Chinatown massacre of 1871 first brought Los Angeles to national and international attention. In the 1930s, the city forcibly evicted the residents and razed Old Chinatown to build Union Station. New Chinatown was created at the site of the old Mexican-American barrio of Sonoratown, just west of the Cornfield. Mexican-Americans, including U.S. citizens, were deported from the Cornfield during the Great Depression as a result of discrimination and competition for jobs. Japanese who arrived because of the labor shortage caused by the Chinese Exclusion Act settled in Little Tokyo. They were forced into concentration camps at Manzanar and other places during World War II. The area became known as Bronzertown when Blacks arriving from the South to work in the war industry filled the Japanese vacancies. The city destroyed the bucolic Latino community in Chavez Ravine with promises of affordable housing, then sold the land to the Dodgers, who buried the site with 50,000 places for cars to park and no place for children to play.<sup>98</sup>

Despite the prominent role of blacks in early Los Angeles,<sup>99</sup> black residential and business patterns were restricted in response to discriminatory housing and land use patterns. "Whites only" deed restrictions, housing covenants, mortgage policies subsidized by the federal government, and other racially discriminatory measures dramatically limited access by people of color to housing, parks, schools, playgrounds, swimming pools, beaches, transportation, and other public accommodations.<sup>100</sup>

Prof. Ira Katznelson's book *When Affirmative Action Was White* documents how racial inequities were aggravated by economic policies dating back to the Great Depression that had the impact of excluding blacks and increasing income, wealth, and class disparities. A continuing legacy of discriminatory economic policies is that the average black family in the United States holds just 10% of the assets of the average white family.<sup>101</sup> In the past, when beachfront prices were lower, for example, people of color were forbidden from buying, renting or even using beachfront property. Today, when beachfront property has skyrocketed in value, people of color often cannot afford to buy or rent beachfront property.

### A. Housing Restrictions

Los Angeles pioneered the use of racially restrictive housing covenants. The California Supreme Court sanctioned restrictive covenants in 1919 and California courts continued to uphold them as late as 1947. The Federal Housing Authority not only sanctioned racially restrictive housing covenants, but developed a recommended formula for their inclusion in subdivision contracts.<sup>102</sup> As a result, blacks increasingly became concentrated in South Central Los Angeles, for example, and Chinese in Chinatown, Mexican-Americans in East L.A., and Japanese in Little Tokyo.

The landmark Supreme Court decisions in *Shelley v. Kramer*<sup>103</sup> in 1948 and *Barrows v. Jackson*<sup>104</sup> in 1951 made racially restrictive housing covenants illegal and unenforceable. Even after those decisions, however, blacks and other people of color were excluded from white neighborhoods.<sup>105</sup> "In the postwar era many individual white homeowners, and virtually all the public and private institutions in the housing market,

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did everything possible to prevent African Americans from living outside areas that were already predominantly black.”<sup>106</sup>

#### B. Parks

Though not codified in law, public space in Los Angeles was “tacitly racialized.”<sup>107</sup> For example, blacks were not allowed in the pool in many municipal parks, and in others were allowed to swim only on “International Day,” the day before the pool was cleaned and the water drained. Segregated public pools continued into the 1940s.

There were some places of refuge, however. Lincoln Park in East Los Angeles was a popular destination for black youth from South Central and Latino youth from East Los Angeles, who could take the Pacific Electric railroad to reach one of the few parks where they were not feared, despised, and excluded.<sup>108</sup>

#### C. Beaches

*Bruces’ Beach.* When Manhattan Beach was incorporated in 1912, the city set aside a two-block area on the ocean for African-Americans. A black couple named Charles and Willa Bruce bought the land and built the only beach resort in the Los Angeles area that allowed blacks. Bruces’ Beach offered bathhouses, outdoor sports, dining, and dancing to African-Americans who craved a share of Southern California’s good life. As the area’s black population increased, so did white opposition to the black beach. Manhattan Beach drove out the black community and closed down Bruces’ Beach in the 1930s. City officials forced black property owners to sell at prices below fair market value through condemnation proceedings. The nearby Peck’s Pier – the only pier that allowed blacks – and the surrounding black neighborhood were destroyed. Black Angelenos were then relegated to the blacks-only section of Santa Monica beach at Pico Boulevard known as the Inkwell. Manhattan Beach in 2006 commemorated the struggle of the Bruce family and the African American community by renaming the park at the historical site as Bruces’ Beach Park.<sup>109</sup>

*Malibu.* At the turn of the century, Malibu consisted of a 13,316-acre rancho along a 25-mile stretch of beaches, mountains and canyons, owned by Frederick H. Rindge and later by his widow May.<sup>110</sup> To pay her taxes after her husband’s death, May Rindge began leasing and selling off land parcels to movie celebrities and others.<sup>111</sup> Parcels carried racially restrictive covenants that prevented people who were not white from using or occupying beach premises except as domestic servants, and even domestics who were not white were prohibited from using the public beach for bathing, fishing, or recreational purposes. A typical covenant reads:

[S]aid land or any part thereof shall not be used or occupied or permitted to be used or occupied by any person not of the white or Caucasian race, except such persons not of the white or Caucasian race as are engaged on said property in the bona fide domestic employment of the owner of said land or those holding under said owner and said employee shall not be permitted upon the beach part of said lands for bathing, fishing or recreational purposes.<sup>112</sup>

The demographics of Malibu today reflect its discriminatory history, as discussed above.

#### D. Mountains

In the 1920s and beyond, racially restrictive covenants prevented people of color from occupying or using property at Lake Arrowhead, the major mountain lake near Los Angeles.<sup>113</sup> The federal government traded away land on the lake for land in the woods. Today private mansions and businesses ring the lake and only the wealthy can live in what is known as “the Beverly Hills of the Mountains.” There is no public access to Lake Arrowhead.<sup>114</sup> This is a prologue for the future of natural public places if the privatization of public space continues.

The next Part articulates the values at stake in natural public places.

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HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

### VII. WHY PARKS AND RECREATION MATTER: THE VALUES AT STAKE

Parks, school fields, beaches, rivers, mountains, forests, and other natural public places are places to have fun. Having fun goes hand-in-hand with other values including human health; youth development and academic performance; conservation values of clean air, water, and land; spiritual values in protecting people and the earth; economic vitality; and sustainable regional planning. Fundamental principles of equal justice and democracy underlie each of these other values.

#### *Fun.*

Children have the right to the simple joys of playing in parks and other safe public places. The United States was founded in part for the pursuit of happiness.<sup>115</sup> The United Nations recognizes the right to play as a fundamental human right.<sup>116</sup>

#### *Human Health.*

The human health implications of places and policies for physical activity in parks, schools, and other public places are profound.<sup>117</sup>

If current trends in obesity and inactivity continue, today's youth will be the first generation in this nation's history to face a shorter life expectancy than their parents.<sup>118</sup> The epidemic of obesity, inactivity, and related diseases including diabetes is shortening children's lives and destroying the quality of their lives. The obesity and inactivity crisis costs the United States \$117 billion in lost productivity and medical costs.<sup>119</sup>

Overweight and unfit children face a greater risk of developing lung disease, diabetes, asthma, and cancer.<sup>120</sup> Type 2 diabetes, formerly known as adult-onset diabetes, now affects millions of overweight and inactive children at younger and younger ages.<sup>121</sup> As a result, children are more likely to suffer long range effects including death, loss of limbs, and blindness.

The crisis of obesity and inactivity is not just the result of individual eating or exercise habits. Children, adolescents, and adults cannot become more physically active and fit if they do not have places to play and be physically active in parks and schools.<sup>122</sup>

Physical inactivity is more prevalent among women than men, among blacks and Hispanics than whites, among the less affluent than the more affluent, and among older than younger adults.<sup>123</sup>

The most frequently used facilities for physical activity are informal and include streets, parks, and beaches.<sup>124</sup> The health costs of urban sprawl should inform land use and planning decisions to create and preserve parks, open space, and walkable neighborhoods with mixed land uses and transit alternatives.<sup>125</sup> “[A]pplying public health criteria to land-use and urban design decisions could substantially improve the health and quality of life of the American people.”<sup>126</sup>

Regular physical activity is associated with enhanced health and reduced risk for all-cause mortality, heart disease, diabetes, hypertension, and cancer.<sup>127</sup> Physical activity for children and adolescents helps to build and maintain healthy bones, muscles, and joints, and helps prevent or delay the development of high blood pressure.<sup>128</sup> Natural spaces are also linked to improved mental health. Physical activity relieves depression and anxiety.<sup>129</sup> Views of nature have been linked to a variety of positive health outcomes in adults and children and can relieve attention deficit disorder.<sup>130</sup>

#### *Youth Development.*

Sports and after school activities can promote positive choices and help reduce youth violence, crime, drug abuse, and teen pregnancy.<sup>131</sup> Sports and recreation also build character, pride, self esteem, teamwork, leadership, concentration, dedication, fair play, mutual respect, social skills, and healthier bodies; help keep children in school; help develop academic skills; and increase access to higher education.<sup>132</sup> Physically fit

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students perform better academically.<sup>133</sup> Male athletes are four times more likely to be admitted to Ivy League colleges than other males; for female athletes, the advantage is even greater.<sup>134</sup>

In the aftermath of the riots and rebellion following the acquittals of the police for the Rodney King beating in Los Angeles, gang members issued a manifesto calling for peace and listing the shortage of parks and natural space as one of their major concerns.<sup>135</sup>

Active recreation programs prevent gang violence, crime, prostitution, drug abuse, and teen sex. A study by the Los Angeles County District Attorney concluded that young people join gangs for the expected reasons, including the fact that they “have been excluded by distance and discrimination from adult-supervised park programs.”<sup>136</sup> The study recommends that “alternative activities like recreation” should be part of every gang prevention strategy. Organized sports “fill those idle hours that seduce adolescent boys into trouble . . . . At the least, they can keep older gang members busy during prime-time-crime hours . . . . At the most, they can keep marginal boys too busy for gangs, or give them an excuse not to join.”<sup>137</sup>

#### *Public Safety.*

The best way to ensure that parks are safe is to give people a sense of ownership of their parks. A diversity of people using parks differently at different times of the day and night will help drive away crime and criminals.<sup>138</sup>

#### *Conservation Values.*

Parks and natural open spaces promote environmental values including clean air, water, and ground, and habitat protection. Green spaces in parks, schools, and other public places can help clean water through natural filtration. Flood control basins can provide green space for parks and playing fields. Green spaces can help cool urban areas and help reduce global warming.

#### *Spiritual Values in Protecting the Earth and its People.*

Social justice and stewardship of the earth motivate spiritual leaders, including Cardinal Roger Mahony, and the Justice and Peace Commission of the Catholic Archdiocese of Los Angeles, to actively support equal access to parks and natural space.<sup>139</sup> Nobel Peace Prize Laureate Rigoberta Menchú has praised the work of The City Project and Anahuak Youth Sports Association to promote equal access to parks and recreation as a way of saying no to war, no to violence, and giving children hope. “It is very important that our children grow up healthy. The more they run, the happier they are. The more they play together with other children, the better people they will be in the future. Parks and school yards are a place for peace, a place where life-long values are built. Community activism to build parks and schools is a way of saying no to violence, no to war. Peace and hope are part of our children’s education and culture.”<sup>140</sup>

In 2004, the Nobel Peace Prize Committee awarded the Peace Prize to the Kenyan woman Wangari Muta Maathai for planting trees and speaking out for women. “In managing our resources and in sustainable development, we plant the seeds of peace,” according to Ms. Maathai.<sup>141</sup> The award for Ms. Maathai is an explicit mainstream recognition that there is more at stake in protecting the earth than traditional environmental values. We are fighting for peace and justice in seeking equal access to public resources for all.

#### *Economic Values.*

When cities create urban parks, property values rise and the number of businesses and jobs grows, contributing to the state and local economies. For example:

- When Chattanooga, Tennessee, replaced warehouses with an eight-mile greenway, full-time jobs and businesses more than doubled, and property values increased by 127%.
- When San Antonio, Texas, revitalized the San Antonio River, the river park became the most popular attraction in the city’s \$3.5 billion tourist industry.
- After expansion and restoration of the Martin Luther King, Jr. National Historic Site, in Atlanta, Georgia, the African-American “Sweet Auburn” neighborhood experienced a revitalization, with dozens of new homes, 500,000 annual visitors boosting local business, and a decrease in crime.<sup>142</sup>

Advocates and activists need to ensure that these economic benefits are distributed equitably -- for example, through local jobs for local workers and affordable housing to avoid gentrification.

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### HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

#### *Equal Justice and Democracy.*

Fundamental principles of equal justice and democracy underlie each of the values above. The Maps, demographic analyses, and history discussed throughout this Policy Report documents the unfair disparities in access to natural public places based on race, ethnicity, youth, income, poverty, and access to transportation.

As a matter of simple justice, parks, school fields, and other natural public places are a public resource, and the benefits and burdens should be distributed equally. All people are entitled to equal access to parks and recreation. People are entitled to parks and natural public places that serve the diverse needs of diverse users. Public dollars should not be spent in ways that discriminate unfairly against people of color and low income communities. Agencies should provide full and fair information and public participation in planning and investing infrastructure resources. Equal justice and democracy are fundamental values in this society.<sup>143</sup>

Framing the values at stake to appeal to different stakeholders is consistent with Professor George Lakoff's call to frame a progressive movement that defines who progressives are, encompassing strategic campaigns on many different issue areas and programs.<sup>144</sup>

The next Part discusses the articulation through law of the values at stake in natural public places.

### VIII. LEGAL JUSTIFICATIONS FOR EQUAL ACCESS TO PARKS AND RECREATION

Advocates have creatively combined a variety of legal theories to create new great urban parks and to protect public access to public lands, including state and federal civil rights and environmental laws and First Amendment rights to freedom of association and expression in parks and beaches.<sup>145</sup> Los Angeles faces the opportunity to affirmatively comply with these laws.

Federal and state laws prohibit both intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives in the provision of public resources, including access to parks and other public lands. An important purpose of the statutory civil rights framework is to ensure that recipients of public funds do not maintain policies or practices that result in racial discrimination.<sup>146</sup>

Title VI of the Civil Rights of 1964 and its implementing regulations prohibit both (1) intentional discrimination based on race, color or national origin, and (2) unjustified discriminatory impacts for which there are less discriminatory alternatives, by applicants for or recipients of federal funds, including municipalities such as the city of Los Angeles.<sup>147</sup>

California law also prohibits intentional discrimination and unjustified discriminatory impacts by recipients of state funds under Government Code section 11135, which is analogous to Title VI and its regulations.<sup>148</sup> In addition, California law defines environmental justice as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."<sup>149</sup>

The California Coastal Commission adopted a local coastal plan requiring Malibu to maximize public access to the beach while ensuring the fair treatment of people of all races, cultures, and incomes in 2002.<sup>150</sup> This was the first time an agency implemented the statutory definition of environmental justice under California law. Commissioner Pedro Nava told the Los Angeles Times he hoped to set a precedent for other communities, ensuring that visitors are not excluded because of their income or race.<sup>151</sup> The Commission adopted the provision in response to the advocacy of The City Project on behalf of a diverse alliance.<sup>152</sup>

Then-Secretary Andrew Cuomo of the United States Department of Housing and Urban Development recognized that the principle of equal justice must be implemented through parks and recreation in Los Angeles. Secretary Cuomo withheld federal funding for the proposed warehouses at the site of the Los Angeles

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State Historic Park at the Cornfield unless the city of Los Angeles and the developers conducted a “full-blown” assessment of the impact of the proposed development on communities of color and low-income communities, including the park alternative. Secretary Cuomo acted after members of the Chinatown Yard Alliance filed an administrative complaint on the grounds that the warehouse project was the result of discriminatory land use policies that had long deprived communities of color and low-income communities of parks under federal civil rights, environmental justice, and environmental laws.<sup>153</sup>

Unfair park, school, and health disparities in Los Angeles are not just the result of bad management or dumb policies and practices. Compliance with the civil rights laws is necessary to eliminate “business as usual” that perpetuates the pattern and history of park, school, and health disparities. According to the authors of *Rethinking Urban Parks*, “racist ideology and practices underlie the cultural processes and forms of exclusion we describe in urban parks and beaches. We intend this work to be antiracist at its core, and to contribute to a better understanding of how racism, as a system of racial advantage/disadvantage, configures everyday park use and management.”<sup>154</sup>

Despite cutbacks in enforcement of civil rights protections in federal courts, it is important to keep in mind that both intentional discrimination and unjustified discriminatory impacts remain unlawful under federal and state law. As a matter of simple justice, it is unfair to use public tax dollars to subsidize discriminatory intent and discriminatory impacts.<sup>155</sup> Recipients of federal and state funds like the City of Los Angeles and park and recreation agencies remain obligated to prohibit both.

