

Section 5. Responses to Comments on the Draft RTP PEIR

1. U.S. Environmental Protection Agency

- 1-1 Comment noted. SCAG will continue to coordinate with EPA staff on conformity issues.
- 1-2 The Draft 2008 Regional Transportation Plan Program Environmental Impact Report (PEIR) includes a regional scale discussion of air quality cumulative impacts as appropriate in a program level document (see pp. 3.2-22 through 3.2-43, of the Draft PEIR). This analysis indicated that although the SCAG 2008 Regional Transportation Plan (2008 RTP) will achieve transportation conformity (i.e., not exceed the emissions budgets set forth in the applicable state implementation plan), at the regional scale air quality impacts would remain cumulatively considerable. This analysis includes estimates by the South Coast Air Quality Management District (SCAQMD) for off-road mobile sources of emissions from Ports, Airports and other sources including train, aircraft, ship and commercial boats and all other off-road mobile sources. The PEIR also includes a discussion (p. 3.2-6) of the health impacts of certain pollutants, such as particulate matter that have been shown to result in negative health effects.

Section 3.2, Air Quality, of the PEIR evaluates local and regional air quality issues (including greenhouse gas emissions). The focus of the environmental analysis in the PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2008 RTP pursuant to CEQA Guidelines § 15168. Impact 3.2-1 (p. 3.2-31, of the Draft PEIR) provides a discussion of the screening-level Health Risk Assessment (HRA) conducted for the Draft PEIR (the HRA is contained in Appendix B of the PEIR). The HRA quantified the changes in cancer risk, at nearby sensitive receptors, resulting from vehicles on selected freeway corridors. The selected freeways included freeways that serve the ports. The HRA included an EPA-approved pollutant dispersion model in conformance with the South Coast Air Quality Management District's (SCAQMD) diesel exhaust risk assessment procedures.

The Draft and Final 2008 RTP Environmental Justice Analysis Appendix provide an evaluation of region-wide changes in pollutant emissions (CO and PM10 are used as general indicators, since these pollutants have localized effects generally proportionate to emissions) on various demographic. The goal of the 2008 RTP Environmental Justice Analysis is to ensure that when transportation decisions are made, low-income and minority communities have ample opportunity to participate in the decision-making process and receive an equitable distribution of benefits and not a disproportionate share of burdens. Impacts of individual projects are to be addressed in detail during subsequent project-level environmental review, based on more precise information regarding project specification.

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SCAG supports the development of policies and mitigation measures that seek to minimize any adverse impacts that may result from implementation of the 2008 RTP. SCAG has no jurisdictional authority over the marine ports (see also Master Response 3), but does work cooperatively with the ports themselves as well as other local, state and federal agencies on a variety of issues related to the ports, including mitigation. MM-AQ.2 includes a list of measures adopted by the California Air Resources Board (ARB) to attain federal air quality standards in the South Coast SIP for PM2.5 and 8-hour ozone. These included ship auxiliary engine cold ironing and other clean technologies, cleaner ship main engines and fuels, port truck modernization; clean up of existing commercial harbor craft, and etc.

The PEIR does not include site specific analysis of any project nor geographic area contained in the 2008 RTP. The long range planning horizon of more than 25 years necessitates that many of the highway, arterial, goods movement, and transit projects included in the 2008 RTP are identified at the conceptual level. This document addresses environmental impacts to the level that they can be assessed without undue speculation. Development at the ports, airports and in other areas of the region, as well as projects contained within the 2008 RTP will require additional site specific environmental analysis to assess impacts at the appropriate level.

To address the comment that the PEIR should include a commitment to mitigation measures consistent with the Clean Air Action Plan (CAAP), a new mitigation measure, MM.AQ-18, is added to the PEIR (see Section 6 of this document, Corrections and Additions).

- 1-3 As noted above, the PEIR Appendix B includes a HRA to address changes in cancer risk adjacent to freeways, including freeways with high truck volumes that serve the ports. Also as noted above the RTP assesses environmental justice issues associated with changes in pollutant concentrations in the region.
- 1-4 See Section 2 of this Final EIR Addendum, Master Responses 1 and 3 regarding growth in the region (including at the ports) and SCAG's role and authority. As discussed above in Response 1-1 the PEIR includes a general discussion of cumulative impacts in the region, including a discussion of all sources. As discussed in Response 1-3 above, a general discussion of pollutants in the region and impacts on environmental justice are discussed in the RTP. As discussed above in Response 1-1, the PEIR includes a HRA to assess changes in cancer risk adjacent to freeways in the region.
- 1-5 See Response 1-1 above including the addition of MM.AQ-18 in the PEIR committing SCAG to working with the ports to facilitate implementation of the CAAP. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-119).



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- 1-6 As required by CEQA the PEIR identifies all feasible mitigation measures. See responses above regarding the addition of a mitigation measure committing SCAG to working with the ports to implement the CAAP.
- 1-7 See Response 1-1 above with respect to the RTP and PEIR inclusion of analyses related environmental justice.
- 1-8 -- 11 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-119).

2. Office of Planning and Research

- 2-1 This letter is acknowledges the Governor's Office of Planning and Research (OPR) receipt of the Draft PEIR and transmits comments from state agencies who submitted comments through the State Clearinghouse.

3. California Regional Water Quality Control Board – Lahontan Region

- 3-1 -- 3 The PEIR is a programmatic document intended to address regional not site specific issues. As such the PEIR includes general mitigation for projects in the region.

Mitigation measures included in Section 3.15 Water Resources address compliance with applicable laws, BMPs, vegetated buffers, Storm Water Pollution Prevention Plans, requirements of Sections 404 and 401 of the Clean Water Act, NPDES requirements, as well as infiltration through median strips (see MM-W.1 to 7, Draft PEIR pp. 3.15-40 through 3.15-41).

The general location of known wetlands in the region is shown on Map 3.3-2.

4. California Department of Fish and Game

- 4-1 Commentor's opinion in support of steering planned growth away from natural habitat areas and/or areas subject to natural hazards to assist in avoiding the loss of biodiversity is noted and will be forwarded to the decision-makers for their consideration in adopting the 2008 RTP. See also Section 2 of this FEIR Addendum, Master Response 1 regarding growth.
- 4-2 See Master Response 3 regarding SCAG role and authority. SCAG does not approve specific projects in the RTP; approval of projects is at discretion of the appropriate project implementing agency. SCAG has an oversight role for regionally significant projects. SCAG reviews regionally significant project EIRs through its Intergovernmental Review program, for consistency with the RTP, RTP PEIR, Regional Housing Needs Assessment (RHNA), and Regional Comprehensive Plan and Guide (see CEQA Guidelines §15125(d) and §15206). The PEIR Mitigation Monitoring and Reporting Program (MMRP) requires each lead agency to submit a mitigation compliance report for transportation projects subject to an EIR or a Mitigated Negative Declaration. This report must include

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the lead agency's decision as to whether or not a mitigation measure is appropriate. The PEIR, through its MMRP, indicates mitigation measures where SCAG has authority and indicates where SCAG has oversight of mitigation measures carried out by project implementation agencies. SCAG notifies agencies of projects found to be inconsistent with SCAG plans, policies and mitigation measures.

- 4-3 See changes to mitigation measures on pages ES-19, 3.3-39 (BIO.8); ES-23, 3.3-43(BIO.18); ES-23 to ES-24, 3.3-43 to 3.3-44(BIO.20); ES-27, 3.3-48 (BIO.29); ES-29, 3.3-52 (BIO.39, BIO.41, BIO.42) in Section 6 of this FEIR Addendum, Corrections and Additions.