The planning and administrative processes are available to achieve compliance with civil rights laws and overcome discriminatory impacts. The California Coastal Commission took such a step when it required Malibu to maximize public access to the beach while ensuring the fair treatment of people of all races, cultures, and incomes.<sup>156</sup> State civil rights and environmental justice protections can be enforced and strengthened, such as California’s Government Code section 11135 and the statutory environmental justice definition. The same kinds of evidence can be as persuasive in the planning process, administrative arena, and court of public opinion, as in a court of law. Similar evidence is relevant to prove both discriminatory intent and discriminatory impact. Known discriminatory impact – whether known in advance or after the fact – continues to be among the most powerful evidence to establish discriminatory intent. Civil rights and environmental impacts can be analyzed together to alleviate unfair disparities in access to parks and recreation and achieve compliance with both bodies of laws.

Elected officials should be increasingly sensitive to, and held accountable for, the impact of their actions on communities of color, especially now that people of color are in the majority in forty-eight out of the 100 largest cities in the country.<sup>157</sup>

These are some of the tools that advocates and activists have successfully relied on in creating the great urban parks in Los Angeles, and keeping public lands public for all.

## IX. PRINCIPLES AND RECOMMENDATIONS

Natural public places, including parks, school fields, rivers, beaches, forests, mountains, and trails, are a necessary part of any urban infrastructure for healthy, livable communities. We recommend the following principles to ensure that everyone—especially people of color and others in low-income communities—benefits equally from infrastructure investments in natural public places.<sup>158</sup>

*Principle 1.* Infrastructure decisions involving natural public places have widespread impacts on health, housing, development, investment patterns, and quality of life. The process by which those decisions are reached, and the outcomes of those decisions, must be fair and beneficial to all.

*Principle 2.* Infrastructure investments should be guided by a regional vision for a comprehensive web of communities, parks, schools, beaches, forests, rivers, mountains, and transit to trails to achieve results that are equitable; promote human health, the environment, and economic vitality; and serve diverse community needs.

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### HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

*Principle 3.* Infrastructure areas should be planned together in complementary rather than conflicting ways to serve health, education, and human service needs; to fulfill critical governmental and societal responsibilities; and to produce equitable results. For example, green parks can be used as flood control basins and can clean water and mitigate polluted storm water runoff. Shared use of schools and parks can provide places and policies for physical activity and healthy eating to improve health. Transit can provide access to trails.

*Principle 4.* Budget priorities within infrastructure areas should be thoroughly assessed through an equity lens. For example, there is a need for both active and passive recreation in natural public places. Urban and wilderness park advocates should work together rather than at cross purposes. Schools must develop the body and mind of the child through physical education as well as academics.

*Principle 5.* Employment and economic benefits associated with building and maintaining infrastructure, including parks, schools, and other natural public places, should be distributed fairly among all communities. Local jobs with livable wages should go first to local residents. Job training should be provided for those who need it to qualify for jobs. There should be a level playing field for small, women, and minority business enterprises. Affordable housing should be provided near parks and schools that are revitalizing neighborhoods, in order to prevent gentrification.

*Principle 6.* Revenues to support infrastructure improvements, including parks, schools, and other natural public places, should be collected and allocated fairly to distribute the benefits and burdens of these projects. Resources for parks and recreation should be allocated to overcome the continuing pattern and history of unfair park, school, and health disparities.

*Principle 7.* Infrastructure decision-making should be transparent and include mechanisms for everyone to contribute to the planning and policymaking process. For example, citizenship, voter registration, and get out the vote drives can engage new voters – young people, immigrants, and others -- to elect officials and decide ballot measures. Full environmental impact reports and statements, and health impact assessments, for parks and schools should be required to provide full and fair information and enable effective public participation. Audits and reports on bond funds and park agencies can illuminate inequities and provide blueprints for reform. Community oversight bodies should review infrastructure investments. Litigation is a profoundly democratic means of providing access to justice and the fair distribution of public resources, particularly for traditionally disempowered communities. Public officials and foundations should recognize this and support and fund such litigation. The Cornfield and Taylor Yard would not be parks but for litigation, and those victories spawned the diverse movements that have produced additional public land and resource bond victories.

*Principle 8.* Standards for measuring equity and progress should be articulated and implemented to hold agencies accountable for building healthy, livable communities for all.

*Principle 9.* In making infrastructure investments and decisions involving natural public places, recipients of federal and state funds should proactively comply with federal and state laws designed to achieve equal access to public resources, including Title VI of the Civil Rights Act of 1964 and its implementing regulations, California Government Code 11135, and the California statutory definition of environmental justice. Compliance with civil rights and environmental laws should be combined.

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*Principle 10.* Government agencies and the philanthropic community must dedicate resources to enable community based organizations to serve their communities and actively participate in infrastructure planning and investments.

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### X. CONCLUSION

In 1930, Los Angeles threw away the opportunity to implement a regional vision for parks, playing fields, and beaches for the Los Angeles region. Over 75 years later, Los Angeles has a historic opportunity to restore part of the lost beauty of the region and to achieve equal access to parks and recreation. Billions of dollars of park, school, water, and other infrastructure bonds are available. Various agencies are implementing park, school, and river plans that will shape Los Angeles for generations to come. Applying the principles, recommendations, and laws above to achieve equitable infrastructure investments will create healthy, livable, communities for all.

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1. Robert García is Executive Director and Counsel of The City Project in Los Angeles, California, and Aubrey White is Program Director. Amanda Recinos, Associate Director of GreenInfo Network and a GIS specialist, prepared the maps and statistics in this Report. Robert García has been an attorney or advocate in the Cornfield, Taylor Yard, Baldwin Hills, Ascot Hills, Los Angeles River, Canyon Back, Millard, and Malibu, and Bruce's Beach matters discussed below. He served as Chairman of the LAUSD School Bond Citizens' Oversight Committee from 2000 to 2005.

2. Robert García and The City Project have worked and published extensively on equal access to parks, school fields, rivers, beaches, forests, transportation, and related issues at the intersection of equal justice, democracy, and livability. *See generally* Robert García and Erica Flores, *Anatomy of the Urban Park Movement: Equal Justice, Democracy and Livability in Los Angeles* [hereinafter *Urban Parks Movement*], in *THE QUEST FOR ENVIRONMENTAL JUSTICE: HUMAN RIGHTS AND THE POLITICS OF POLLUTION* 145 (Robert Bullard, ed., 2005); Robert García et al., *We Shall Be Moved: Community Activism As a Tool for Reversing the Rollback* [hereinafter *We Shall Be Moved*], in *AWAKENING FROM THE DREAM: PURSUING CIVIL RIGHTS IN A CONSERVATIVE ERA* 329 (Denise C. Morgan et al., eds., 2005); Robert García and Thomas A. Rubin, *Crossroad Blues: The MTA Consent Decree and Just Transportation*, in *RUNNING ON EMPTY: TRANSPORT, SOCIAL EXCLUSION, AND ENVIRONMENTAL JUSTICE* 221 (Karen Lucas, ed., 2004); Robert García and Erica Flores Baltodano, *Free the Beach! Public Access Equal Justice, and the California Coast*, 2 *STANFORD JOURNAL OF CIVIL RIGHTS AND CIVIL LIBERTIES* 142 (2005) [hereinafter *Free the Beach!*]; Robert García and Erica Flores Baltodano, *Healthy Children, Healthy Communities, and Legal Services*, published in a special issue on Environmental Justice for Children in the *Journal of Poverty Law and Policy* by the National Center on Poverty Law and the Clearinghouse Review (May-June 2005) [hereinafter *Healthy Children, Healthy Communities, and Legal Services*]; *Healthy Children, Healthy Communities: Schools, Parks, Recreation, and Sustainable Regional Planning*, 31 *FORDHAM URB. L.J.* 101 (2004) (Symposium on Urban Equity); ROBERT GARCÍA, ERICA S. FLORES, JULIE EHRLICH, *POLICY REPORT, THE CORNFIELD AND THE FLOW OF HISTORY* (2004), available at [www.cityprojectca.org/publications/index.html](http://www.cityprojectca.org/publications/index.html); *See generally* ROBERT GARCÍA, ET AL., *DREAMS OF FIELDS: SOCCER, COMMUNITY, AND EQUAL JUSTICE* 17 (2002); available at [www.cityprojectca.org/publications/index.html](http://www.cityprojectca.org/publications/index.html).

3. This Report will often use the shorthand term "parks and recreation" to refer to parks, school fields, rivers, beaches, forests, and other natural public places.

4. SETHA LOW, DANA TAPLIN, & SUZANNE SCHELD, *RETHINKING URBAN PARKS: PUBLIC SPACE AND CULTURAL DIVERSITY* 210 (2005) (hereinafter *RETHINKING URBAN PARKS*).

5. Jane Lawler Dye and Tailese Johnson, U.S. Census Bureau, *A Child's Day 2003: Selected Indicators of Child Well-Being Table D29* (Jan. 2007) ("*A Child's Day*"), available at [www.census.gov/population/www/socdemo/wellbeing.html](http://www.census.gov/population/www/socdemo/wellbeing.html).

6. 33% of Hispanic children in suburban areas were kept inside because of perceived dangers, followed by 25% of Blacks and 15% of non-Hispanic Whites. The number of Asian respondents in metropolitan areas outside central cities was not statistically significant. *Id.* at 19-20.

	Safe Place to Play	Kept Inside/Cities Under 18	Kept Inside/Suburbs Under 18
Non-Hispanic White	87%	25%	15%
Hispanic	68%	48%	33%
African American	71%	39%	25%
Asian	81%	24%	N/A

7. Non-Hispanic White children were most likely to participate in sports – 45% of both 6- to 11- and 12- to 17-year-old children, compared to 26% and 42% of Asians; 24% and 35% of blacks; and 21% and 35% of Hispanics. Only 26% of 6- to 17-year-old children in poverty participated in after school sports, compared to 46% living at twice the federal poverty level or higher. *Id.* at 13-14.<sup>7</sup> (See chart on next page.)

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MAPPING GREEN ACCESS AND EQUITY

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	Sports ages 6-11	Sports ages 12-17
Non-Hispanic White	45%	45%
Hispanic	21%	35%
African American	24%	35%
Asian	26%	42%
Poverty	26%	26%
2X poverty level	46%	46%

8. *Id.* at 13, citing Joseph Mahoney, “School Extracurricular Activity Participation as a Moderator in the Development of Antisocial Patterns,” 71 *Child Development* 502-16 (2000), and National Institute of Child Health and Human Development Early Child Care and Youth Development Research Network (NICHD), “Are Child Developmental Outcomes Related to Before- and After-School Care Arrangements? Results From the NICHD Study of Early Child Care,” 75 *Child Development* 284-95 (2004).

9. Evan George, *Browning the Green Movement*, L.A. ALTERNATIVE, Sept. 15, 2006, available at [www.cityprojectca.org](http://www.cityprojectca.org) and [www.laalternative.com/index.php/2006/09/15/browning-the-green-movement](http://www.laalternative.com/index.php/2006/09/15/browning-the-green-movement).

10. *Id.*

11. Olmsted Brothers & Bartholomew and Associates, *Parks, Playgrounds and Beaches for the Los Angeles Region 1* (1930) [hereinafter OLMSTED REPORT], reprinted in GREG HISE & WILLIAM DEVERELL, EDEN BY DESIGN (2000). The City Project's digital edition of the Olmsted vision is available at <http://www.clipi.org/images/g-olmstedlarge.jpg>.

12. See, e.g., OLMSTED REPORT at 129.

13. *Id.* at 85-88, 92-93.

14. *Id.* at 14-16.

15. *Id.* at 13-14, 35-43.

16. *Id.* at 22.

17. *Id.* at 16.

18. See HISE & DEVERELL, *supra*, at 7-56; Mike Davis, *How Eden Lost Its Garden*, in *ECOLOGY OF FEAR* 59-91 (1998).

19. L.A. TIMES, “How Propositions 40 and 45 Fared Among Voters,” Mar. 7, 2002 (statewide exit poll).

20. Exit poll and turnout study by the William C. Velazquez Institute (WCVI), [www.wcvi.org/press\\_room/press\\_releases/2006/exitpoll\\_caProp842006.htm](http://www.wcvi.org/press_room/press_releases/2006/exitpoll_caProp842006.htm).

21. JENNIFER WOLCH, JOHN WILSON & JED FEHRENBACH, *PARKS AND PARK FUNDING IN LOS ANGELES: AN EQUITY MAPPING ANALYSIS* (2002).

22. MARK BALDASARE, *PUBLIC POLICY INSTITUTE OF CALIFORNIA STATEWIDE SURVEY: SPECIAL SURVEY ON CALIFORNIANS AND THE ENVIRONMENT* vi (June 2002).

23. Los Angeles County Children’s Planning Council, 2006 Children’s ScoreCard (hereafter “ScoreCard”) at 19, citing the Los Angeles County Children’s Planning Council, Los Angeles County Chief Administrative Office and Inter-Agency Operations Group, “Los Angeles County Forum Findings, August 2005.” The ScoreCard appears at [www.childrensplanningcouncil.org](http://www.childrensplanningcouncil.org).

24. ScoreCard at 20.

25. James Ricci, *A Park with No Name (Yet), but Plenty of History*, L.A. TIMES MAGAZINE, July 15, 2001; Jesus Sanchez *L.A.’s Cornfield Row: How Activists Prevailed*, L.A. TIMES, April 20, 2001, at A1. See generally García, *Urban Park Movement, supra*; Paul Stanton Kibel, *Los Angeles’ Cornfield: An Old Blueprint for New Greenspace*, 23 *STANFORD ENVIRONMENTAL LAW JOURNAL* 275 (2004).

26. Chi Mui, *Civil Rights Hero*, [www.cityprojectca.org/blog/archives/276](http://www.cityprojectca.org/blog/archives/276).

27. Miguel Bustillo, *State, Youth Sports Advocates Clash Over Best Use of Parks*, L.A. TIMES, Dec. 22, 2002.

28. Lisa Richardson, *Fighting This Conservancy Won’t Be a Walk in the Park*, L.A. TIMES, Oct. 22, 2004.

29. Miguel Bustillo, *Former Foes Unite behind a Proposal to Turn Old Reservoir Site into Park*, L.A. TIMES, Jan. 15, 2004.

30. Gordon Smith, *Refurbishing L.A.’s Soul*, DAILY BREEZE, Dec. 6, 2006, at A1.

31. ROBERT GARCÍA, ERICA S. FLORES, JULIE EHRLICH, *POLICY REPORT, THE CORNFIELD AND THE FLOW OF HISTORY* (2004), available at [www.cityprojectca.org/publications/index.html](http://www.cityprojectca.org/publications/index.html); Cornfield State Park Advisory Committee, *Recommendations Report: A Unified Vision for Cornfield State Park, Appendix I: Cultural, Historical, and Recreational Links* (2003), available at [www.parks.ca.gov/pages/21299/files/recommendationsreport.pdf](http://www.parks.ca.gov/pages/21299/files/recommendationsreport.pdf).

32. *RETHINKING URBAN PARKS, supra*, at 203-04.

33. Jessica Garrison, *Hikers, Homeowners Are at Odds Over Trails*, L.A. TIMES, May 10, 2006.

34. Jessica Garrison, *Developers and Hikers Settle Access Dispute*, L.A. TIMES, July 26, 2006.

The suits involving Canyon Back and Millard relied on laws providing that trails that were public for five years before 1972 are to remain public. See *Gion v. City of Santa Cruz*, 2 Cal. 3d 29, 38 (1970); *Friends of the Trails v. Blasius*, 78 Cal. App. 4th 810, 820-822 (2000). Park agencies should publish inventories of such trails to avoid evidentiary problems as time goes by.

## COMMENT LETTER 29

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### HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

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35. Editorial, *Settle La Vina Access Issue*, PASADENA STAR NEWS, Nov. 21, 2005. See Louis Sahagun, *Canyon Neighbors Gird for Another Legal Battle*, L.A. TIMES, Jan. 18, 2005.
  36. See generally García, *Free the Beach!*, *supra*.
  37. The beach bulldozing drew international attention. Kenneth R. Weiss and Amand Covarrubias, *Battle over Broad Beach Takes New Turn, With Earthmoving Equipment*, L.A. TIMES, June 9, 2005, at B3; Jamie Wilson, *Bulldozer Tactics by Malibu's Super-rich*, THE GUARDIAN (LONDON), June 10, 2005, at 17.
  38. *Cal. Coastal Comm'n v. Trancas Property Owners Association*, Case No. SC 086150 (Ca. Superior Court L.A. County July 6, 2005). The matter remained scheduled for trial on liability and fines of up to \$15,000 a day as of January 2007.
  39. See Letter from Robert García, et al., to California Coastal Commission re: *Commission Cease & Desist Order No. CCC-05-CD-9 (Trancas Property Owners Association, Malibu)* (Aug. 8, 2005) (on file with The City Project); Sara Lin, *Public's Use of Beach Is Affirmed: Malibu homeowners group must forgo signs and security guards, coastal panel says*, L.A. TIMES, Aug. 15, 2005, at B1.
  40. Kenneth R. Weiss, *Mogul Yields Beach Access to Public*, L.A. TIMES, April 15, 2005; Kenneth R. Weiss, *Geffen to Reimburse \$300,000*, L.A. TIMES, April 16, 2005. The City of Malibu dropped out of the suit earlier.
  41. Daryl Kelley, *Visitors to Park Are Told Not to Take a Hike*, L.A. TIMES, Aug. 19, 2005 at B1.
  42. Telephone conversation with agency official, June 16, 2005.
  43. U.S. Census 2000 data available at [www.factfinder.census.gov](http://www.factfinder.census.gov) and compiled by Greeninfo Network for The City Project.
  44. ScoreCard at 8.
  45. See Maps 401-903 and accompanying Charts and Graphs.
  46. California Center for Public Health Advocacy, *An Epidemic: Overweight and Unfit Children in California Assembly Districts* (Dec. 2002).
  47. Cal Dep't. of Ed. website, at [www.cde.ca.gov/ta/tg/pf/index.asp](http://www.cde.ca.gov/ta/tg/pf/index.asp); Cara Mia DiMassa, *Here's the Skinny: Most Students Aren't*, L.A. TIMES, Nov. 25, 2004.
  48. California Center for Public Health Advocacy, Press Release (June 6, 2006), on file with The City Project.
  49. García, *Healthy Children, Healthy Communities, and Legal Services*, *supra*, at 57.
  50. Obtaining information about which schools have five acres or more of field space is difficult. It took years for LAUSD to produce the information to The City Project, and LAUSD does not guarantee its accuracy. USC students researching other school districts in Los Angeles County (there are 80) were not readily able to obtain such information from the districts, and were forced to locate and measure school fields using web satellite images and field checks. They found that school districts with five acres or more of school fields are in disproportionately white and wealthy areas, except for Compton, but those schoolyards were generally in worse condition and had less green space. Amelia Canright, Tyler Claxton, Yukai Hong, Christina Jackson, University of Southern California Geography Department, *Disparity in Recreational Space Throughout School Districts of Los Angeles County* (2006) (on file with The City Project).
  51. Testimony and Powerpoint presentation by Michael Strumwasser, an attorney for LAUSD, before the LAUSD Citizens' School Bond Oversight Committee, November 17, 2004.
  52. Juliet Howland, Francine Young, Jon Erdsieck, Bunny Tucker, University of Southern California Geography Department, *Access to Recreational Space: Joint Use Agreements in the Los Angeles Unified School District* (2006) (on file with The City Project).
  53. WILLIAM DEVERELL, *WHITEWASHED ADOBE 93* (2004). Major works about the Los Angeles River include JOE LINTON, *DOWN BY THE LOS ANGELES RIVER* (2005); BLAKE GUMPRECHT, *THE LOS ANGELES RIVER: ITS LIFE, DEATH, AND POSSIBLE REBIRTH* (1999); LEWIS MACADAMS, *THE RIVER: BOOKS ONE, TWO, & THREE* (2005); and D.J. WALDIE, *WHERE WE ARE NOW: NOTES FROM LOS ANGELES* (2004).
  54. See also Maps 1002-1010. For example, within three miles of the river *outside* the City, 60% of the population is Hispanic, 10% is black, 43% of children live in poverty, and the median household income is \$34,751. Within three miles of the river *within* the City, 49% of the population is Hispanic, 5% is black, 35% of children live in poverty, and the median household income is \$41,681. Total acres of parks per thousand residents is higher within than outside the City (8.3 versus 5.6), while net acres are about the same (5.4 versus 5.6) within and outside the City.
  55. The County's Los Angeles River Plan is available at [http://ladpw.org/wmd/watershed/LA/LA\\_River\\_Plan.cfm](http://ladpw.org/wmd/watershed/LA/LA_River_Plan.cfm).
  56. The County's San Gabriel River Plan is available at <http://ladpw.org/wmd/watershed/sg/mp>.
  57. State and federal clean water laws, CEQA, and NEPA provide the framework for environmental restoration,

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## COMMENT LETTER 29

### MAPPING GREEN ACCESS AND EQUITY

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revitalization and development along the Los Angeles and San Gabriel Rivers. *See, e.g.*, Federal Water Pollution Control Act, 33 U.S.C. §1313(a) et seq.; Porter-Cologne Act, Cal. Water Code §13000 et seq.; National Environmental Policy Act (NEPA), 42 U.S.C. § 4321; California Environmental Quality Act (CEQA), Cal. Pub. Resources Code, § 21000 et seq.). Civil rights laws are discussed below.

58. The Baldwin Hills Estates Homeowners' Association, Inc., Baldwin Hills Village Garden Homes Association, United Homeowners Association, Village Green Owners Association, and Concerned Citizens of South Central Los Angeles filed a complaint in intervention against the city of Los Angeles in 2001, alleging that sewage spills and nuisance odors violated the Clean Water Act, 33 U.S.C. § 1311(a), and/or the terms and conditions of National Pollution Discharge Elimination System ("NPDES") permits. Plaintiffs represented residents in Baldwin Hills, Crenshaw, Leimert Park, and South Central Los Angeles, which are disproportionately communities of color or low income communities. After conceding liability for certain spills, the city agreed to invest over \$2 billion to eliminate or mitigate the odors in 2004 as part of an agreement settling a broader clean water suit by the United States, the State of California, the California Water Quality Control Board, and Santa Monica Baykeeper. *See* Settlement Agreement and Final Order, Civil Actions No. 01-191-RSWL and 98-9039-RSWL (2004).

59. Phone survey by the William C. Velazquez Institute, September 2006, available at [http://www.wcvi.org/latino\\_voter\\_research/polls/ca/2006/lariverpoll\\_91106.html](http://www.wcvi.org/latino_voter_research/polls/ca/2006/lariverpoll_91106.html).

60. *Id.*

61. *See also* Maps 1102-1110, Chart 1201C. There is a higher percentage of Hispanics and Asian/Pacific Islanders compared to the county as a whole. A higher percentage of people live in poverty. The percentage of people with a high school education or less is greater. However, the median household income is higher, and a higher percentage have access to a car.

62. WOLCH, PARKS AND PARK FUNDING IN LOS ANGELES, *supra*.

63. The audit of Recreation and Parks is available in three parts at [www.cityprojectca.org/blog/wp-content/fiscalmanagementCityParks11102005\\_01.pdf](http://www.cityprojectca.org/blog/wp-content/fiscalmanagementCityParks11102005_01.pdf); [www.cityprojectca.org/blog/wp-content/RecreationandCommunityServicesAudit.pdf](http://www.cityprojectca.org/blog/wp-content/RecreationandCommunityServicesAudit.pdf); and [www.cityprojectca.org/blog/wp-content/MaintanceAudit01092006.pdf](http://www.cityprojectca.org/blog/wp-content/MaintanceAudit01092006.pdf).

64. Performance Audit of Recreation and Community Services in the Department of Recreation and Parks, Jan. 6, 2006, at 10, available at [www.cityprojectca.org/blog/wp-content/RecreationandCommunityServicesAudit.pdf](http://www.cityprojectca.org/blog/wp-content/RecreationandCommunityServicesAudit.pdf).

65. David Johnston, *Dead Parks*, L.A. TIMES, Sept. 3, 1987.

66. Shirley Leung, *Riordan Seeks More Funds for Urban Core*, WALL STREET JOURNAL, April 28, 1999.

67. Jocelyn Stewart, *Officials Resort to Creativity to Meet Need for Parks*, LOS ANGELES TIMES, June 15, 1998. Accord, Shirley Leung, *Riordan Seeks More Funds for Urban Core*, WALL STREET JOURNAL, April 28, 1999.

68. *Id.*

69. For a comprehensive study of equal access to public beaches, *see generally* García, *Free the Beach!*, *supra*.

70. Mark Baldassare, *Special Survey on Californians and the Environment: Ignoring Environmental, Coastal Concerns Could Be Perilous for California Politicos in 2006 Election Year* (Feb. 23, 2006) (on file with The City Project).

71. *Id.*

72. National Ocean Economics Program, *California's Ocean Economy*, Report to the Resources Agency, State of California 1 (July 2005).

73. *Id.* at 7.

74. The Coastal Commission has published a guide only for public beaches along Broad Beach in Malibu. The Commission should publish a similarly detailed guide to all public beaches in Los Angeles County and the state. The guide is available at [www.cityprojectca.org/pdf/broadbeachaccess.pdf](http://www.cityprojectca.org/pdf/broadbeachaccess.pdf). On beach access, *see generally* Olena Horcajo, Jennifer McCard, Brian Selogie, & Ryan Terwilliger, University of Southern California Geography Department, *Taking Back the Beach: An Evaluation of Beach Access Issues Along the Los Angeles County Coastline* (2006), on file with The City Project and forthcoming at [www.cityprojectca.org](http://www.cityprojectca.org).

75. Timothy Egan, *Owners of Malibu Mansions Cry, "This Sand Is My Sand,"* N.Y. TIMES, Aug. 25, 2002, p. 1.

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COMMENT LETTER 29

76. Demographics of Coastal Communities in Los Angeles County

Community	Total Population	Non-Hispanic White	Latino	Asian	Median Household Income
Malibu	18,528	85%	6%	3%	\$102,052
Pacific Palisades	17,143	89%	4%	5%	\$125,711
Santa Monica	54,341	74%	12%	6%	\$50,435
Venice (Ocean Park)	24,639	61%	24%	3%	\$48,101
Marina del Rey	14,837	80%	6%	7%	\$74,444
Playa del Rey	16,830	70%	11%	8%	\$67,651
El Segundo	15,970	78%	10%	7%	\$61,385
Manhattan Beach	29,017	86%	5%	5%	\$102,739
Hermosa Beach	18,442	85%	7%	4%	\$81,883
Redondo Beach	27,107	77%	10%	8%	\$61,142
Torrance	11,026	80%	7%	10%	\$72,920
Palos Verdes Estates	13,340	76%	3%	17%	\$123,996
Rancho Palos Verdes	21,525	64%	4%	25%	\$104,552
Rolling Hills	1,871	77%	5%	14%	\$200,001
L.A. Harbor	34,878	58%	28%	4%	\$51,482
Long Beach	100,920	47%	31%	9%	\$41,587
L.A. County (for comparison)	9,519,338	49%	45%	12%	\$42,289
California (for comparison)	33,871,648	60%	32%	11%	\$47,493

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Scott Anderson & Mike Godfrey, University of Southern California Geography Department, *Coastal Demographic: Los Angeles Pilot Project 1-2* (2003) (on file with The City Project). The study analyzed beach communities from Malibu to Long Beach using 2000 census tracts within approximately one mile from the coast. The household income is an average of the median household incomes within one community as defined by the study. The tracts containing Los Angeles International Airport and Long Beach Harbor were omitted because they contained negligible data.

77. John H. M. Laslett, *Historical Perspectives: Immigration and the Rise of a Distinctive Urban Region, 1900-1970*, in *ETHNIC LOS ANGELES 54* (Roger Waldiner and Mehdi Bozorgmehr eds., 1996).

78. Garcia, *Free the Beach!*, *supra*, at 197-98.

79. Chart 701C.

80. *Id.* Six to ten acres has been the National Recreation and Park Association standard. See GEORGE FOGG, PARK, RECREATION AND LEISURE FACILITIES SITE PLANNING GUIDELINES (Alexandria, VA: National Recreation and Park Association, 2005); JAMES D. MERTES & JAMES R. HALL, PARK, RECREATION, OPEN SPACE AND GREENWAY GUIDELINES (Alexandria, VA: National Recreation and Park Association, 1995).

81. United States Department of Agriculture, Forest Service, Draft Environmental Impact Statement for Revised Land Management Plans for the Angeles, Cleveland, Los Padres, and San Bernardino National Forests (May 2004) at 3-58 (“DEIS”), on file with The City Project.

82. Race/Ethnicity of Visitors to the Angeles National Forest (2000 Survey). Source: U.S. Forest Service, [www.losangelesalmanac.com/topics/Parks/pa07.htm](http://www.losangelesalmanac.com/topics/Parks/pa07.htm).

83. See generally Robert Garcia, Notice of Appeal of Final Environmental Impact Statement and Land Management Plans for Four Forests of Southern California (July 20, 2006), on file with The City Project.

84. The Report recognized the need to incorporate the Angeles National Forest, the San Gabriel and San Bernardino Mountains, and other outlying areas, including Catalina Island, to serve the recreation and open space needs of Los Angeles

County. *Id.* at 85-88, 92-93.

85. See generally Robert García and Thomas A. Rubin, *Cross Road Blues: Transportation Justice and the MTA Consent Decree*, chapter in Karen Lucas, ed., *Running on Empty: Transport, Social Exclusion and Environmental Justice* 221-56 (2004).

86. Ron Frescas, Chris Martin, and Christine Steenken, University of Southern California Geography Department, *Public Transportation to Local National Forests* (2004), available at [cityprojectca.org/publications/transportation.html](http://cityprojectca.org/publications/transportation.html).

87. Mike Agrimis, et al., University of Southern California Geography Department, *Equity and Beach Access in Los Angeles* (2003) (on file with The City Project). The study identified departure points in heavily Latino, African-American, and low-income communities.

88. OLMSTED REPORT at 13-14, 35-43.

89. See generally ROBERT GARCÍA, ET AL., POLICY REPORT, DREAMS OF FIELDS: SOCCER, COMMUNITY, AND EQUAL JUSTICE 17 (2002), available at [www.cityprojectca.org/publications/index.html](http://www.cityprojectca.org/publications/index.html).