Several mitigation measures indicate mitigation measures may vary subject to approval by CDFG and USFWS, see MM-BIO.11 through MM-BIO.13, MM-BIO-15 through MM-BIO.17, MM-BIO.23, MM-BIO.24 and referenced in MM-BIO.33, MM-BIO.36, and MM-BIO.37.

- 4-4 See change to pp. ES-20, 3.3-40 (BIO.12) in Section 6, Corrections and Additions, The mitigation measure is changed to more clearly reflect its applicability to all species listed as threatened or endangered under the CESA or ESA, such as the Mohave ground squirrel.
- 4-5 See change to pp. ES-23, 3.3-43 (BIO.18) in Section 6, Corrections and Additions. This mitigation measure is changed to more clearly reflect its applicability to all species listed as California species of special concern (CSC), including the bats.
- 4-6 See change to pages ES-23 to ES-24, 3.3-43 to 3.3-44 (BIO.20) in Section 6 Corrections and Additions.
- 4-7 See change to pages ES-24, 3.3-44 (BIO.21) in Section 6, Corrections and Additions.
- 4-8 See change to pages ES-26 to ES-27, 3.3-46 (BIO.25) in Section 6, Corrections and Additions.
- 4-9 See Response to Comment 4-5 above. Protection for bat habitat during project implementation is now reflected in MM-BIO.18.
- 4-10 See change to pp ES-27, 3.3-48 (BIO.26) in Section 6, Corrections and Additions.
- 4-11a See change to pages ES-28, 3.3-48 (Impact 3.3-3) and ES-28, 3.3-49 (BIO.30) in Section 6, Corrections and Additions.
- 4-11b See change to page 3.3-23 in Section 6, Corrections and Additions.
- 4-11c See change to pages ES-28, 3.3-49 (BIO.31) in Section 6, Corrections and Additions.

4-12 See changes to pages ES-19, 3.3-39 (BIO.8) and ES-29, 3.3-52 (MM-BIO.39) in Section 6, Corrections and Additions. SCAG recognizes the importance of preserving wetlands and riparian areas which are of key importance to maintaining a healthy ecosystem. The mitigation measures listed as MM-BIO.39 through MM-BIO.41 are intended to prevent the alteration of wetlands and riparian areas as much as possible. In the event losses to these types of areas and habitats are unavoidable, MM-BIO.42 will help mitigate the loss through enhancements in nearby wetlands and other aquatic areas. In addition, mitigation measures MM-BIO.1 through MM-BIO.9 and MM-OS.12 through MM-OS.25 call for projects to avoid loss to habitat and open space resources, such as wetlands and riparian areas. SCAG has included a mitigation measure that recommends a ratio for replacing lost habitats. MM-BIO.8 states that permanent impacts to sensitive habitats should be compensated for by creating or restoring habitats at a 3:1 ratio of compensatory habitat to lost habitat and MM-OS.23 states that at least one acre of open space should be permanently conserved for each acre of open space developed.

MM-BIO.7 requires that the appropriate agencies and permits are obtained for each project-level EIR. Notification of the DFG is required by law before an activity that will substantially modify a river, stream, or lake is begun. Streambed Alteration Agreements (SAA) will be entered into with DFG on an individual project basis. Since this is a regional and programmatic discussion of biological resources in a program level EIR, further discussion of project-level impacts to biological resources will be appropriately disclosed as those individual projects are planned, designed, and implemented. See also Master Response 2 regarding Program EIR vs. Project/Site Specific EIR.

5. Caltrans District 7

5-1 -- 2 Tables 3.14-2, 3.14-3 and 3.14-5 to 3.14-10 are based on the SCAG 2007 Regional Travel Demand Model; modeling was performed for 2008 to reflect existing conditions. CEQA requires that existing conditions shall normally be the base year for analysis. However, in accordance with federal regulations the RTP uses 2003 as the base year.

Slightly different terminologies are used for the RTP, transportation conformity, and CEQA purposes. Again, base year for the RTP is 2003. The baseline analysis year for the PEIR is 2008. The RTP Baseline is the PEIR No Project Alternative which is the same as the Conformity No Build. Different terminologies are required by different regulations. The RTP, PEIR and transportation conformity analysis all explain what is meant by each term (see PEIR pp. 1-2 and 1-3).

5-3 – 4 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-014).

6. South Coast Air Quality Management District

- 6-1 The Air Quality Greenhouse Gas Calculation Methodology in the PEIR, Appendix B was provided to the SCAQMD on January 17, 2007.

The average project size in each county was assumed to be 100 residential units or 250,000 square feet of commercial development. Table A below shows the number of average-sized project located in each county for the Plan and the alternatives.

**TABLE A
AVERAGE SIZE PROJECT FOR THE CONSTRUCTION GREENHOUSE GAS ANALYSIS**

| Area and Source | Scenario ¹ | | | | |
|--------------------------------------|-----------------------|-------------------|----------|----------------------|----------------------|
| | Existing | Future No Project | 2008 RTP | 2004 RTP Alternative | Envision Alternative |
| Imperial County | | | | | |
| Residential (Per 100 units) | 198 | 198 | 191 | 163 | 191 |
| Commercial (Per 250,000 Square Feet) | 8 | 8 | 8 | 6 | 8 |
| Los Angeles County | | | | | |
| Residential (Per 100 units) | 2,864 | 2,864 | 3,206 | 2,730 | 3,206 |
| Commercial (Per 250,000 Square Feet) | 67 | 67 | 73 | 69 | 73 |
| Orange County | | | | | |
| Residential (Per 100 units) | 397 | 397 | 459 | 541 | 556 |
| Commercial (Per 250,000 Square Feet) | 33 | 33 | 34 | 48 | 36 |
| Riverside County | | | | | |
| Residential (Per 100 units) | 1,968 | 1,968 | 1,808 | 1,952 | 1,692 |
| Commercial (Per 250,000 Square Feet) | 80 | 80 | 77 | 66 | 75 |
| San Bernardino County | | | | | |
| Residential (Per 100 units) | 1,400 | 1,400 | 1,171 | 1,396 | 1,171 |
| Commercial (Per 250,000 Square Feet) | 57 | 57 | 53 | 57 | 53 |
| Ventura County | | | | | |
| Residential (Per 100 units) | 237 | 237 | 253 | 280 | 272 |
| Commercial (Per 250,000 Square Feet) | 12 | 12 | 12 | 12 | 12 |

NOTES:

1. Project sizes were assumed to be identical in 2020 and 2035.

The SCAQMD suggested including construction of roadway and other transportation improvement projects in the GHG analysis. The No Project Alternative and the 2008 RTP would result in the construction 1,810 and 7,095 lane miles, respectively. In addition, the 2008 RTP would result in the construction of 210 miles of rail lines. If we assume that one roadway construction crew could work on 600 linear feet of roadway lane in one eight-hour workday, and we further assume that 100 linear feet of rail line would be worked upon in one eight-hour workday and that all rail construction would occur over a

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three-year period, then roadway and other transportation improvement projects would result in less than 0.01 million metric tonnes of GHG per year. Roadway and other transportation improvement project emissions would be negligible on a regional basis when compared to the 2020 No Project and 2020 2008 RTP GHG emissions of 202.44 and 201.10 million metric tonnes, respectively, and the 2035 No Project and 2035 2008 RTP GHG emissions of 233.77 and 228.20 million metric tonnes, respectively.