90. Anastasia Loukaitou-Sideris, *Urban Form and Social Context: Cultural Differentiation in the Uses of Urban Parks* [hereinafter *Urban Form and Social Context*], 14 J. PLANNING & ED. & RESEARCH 89, 100-02 (1995). See also Anastasia Loukaitou-Sideris & Orit Stieglitz, *Children in Los Angeles Parks: A Study of Equity, Quality, and Children Satisfaction with Neighborhood Parks*, 73 (4) TOWN PLANNING REV. 1-6 (2002).

91. Loukaitou-Sideris, *Urban Form and Social Context*, *supra*, at 92-96.

92. See generally ALISON H. DEMING & LAURET E. SAVOY, ED., THE COLORS OF NATURE: CULTURE, IDENTITY, AND THE NATURAL WORLD (2002); RETHINKING URBAN PARKS, *supra*, at 40-43; Deborah J. Chavez, *Mexican-American Outdoor Recreation: Home, Community & Natural Environment*, proceedings paper, Hawaii International Conference on Social Sciences 5, 41-43 (2003); Deborah J. Chavez, *Adaptive Management in Outdoor Recreation: Serving Hispanics in Southern California*, 17 (3) WEST. J. APPLIED FORESTRY 132 (July 2002); Deborah S. Carr & Deborah J. Chavez, *A Qualitative Approach to Understanding Recreation Experiences: Central American Recreation in the National Forests of Southern California in CULTURE, CONFLICT, AND COMMUNICATION IN THE WILDLAND-URBAN INTERFACE* 181, 184-94 (A.W. Ewert, D.J. Chavez, A.W. Magill eds., 1993); Patrick T. Tierney, et al., USDA, Forest Service, Pacific Southwest Research Station, *Cultural Diversity of Los Angeles County Residents Using Undeveloped Natural Areas* 5 (1998).

93. See generally RETHINKING URBAN PARKS, *supra*, at 40-43; *Mexican-American Outdoor Recreation*, *supra*, at 2.

94. See Regina Austin, *"Not Just for the Fun of It!": Governmental Restraints on Black Leisure, Social Inequality, and the Privatization of Public Space*, 71 S. CAL. L. REV. 667, 694, 711-12 (1998).

95. On the use of statistical evidence to show adverse disparate impact under civil rights laws, see, e.g., *Hazelwood School Dist. v. U.S.*, 433 U.S. 299, 306-13 and note 14 (1977).

96. WOLCH, PARKS AND PARK FUNDING IN LOS ANGELES, *supra*.

97. OLMSTED REPORT, *supra*, at 47-58.

98. The Heritage Parkscape will commemorate this history. See generally ROBERT GARCÍA, ERICA S. FLORES, JULIE EHRlich, POLICY REPORT, THE CORNFIELD AND THE FLOW OF HISTORY (2004), available at [www.cityprojectca.org/publications/index.html](http://www.cityprojectca.org/publications/index.html). See also WILLIAM ESTRADA, SACRED AND CONTESTED SPACE: THE LOS ANGELES PLAZA (Ph. D. dissertation 2003), on file with The City Project.

99. The original Pobladores included blacks and mulattos. A black man, Francisco Reyes, served as alcalde (mayor) of El Pueblo in 1793, almost two hundred years before Tom Bradley, the first black man elected mayor under statehood. Jean Bruce Poole & Tevvy Ball, *El Pueblo: the Historic Heart of Los Angeles* 11 (2002). The last Mexican governor of California before statehood, Pío Pico, was born of African, Native American, and European ancestry under a Spanish flag. *Id.* at 30-31. Biddy Mason, a prominent citizen and philanthropist of early Los Angeles, was born a slave in Mississippi. She gained her freedom in Los Angeles through a federal court order in 1856, just before the United States Supreme Court held in the *Dred Scott* case that slaves were chattel entitled to no constitutional protections because blacks had "no rights which the white man was bound to respect." *Scott v. Sandford*, 60 U.S. 393, 407 (1857). She helped found the First African Methodist Episcopal Church, one of the major African American churches in Los Angeles today. Dolores Hayden, *The Power of Place: Urban Landscapes as Public History* 168-87 (1997).

100. See generally DOUGLAS FLAMMING, BOUND FOR FREEDOM: BLACKS IN LOS ANGELES IN JIM CROW AMERICA 271-75, 303, 414 n.38 (2005); JOSH SIDES, L.A. CITY LIMITS: AFRICAN AMERICAN LOS ANGELES FROM THE GREAT DEPRESSION TO THE PRESENT 101 (2003); MIKE DAVIS, CITY OF QUARTZ 160-64 (1990); Davis, *supra*, at 59-91; California Department of Parks and Recreation, FIVE VIEWS: AN ETHNIC SITES SURVEY FOR CALIFORNIA 68-69 (1988). Professor Lawrence Culver has written a detailed analysis of the history of race and recreation in *The Garden and the Grid: A History of Race, Recreation, and Parks in the City and County of Los Angeles* (forthcoming 2007).

101. See generally IRA KATZNELSON, WHEN AFFIRMATIVE ACTION WAS WHITE (2005).

102. For example, the Federal Housing Administration Manual of 1938 states: "If a neighborhood is to retain stability, it is necessary that properties shall continue to be occupied by the same racial classes. A change in social or racial occupancy generally contributes to instability and a decline in values." See also Robert Liberty, "Abolishing Exclusionary Zoning: A Natural Policy Alliance for Environmentalists and Affordable Housing Advocates," 30 Boston College Environmental Affairs Law Review 581 (2003); DAVIS, CITY OF QUARTZ, *supra*, at 160-64; Davis, *supra*, at 59-91.

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### HEALTHY PARKS, SCHOOLS, AND COMMUNITIES

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103. 334 U.S. 1 (1948).
  104. 346 U.S. 249 (1953).
  105. JOSH SIDES, L.A. CITY LIMITS: AFRICAN AMERICAN LOS ANGELES FROM THE GREAT DEPRESSION TO THE PRESENT 101 (2003).
  106. *Id.* at 108.
  107. *Id.* at 21.
  108. *Id.*
  109. See García, *Free the Beach!*, *supra*, at 163-67, and authorities cited; Lisa McDivitt, A Park by Any Other Name, *Easy Reader* (July 13, 2006); Cecilia Rasmussen, L.A. Then And Now: Resort Was An Oasis For Blacks Until Racism Drove Them Out, *L.A. Times*, July 21, 2002; Letter from Robert García to Manhattan Beach Mayor and City Council re: New Bruces' Beach Plaque to Celebrate Proud Legacy of Black Los Angeles (Dec. 5, 2006), on file with The City Project).
  110. LEONARD PITT & DALE PITT, LOS ANGELES A TO Z: AN ENCYCLOPEDIA OF THE CITY AND COUNTY 313 (1997).
  111. *Id.* at 313-14.
  112. Malibu property restrictions recorded 1945 (on file with The City Project).
  113. Stan Bellamy, *My Mountain, My People Vol. I: Arrowhead!* 188 (2000).
  114. John W. Robinson, *The San Bernardinos* 127-32 (1989).
  115. U.S. Declaration of Independence. See also Cal. Const., art. I, § 1.
  116. *Declaration of the Rights of the Child*, Proclaimed by General Assembly resolution 1386 (XIV) of 20 November 1959, Principle 7; *United Nations' Convention on the Right of the Child*, General Assembly resolution 44/25 of 20 November 1989, Article 31.
  117. See generally García, *Healthy Children, Healthy Communities and Legal Service Providers*, *supra*, and authorities cited; RICHARD LOUV, *LAST CHILD IN THE WOODS* (2005).
  118. Eloisa Gonzalez, MD, MPH, L.A. County Dept. of Public Health, testimony Jan. 21, 2004, LAUSD Citizens' School Bond Oversight Committee. See generally Editorial, *The Schools Go Flabby*, L.A. TIMES, May 22, 2004; Jennifer Radcliffe, *Going to War against the Epidemic of Childhood Obesity*, L.A. DAILY NEWS, Jan. 27, 2004; Cara Mia DiMassa, *Campus Crowding Can Make PE a Challenge*, L.A. TIMES, Nov. 19, 2003.
  119. U.S. DEPT. HEALTH & HUMAN SERVICES, *THE SURGEON GENERAL'S CALL TO ACTION TO PREVENT AND DECREASE OVERWEIGHT AND OBESITY* 9-10 (2001).
  120. GOLD COAST COLLABORATIVE, *A HEALTH CRISIS IN PARADISE* 18 (Sept. 2003).
  121. *Id.* at 3.
  122. See U.S. Dept. of Health and Human Services and U.S. Department of Education, *Promoting Better Health for Young People Through Physical Activity and Sports*, available online at <http://www.cdc.gov/nccdphp/dash/presphysactrpt> (Fall 2001).
  123. U.S. DEPT. OF HEALTH AND HUMAN SERVICES, *PHYSICAL ACTIVITY AND HEALTH: A REPORT OF THE SURGEON GENERAL [hereinafter SURGEON GENERAL, PHYSICAL ACTIVITY]* 200 (1996); Patricia Barnes, *Physical Activity Among Adults: United States, 2000*, Advance Data, No. 333, U.S. Dept. Health and Human Services (May 14, 2003); POLICY LINK, *REGIONAL DEVELOPMENT AND PHYSICAL ACTIVITY: ISSUES AND STRATEGIES FOR PROMOTING HEALTH EQUITY* 9-12 (Nov. 2002) [*hereinafter HEALTH EQUITY*].
  124. B. Giles-Corti, et al. *The relative influence of individual, social and physical environment determinants of physical activity*, 54 SOC. SCI. & MED. 1793 (2002).
  125. See Richard J. Jackson, MD, MPH & Chris Kochtitzky, MSP, *Creating a Healthy Environment: The Impact of the Built Environment on Public Health*, SPRAWL WATCH CLEARINGHOUSE MONOGRAPH SERIES, PUBLIC HEALTH/LAND USE MONOGRAPH 5, available at <http://www.sprawlwatch.org/Jackson>; *HEALTH EQUITY*, *supra*, at 15.
  126. Jackson, *supra*, at 5.
  127. SURGEON GENERAL, *PHYSICAL ACTIVITY*, *supra*, at 7, 85-87, 90-91, 102-03, 110-12, 127-30, 135.
  128. U.S. Dept. of Health and Human Services and U.S. Department of Education, *Promoting Better Health for Young People Through Physical Activity and Sports* 7 (Fall 2001), at <http://www.cdc.gov/nccdphp/dash/presphysactrpt>.
  129. A. Faber Taylor, et al., *Coping with ADD: The surprising connection to green play settings*, ENV'T & BEHAVIOR 33, 54-77 (2001); A. Faber Taylor, et al., *Views of Nature and Self-Discipline: Evidence from Inner City Children*, J. ENV'T. PSYCH. (2001); SURGEON GENERAL, *PHYSICAL ACTIVITY*, *supra* note 133, at 135-36, 141.
  130. F. E. Kuo, *Coping with Poverty: Impacts of Environment and Attention in the Inner City*, 33 ENV'T. & BEHAVIOR, 5-34 (2001); C. M. Tennesen et al., *Views to Nature: Effects on Attention*, 15 J. ENV'T. PSYCH. 77-85 (1995); R. Kaplan, *Nature at the*

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*Doorstep: Residential Satisfaction with Nearby Environment*, 2 *Journal of Architectural and Planning Research*, 115-27 (1985).

131. See Russell R. Pate et al., *Sports Participation and Health-Related Behaviors Among US Youth*, ARCHIVES PEDIATRICS & ADOLESCENT MED. (Sept. 2000); see also U.S. Dep't. of Health and Human Services, *Physical Activity Fundamental to Preventing Disease* [hereinafter *Physical Activity Fundamental*] 9 (June 20, 2002); *Gangs, Crime and Violence in Los Angeles: Findings and Proposals from the District Attorney's Office* (1992).

132. *Id.* See Loukaitou-Sideris & Stieglitz, *Children in Los Angeles Parks*, at 1-6.

133. Ca. Dep't of Ed., Press Release, Dec. 10, 2002.

134. WILLIAM G. BOWEN & SARAH A. LEVIN, ET AL., RECLAIMING THE GAME: COLLEGE SPORTS AND EDUCATIONAL VALUES (2003).

135. Loukaitou-Sederis & Stieglitz, *Children in Los Angeles Parks*, *supra*, at 1-6.

136. *Gangs, Crime and Violence in Los Angeles: Findings and Proposals from the District Attorney's Office* (1992).

137. *Id.*

138. See Loukaitou-Sideris, *Urban Form and Social Context*, *supra*, at 89-102; Jane Jacobs, *The Death and Life of Great American Cities* 89-111 (1992).

139. Julia Romano, *A Controversial Woman of Peace*, SANTA MONICA BAY WEEK, Nov. 21, 2002. According to the United States Catholic Conference, for example, Catholics show their respect for the Creator through stewardship and care for the earth as a requirement of their faith. United States Catholic Conference, Inc., Washington D.C. (1999). The United Nations has published an interfaith book of reflection for action. See LIBBY BASSETT, ET AL., EARTH AND FAITH (2000).

140. See video of Ms. Menchu at <http://cityprojectca.org/ourwork/menchutum.html>.

141. Patrick E. Tyler, *Kenyan Environmentalist Wins Nobel Prize for Peace*, N.Y. TIMES, Oct. 8, 2004.

142. See, e.g., Steve Lerner & William Poole, *The Economic Benefits of Parks and Open Spaces* 12, 13, 17, 20, 26 (1999).

143. See generally García, *Urban Parks Movement*, *supra*; García, *Free the Beach!*, *supra*; RETHINKING URBAN PARKS, *supra*, at 1-18; GARCÍA, *DREAMS OF FIELDS*, *supra*, at 17; Regina Austin, "Not Just for the Fun of It!: Governmental Restraints on Black Leisure, Social Inequality, and the Privatization of Public Space," 71 S. CAL. L. REV. 667, 711-12 (1998).

144. Professor Lakoff identifies six types of progressives with shared values: (1) socio-economic: issues are a matter of money and class; (2) identity politics: our group deserves its share now; (3) environmentalists: respect for the earth and a healthy future; (4) civil libertarians: freedoms are threatened and have to be protected; (5) spiritual progressives: religion and spirituality nurture us and are central to a fulfilling life; (6) anti-authoritarians: we have to fight the illegitimate use of authority. See GEORGE LAKOFF, DON'T THINK OF AN ELEPHANT! KNOW YOUR VALUES AND FRAME THE DEBATE (2004); GEORGE LAKOFF, MORAL POLITICS: HOW LIBERALS AND CONSERVATIVES THINK (2002).

145. *Leydon v. Town of Greenwich*, 257 Conn. 318 (2001). Environmental laws generally are cited in footnotes 34, 57, and 58 above. The policy and legal justifications for coastal access, including the public trust doctrine, the California Constitution, Cal. Const. Article X, Section 4, and the California Coastal Act, Cal. Pub. Resources Code § 30001.5(c), are comprehensively explored in García, *Free the Beach!*, *supra*.

146. *Guardians Ass'n v. Civil Service Comm'n*, 463 U.S. 582, 629 (1983) (Justice Marshall, concurring in part and dissenting in part).

147. 42 U.S.C. § 2000d (2004). Cf. 43 C.F.R. 7.30 (nondiscrimination statement for recipients of federal funds from the Department of Interior, which has jurisdiction over National Parks and other public lands). See also Executive Order 12,898 on Environmental Justice (Feb. 11, 1994). The Equal Protection Clause of the Fourteenth Amendment to the United States Constitution also prohibits intentional discrimination. See also Section 1983 of the Civil Rights Act of 1871.

148. See Cal Gov. Code § 11135 *et seq.*; 22 CCR § 9810.

149. Cal. Gov. Code § 65040.12.

150. Local Coastal Plan, *supra*, at 9.

151. Seema Mehta, *Land-Use Plan OK'd for Malibu*, L.A. TIMES, Sept. 14, 2002.

152. See Letter to California Coastal Commission from Robert Garcia, et al., regarding Equal Access to California's Beaches (Sept. 12, 2002).