6-2 Emissions from other than on-road mobile sources are addressed as part of the AQMP; Table 3.2-12 includes forecast train emissions from the Final 2007 AQMP (2035 is not included in the AQMP, 2035 is calculated using the annualized rate of change between 2023 and 2030). The RTP is technology neutral in its discussions of high speed rail. SCAG has listed the results of a preliminary evaluation of alternative scenarios for rail electrification in Appendix C of the RTP Goods Movement Report. The study results include estimated electrification costs, appropriate electrification milestones and their durations, and electric power consumption associated with electrified rail for three electrification scenarios. Additionally, SCAG has evaluated a zero-emissions high-speed rail transport system for goods movement along with dedicated lanes for clean trucks. More information about those alternatives can be found in the RTP High-Speed Regional Transport Report and the RTP Goods Movement Report. Evaluation of rail electrification and other zero emission technologies is more specific than the level of detail addressed by the PEIR. See Master Response 2 Programmatic EIR vs Project/Site Specific EIR.

6-3 The SCAQMD (District) implicitly acknowledges the impracticality of quantitatively modeling cancer risk for the entire, extensive freeway system encompassed in SCAG's six-county planning area. Such an effort would require extensive inventory development, input of thousands of receptors and extensive dispersion modeling. SCAG's approach was to select a representative set of freeway corridors for which quantitative modeling and analysis could be performed. As the District notes, one corridor was selected in each county that exhibited the highest total vehicle volumes. SCAG recognizes that this approach does not guarantee the impacts presented in the analysis represent absolute worst-case risk levels from freeways in the RTP. The Draft PEIR indicates that there is wide variability in concentrations throughout the SCAG region. This results from spatial variations in meteorology, receptor-to-source proximity and source mix (i.e., the diesel particulate emission fraction, on freeways characterized by the fraction of heavy-duty trucks).

Two¹ of the six freeway corridors modeled in the analysis are contained within the areas identified in SCAQMD's Multiple Air Toxics Exposure Study (MATES) III Draft Report² as having the highest cumulative health risks (over 1,200 per million) across the entire planning region. These areas of the highest cumulative risk were determined based upon exhaustive emission inventory development and dispersion modeling performed by the SCAQMD and more robustly account

¹ I-710 near Compton in Los Angeles County and I-405 near Seal Beach in Orange County.

² Figure 4-3 from the MATES III Draft Report at <http://www.aqmd.gov/prdas/matesIII/draft/ch4.pdf>

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for variations in meteorology, source-receptor proximity and all emission sources (e.g., rail, stationary sources, etc.). According to the MATES III report, these “highest risk” areas are located within significant portions of Los Angeles County and small areas of northwestern Orange County where it borders Los Angeles County. The two freeway corridors selected and modeled by SCAG in those counties -- I-710 near Compton in Los Angeles County and I-405 near Seal Beach in Orange County—are both contained within these highest risk areas. In addition, residential receptors were located (and modeled) directly adjacent to the freeway corridors themselves. Thus, short of conducting comprehensive inventory development and modeling of the type already performed by the District under the MATES III study, SCAG believes the set of freeway corridors selected for quantitative modeling appropriately characterizes the range of health risk levels associated with the RTP over its entire planning region.

The modeling in the PEIR assumes the addition of new freeway lanes (for those planning scenarios and freeway corridors affected) would occur inward, i.e., toward the median. This simplifying assumption is made because most of the freeway corridors in the SCAG system are “right of way” constrained for outward expansion toward the shoulders. SCAG explicitly examined the underlying projects contained in the RTP that would result in additional lanes on three of the six freeway corridors modeled in the risk assessment. (No lane additions were projected for the other three corridors.) On each of these corridors, expansion (i.e., lane addition) was programmed to occur toward the outside. As a result, the roadway geometry inputs for these three corridors were corrected and the dispersion modeling was re-run in response to this comment. The revised HRA, including revised modeling, is included at the end of Section 6 of this FEIR Addendum.

HSRT in the region would reduce vehicle trips in the region and the emissions associated with these trips would be eliminated thereby incrementally reducing risk. Because the technology of the HSRT has not been selected, it is not possible to identify risk associated with HSRT. Changing land use patterns in response to Compass Blueprint, RTP Advisory policies and other factors are going to tend to shift people closer to transit. The impacts on health will have to be assessed on a community-by-community, project-by-project basis. Master Response 2 in this Final EIR Addendum discusses Program versus Project/Site specific analyses.

- 6-4 “BURDEN mode” outputs from EMFAC2007 were used in the analysis. The documentation in the Draft PEIR indicates those specific emission factor modes or elements were assumed to apply to freeway travel and those that were not. BURDEN outputs for running exhaust and running loss evaporative emissions were assumed to be applicable to freeways. Starting and initial idling exhaust modes and evaporative hot soak, diurnal breathing and resting loss modes were not included in the freeway emission factors developed under this analysis because they occur either when the vehicle is operated off the freeway system (starting and idling exhaust) or when the vehicle is parked and shut off (evaporative hot soak, diurnal breathing and resting losses).



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- 6-5 As stated in the response 6-4, BURDEN-mode emission factors were used in the analysis. It is recognized that these BURDEN-based factors represent composite daily values that account for time-of-day variations in ambient conditions (e.g., temperature and humidity), vehicle volumes, fleet mix and speed for a planning area such as a county, air basin or air district. County or air basin-wide diurnal variations built into BURDEN may not be representative of those variations along individual freeway corridors modeled in the risk assessment. Diesel Particulate Matter (DPM) emissions from heavy-duty Diesel (HDD) trucks dominate the overall risk from on-road vehicles. Corridors with higher nighttime HDD fractions (when dispersion decreases from lower wind speeds) might exhibit higher risk if time-of-day variations on each corridor (available from SCAG's travel model) were accounted for. Thus, the analysis included in the DEIR applied adjustments to jointly account for time-of-day variations in both vehicle volume and HDD fraction estimates for each corridor from the SCAG travel model.

For preparation of this Final PEIR Addendum, this issue was examined more robustly. Parallel modeling runs on each corridor were performed with and without explicit diurnal adjustments as were used in the draft analysis. For most of the corridors, the modeled risk impacts were actually lower when superimposing these diurnal adjustments. (This resulted from the fact that increases in nighttime HDD fractions were more than offset by decreases in total HDD volumes.) Thus, to ensure both consistency in the use of BURDEN-based daily-composite emission factors and that quantitative impacts were not understated, the revised modeling analysis was performed using the BURDEN-based emission factors, but without applying corridor-specific, time-of-day adjustments. The revised HRA, including revised modeling, is included at the end of Section 6 of this FEIR Addendum.

- 6-6 Emission factors for each modeled toxic air contaminant (TAC) from operation of on-road vehicles were developed using the most recent emission factor model developed by the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB). On-road emission factors for Diesel exhaust particulate matter (DPM) and total organic emissions (TOG) were generated through the use of the CARB EMFAC2007 model. A special toxics module of EPA's MOBILE6 model was used to determine the fractions of individual cancer-causing toxic compounds listed below in TOG emissions, a capability not possessed by the EMFAC2007 model. Table B lists these calculated toxic fractions by individual EMFAC vehicle class for each compound.