153. Letter from Office of the Secretary, United States Department of Housing and Urban Development, to Los Angeles Deputy Mayor Rocky Delgadillo Re: City of Los Angeles – Section 108 Application – Cornfields B-99-MC-06-0523, Sep. 25, 2000, on file with The City Project.

154. RETHINKING URBAN PARKS, *supra*, at X.

155. See, e.g., *Alexander v. Sandoval*, 532 U.S. 275 (2001); *Gonzaga Univ. v. Doe*, 536 U.S. 273 (2002).

156. Local Coastal Program, *supra*.

157. Brookings Institution, *Racial Change in the Nation's Largest Cities: Evidence from the 2000 Census* (2001).

158. These principles are adapted from the work on equitable strategies for infrastructure investment by PolicyLink and others. See, e.g., Victor Rubin, *Safety, Growth, and Equity: Infrastructure Policies that Promote Opportunity and Inclusion 3* (PolicyLink 2006), [www.policylink.org/pdfs/Safety\\_Growth\\_Equity.pdf](http://www.policylink.org/pdfs/Safety_Growth_Equity.pdf). PolicyLink cites the struggle for the Cornfield as example of equity principles guiding urban park development. *Id.* at 11.

## COMMENT LETTER 30

## City of Diamond Bar

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February 19, 2008

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

Dear Ms. Kirchner:

We recognize the importance of the Southern California Association of Governments' ("SCAG") draft 2008 Regional Transportation Plan ("2008 RTP") and Draft Program Environmental Impact Report ("PEIR"). It is also our understanding that integration of the RTP with other plans is critical; such as the Regional Transportation Improvement Program ("RTIP") down to individual projects. We also would like to acknowledge the efforts of the San Gabriel Valley Council of Governments ("SGVCOG") and believe you will receive comments from the SGVCOG on the 2008 RTP and PEIR.

Our intent of this letter make clear the City of Diamond Bar's concerns (that very well could become regional concerns), while reserving the right to submit further detailed comments if we can not achieve satisfactory resolution of these primary issues. The RTP and PEIR must support timely resolution of mixed flow traffic congestion on the SR-60 and specifically at the confluence of the SR-60 and SR-57. Immediate solutions to mixed flow traffic congestion is of primary importance to the City of Diamond Bar and must be adequately recognized and included in the 2008 RTP, PEIR, and any other associated plans and documents.

We ask that you proceed with finalization of the RTP and PEIR, only after modification of pertinent text and assumptions, to address our stated concerns, have been included in these documents.

**REQUESTS AND COMMENTS**

The following requests and comments are provided to clarify our concerns, so they may be addressed as the final documents are prepared.

**Jack Tanaka**  
 Mayor

**Ron Everett**  
 Mayor Pro Tem

**Wen P. Chang**  
 Council Member

**Carol Herrera**  
 Council Member

**Steve Tye**  
 Council Member

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- ***Mitigation of Existing and Future Mixed Flow Traffic Congestion at the SR-57/60 Interchange Needs to be Included.***

Mitigation of existing and future mixed flow traffic congestion at the SR-57/60 interchange is of critical importance to the City of Diamond Bar. The City has been actively participating in various improvement efforts that affect this area; including but not limited to the Los Angeles County Metropolitan Transportation Authority ("Metro") feasibility study of potential large scale improvements for the SR-57/60, modification of the Grand Avenue interchange at SR-57/60 being proposed by the City of Industry, development of the planned Lemon Avenue interchange at SR-60, and participation in the completion of the high occupancy vehicle ("HOV") facilities for SR-60 that serve a portion of the SR-57/60 interchange.

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In particular we did not find reference to potential, future SR-57/60 large scale improvements that are expected to result from the current Metro studies. We did note that approximately \$1.2 billion is included for SR-57/SR-60 Interchange Improvements by year 2023, but this does not concur with current understandings provided by Metro. While we welcome inclusion of this dollar value, we want to insure that the funding can be used for the Metro study's large scale improvements and not necessarily dedicated truck lanes.

It is the City of Diamond Bar's expectation that mixed flow traffic improvements will be implemented for this freeway confluence area (which is also critical to the region as a whole). These improvements may include added benefits such as (but would not be limited to) construction of missing freeway connectors, development of added high occupancy vehicle ("HOV") facilities, provision of goods movement improvements, etc. We request that the SCAG RTP and other associated plans recognize Metro's current work and the future SR-57/60 mixed flow improvements that are expected to result from this and subsequent analyses, so these mixed flow improvements may be programmed for implementation without delays.

- ***Opposition to Proposals that Serve to Concentrate Goods Movement along the SR-60 Freeway (e.g. between the I-710 and I-15 Freeways).***

The City of Diamond Bar fully supports projects that will provide improved goods movements throughout the SCAG region. The potential goods movement improvements, however; must result in a balanced approach using many routes and must not place undue emphasis on one path. For example, the draft RTP in the Goods Movement Report (page 23) when addressing "Dedicated Lanes for Clean Technology Trucks", identifies the "specific corridors under consideration for such enhancements are I-710, SR-60, and I-15 corridors". The SCAG RTP and associated documents need to be

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 Senior Regional Planner  
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modified to allow full consideration of all potential routes and alternatives for accommodating truck lanes and/or goods movement. We believe this is also a primary request of the SGVCOG as well.

At the SCAG public hearing meetings, the City of Diamond Bar's expressed concerns included potential for truck lanes on SR-60. SCAG response at the meetings indicated that the truck lanes will be available for use by only clean, new technology vehicles. Does the RTP specifically allow use of future truck lanes, from day one and there after, by only new technology, zero emission, "clean" trucks? This is this impression we were left with, based on the response at the public meeting.

3 cont.

Other technical documents have also identified the SR-60 as the preferred route for truck lanes and did not appear to limit use to new "clean" trucks. The City of Diamond Bar has already expressed significant concerns with the Metro "Multi-County Goods Movement Action Plan" (see attached letter, dated January 15, 2008) as there are believed to be many unsubstantiated conclusions contained in that report. Overall the City of Diamond Bar support use of the SR-60 to provide its "fair share" of the goods movement burdens, but is strongly opposed to its designation and implementation as a "Primary" goods movement corridor. We are very concerned that RTP "mandated" truck lanes along the SR-60 would actually preclude (e.g., due to right-of-way, constraints, environmental impacts, costs, etc.) some mixed flow improvement options. If there were unlimited funding available and no environmental factors existed, then perhaps potential truck lanes would not impact potential mixed flow solutions; but obviously that is not a reality.

Based on the RTP it appears that rail and alternative technologies may also result in viable methods to serve increased goods movement needs (i.e.; rather than construction of dedicated truck lanes, etc.). We believe the RTP needs to highlight the pursuit of these goods movement alternatives, given existing constraints on the highway system and in particular on the SR-60.

- ***Concern that Inclusion and/or Absence of SR-57/60 Improvement Projects Will Mandate and/or Preclude Consideration and Ultimate Implementation.***

We understand that the SCAG RTP and other related documents are the result of significant efforts and are under time constraints in moving toward approvals of final reports. In general, the City of Diamond Bar is very concerned that the current drafts appears to contain text and materials that may serve to "mandate", implementation of truck lanes and/or focus goods movements along "primary" corridors (specifically the SR-60 Freeway), while also excluding the potential for mixed flow improvement projects. We respectfully request modification of the documents to best address our

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 Senior Regional Planner  
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concerns. Given the voluminous amounts of materials we believe that SCAG and the authors of the reports can best implement edits that will address our concerns, while maintaining the integrity of the overall documents.

In short we need the RTP to consider the potential for only mixed flow improvements to be implemented on SR-60 and the potential for exclusion of truck lanes on the SR-60. While we understand this cannot be the only consideration, it must be one of the potential scenarios highlighted in the RTP.

4 cont.

We mention other related documents, as we understand there will be on-going coordination between SCAG and Metro to assure consistency between their two plans. There is also the "Multi-County Goods Movement Action Plan", as well as other studies that will need to be considered and made consistent with the SCAG RTP and Metro's Long Range Transportation Plan.

The City of Diamond Bar has already committed significant efforts to assure that our voice is heard. We have attended public hearings for the RTP, the PEIR for the RTP, and a policy committee meeting in efforts to express concerns that are not new, but certainly still of critical importance to our community. Our elected officials and community have provided a clear message that solutions to mixed flow traffic congestion is the number one priority. It is our current understanding that implementation of exclusive truck lanes on the SR-60 as identified in the RTP and other technical documents, would likely result in significant impacts to mixed flow traffic congestion. The following comments summarize the issues raised by the City of Diamond Bar at the SCAG public hearings and serve to emphasize our concerns and issues:

5

**Traffic Congestion**

- The City of Diamond Bar is committed to finding real solutions to the SR-57/60 traffic congestion, which will benefit local and regional citizens. As it stands, the draft RTP does not appear to be consistent with this goal.
- Residents of Diamond Bar and the region as a whole have been living with traffic congestion at the SR-57/60 interchange far too long. In addition, the City of Diamond Bar endures substantial impacts from commuters avoiding freeway congestion with the use of our City's streets.
- The environmental studies for the implementation of four truck lanes (two in each direction) on the I-710 Freeway from the Ports to the SR-60 have begun. Given the proposed termination of the project at the SR-60, we must conclude that SR-60 will be heavily impacted.

**Environmental Impact**

- The City of Diamond Bar believes any plans that will direct truck traffic to SR-60 will only increase health and safety issues.

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- The SR-57/60 interchange is already heavily impacted so adding significant truck traffic to this area is expected to have air quality, noise, and safety impacts, as well as added traffic impacts.

6 cont.

**Alternative Routes, Modes and Technologies**

- The RTP suggests that there are alternative routes, modes and technologies that will be looked at, but the technical reports seem to encourage truck lanes on the SR-60.
- For instance, on page 23 of the Goods Movement Report which contains the heading "Dedicated Lanes for Clean Technology Trucks", the RTP states, "specific corridors under consideration for such enhancements are I-710, SR-60, and I-15 corridors."
- Another example is contained in the Metro Multi-County Goods Movement Action Plan, which identified the SR-60 as the "preferred" truck route option. However, this assumption was found to be an unproven conclusion without proper technical support. The City of Diamond Bar has submitted comments expressing our concerns with this report.

7

**Funding**

- According to the Metro 2008 Draft Long Range Transportation Plan, approximately \$475 million has been programmed by Metro for improvements at the SR-57/60 interchange. However, this contrasts the \$1.2 billion identified for the SR-57/60 Interchange Improvements in the financially constrained RTP projects list. If added monies are intended to be available it would be the ideal scenario, if however, a different project is envisioned in the RTP (like truck lanes) then we have major concerns.
- We need clarification of the SR-57/60 improvements envisioned and included in the RTP. We are very concerned that provision of truck lanes on the SR-60 will serve to exclude improvements that would serve the general motoring public.

8

**Equitable Solutions**

- The City of Diamond Bar has always understood and supported the development of goods movement across Southern California and the Country as a whole. However, we have two primary concerns regarding the emphasis on SR-60:
  1. We have not seen any credible analysis to show that SR-60 is the "best" route based upon utility and community compatibility.
  2. Even if SR-60 is the "best" route, it should not be the only route.
- There must be a genuine effort to consider all possible routes to serve the ever-increasing demands of the east-west goods movement between the I-710 and I-15. It is unreasonable to designate the SR-60 as the singular east-west route.

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Jessica Kirchner  
Senior Regional Planner  
February 19, 2008  
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- Ending the I-710 truck lanes at SR-60 appears to rule out the I-10, I-91, and I-210 as possible routes to share the truck burden.
- The City of Diamond Bar has been participating in the Metro's SR-57/60 Improvement Feasibility Study. This study considers improvements for all traffic types rather than just truck lanes. Our City is concerned that the RTP may not respect potential solutions that are expected to come out of this study.

9 cont.

**In Conclusion**

- We need to make certain that the SR-57/60 improvements included in the final RTP, place the mobility of people as the highest priority.
- We respectfully request an update of the RTP and PEIR to assure that all possible improvement options that may emerge from the SR-57/60 Improvement Feasibility Study area can be considered so that the best improvement options may be implemented without undue delays.
- Attempts to focus truck travel on the SR-60 are not new. This type of proposal has been previously pursued. The City of Diamond Bar and for that matter other cities and communities along the SR-60, are sure to be 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 "shoulder the burden" of east-west truck movements and have been willing to "go the distance" in their efforts against such proposals.

10

**SUMMARY**

All analyses and materials reviewed to date cast doubt upon the conclusion that truck lanes along SR-60 Freeway are a "preferred" option. We respectfully request update of the RTP and PEIR to assure that all possible improvement options (including mixed flow traffic improvements, construction of missing connectors, added HOV facilities, incorporation of goods movement improvements, etc.) at the SR-57/60 interchange area can be considered, so the best improvement option(s) may be implemented without undue delays.

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Thank you in advance for your attention to our concerns. Should you have any questions regarding this letter, please contact Mr. David G. Liu, Director of Public Works/City Engineer at (909)839-7040.

Sincerely,

  
James DeStefano  
City Manager

- c: City Council  
David G. Liu, Director of Public Works/City Engineer  
Nick Conway, SGVCOG

## COMMENT LETTER 30



# City of Diamond Bar

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January 15, 2008

Shahrzad Amiri  
 Metro  
 One Gateway Plaza  
 Los Angeles, CA 90012-2952

RE: Technical Memorandum 6b – Evaluation of Detailed Goods Movement Strategies, Multi-County Goods Movement Action Plan.

Dear Ms. Amiri:

The City of Diamond Bar is supportive of the Metropolitan Transportation Authority's efforts to develop a regional goods movement plan. We recognize the importance of freight movement as a key economic driver and its influence on quality-of-life in the region.

After reviewing the subject Technical Memorandum 6b, we have significant concerns with the conclusions and underlying analysis presented in the most recent working papers generate for the Multi-County Goods Movement Action Plan. We ask that you not proceed with developing any further recommendations or take any formal actions until our concerns have been addressed.

### Unsubstantiated Conclusions

Working Paper 6b (Evaluation of Detailed Goods Movement Strategies) – draws the following conclusion on Page 3-21: "Therefore, a truck lane system from the San Pedro Bay Ports to Victorville on I-710, SR-60, and I-15 would be the preferred option." On this same page, the statement is made that "SR-60 clearly offers the best performance..." Both of these statements are based upon sketch-level analysis in five subject areas that we discuss below. We do not believe the analysis is sufficiently rigorous or meaningful to support such conclusions.

**Jack Tanaka**  
 Mayor

**Ron Everett**  
 Mayor Pro Tem

**Wen P. Chang**  
 Council Member

**Carol Herrera**  
 Council Member

**Steve Tye**  
 Council Member

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12 cont.

**Incomplete or Misleading Analysis**

The following interim conclusions are developed in Working Paper 6b regarding the preferred east/west corridor and summarized on Page 3-21.

- ***R-60 would carry the highest level of truck volumes.*** Page 2-17 identifies the average daily truck volumes on the three east/west corridor options as:
  - 10,542 for SR- 91
  - 11,195 for I-10
  - 11,872 for SR-60

These differences are not meaningful within the "noise" of the forecasting model. Further, the measurement of volumes along each of these routes represents one arbitrary point. If the measurements were taken at different locations then the conclusion may be different.

In addition, there are important differences in the trucking activities that serve the local region and those that connect the Ports with other parts of the Country. These differences merit substantial considerations and evaluations prior to determining the preferred route. We don't believe this analysis is significantly rigorous to conclude one corridor is better than another.

- ***SR-60 would carry very high vehicle volumes (compared to other options).*** We do not understand why this is relevant to the choice of a preferred corridor. In fact, one can argue that higher auto volumes in a corridor make it less attractive due to potential conflicts with trucks.

The reduction in corridor delay with the installation of truck lanes is a meaningful factor, but that analysis was not factored into the recommendation as we discuss below.

- ***SR-60 would affect the least number of schools.*** The analysis is based on very general criteria of the number of schools within 1/3 mile. This does not consider how many children are affected, the age of students (elementary or college), whether the impact is to play areas or classrooms, etc.
- ***SR-60 would affect the least amount of residential land uses.*** The analysis is based upon residential acreage, rather than the number of units (or preferably, the number of people). Given the acreage comparison is relatively close between corridors; the actual number of residents within 1/2 mile may not be the lowest along SR-60.

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- ***SR-60 would provide the most connectivity to warehouse/distribution land uses.*** It is not clear whether this analysis represents actual built facilities and/or land use designations. If the later, the analysis may be counting properties that are not economically-viable for warehousing/distribution uses.

Additionally, existing buildings and/or designated lands may be changed to other uses due to advances in delivery technologies, the need for larger facilities, desires for locations that serve to avoid traffic congestion, etc.

We also question the relevance of these criteria if the primary purpose of the truck lanes would be to facilitate longer-distance movement of goods, and not local needs.

**Missing Analysis**

The document provides very little discussion and no details on alternatives to truck lanes. Only one of the 12 scenarios reflects something other than truck lanes, and no quantitative analysis is provided for the "alternative technologies."

The evaluation of costs related to an alternative technology system (e.g., page 3-12) did not appear to consider the savings due to the reduction in trucking costs.

Alternative technologies may have significantly lower construction-related impacts relative to truck lanes. Namely, there will likely be significant congestion impacts associated with added lanes for the routes being considered. This should be considered in the comparison.

Given that travel distance is a primary consideration for minimizing trucking costs, it seems that an east/west route should be evaluated that includes the I-710, I-105, I-605, and the I-10 or I-210.

The cost analysis uses unit costs per mile; consequently, the cost estimate is strictly a function of the corridor length. In reality, the true costs will depend greatly on physical conditions and available right-of-way. We do not believe a unit cost approach provides any meaningful information about the relative costs between corridors.

Given the heightened awareness of the impact of greenhouse gases, we believe a more thorough air quality analysis should be prepared. This might provide a stronger argument for alternative technologies that reduce or shorten truck trips.

12 cont.

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Metro  
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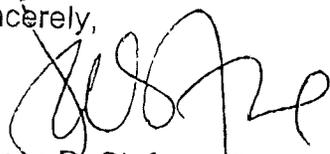
Figures 16, 18 and 20 provide meaningful comparisons between alternatives regarding the reduction in auto and truck delays. These comparisons show that truck lanes on I-10 would provide far greater congestion relief than comparable facilities on SR-60. This information is dismissed and not used in the conclusions.

**12 cont.****Summary**

All of the concerns and questions raised above cast doubt upon the conclusion that truck lanes along State Route 60 are the "preferred" option. Specifically, we believe the current analysis is incomplete and superficial. We also do not agree that the five factors that formed the basis for selecting the "preferred option" are the most pertinent considerations. Based upon these short comings, we do not believe there is sufficient technical support for any recommendation at this time.

Thank you for your attention to our concerns, and we look forward to assisting Metro in developing/implementing a sensible freight movement plan for the region. Should you have any questions, please contact Mr. David G. Liu, Director of Public Works/City Engineer at (909) 839-7040.

Sincerely,



James DeStefano, City Manager

cc: City Council  
David Liu, Director of Public Works  
Michelle Smith, Metro  
Nick Conway, SGVCOG



COMMENT LETTER 31  
*CITY OF ORANGE*

DEPARTMENT OF COMMUNITY DEVELOPMENT

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February 11, 2008

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

#02-08

**Subject:** Notice of Availability of a Draft Program Environmental Impact Report (DPEIR) for the 2008 Regional Transportation Plan (RTP)

Dear Ms. Kirchner,

Thank you for the Notice of Availability of the DPEIR and the opportunity to review the DPEIR for the 2008 Regional Transportation Plan. The City of Orange (City) would appreciate consideration of the following comments regarding the RTP and DPEIR:

1. The Project Description of the DPEIR includes discussion about the regional growth forecast (i.e., SCAG's Policy Growth Forecast) and Compass Blueprint Vision in both the "Purpose and Need for Action" and "Integrated Land Use and Demand Management" sections. There is discussion about the fact that the growth trends applied to the RTP reflect an adjusted regional growth forecast and incorporation of SCAG's Compass Blueprint Growth Vision Process. The City of Orange finds the integration of the adjusted forecast and Compass Blueprint process problematic and inaccurate. The input provided by the City to the Center for Demographic Research at Cal State Fullerton for the Orange County Projections 2006 efforts represents what we believe is likely to occur based on our intimate knowledge of our city. The City requests the DPEIR re-evaluate the Compass Blueprint and Growth Vision Process using the 2006 Orange County Projects available at the Center for Demographic Research at Cal State Fullerton since it provides a more accurate growth projection for the City of Orange.
2. In addition, as noted in a letter the City sent to Frank Wen of SCAG regarding the Policy Growth Forecast (attached), there are a number of factors that have not been taken into account in the distribution of housing and employment growth in Orange. There are a

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number of physical conditions and constraints in our community that have been entirely ignored, such as our protected National Register listed historic districts, and other areas with significant employment and housing growth potential that are not appropriately reflected in either the Compass Blueprint Vision or the Policy Growth Forecast. Throughout the Compass Blueprint and Policy Growth Forecast efforts the City has consistently expressed its disagreement with their conclusions to SCAG, the Orange County Council of Governments, and Center for Demographic Research. Therefore, we find the growth distribution assumptions used for the RTP flawed and continually request the appropriate adjustments be made as stated in letter sent to Mr. Wen.

1 cont.

The City shares SCAG's goal of trying to create more efficient relationships between land use and the region's circulation network. Toward that end, the City is nearing completion of a comprehensive General Plan update that incorporates land use changes which concentrate future growth and employment in the form of mixed-use development in areas of the City that are home to major employers (hospitals, County justice facilities, retail and office) and currently served by bus and rail transit service; characteristics that provide a solid foundation for future mixed-use development. The SCAG growth forecast is not consistent with either existing or expected growth conditions.

3. The "Impacts and Mitigation Measures" section of the Land Use analysis again refers to implementation of the Compass Blueprint Growth Vision. For the reasons cited above, the City has fundamental concerns with implementation of certain strategies as a means of mitigating impacts. Specifically, Mitigation Measures MM-LU.5, MM-LU.6, MM-LU.7 and MM-LU.12 would be in conflict with the land use plan proposed in our General Plan update.
4. There are a number of mitigation measures that place responsibility on local governments for implementation. These have been included without any commitments from cities to participate in those efforts. The feasibility of implementation is dependent, to a certain extent, on city staffing and resources available to devote to endeavors such as programs to assist in the brownfield cleanup (MM-LU.13) and adaptive re-use efforts (MM-LU.14).
5. One of the projects identified in the RTP is high frequency Metrolink service on the Orange County line. This rail line passes through a built-out portion of the City of Orange, and also through the Old Towne Orange National Register listed historic district. The mitigation measures proposed in the Noise portion of the EIR are largely oriented to maximizing the distance between sensitive land uses and transportation facilities and improving noise insulation for existing development. The City appreciates the inclusion of these measures in the DPEIR. However, we would like to note that in the case of Orange, existing development immediately abuts the rail corridor. In many cases, this development involves protected historic buildings, while in others, development near the rail corridor consists of established neighborhoods, commercial, and industrial districts. Therefore, while noise insulation may be an effective approach in some circumstances, providing a separation is not

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possible. Other mitigation measures propose construction of sound walls. In many instances, existing development conditions cannot accommodate sound wall construction.

Based on these constraints, the City requests that additional mitigation be added to provide for the establishment of Quiet Zones and associated improvements along rail corridors where other methods of noise reduction are not feasible.

3 cont.

6. Also with respect to increasing train frequency on the Metrolink Orange County Line, the City believes that greater consideration to the impact of train vibration on historic resources in the Old Towne Orange Historic District warrants attention. The discussion of vibration in the RTP DPEIR focuses on construction-related vibration associated with pile driving, and other construction activities. This is an issue not only for Orange, but other Orange County cities along the rail corridor where historic resources are present.

7. As a follow up to the references made to the Old Towne Orange Historic District, the City believes that the RTP DPEIR should include an assessment of impacts to cultural resources. Proposed RTP projects involving the rail corridor, whether for commuter or goods movement purposes, should consider potential impacts to the historic resources present in multiple communities along regional rail corridors.

4

Thank you for the opportunity to review the DPEIR for the 2008 RTP and taking the City's comments into consideration.

Sincerely,



Alice Angus  
Community Development Director  
City of Orange

- cc: John Sibley, City Manager  
Gail Farber, Public Works Director  
Doug Keys, City Transportation Analyst  
Anna Pehoushek, Principal Planner  
Sharon Song, Assistant Planner  
Tracy Sato, City of Anaheim (OCCOG)  
Gail Shiomoto-Lohr, City of Mission Viejo (OCCOG)

Attachment: Letter sent to Mr. Frank Wen of SCAG, dated January 29, 2008



COMMENT LETTER 31

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DEPARTMENT OF COMMUNITY DEVELOPMENT

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January 29, 2008

Frank Wen  
Planning and Policy Department  
Southern California Association  
of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**Subject: Feedback on Policy Growth Forecast Maps, Assumptions and Methodology**

Dear Mr. Wen,

The City of Orange has significant concerns about the level and distribution of growth assumed in our community in SCAG's Policy Growth Forecast. After reviewing the maps provided by both SCAG and the Center for Demographic Research, we have widespread disagreement with the discrepancies between the Orange County Projections (OCP) 2006 and the Policy Growth Forecast pertaining to households and employment. Orange shares in SCAG's objective of concentrating growth in areas that are now, or in the future could be, transit and employment hubs for the purposes of creating more efficient relationships between land use and transportation; however, there are certain community realities that cannot be ignored in the Policy Growth Forecast.

During the City's review of the OCP 2006 data, great efforts were made to arrive at what we reasonably expected to occur in the way of growth in Orange based on our existing and possible future land use policies, level of development activity, and knowledge of our stable single-family residential and industrial areas. In a number of areas, what we now see represented in the Policy Growth Forecast has limited bearing on true conditions in the Orange of today and the future.

It should be noted that the City is in the midst of a comprehensive General Plan update, which proposes redesignation of certain historically commercial and industrial areas for different intensity mixed-use districts. In addition to the General Plan update, the City is updating its Santa Fe Depot Specific Plan, which applies to the area around the Orange Metrolink Station and OCTA Transportation Center. The proposed land use plan

5

associated with this update has a transit orientation, but is also highly constrained by the designated historic district that it is located within. Both the General Plan and Specific Plan updates consider concentrating new commercial and residential growth in areas of the City that are served by transit and are centers of employment. Much like SCAG's objective with the Policy Growth Forecast, the City intends to accommodate future growth and change in a logical way that promotes efficiency between land use and the transportation network. Our review and acceptance of the Center for Demographic Research's OCP 2006 data reflects this perspective.

5 cont.

This local familiarity, however, has become distorted through SCAG's Policy Growth Forecast. The manipulation of OCP data by SCAG to accommodate the Compass Blueprint Growth Vision results in a future growth distribution scenario for Orange that is inaccurate. Given that the Regional Transportation Plan (RTP) includes Implementation Programs, Strategic Initiatives and Monitoring Measures related to implementing Compass Blueprint, the City cannot accept the growth distribution of the Policy Growth Forecast. City staff is in the process of conducting a more detailed review of the RTP in order to provide comments prior to the close of the public review period for that document. Separate from that effort, we would like to provide the following feedback on the materials reviewed at recent Orange County Council of Governments (OCCOG) Technical Advisory Committee meetings.

### Employment

As a general comment, the Policy Growth Forecast shows a reduction in jobs from OCP 2006 in some Census tracts through which many of the City's major commercial corridors pass. These include Chapman Avenue, Tustin Street, and Main Street. The City considers these to be relatively stable commercial districts, and does not anticipate job loss over time in these corridors. There are also certain areas of the City that we know to be major employment centers with expanding employment opportunities where the Policy Growth Forecast assumes a lower level of employment than that which was accepted by the City through the OCP 2006 process. We would also like to make the following tract-specific comments:

- **Census Tracts 759.01 and 759.02:** These two tracts encompass the City's Old Towne Orange Historic District. The Historic District is listed on the National Register of Historic Places, and the City has strict development and design standards in place to ensure the long-term protection of historic buildings. Although it contains the Orange Metrolink station and OCTA Transportation Center, and the City is preparing a specific plan update for the area that encourages transit-oriented mixed-use development in the area around the station, any future development will be constrained by the extremely limited number of possible redevelopment sites, expectations for the adaptive reuse of historic buildings, and limitations on building heights and densities in order to ensure compatibility of new development with the historic urban fabric.

The number of jobs the City accepted in 2035 through the OCP process (191 more than existing) in Old Towne seemed reasonable in consideration of the work on the General Plan and Specific Plan updates. The City strongly objects to the identification of nearly 6,000 more jobs for Old Towne in the Policy Growth Forecast than what has been projected in OCP 2006.

- **Census Tracts 758.12:** This Census tract consists of an established single-family residential area on the east side of the 55 Freeway, and a mix of strip commercial and mutli-family residential development on the west side of the freeway. Therefore, it is unlikely that the 1,012 jobs above and beyond the OCP projection (additional 33 more than existing) will materialize. Existing development in this area is not expected to change significantly in the future due to size and character of land parcels west of the freeway.
- **Census Tract 758.13:** Because this Census tract is primarily an established single-family residential area, with the exception of limited strip commercial property on the east side of the 55 Freeway, and consists of a mix of strip commercial and mutli-family residential development on the west side of the freeway, the City believes that the 1,335 jobs above and beyond the OCP projection (additional 14 more than existing) for 2035 is unrealistic. While intensified commercial development would be possible in the future, it is unlikely to generate the additional jobs identified in the Policy Growth Forecast.
- **Census Tract 760.00:** The expanding St. Joseph Hospital and Children's Hospital of Orange County are located in this tract. Both of these hospitals are major medical centers in the region and are in the process of implementing or preparing master plans for significant future expansion. The Town and Country commercial area is also within this tract. This is an area of the City that is proposed through the pending comprehensive General Plan update to be redesignated from office professional to a higher intensity mixed-use land use classification. Furthermore, due to the area's proximity to the hospitals, there is ongoing demand for medical office space in this area, which is expected to result in site redevelopment and job creation in the future. Therefore, we disagree with the Policy Growth Forecast determination that there will be approximately 1,200 fewer jobs in this tract than what the City believes to be possible in 2035 as reflected in OCP 2006 (additional 483 more than existing).
- **Census Tract 761.01:** The level of job growth in this Census tract appears high with respect to the City of Orange. Presumably, much of the job growth identified in the Policy Growth Forecast relates to build out of Anaheim's Platinum Triangle area. We would like confirmation of that, particularly given the fact that the Policy Growth Forecast projects over 5,300 more jobs for the tract than accepted by the City in OCP 2006 (additional 27 more than existing). The portion of this tract that is located in Orange is a built out mix of single-family residential, light industrial, and strip

commercial development. While some intensification of non-residential uses could occur through redevelopment, it would not support the significant increase identified by SCAG.

- ***Census Tract 761.02:*** This Census tract is home to the expanding UCI Medical Center, major County of Orange criminal justice facilities, high-rise office development, and The Block at Orange. The proposed land use alternatives under consideration as part of the City's comprehensive General Plan update identify this area for a future higher density mixed-use district. This area not only is one of the City's major employment hubs, but is also served by transit with regional bus service as well as bus linkage to the Orange and Anaheim Metrolink stations. It is also easily accessible from both the Interstate 5 and State Route 22 Freeways. Therefore, it is unclear why the Policy Growth Forecast shows nearly 1,000 fewer jobs than the OCP for 2035 (additional 2,526 more than existing).
- ***Census Tracts 762.05 and 762.06:*** While a segment of the Tustin Street and Katella Avenue commercial corridors pass by and through these tracts, this is a largely single-family residential area. Therefore, the 2,285 additional number of jobs projected in the Policy Growth Forecast in relation to those identified in OCP 2006 (additional 201 more than existing) is unlikely.
- ***Tracts 758.05, 758.06, 768.07, 758.16, 219.14, 219.18, and 219.24:*** The City is concerned about the job reduction reflected in the Policy Growth Forecast for these tracts. Specifically, Chapman Avenue, one of the City's major commercial corridors, passes through the tracts. While we do not necessarily anticipate significant job growth along this corridor in the future, we also do not expect notable job loss.