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| Table B Toxic Fractions by Vehicle Class and Compound | | | | | | |
|--|---------|--------------|--------------|--------------|------------------|--------------|
| Vehicle Class | Benzene | | Formaldehyde | Acetaldehyde | 1,3 Butadiene | Diesel PM |
| | Exhaust | Evap- Run | | | | |
| LDA-NCAT | 0.0257 | 0.0046 | 0.0237 | 0.0099 | 0.0098 | na |
| LDA-CAT | 0.0257 | 0.0046 | 0.0180 | 0.0104 | 0.0051 | na |
| LDA-DSL | 0.0200 | 0.0046 | 0.0386 | 0.0123 | 0.0090 | 1.0000 |
| LDT1-NCAT | 0.0257 | 0.0046 | 0.0237 | 0.0099 | 0.0098 | na |
| LDT1-CAT | 0.0257 | 0.0046 | 0.0180 | 0.0104 | 0.0051 | na |
| LDT1-DSL | 0.0200 | 0.0046 | 0.0386 | 0.0123 | 0.0090 | 1.0000 |
| LDT2-NCAT | 0.0257 | 0.0046 | 0.0237 | 0.0099 | 0.0098 | na |
| LDT2-CAT | 0.0257 | 0.0046 | 0.0180 | 0.0104 | 0.0051 | na |
| LDT2-DSL | 0.0200 | 0.0046 | 0.0386 | 0.0123 | 0.0090 | 1.0000 |
| MDV-NCAT | 0.0257 | 0.0046 | 0.0237 | 0.0099 | 0.0098 | na |
| MDV-CAT | 0.0257 | 0.0046 | 0.0180 | 0.0104 | 0.0051 | na |
| MDV-DSL | 0.0200 | 0.0046 | 0.0386 | 0.0123 | 0.0090 | 1.0000 |
| LHDT1-NCAT | 0.0257 | 0.0046 | 0.0368 | 0.0111 | 0.0079 | na |
| LHDT1-CAT | 0.0408 | 0.0046 | 0.0180 | 0.0104 | 0.0031 | na |
| LHDT1-DSL | 0.0105 | 0.0046 | 0.0782 | 0.0288 | 0.0061 | 1.0000 |
| LHDT2-NCAT | 0.0257 | 0.0046 | 0.0368 | 0.0111 | 0.0079 | na |
| LHDT2-CAT | 0.0408 | 0.0046 | 0.0180 | 0.0104 | 0.0031 | na |
| LHDT2-DSL | 0.0105 | 0.0046 | 0.0782 | 0.0288 | 0.0061 | 1.0000 |
| MHDT-NCAT | 0.0257 | 0.0046 | 0.0368 | 0.0111 | 0.0079 | na |
| MHDT-CAT | 0.0408 | 0.0046 | 0.0180 | 0.0104 | 0.0031 | na |
| MHDT-DSL | 0.0105 | 0.0046 | 0.0782 | 0.0288 | 0.0061 | 1.0000 |
| HHDT-NCAT | 0.0257 | 0.0046 | 0.0368 | 0.0111 | 0.0079 | na |
| HHDT-CAT | 0.0408 | 0.0046 | 0.0180 | 0.0104 | 0.0031 | na |
| HHDT-DSL | 0.0105 | 0.0046 | 0.0782 | 0.0288 | 0.0061 | 1.0000 |
| LHV-NCAT | 0.0257 | 0.0046 | 0.0368 | 0.0111 | 0.0079 | na |
| LHV-CAT | 0.0408 | 0.0046 | 0.0180 | 0.0104 | 0.0031 | na |
| LHV-DSL | 0.0105 | 0.0046 | 0.0782 | 0.0288 | 0.0061 | 1.0000 |
| SBUS-NCAT | 0.0257 | 0.0046 | 0.0368 | 0.0111 | 0.0079 | na |
| SBUS-CAT | 0.0408 | 0.0046 | 0.0180 | 0.0104 | 0.0031 | na |
| SBUS-DSL | 0.0105 | 0.0046 | 0.0782 | 0.0288 | 0.0061 | 1.0000 |
| UB-NCAT | 0.0257 | 0.0046 | 0.0368 | 0.0111 | 0.0079 | na |
| UB-CAT | 0.0408 | 0.0046 | 0.0180 | 0.0104 | 0.0031 | na |
| UB-DSL | 0.0105 | 0.0046 | 0.0782 | 0.0288 | 0.0061 | 1.0000 |
| MH-NCAT | 0.0257 | 0.0046 | 0.0368 | 0.0111 | 0.0079 | na |
| MH-CAT | 0.0408 | 0.0046 | 0.0180 | 0.0104 | 0.0031 | na |
| MH-DSL | 0.0105 | 0.0046 | 0.0782 | 0.0288 | 0.0061 | 1.0000 |
| MCY-NCAT | 0.0257 | 0.0046 | 0.0237 | 0.0099 | 0.0098 | na |
| MCY-CAT | 0.0257 | 0.0046 | 0.0237 | 0.0099 | 0.0098 | na |
| MCY-DSL | 0.0200 | 0.0046 | 0.0386 | 0.0123 | 0.0090 | 1.0000 |

6-7 The “time factor” referred to in this comment was the volume or travel per day, converted to per second units of cancer risk. The risk emission factors in Table 4 of the HRA, expressed in units of grams/mile-risk per $\mu\text{g}/\text{m}^3$ were converted to time-dependent source strengths (in grams/second per $\mu\text{g}/\text{m}^3$) by dividing by the daily vehicle miles traveled (VMT/day) on each link. (This was performed for

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booth mixed-use and HOV links.) A detailed spreadsheet with these steps (Emission Factors.xls) is available from SCAG upon request.

- 6-8 The meteorological file for Los Alamitos listed in the input file -- LOSALAMS.ASC is the same as LOSALAM.ASC. Sierra renamed the file to the 12-character version to be compatible with a hard-coded reference in another dispersion model. This is the same 1981 Los Alamitos meteorological data file cited by the commenter.
- 6-9 The dispersion modeling was re-run without the use of the MISSING data processing routine in the ISCST model to comply with SCAQMD guidance. Based on parallel runs performed for one of the six freeway corridors (I-405 in Orange County) no difference (to the precision reported in model outputs) was observed in maximum concentrations because meteorological input dataset contained no missing data. The other meteorological datasets used in the analysis also contain missing hourly data records; thus, no difference in modeled risks occurred from this revision.
- 6-10 Similar to response 6-9, the dispersion modeling was re-run without the use of the WINDCATS parameter in ISCST to comply with SCAQMD guidance. Based on parallel runs performed for one of the six freeway corridors (I-405 in Orange County) no difference (to the precision reported in model outputs) was observed in maximum concentrations. It is expected that the effect of disabling the WINDCATS option for the other modeling corridors is also minor.
- 6-11 The risk assessment dispersion modeling runs were conducted in a manner in which a dense grid of receptors and a separate set of discrete receptors were combined within the same modeling run. The grid of receptors was used to construct risk isopleths. The discrete receptors represent locations of actual nearby residences (and workplaces). It is possible that some of the grid receptors overlapped the area sources in the model runs, but these receptors were masked out of the source area to plot the isopleths. In addition, the maximum risk presented in Table 3.2-9 (Table 6 of the Screening Risk Assessment) is based only on the discrete receptors corresponding to the nearest residences along each corridor. These receptors do not overlap the area sources as modeled and thus reflect the highest risks at valid receptor locations. (As noted in response 6-12 below, the revised modeling analysis included summaries of the highest risk for both valid residential and workplace receptors.. The revised HRA, including revised modeling, is included at the end of Section 6 of this FEIR Addendum).
- 6-12 Quantitative modeling of workplace health risk was not undertaken for the Draft EIR because workplace risk (as shown below) is generally less than residential risk due to the fact that the amount of time and thus maximum exposure is less. However, in response to the comment, provided below in Table C is information on workplace risk.