With respect to Tract 219.24, the City expects recreation-oriented commercial development (e.g., golf resort) in the vicinity of Irvine Lake in the future. Therefore, the City does not believe that a reduction in the number of jobs below that anticipated in OCP 2006 is appropriate.

### **Households**

As a general comment, during the City's review and acceptance of the OCP 2006 data, careful consideration was given to reviewing the possibility for increasing housing units/households in established single-family neighborhoods through the construction of secondary living units (a.k.a., in-law units or granny flats). Because a significant portion of the City's planning area consists of established residential neighborhoods that are in good condition, and there are very few vacant residential sites available in these areas, the City does not anticipate any measurable growth or reduction of housing units. Therefore, the City requests that SCAG honor the OCP 2006 data that was accepted by the City, and not account for further reductions in the number of housing units in our established residential areas.

5 cont.

The only areas where growth can be expected are in East Orange in conjunction with the future construction of approved Irvine Company Project (Tracts 219.12, 219.24, and 524.20) and in areas where the City is considering redesignation of land from commercial or industrial to mixed-use (Tracts 754.01, 759.01, 759.02, 760.00, 761.02, and 762.04). Of these tracts, 759.01 and 759.02 fall within the Old Towne Historic District and even though infill development is being planned for, it is expected that this will occur in a careful and controlled manner. We would also like to make the following tract-specific comments:

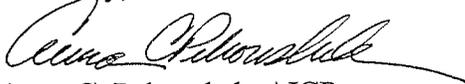
- **Census Tracts 759.01 and 759.02:** As noted previously, these two tracts encompass the City's National Register listed Old Towne Orange Historic District and are subject to the same constraints related to the development of new housing units as they are to new employment. The number of housing units the City accepted through the OCP process in Old Towne considered the work on the General Plan and Santa Fe Depot Specific Plan updates. Therefore, the City objects to the identification of another 2,500 households projected in the Policy Growth Forecast for 2035 on top of the 114 additional households projected in OCP 2006 for Old Towne.
- **Tracts 758.11 and 758.12:** On the east side of the 55 Freeway, these tracts are built-out single-family residential neighborhoods. West of the freeway, a substantial portion of Tract 758.11 is taken up by a large Southern California Edison transmission facility. The remaining area of the two tracts consists of multi-family residential development, a mobile home park, strip commercial and shopping center development. These tracts are not expected or planned to redevelop with significant new residential development. Therefore, the 192 units identified in the Policy Growth Forecast above and beyond those expected in the OCP (additional five (5) more than existing) is unlikely.
- **Census Tract 758.13:** As noted above, the City had been considering re-designation of the portion of the Tustin Street corridor passing through this tract for a future mixed-use land use designation. Given that this is no longer the case, and the portion of the tract east of the freeway is an established single-family neighborhood, the 75 additional units anticipated in the Policy Growth Forecast beyond the OCP 2006 data are not likely to materialize.
- **Census Tract 761.01:** The City's OCP input reflected a slight increase in the number of housing units in this tract (additional 83 more than existing) by 2035 given the mix of single-family, multi-family, commercial, office, and industrial land use designations in the area. Because the portion of the tract that is within the City of Orange is built out, new housing would occur through redevelopment activity. It is unclear why the Policy Growth Forecast projects 1,124 fewer units than existing conditions, particularly given the City of Anaheim's plans for the Platinum Triangle.

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- **Census Tract 761.02:** As noted in the comments on employment, this Census tract is expected to experience land use policy changes that would accommodate higher density mixed-use development in the future through the comprehensive General Plan update. Therefore, the City believes that the Policy Growth Forecast should reflect the housing data the City accepted in OCP 2006 (additional 418 more than existing) rather than a reduction in units (222 fewer units than exist today) identified by SCAG. Consistent with the Policy Growth Forecast objectives, the City would like to encourage the development of housing near employment and transportation facilities. As noted above, this area benefits from transit service, freeway proximity, and is a significant employment node.
- **Census Tracts 762.05, 762.06, and 762.08:** These tracts encompass a predominantly single-family residential area, as well as commercial properties on Tustin Street and Katella Avenue. Therefore, the additional number of households projected in the Policy Growth Forecast (1,005 more than existing) in relation to those identified in OCP 2006 (additional 10 more than existing) is unlikely.
- **Tracts 219.12, 219.24, and 524.20:** The City is concerned about the household reduction reflected in the Policy Growth Forecast for these tracts. These tracts encompass an approved approximately 3,900 unit Irvine Company development project. The City is currently processing tract maps for a portion of this development, and has no reason to believe that there will be fewer units constructed than those reflected in the OCP 2006 data. Therefore, we disagree with the Policy Growth Forecast's representation of approximately 700 fewer units than what is reflected in the OCP for these tracts.

We look forward to future dialogue with SCAG regarding these comments and hope that adjustments can be made and incorporated into the Policy Growth Forecast and RTP prior to its final adoption. Please contact me at (714) 744-7228 or [apehoushek@cityoforange.org](mailto:apehoushek@cityoforange.org) with any questions.

Sincerely,



Anna C. Pehoushek, AICP  
Principal Planner

- c: John Sibley, City Manager  
Alice Angus, Community Development Director  
Ed Knight, Assistant Planning Director  
Tracy Sato, Senior Planner, City of Anaheim/OCCOG TAC  
Gail Shiomoto-Lohr, Contract Planner, City of Mission Viejo/OCCOG TAC

5 cont.



## COMMENT LETTER 32

February 12, 2008

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

Dear Ms. Kirchner:

**SUBJECT: CITY OF SEAL BEACH COMMENTS ON “DRAFT 2008 REGIONAL TRANSPORTATION PLAN PROGRAM ENVIRONMENTAL IMPACT REPORT”**

The City of Seal Beach has reviewed the Draft 2008 Regional Transportation Plan Program Environmental Impact Report (“2008 RTP PEIR”), and has several comments and concerns relating to the subject document. This document provides a clear and concise overview of the potential environmental impacts of the proposed 2008 RTP.

The 2008 RTP PEIR evaluates the 2008 RTP and the regional impacts associated with the proposed major public infrastructure and transportation demand management projects and programs for the time frame of this plan, 2003 to 2035. The identified environmental impacts are not project specific, but evaluate the impacts on various areas of concern on the program level of evaluation. As our staff has reviewed the proposed “mitigation measures”, they appear to be reasonable and appropriate to respond to the identified impacts at this “program” level of analysis.

**Request Removal of PEIR Mitigation Measures that are Not Related to Transportation Product Delivery and Implementation:**

The Draft PEIR for the 2008 RTP includes more than 60 pages of mitigation measures that would be applied to and be binding upon transportation agencies and local governments responsible for implementing the transportation projects included in the final adopted 2008 RTP. In conducting a review of the proposed mitigation measures, City staff supports the OCCOG stated concerns on mitigation measures that have no bearing on the mitigation of transportation project delivery, and recommend that these measures be removed from the 2008 Draft PEIR.

1

## COMMENT LETTER 32

City of Seal Beach Comment Letter re:  
Draft 2008 Regional Transportation Plan  
Program Environmental Impact Report  
February 12, 2008

OCCOG and OCTA also raise concerns on mitigation measures that impose questionable requirements on transportation project delivery, and recommend that such measures be removed or revised. For purposes of illustration, such examples include the following:

1 cont.

- ❑ **MM-LU.10:** Local governments should provide for new housing consistent with state housing law to accommodate their share of the forecasted regional growth.
- ❑ **MM-LU.11:** Local governments should adopt and implement General Plan Housing Elements that accommodate the housing need identified through the RHNA process.
- ❑ **MM-PS.20:** Local jurisdictions shall implement or expand city or county-wide recycling and composting programs for residents and businesses.

Many of the mitigation measures of concern appear to be draft Regional Comprehensive Plan policies that are been carried over into the 2008 RTP as proposed mitigation measures. A complete listing of mitigation measures proposed for deletion is being compiled as a cooperative effort with OCCOG, OCTA and local jurisdictions of Orange County, and will be transmitted to SCAG prior to the close of the public comment period. Seal Beach is in support of the recommendations of OCCOG and OCTA regarding this issue.

- ❑ **Technical Appendix B: Air Quality - "Screening Risk Assessment of Sample Selected Projects Included in the Southern California Association of Governments, Draft 2008 Regional Transportation Plan":**

2

Technical Appendix B: Air Quality includes a "Screening Risk Assessment of Sample Selected Projects Included in the Southern California Association of Governments, Draft 2008 Regional Transportation Plan," prepared by Sierra Research for SCAG. This document was prepared to assist SCAG in the analysis of environmental impacts resulting from construction and operation of freeway links proposed in the Draft 2008 RTP. The analysis was focused on the potential changes in cancer risk impacts associated with operation characteristics from six operating freeway segments, one located in each of the counties in SCAG's planning jurisdiction.

The findings indicate that cancer risks resulting from vehicle operations on freeways will decline over the time frame of the RTP, but that impacts at maximum exposed residences will remain in excess of minimum accepted risk levels (i.e., 1-in-one million increased lifetime cancer risk).

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City of Seal Beach Comment Letter re:  
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The segment modeled in Orange County was the I-405 in Seal Beach, east of the I-605 Interchange. As such, the information regarding this “screening risk assessment” is very important to Seal Beach.

The Technical Appendix does not include the documentation referenced within the Appendix as Attachment 1. Seal Beach is clearly identified within the April 2006 ARB report titled “*Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach*” as being impacted adversely by the health risks identified within the study, and is almost totally located within the identified 100-200 isopleths for all emission sources from the port facilities<sup>1</sup>. In addition to the general exposure to citizens discussed in the document a large portion of Seal Beach is developed with a 7,700 person senior living community, Seal Beach Leisure World. This senior living community is completely located within the identified 100-200 isopleths for all emission sources from the port facilities. Leisure World comprises approximately 6,000 housing units, with a population of approximately 6,600 persons 65 or older, or approximately 86.5% of the total population of Leisure World. In addition, there are 725 elementary school students within the community that are also indicated as being within the identified 100-200 isopleths for all emission sources from the port facilities.

2 cont.

The impacts of the port complex diesel particulate emissions upon our community, and particularly within the Leisure World retirement community are of extreme concern to our citizens. The April 2006 ARB report indicates on page 4 that “*The most vulnerable populations are those with preexisting respiratory or cardiovascular disease especially the elderly*”. The identified health effects on the young, elderly, and infirm are of particular concern to our residents.

The City requests that SCAG work with Sierra Research to schedule a presentation before the City Environmental Quality Control Board regarding the findings of the above screening risk assessment, with a particular emphasis of the presentation to the identified impacts upon Leisure World and Rossmoor.

Thank you for your consideration of the comments of the City of Seal Beach. We look forward to positive responses from your organization regarding the above concerns.

Please do not hesitate to contact Mr. Lee Whittenberg, Director of Development Services, City Hall, 211 Eighth Street, Seal Beach, 90740, telephone (562) 431-2527, extension 1313 if you have any questions regarding this matter. Mr. Whittenberg can also be contacted at [lwhittenberg@ci.seal-beach.ca.us](mailto:lwhittenberg@ci.seal-beach.ca.us).

<sup>1</sup> Figure 1, “Estimated Diesel PM Cancer Risk from POLA and POLB”, page 8, “Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach – Final Report,” April 2006

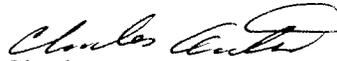
**COMMENT LETTER 32**

*City of Seal Beach Comment Letter re:  
Draft 2008 Regional Transportation Plan  
Program Environmental Impact Report  
February 12, 2008*

In addition, please provide four (4) copies of the adopted 2008 Regional Transportation Plan Program Environmental Impact Report to Mr. Whittenberg for distribution to the appropriate Commissions and the City Council when it is available.

3

Sincerely,



Charles Antos  
Mayor, City of Seal Beach



Mario Voce  
Chairman, Environmental Quality Control Board

Distribution:

Seal Beach City Council  
Seal Beach Environmental Quality Control Board

Seal Beach Planning Commission

City Manager

Director of Development Services

Troy Edgar, SCAG Regional Council, District 20 Representative  
Orange County Council of Governments  
Orange County Transportation Authority  
Center for Demographic Research

COMMENT LETTER 33



DENNIS R. YAIES  
Mayor

EUNICE M. ULLOA  
Mayor Pro Tem

GLENN DUNCAN  
EARL C. ELROD  
TOM HAUGHEY  
Council Members

PAATRICK J. GLOVER  
City Manager

CITY of CHINO

February 19, 2008

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

RE: 2008 RTP Draft PEIR

Dear Ms. Kirchner:

Thank you for providing the City of Chino an opportunity to review and comment on the Draft Program Environmental Impact Report (PEIR) for the 2008 Regional Transportation Plan (RTP).

Based upon staff's review of the project, the City of Chino has the following comments:

In 2005, the City of Chino opened the Chino Transit Center, which today functions as a hub for Omnitrans and Foothill Transit, and in the future will provide connections to Metrolink stations throughout the region. Please ensure that the Chino Transit Center is properly recognized in the RTP and the traffic impacts are considered in the supporting environmental documents.

1  
2

Since the development of the 2004 RTP, Chino has planned for tremendous growth in two specific plan areas of the City. The Preserve and College Park Specific Plans will add approximately 12,000 new units to the City over the next couple decades. Several amendments have been made to these specific plans since their adoption, so it is critical that SCAG has the most up to date information when considering regional growth. Additionally, the City is in the middle of a comprehensive update to its General Plan, which will also add growth and impact transportation in the region.

3

Please analyze the projected impacts resulting from increased goods movement along the 60 Freeway, State Route 71, and State Route 83 (Euclid Avenue).

4



Ms. Jessica Kirchner  
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February 19, 2008

**COMMENT LETTER 33**

Impacts on the City's local roadway infrastructure will occur on Central Avenue, Ramona Avenue, Mountain Avenue, Chino Avenue, Edison Avenue, Chino Hills Parkway, and Pine Avenue, on both on and off-ramps leading to and from the affected arterials.

4 cont.

Thank you again for providing the City of Chino the opportunity to review the subject documents. Should you have any questions, please feel free to contact me at (909) 464-8310.

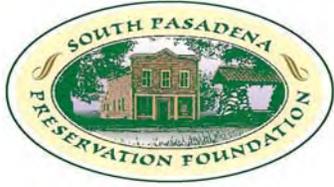
Sincerely,



Michael T. Kellison, AICP  
Senior Planner

cc: Charles E. Coe, AICP, Director of Community Development  
Jose Aire, Director of Public Works  
Karen Nieckula, Associate Engineer  
Community Development Department File

# COMMENT LETTER 34



913 Meridian St, South Pasadena, CA  
[www.SPPRESERVATION.org](http://www.SPPRESERVATION.org)

February 19, 2008

Ryan Kuo  
Robert Huddy

Southern California Association of Governments (SCAG)

Re: DRTP/DEIR Comments

This letter provides the response of the South Pasadena Preservation Foundation (SPPF) to the Draft 2008 Regional Transportation Plan (DRTP) that proposes listing the SR 710 Tunnels on the constrained list and the Draft 2008 Regional Transportation Plan Program Environmental Impact Report (DEIR).