TABLE C
INCREMENTAL CANCER RISK AT MAXIMUM EXPOSED WORKPLACE FROM
VEHICLE OPERATION BY PLANNING SCENARIO AND FREEWAY CORRIDOR

| Planning Scenario | Increased Cancer Risk over 70-Year Exposure (per million) | | | | | |
|-------------------|---|------------------------|-------------------|---------------------------|----------------------|---------------------|
| | I-405 (Orange) | I-710 (Los Angeles) | I-8 (Imperial) | SR 60 (San Bernardino) | SR 91 (Riverside) | US 101 (Ventura) |
| 2008 Existing | 30 | 79 | 8 | 116 | 14 | 32 |
| 2035 No Project | 7.6 | 26 | 2.6 | 36 | 3.7 | 10.9 |
| 2035 Plan | 7.5 | 22 | 2.4 | 32 | 3.8 | 10.5 |

SOURCE: Southern California Association of Governments, 2007

- 6-13 The results presented in Table 6 (table 3.2-9 of the PEIR) do not represent total health risk. Rather, Table 6 represents the highest modeled cancer risk resulting from exposure to on-road vehicle emissions in the vicinity of each of the selected freeway corridors. Thus, they represent the incremental risk from vehicle operation on the freeway over and above that resulting from all other carcinogenic emission sources that impact nearby receptors. The title of Table 3.2-9 of the DEIR and Table 6 of the Screening Assessment is clarified with the addition of the word “Incremental” (see Section 6, Corrections and Additions, revised table 3.2-9). In addition, the accompanying narrative is revised to include a discussion of total existing risk within the SCAG domain based on the District’s Draft MATES-III study.
- 6-14 A discussion of why the modeled risk values vary between planning scenarios is added to the HRA (also referred to as the Screening risk Assessment). In order to clearly understand the revised HRA, it is presented in its entirety at the end of this FEIR Addendum document. See also the discussion at the end of Section 6, Corrections and Additions, of how the HRA Appendix was revised. Note that the revisions to the HRA do not present significant new information or data, and therefore recirculation is not necessary. It points out that the modeled results under a series of planning scenarios for any given freeway corridor are directly related to the vehicle volumes, fleet mix (particularly the heavy-duty diesel vehicle fraction) and vehicle speeds on the roadway links that comprise the corridor as well as the meteorology and source-receptor geometry at each corridor.

Vehicle volumes, fleet mix and speeds are predicted for each roadway link by SCAG’s regional travel demand model under each planning scenario. The effects of individual elements represented in each regional planning alternative on these parameters are accounted for in SCAG’s regional travel modeling process, which translates planning elements (e.g., land uses, socioeconomic projections, travel mode choices, etc.) into production and attraction of trips throughout the six-county planning area. The differences in health risks among the alternatives, at the regional scale, are primarily related to the different travel

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patterns associated with the different alternatives. The proximity of land uses to transportation facilities that have health risks is a site specific issue that will be addressed in tier two environmental documents on Specific or General Plans and/or individual projects.

6-15 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-106).

6-16 Comment noted.

7. Metropolitan Water District

7-1 Comment noted; SCAG concurs that the central task of estimating, planning and providing for regional water needs is the central role of the water agencies.

7-2 MM-W.36 addresses comment that SCAG's role in mitigating water supply impacts from growth is through cooperation, information sharing, and program development. See also Master Response 4 regarding mitigation measures and the link between transportation planning, land use and regional impacts associated with growth, and therefore the need to include mitigation related to growth in general. A mitigation measure need not fall within the jurisdiction of the recommending agency to qualify as a program-level mitigation.

8. Los Angeles County Flood Control District

8-1 -- 2 Please see Section 6, Corrections and Additions for revisions to pages 3.15-9 and 3.15-30 of the Draft PEIR.

9. Soboba Band of Luiseno Indians

9.1 The PEIR includes mitigation measure MM-CUL.5 (Draft PEIR, p. 3.4-23) which indicates that in the event cultural resources are discovered at a project site, project sponsors are required to consult with the Native America Heritage Council (NAHC) which will identify the appropriate Native American contact(s). Also see MM CUL.6-CUL.8 which addresses the aspect of the comment regarding archeological records research prior to construction activities to identify any potential cultural resources. Further discussion of project-level activities surrounding cultural resources will be addressed at the project level as those individual projects are planned, designed, and implemented. See also Master Responses 2 and 3 regarding program EIR versus Project/Site Specific EIR and Role of SCAG and SCAG's Authority.

10. Mojave Desert Air Quality Management District

10-1 SCAG thanks the District for its review.



11. Orange County Transportation Authority

11-1 The No Project Alternative consists of the baseline transportation network paired with the Baseline Growth Forecast. The text on pages ES-7 and p. 1-3 is revised. See Section 6, Corrections and Additions.

11-2 See Master Response 1 regarding Growth Forecasts in the RTP. See also Section 2, Changes Since Publication of the Draft EIR. The growth forecast for the 2008 RTP has been changed to the Baseline Growth Forecast which is consistent with Orange County Projections (OCP) 2006. There will continue to be a potentially significant impact between currently adopted land use plans and policies and the RTP because local policies continue to change and therefore a *potential* for inconsistency remains. See also the Responses to RTP Comments regarding the Growth Forecast, Final 2008 RTP, letter (08-152)..

11-3 At the time of this writing the Orangeline is anticipated to be included in the Strategic Plan, rather than the Constrained project list. As indicated on page 1-4 of the PEIR, inclusion or removal of this one project from the project listing would not change any of the conclusions presented in the document. In general, the addition or deletion of this component to the 2008 RTP is within the error margin of the regional-scale modeling techniques and data presentation for the PEIR analysis.

11-4 Grade separation projects identified for Orange County in Map 2.1-10 are those projects specifically associated with the regional rail capacity expansion program. Additional grade separation projects for Orange County, while not identified in map 2.1-10 are covered as part of its lump sum grade separation submittal (ID Number 2GL04) in SCAG's RTP project listing.

11-5 The list of references at the end of Section 3.2 is modified to include the Screening Risk Assessment prepared for the PEIR.

See change to pages 3.2-21 and 3.2-31 in Section 6, Corrections and Additions. A summary of the health risk screening assessment is presented on page 3.2-32. This section also includes a table detailing the incremental, increased cancer risk at maximum exposed residences from vehicle operation by planning scenario and freeway corridor. The complete report on overall cancer risk is included in the PEIR Appendix B: Air Quality, Screening Risk Assessment of Sample Selected Projects Included in the Southern California Association of Governments' Draft 2008 Regional Transportation Plan. The revised HRA/Screening Risk Assessment is included at the end of Section 6, Corrections and Additions.

11-6 The Draft RTP PEIR, Section 3.5, Energy, pages 3.5-6 through 3.5-30 discusses transportation energy sources and potential consumption reduction efforts and regulations. At this time however, the future saturation rate of Partial Zero Emission Vehicles and Zero Emission Vehicles in the region's vehicle fleet is difficult to forecast, and therefore speculative. For mobile source emissions, the

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GHG calculation includes reduced emissions in light of anticipated changes in the vehicle fleet, including improvements in technologies.