By way of background, SPPF has been involved in the SR 710 Freeway Extension issue since the 1970's. We are members of a broad coalition of national, state and local organizations that oppose this freeway extension. We are also co-plaintiffs with the City of South Pasadena, Sierra Club, National Trust for Historic Preservation, California Preservation Foundation, Los Angeles Conservancy, Pasadena Heritage and the South Pasadena Unified School District in City of South Pasadena, et al v. Slater.

In 1983, the foundation was renamed the South Pasadena Preservation Foundation formerly known as the Jean Driskel Cultural Heritage Foundation. Our mission is to foster awareness and appreciation of the historic heritage of South Pasadena and to advocate and facilitate preservation of significant examples of that heritage.

The proposed SR 710 Extension or SR 710 North is incorrectly designated an Interstate (I) in the documents. Since the early 90's the City of South Pasadena, SPPF and others, including FHWA, have continually tried to correct this error. This is a prevalent misstatement that SPPF hopes will be corrected in the final RTP and EIR and any future documents produced by SCAG and others.

1

SPPF agrees that the proposed SR 710 surface freeway be removed from the DRTP. This project has languished for thirty years under an injunction, due to severe negative environmental impacts, while Caltrans produced multiple drafts of an EIS/EIR. Ultimately the federal and state approvals for this project were rescinded.

2

There is no future for the surface SR 710 project. And, there is no reason not to return/restore the five hundred properties owned by the state in Pasadena, South Pasadena and the Los Angeles community of El Sereno, many historic, to private home ownership and restore the neighborhoods in the corridor cities.

3

In the DRTP, the proposed sub-surface tunnels are not without their own set of negative environmental impacts. SPPF's comments are based on the information contained in the MTA's 6/7/2006 Route 710 Tunnel Technical Feasibility Assessment Report by Parsons Brinkerhoff. There are impacts on historic resources and sensitive receptors as well as environmental justice issues.

## COMMENT LETTER 34

There are severe impacts on historic resources at the tunnel portals and around the ventilation towers due to the large numbers of resources in the three corridor cities. (See 710 Corridor Historic Property Summary prepared by Glen Duncan 2/11/2008) In particular, at the north portal entrance in Pasadena where one of the proposed ventilation buildings might be located, Singer Park, Markham Place Historic District and Pasadena Avenue Historic District would be severely impacted by demolition, construction, noise, dust, decreased air quality, the visually negative ventilation buildings, ongoing operations and an increase of two to three times the number of vehicle trips that currently occur.

3 cont.

South Pasadena may have lesser impacts, but negative impacts nonetheless abound around the mid-point ventilation tower or towers. It would be impossible, due to the five historic districts and individually eligible properties in the city's corridor, to locate one or two of these towers without major impacts.

The Short Line Villa District and individual resources in El Sereno would be impacted by the possible interchange at Huntington Drive and location of the mid-point ventilation tower.

In the entirely built out SR710 corridor there are many sensitive receptors...schools, residences, churches, nursing homes, libraries, auditoriums, parks, and a premier medical facility. These will all suffer negative impacts with the previously mentioned activities related to construction and ongoing operations at the portals and mid-point ventilation tower locations.

There is a particular concentration at the north portal in Pasadena with Huntington Memorial Hospital and Day Care Center, Sequoyah School, Waverly School, Pacific Oaks, Cottage Co-Op Preschool, Maranantha, Westridge and potentially Kids Klub as well.

4

In South Pasadena, the mid-point, there are St. James and Calvary Pre-Schools, South Pasadena Middle and High Schools, Arroyo Vista and Marengo Elementary Schools, South Pasadena Library and Almansor Center. In El Sereno, another potential mid-point tower location, there are Sierra Park and Sierra Vista Elementary Schools that could be affected.

There is an environmental justice issue in the largely Hispanic community of El Sereno, the location of the southern portal. Due to grade and water issues, it would be more advantageous for the contractor to tunnel both bores south to north as currently proposed.

This construction advantage would concentrate most of the construction impacts at the southern portal and create unequal, more severe impacts in El Sereno compared to the cities of Pasadena and South Pasadena. Additionally, the years of construction and eventual operation of the proposed freeway would be located virtually next door to Cal State Los Angeles (over 25,000 students) and the Children's Court.

In conclusion, because of all the stated negative environmental impacts, plus those not known at this time due to the lack of a thorough substantive study and years before environmental clearance, SPPF feels it is inappropriate to list the tunnels on the constrained (funded) list in the RTP. Many more deserving projects that are environmentally cleared and ready to construct, but for lack of funding, should be placed on the constrained list in place of the SR 710 tunnels.

5

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Steven Karr  
President - SPPF

# 710 Corridor Historic Property Summary

Prepared by Glen Duncan  
February 11, 2008

6

## **SOUTH PASADENA**

LISTED ON THE NATIONAL REGISTER<sup>1,2</sup>

### **851 Lyndon St (Wynyate)**

#### **SOUTH PASADENA HISTORIC BUSINESS DISTRICT** (mis-named "Mission West District")

- |                      |                      |
|----------------------|----------------------|
| 1019 El Centro       | 1115 El Centro       |
| 1120 El Centro       | 913 Meridian         |
| 919 Mission St       | 950-956 Mission St   |
| 1001-1019 Mission St | 1006 Mission St      |
| 1010 Mission St      | 1012 Mission St      |
| 1014-1016 Mission St | 1020-1022 Mission St |
| 1024 Mission St      | 1026-1030 Mission St |
| 1032-1034 Mission St |                      |

INDIVIDUALLY DETERMINED ELIGIBLE OR NATIONAL REGISTER<sup>1,2</sup> (Note: bold listings in Historic Districts have also been determined eligible for individual listing)

- |                                      |  |
|--------------------------------------|--|
| <b>857 Bank St</b> (Otake-Nambu)     | <b>209 Beacon St</b> (Whit Smith)        |
| <b>816 Bonita St</b> (Grokowsky)     | <b>919 Columbia St</b> (Riggins)         |
| <b>1109 Columbia St</b>              | <b>1127 Columbia St</b>                  |
| <b>1131 Columbia St</b>              | <b>909 Lyndon St</b> (East Wynyate)      |
| <b>920 Monterey Rd</b> (Pierce)      | <b>930 Oliver St</b> (Warren Clarke)     |
| <b>220 Orange Grove Av</b> (Thomson) | <b>909-915 Summit Dr</b> (Bellmar Court) |
| <b>Arroyo Seco Parkway</b>           |  |

<sup>1</sup> Source: Caltrans' 710 Freeway Gap Closure Project. *Effect and Mitigation Proposal for Historic Properties* (N.D.)

<sup>2</sup> Source: Caltrans' Third Supplemental Historic Architectural Survey Report: 710 Gap Closure Report. Vol. I: Overview. Maarch, 1994 (Diane Kane)

### ADDITIONAL CALIFORNIA REGISTER PROPERTIES WITHIN RIGHT-OF WAY<sup>3</sup>

- |                             |                        |
|-----------------------------|------------------------|
| 2060 Alpha Av               | 2017 Berkshire Av      |
| 2020 Berkshire Av           | 2031 Berkshire Av      |
| 2037 Berkshire Av           | 708 Bonita Dr          |
| 717 Bonita Dr               | 751 Bonita Dr          |
| 756 Bonita Dr               | 933 Columbia St        |
| 1001 Columbia St            | 1007 Columbia St       |
| 1709 Gillette Crescent      | 1709 Gillette Crescent |
| 1912-1914 Gillette Crescent | 1715 Gillette Crescent |
| 1719 Gillette Crescent      | 1720 Gillette Crescent |
| 1107 Glendon Ct             | 1112 Glendon Ct        |
| 1115 Glendon Ct             | 1116 Glendon Ct        |
| 815 Magnolia St             | 820 Magnolia St        |
| 821 Magnolia St             | 827 Magnolia St        |

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300 Meridian Av  
1725 Meridian Av  
1733 Meridian Av  
835 Monterey Rd  
852 Monterey Rd  
924 Oliver St  
511 Prospect Dr  
912 Summit Dr  
920 Summit Dr

310 Meridian Av  
1729 Meridian Av  
835 Mission St  
848 Monterey Rd  
856 Monterey Rd  
930 Oliver St  
909-915 Summit Dr  
917 Summit Dr  
921 Summit Dr

6 cont.

<sup>3</sup> Caltrans' Third Supplemental Historic architectural Survey Report, 710 Gap Closure Project Vol. III  
*Selected South Pasadena Properties*. May, 1994 (Ann Scheid)

### HISTORIC DISTRICTS DETERMINED ELIGIBLE<sup>4</sup>

#### **PROSPECT CIRCLE DISTRICT**

300 Orange Grove  
400 Orange Grove  
420 Orange Grove  
450 Orange Grove  
506 Orange Grove  
525 Orange Grove  
**303 Meridian Av**  
**401 Prospect Circle**  
**411 Prospect Circle**  
**430 Prospect Circle**  
471 Prospect Circle  
**910 Buena Vista St**  
928 Buena Vista St

320 Orange Grove  
410 Orange Grove  
440 Orange Grove  
460 Orange Grove  
514 Orange Grove  
**909 Oliver St**  
400 Prospect Circle  
410 Prospect Circle  
**425 Prospect Circle**  
**431 Prospect Circle**  
481 Prospect Circle  
918 Buena Vista St  
930 Buena Vista St

<sup>4</sup> Source: Caltrans' Third Supplemental Historic Architectural Survey Report: 710 Gap Closure Report. Vol. I:  
Overview. March, 1994 (Diane Kane)

#### **BUENA VISTA DISTRICT**<sup>5</sup>

**917 Buena Vista St**  
**1000 Buena Vista St**  
**1005 Buena Vista St**

**929 Buena Vista St**  
**1001 Buena Vista St**

<sup>5</sup> Source: Caltrans' Third Supplemental Historic Architectural Survey Report: 710 Gap Closure Report. Vol. I:  
Overview. March, 1994 (Diane Kane)

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### NORTH OF MISSION<sup>6</sup>

602 Meridian Av  
610 Meridian Av  
613 Meridian Av  
617 Meridian Av  
621 Meridian Av  
625 Meridian Av  
637 Meridian Av  
708 Meridian Av  
712 Meridian Av  
716 Meridian Av  
726 Meridian Av  
806 Meridian Av

606 Meridian Av  
612 Meridian Av  
616 Meridian Av  
620 Meridian Av  
624 Meridian Av  
631 Meridian Av  
701 Meridian Av  
709 Meridian Av  
713 Meridian Av  
720 Meridian Av  
803 Meridian Av  
810 Meridian Av

6 cont.

<sup>2</sup> Source: Caltrans' DPR 523. Prepared 10/26/82 (John Snyder)

### SOUTH OF MISSION<sup>7</sup>

1014 Glendon Way  
1024 Glendon Way  
1028 Glendon Way  
1103 Glendon Way  
1110 Glendon Way  
1112 Glendon Way  
1118 Glendon Way  
**1123 Glendon Way**  
**1131 Glendon Way**  
1011 Meridian Av  
1020 Meridian Av  
1100 Meridian Av  
1105 Meridian Av  
1108 Meridian Av  
1113 Meridian Av  
1119 Meridian Av  
1121 Meridian Av  
1128 Meridian Av  
1131 Meridian Av  
1134 Meridian Av  
1142 Meridian Av

1021 Glendon Way  
1027 Glendon Way  
1101 Glendon Way  
1108 Glendon Way  
**1111 Glendon Way**  
**1115 Glendon Way**  
**1119 Glendon Way**  
1126 Glendon Way  
851 Collier Alley  
1015 Meridian Av  
1023 Meridian Av  
1103 Meridian Av  
1106 Meridian Av  
1110 Meridian Av  
1114 Meridian Av  
1120 Meridian Av  
1122 Meridian Av  
1130 Meridian Av  
1133 Meridian Av  
1138 Meridian Av  
1146 Meridian Av

<sup>7</sup> Source: Caltrans' Third Supplemental Historic Architectural Survey Report: 710 Gap Closure Report. Vol. I: Overview. Maarch, 1994 (Diane Kane)

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### PASADENA

#### MARKHAM PLACE HISTORIC DISTRICT<sup>8</sup>

6 cont.

Singer Park

**202-204 W California Blvd**

**679 Pasadena Av**

**765 Pasadena Av**

**801 Pasadena Av**

600 St. John Av

620 St. John Av

640 St. John Av

650 St. John Av

659 St. John Av

678 St. John Av

707 St. John Av

721 St. John Av

734 St. John Av

762 St. John Av

235 Bellefontaine

268 Bellefontaine

299 Bellefontaine

310 Bellefontaine

328 Bellefontaine

345 Bellefontaine

282 Markham Pl

303 Markham Pl

320 Markham Pl

346 Markham Pl

285 Congress Pl

300 Congress Pl

310 Congress Pl

326 Congress Pl

342 Congress Pl

378 Congress Pl

**208-216 W California Blvd**

**595 Pasadena Av**

**763 Pasadena Av**

**779 Pasadena Av**

584 St. John Av

602 St. John Av

628 St. John Av

646 St. John Av

651 St. John Av

670 St. John Av

696 St. John Av

714 St. John Av

726 St. John Av

753 St. John Av

**203 Bellefontaine**

265 Bellefontaine

285 Bellefontaine

300 Bellefontaine

325 Bellefontaine

344 Bellefontaine

276 Markham Pl

295 Markham Pl

317 Markham Pl

337 Markham Pl

366 Markham Pl

288 Congress Pl

306 Congress Pl

311 Congress Pl

340 Congress Pl

348 Congress Pl

<sup>8</sup> Source: Caltrans' Third Supplemental Historic Architectural Survey Report: 710 Gap Closure Report. Vol. I: Overview. March, 1994 (Diane Kane)

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### PASADENA AVENUE HISTORIC DISTRICT<sup>9</sup>

231 Wigmore Dr	215 Wigmore Dr
230 Wigmore Dr	212 Wigmore Dr
245 Wigmore Dr	261 Wigmore Dr
268 Wigmore Dr	270 Wigmore Dr
281 Wigmore Dr	295 Wigmore Dr
309 Wigmore Dr	329 Wigmore Dr
335 Wigmore Dr	866 S. Pasadena Av
876 S. Pasadena Av	888 S. Pasadena Av
894 S. Pasadena Av	910 S. Pasadena Av
1190 S. Pasadena Av	1199 S. Pasadena Av
1200 S. Pasadena Av	1220 S. Pasadena Av
165 Hurlbut St	177 Hurlbut St
866 S. Pasadena Av	900 S. Pasadena Av
1000 S. Pasadena Av	1030 S. Pasadena Av
1041 S. Pasadena Av	1051 S. Pasadena Av
1051 S. Pasadena Av	1059 S. Pasadena Av
1112 S. Pasadena Av	202 Madeline Dr
205 Madeline Dr	215 Madeline Dr
218 Madeline Dr	100 State St
224 State St	225 State St
232 State St	237 State St
267 State St	289 State St
95 Columbia St	105 Columbia St
123 Columbia St	145 Columbia St
161 Columbia St	203 Columbia St
231 Columbia St	233 Columbia St
269 Columbia St	1109 Columbia St
1127 Columbia St	1131 Columbia St
1061 Avoca Av	1071 Avoca Av
1105 Avoca Av	1115 Avoca Av
1125 Avoca Av	1135 Avoca Av
1183 Avoca Av	1193 Avoca Av
1201 Avoca Av	1223 Avoca Av
1199 Brookmere Rd	

<sup>9</sup> Source: Caltrans' Third Supplemental Historic Architectural Survey Report: 710 Gap Closure Report. Vol. I: Overview. March, 1994 (Diane Kane)

### LOS ANGELES (EL SERENO)

#### SHORT LINE VILLA DISTRICT<sup>10</sup>

4515 Berkshire Av	5618 Berkshire Dr
5626 Berkshire Dr	5636 Berkshire Dr

<sup>10</sup> Source: Caltrans' Third Supplemental Historic Architectural Survey Report: 710 Gap Closure Report. Vol. I: Overview. March, 1994 (Diane Kane)