Greenhouse gas emissions would increase under the 2008 RTP because of increased VMT. As indicated in footnote 1 of table 3.2-17 the EIR recognizes that all sources of GHG emissions are not included. As stated in Appendix B, Air Quality Greenhouse Gas Emission Calculation Methodology, the Carbon Dioxide (CO₂) emissions were calculated for construction activities, mobile sources and energy use associated with standard electricity usage and natural gas consumption. As stated on page 2-2 of the Draft RTP PEIR, the 2008 RTP is a long-range regional transportation plan that provides a blueprint for future transportation improvements based on specific transportation goals, objectives, policies and strategies. The Draft RTP PEIR is programmatic in nature and does not specifically analyze all possible sources of GHG emissions (For more information on the programmatic nature of the PEIR, please see Master Response 2 Program EIR versus Project/Site Specific EIR).

The GHG emissions inventory methodology in the Draft RTP PEIR can serve as guidance to lead agencies. The GHG emissions inventory in the Draft RTP PEIR should not preclude future project-level environmental impact reports from conducting their own inventory, tailored to their specific projects. Furthermore, pursuant to Senate Bill 97 (Chapter 185, 2007) the Governor's Office of Planning and Research (OPR) is in the process of developing CEQA guidelines "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." OPR is required to "prepare, develop, and transmit" the guidelines to the Resources Agency on or before July 1, 2009. The Resources Agency must certify and adopt the guidelines on or before January 1, 2010. As such, subsequent environmental impact reports will be required to review and address the new CEQA guidelines.

- 11-7 A new MM.AQ-18 is added to the PEIR regarding SCAG working with the Ports of Long Beach and Los Angeles as appropriate to facilitate implementation of the Clean Air Action Plan; and a sentence is added to p. 3.5-17 regarding implementation of a Pier Pass Program at the Ports of Los Angeles and Long Beach designed to improve operations and air quality in and around the ports. See Section 6, Corrections and Additions.
- 11-8 -- 9 See Section 6, Corrections and Additions for revisions to pages 3.14-23 to 3.14-25. The revised table now shows that Orange County VHD improves under Plan conditions as compared to the No Project conditions. The Draft PEIR showed that the percentage of evening work trips completed within 45 minutes in 2035 with the Plan would be 82% in Orange County and 87 % in Riverside County. There were minor errors in these numbers that are corrected in the Final RTP. For the Final Plan these numbers are still 82 % for Orange County but 79 % for Riverside County (see the 2008 Final RTP for the complete set of revised numbers).



12. San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy

- 12-1 See PEIR Section 6, Corrections and Additions for changes to pp. ES-27, 3.3-48 (MM-BIO-26 to MM-BIO.29) which addresses language requested by commenter. See also Master Response 2 regarding Program versus project/Site Specific EIR. Specific discussion of wildlife fencing and wildlife crossing standards are highly dependent on the species of concern/protected species found at each individual site. Further discussion of biological resources and specific mitigation measures tailored toward those resources (such as installing appropriate wildlife fencing and crossings) is most appropriately addressed as those individual projects are planned, designed, and implemented. Also, as research on the success of different types of wildlife fencing/crossings for many species continue to be developed and refined, more effective standards will be identified. It is implied through the language “useful” and “appropriate” that the most effective existing guidelines be used when developing wildlife fencing/crossings to mitigate project impacts. These guidelines would include, but not necessarily be limited to, FHWA’s Critter Crossings, Ventura County Mitigation Guidelines, or the USDA Forest Service’s Wildlife Crossings Toolkit. SCAG works with local jurisdictions and organizations, at the regional level, to identify regional issues and policies. SCAG also reviews consistency with the RTP and RTP mitigation measures through its Intergovernmental (IGR) process.
- 12-2 Mitigation measures MM-BIO.27 and MM-BIO.29 are revised to reflect conformance with proven standards also MM-OS.13 (p. ES-53, 3.10-24) is revised to add consideration of wildlife corridors (see Section 6, Corrections and Additions).
- 12-3 See Section 6, Corrections and Additions, for changes to pages ES-29, 3.3-52 (MM-BIO.39 to MM-BIO-42). See also above Response to Comment 4-12.
- 12-4 See Section 6, Corrections and Additions, for changes to MM-BIO.39 to provide more guidance on wetland retention and habitat values.
- 12-5 See Section 6, Corrections and Additions, change to Table 3.3-1 Natural Wetlands on page 3.3-10. The amount of protected wetlands is 41.5 acres. According to the California Coastal Conservancy, the Los Cerritos Wetlands contain 41.5 acres of protected land area with an additional 24.5 acres of fee title underneath the San Gabriel River. This comes to a total of 66 acres that were purchased by the Los Cerritos Wetlands Authority for protection and restoration of the Los Cerritos Wetlands.
- 12-6 SCAG is a consensus building agency and provides forums for dialogue between project proponents and other agencies. SCAG will continue to provide forums for dialogue and encourages opportunities to inform decision-making through cooperation and facilitation. Additionally, mitigation measure MM-OS.41 is revised to reflect this comment. See Section 6, Corrections and Additions.

13. South Coast Wildlands

- 13-1 Comment noted. Mitigation measure MM-BIO.28 indicates that individual transportation projects should include analysis of wildlife corridors during the project planning phase and requires avoidance or minimization of potential impacts. MM-OS.13 includes consideration of wildlife corridors in corridor realignments, buffer zones and setbacks in order to reduce conflicts.

14. Western Riverside Council of Governments

- 14-1 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-123).
- 14-2 See change to pages ES-15 and 3.2-34, MM-AQ.3 in Section 6, Corrections and Additions.
- 14-3 See Master Response 2 regarding Program EIR versus Project/Site Specific EIRR. Enforcement of dust control measures should occur through implementation of the mitigation Monitoring plan of an individual project. SCAG is the lead agency under CEQA for the RTP. SCAG has no project implementing authority within the region. SCAG has no land use authority and cannot overturn local land use authority. As such it is the responsibility of local jurisdictions and project implementing agencies to prepare project-level analysis and provide site-specific mitigation measures and monitoring, as practicable and feasible. As such, no change is required to mitigation measure MM-AQ.4.
- 14-4 See Master Response 2 regarding Program EIR versus Project/Site Specific EIRR. Enforcement of street sweeping measures should occur through implementation of the mitigation monitoring plan of an individual project. The mitigation measures included in the PEIR seek to minimize any adverse impacts that may result from implementation of the 2008 RTP. CEQA Guidelines § 15364 state that a mitigation measure is considered feasible if it is capable of being accomplished in a successful manner within a reasonable period of time, taking into consideration economic, environmental, legal, social and technological factors. However, CEQA Guidelines § 15126(a) indicates that if a lead agency determines that a mitigation measure cannot be legally imposed, than the EIR may reference that fact and explain the reasons underlying the lead agency's determination. SCAG is the lead agency under CEQA for the RTP. SCAG has no project implementing authority within the region. SCAG has no land use authority and cannot and will not overturn local land use authority. As such it is the responsibility of local jurisdictions and project implementing agencies to prepare project-level analysis and provide site-specific mitigation measures. As such, no change is required to mitigation measure MM-AQ.7.
- 14-5 See Section 6, Corrections and Additions changes to pp. ES-16 and 3.2-35, MM-AQ.11.



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- 14-6 See change to pages ES-16 and 3.2-35, MM-AQ.14 in Section 6, Corrections and Additions.
- 14-7 See Section 6, Corrections and Additions changes to pages ES-17 and 3.2-35, MM-AQ.15.
- MM-AQ.15 mitigates Impact 3.2-5 (page 3.2-40). The concept of sustainable airport development as proposed in MM-AQ.15 would mitigate for the increased VMT that would result with the implementation of the 2008 RTP and reduce air pollution and GHG emissions from airport operations, ground support and access to and from airports. See also Master Response 4, Mitigation Measures.
- 14-8 See Section 6, Corrections and Additions changes to pp. ES-17 and 3.2-35, MM-AQ.16.
- 14-9 See change to pages ES-18 and 3.2-35, MM-AQ.17 in Section 6, Corrections and Additions. SCAQMD and local agencies have the authority to implement anti-idling regulations and mitigation measures.
- 14-10 See changes to pages ES-35 and 3.5-34, MM-EN.2 in Section 6, Corrections and Additions.
- 14-11 The requested changes to MM-EN.13 were more appropriately added to MM-EN.15. See changes to pages ES-38, 3.5-37 in Section 6, Corrections and Additions,
- 14-12 MM-EN.20, also a mitigation measure for Impact 3.5-2, includes a reference to alternative work options such as telecommuting, ridesharing, alternative work schedules and parking cash-outs. Therefore no change is required to mitigation measure MM-EN.17 based on this comment.
- 14-13 MM-EN.20 includes a reference to parking cash-outs, which encourage employers to offer a cash allowance in lieu of a parking space, thereby promoting public transit use. Therefore, no change is required to mitigation measure MM-EN.20 based on this comment.
- 14-14 The Draft RTP PEIR, pp. 3.5-14 through 3.5-22, discusses consumptive uses of energy, including ships, locomotives and motor vehicles. Impacts 3.5-1 and 3.5-2 address impacts related to construction, expansion and operation of the transportation system and associated growth between current conditions and 2035. Mitigation Measure MM-EN.3 indicates that SCAG will consider how energy uncertainty could impact the cost of goods movement-related industries. Furthermore, Mitigation Measure MM-EN.13 includes a list of potential best practices and technological improvements to address goods movement impacts on energy consumption including implementing truck idling rule, devices, and truck stop electrification, reducing locomotives fuel use, modernizing older off-road engines and equipment, implementing cold ironing at ports, encouraging freight mode shift, requiring zero-emission forklifts, and developing landside port strategy with alternative fuels, clean engines and electrification.

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SCAG is evaluating a number of alternatives to move goods through the region including rail and a high-speed rail transport (HSRT) system (See Final 2008 RTP). These are discussed in the 2008 RTP. The focus of the environmental analysis in the PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2008 RTP pursuant to CEQA Guidelines § 15168. It does not include site specific analysis of any project contained in the 2008 RTP (see also Master Response 2 regarding Program EIR versus Project/Site Specific EIR) . The long range planning horizon of more than 25 years necessitates that many of the highway, arterial, goods movement, and transit projects included in the 2008 RTP are identified at the conceptual level. This document addresses environmental impacts to the level that they can be assessed without undue speculation. Those projects contained within the 2008 RTP will require additional site specific environmental analysis to assess impacts at the project level. Therefore, the discussion of programmatic, regional-scale environmental impacts regarding goods movement is adequate pursuant to CEQA § 15151.

- 14-15 The specifics of how SCAG would encourage driver safety training have not been identified. SCAG has a number of mechanisms available to provide such encouragement – through working groups, committees, outreach efforts and a variety of publications. Thus, at this time, no specifics are available to add to mitigation measure MM-HM.2.
- 14-16 SCAG has no jurisdictional authority over the CHP, but does work cooperatively with local, state and federal agencies on a variety of issues including security and emergency preparedness. No change is required to mitigation measure MM-HM.3.
- 14-17 The commenter’s suggested mitigation measure is noted. The mitigation measure described is appropriate for impacts at the project level and should be applied on a site specific basis rather than in a regional scale document such as the 2008 RTP PEIR. Therefore, the mitigation measure is not included. See also Master Response 2 program EIR versus Project/Site specific EIR.
- 14-18 In general, the terms “project sponsor” and “project implementing agency” are used interchangeably in the PEIR. Project implementing agency is intended to refer more to RTP projects, while project sponsor is intended to be more generally applicable to a wider range of projects, possibly including private projects. Nonetheless both types of mitigation (those intended for RTP projects and those more generally identified) would serve to mitigate the impacts of each type of project; therefore the terms are effectively interchangeable. Therefore in MM-HM.5 for private projects the implementing agency would be the project sponsor which may include private property owners that would be required to coordinate clean up and /or maintenance. As such, no change is required to mitigation measure MM-HM.5.
- 14-19 SCAG does not assign specific densities for low, medium or high residential development for planning purposes. Although SCAG uses the terms “low”,

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“medium” and “high” density, the actual specific definitions of those densities are left to the individual city to determine.

However, for mapping purposes SCAG generally uses the following definitions for residential development:

Low density 1-7 dwelling units per acre
Medium density 8-16 dwelling units per acre
High density 17+ dwelling units per acre

- 14-20 Commentor is referred to the Table of Contents and page 1-6 of the Introduction which states that all maps referenced throughout the document are included in Chapter 8.
- 14-21 Commentor is referred to sub-bullet five on page 3.8-4 which refers to the Naval Warfare Assessment Station, Corona which is the same as the Norco weapons center.
- 14-22 SCAG will continue to work with cities and counties, directly and through the subregions to assist in the development of General Plans.
- 14-23 The intent of MM-LU.3 is to ensure that SCAG’s transportation planning process is undertaken in concert with city and county planning so that regional and local planning occurs in an inter-jurisdictional manner.
- 14-24 SCAG’s Compass Blueprint Demonstration Project Program is a service-oriented program designed to assist local governments in the development of General Plans, overlay zones and other planning tools. This service is voluntary. SCAG will not prepare or evaluate plans that have not applied and been selected through the Compass Blueprint Demonstration Project Program process. SCAG provides many services to its members, including: socioeconomic data, Geographic Information Systems (GIS) mapping, aerial photography, transportation and air quality modeling, and technical assistance in areas such as housing policy, land use policy, economic development policy, and legislative policy. All of these methods could be used by local agencies to implement growth strategies proposed in the 2008 RTP.
- 14-25 MM-LU.11 is duplicative and therefore deleted.
- 14-26 See Section 6 Corrections and Additions for page 3.11-8
- 14-27 The sentence referenced by the commentor refers to both transportation investments and transportation and land use policies; no change in text is appropriate.
- 14-28 The RTP includes transportation investments, transportation policies and advisory land use policies, all of which could have indirect impacts on population distribution. No change to the sentence identified by commentor is necessary.

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- 14-29 SCAG provides services to its member jurisdictions such as Compass Blueprint planning assistance, modeling assistance and GIS data assistance. All of these methods could be used by local agencies to implement growth strategies contained in Compass and now presented in the 2008 RTP as advisory policies.

The HSRT system is still in the preliminary stages, although possible alternate alignments have been identified, proposed alignments, exact construction methodology and schedules have yet to be decided. Each component of the HSRT system will have to undergo individual environmental review and analysis. It is anticipated that several alternatives will be considered before the final alignment is decided.

CEQA Guidelines § 15065(a)(3) defines the phrase “cumulatively considerable” to mean that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. This is what is intended by the word “considerable” in the sentence referred to by the commentor. Therefore the word “considerable” is not removed from the sentence.

The commentors suggested mitigation measure is noted. The mitigation measure described is appropriate for impacts at the project level and should be applied on a site specific basis rather than in a regional scale document such as the 2008 RTP PEIR. Therefore, the mitigation measure is not included. See also Master response 2 regarding Program EIR versus Project/Site Specific EIR.

- 14-30 Commentor is referred to Master Response 1 regarding Growth Forecasts. CEQA documents in most cases, do not consider economic impacts. In addition, potential loss of sales taxes and revenues resulting from a shift in population and the resultant potential for fewer facilities to be constructed is too speculative to be addressed at this time.

- 14-31 Comment noted.

- 14-32 See change to MM-PS.5 pages ES-60, 3.12-19 in Section 6 Corrections and Additions.

- 14-33 See change to MM-PS.8 pages ES-61, 3.12-19 in Section 6 Corrections and Additions. The amount of land buffer that should be included in a landfill development project will vary depending on where the landfill is sited, the size of the landfill, and other factors. Further discussion of appropriate buffer size will be specific to the individual project. Since this is a program EIR, a project-level discussion of these and other landfill siting considerations will be appropriately disclosed as those individual projects are planned, designed, and implemented. See also Master Response 2 regarding Program EIR versus Project/Site Specific EIR.

- 14-34 See Master Responses 2 and 3 regarding Program EIR versus Project/Site Specific EIR and SCAG’s Role and Authority. SCAG is a consensus building organization that encourages dialogue among its member jurisdictions about the



future shape of the region. Since this is a regional and programmatic discussion of public services in a program level EIR, further discussion of area or project-level impacts to public services is appropriately disclosed as individual projects are planned, designed, and implemented. Therefore, the activities of other counties and cities with regards to their solid waste management decisions are not specifically addressed.

14-35 -- 36 See change to MM-PS.10 pages ES-61, 3.12-19 in Section 6 Corrections and Additions. As stated in Impact 3.12-3, "Construction necessary to implement the 2008 RTP would affect the demand for solid waste services in the SCAG region." Construction and demolition associated with construction projects produce large quantities of solid waste. The scale and number of projects associated with the 2008 RTP will impact solid waste services and transportation as waste from project sites is transported to landfills located throughout the region. The largest landfill in the state, Puente Hills Landfill, is scheduled to close in 2013. Many other landfills in the SCAG region have already closed or are scheduled to close within the next 5-10 years. As local landfills close, solid waste will have to be transported further and further away potentially adding to traffic congestion and contributing to decreased air quality in the region. The inclusion of mitigation measures, MM-PS.3 through MM-PS.14 and MM-PS.18 through MM-PS.26 are meant to mitigate the potential impacts of the 2008 RTP on solid waste services, traffic, air quality, and other resources by promoting actions to minimize waste generation. While there is sufficient landfill capacity within the SCAG region to accommodate solid waste disposal through the life of the 2008 RTP, minimizing waste and increasing recycling and other waste management strategies will help extend the life of existing landfills.

14-37 See change to page 3.12-23 in Section 6 Corrections and Additions. As new legislation regarding the handling of solid waste material is enacted, the effects of that legislation will be discussed as appropriate in later environmental documents (either updates to the RTP PEIR and/or project specific EIRs). SCAG has no project-implementing authority within the region and therefore, decisions regarding ADC bans or the distribution of waste material upon closing of the Puente Hills landfill is under the jurisdiction of local governments and waste management agencies. A potential ban on green waste use as alternative daily cover (ADC) will not affect existing landfill capacity since landfill operators are required to cover the active surface of a landfill at the end of each operating day.

14-38 -- 39 See response to comment 14-35.

14-40 -- 43 See changes for pp 3.15-8, 3.15-42, 3.15-50 Section 6 Corrections and Additions for revisions to text and mitigation measures.

15. City of Laguna Hills

15-1 See Master Response 1 regarding the Growth Forecasts. The growth forecast for the 2008 RTP has been changed to the Baseline Growth Forecast which is consistent with the OCP-2006 forecast identified by the commentator as the

preferred forecast. See also Responses to RTP Comments regarding the Growth Forecast, Letter 08-055.

- 15-2 See Master Response 4 regarding Mitigation Measures. See Response to Comments to OCCOG letter 24 comments 10 through 13. For individual changes to mitigation measures identified by commentor, please refer to Section 6, Corrections and Additions.

16. County of Los Angeles – Fire Department

16-1 Comment noted.

16-2 Comment noted.

16-3 Comment that areas germane to County of Los Angeles Fire Department, Forestry Division have been addressed is noted.

17. Los Angeles County – Department of Parks and Recreation

17-1 Language has been added to MM-OS.13 (p. ES-53 and p.3.10-24) to address the comment. See Section 6, Corrections and Additions, for p 3.10-24.

17-2 Detailed analysis of the potential for RTP projects to negatively impact existing and proposed trails used for hiking, biking and horseback riding will be undertaken at the Project level. Individual projects included in the RTP will be evaluated for local level impacts on a site-specific basis when project level environmental analysis occurs. The PEIR includes mitigation measures for cities and counties to help address the impacts of the RTP on parks and open space. These include MM-OS.26 through MM-OS.32 (pp. ES-55, 3.10-26, and 3.10-27 of the Draft PEIR). Also see Master Response 2.

17-3 As noted in the introduction to the comment letter, County comments included in this comment letter on the NOP have been addressed with the exception of the two items addressed in responses 17-1 and 17-2 above.

18. Los Angeles County – Department of Regional Planning

18-1 Page 5-7, second sentence of the second paragraph under the heading Significant and Irreversible Impacts indicates that, “[t]he 2008 RTP projects and associated growth would use substantial nonrenewable resources, including sand, gravel, and fuel during construction . . .” See discussion added to page 5-7 and Table 5-1, Permitted Aggregate Resources and 50 year Demand in the SCAG Region in Section 6, Corrections and Additions,

18-2 Impact 3.8-3, p. 3.8-15 indicates that, “urbanization will increase substantially by 2035.” Table 3.8-1 also on p. 3.8-15 shows that the “extraction” land use category will increase by 40 acres under the No Project Alternative and by up to 200 acres under the Plan. The Draft PEIR indicates that this cumulative impact on land use will be significant.

19. County of Los Angeles – Community Development Commission

- 19-1 Comment noted.
- 19-2 See changes to MM-CUL.3 pp ES-31, 3.4-19 to 3.4-20 in Section 6, Corrections and Additions. It is indicated in mitigation measure MM-CUL.17 that all impacts to cultural resources should be minimized through cooperation, information sharing, and SCAG's ongoing regional planning efforts. Compliance with this measure would result in necessary and appropriate consultation and adherence to existing laws and codes regarding cultural and historic resources take place during project planning and implementation. This includes, but is not limited to, consultation with the Office of Historic Preservation and compliance with the National Historic Preservation Act.
- 19-3 Comment noted; SCAG looks forward to CDC/Housing Authority assistance.
- 19-4 Mitigation measure MM-NO.1 indicates that project implementing agencies shall comply with all local sound control and noise level regulations. See also changes to MM-NO.2 in Section 6, Corrections and Additions.
- 19-5 Comment noted. MM-PS.7 indicates that green building design should be integrated in to project design.

20. Endangered Habitats League

- 20-1 Comment noted, and commentor's views will be forwarded to the decision-makers for consideration during the 2008 RTP adoption process. See Master Response 1 regarding growth forecasts and Master Response 3 regarding SCAG's role and authority.
- 20-2 See Master Response 1 regarding Growth Forecasts and Master Response 3 regarding SCAG's Role and Authority. Compass Blueprint is a separately adopted "advisory" policy document, components of which are repeated in the RTP.
- 20-3 See Master Response 5 regarding alternatives. Federal transportation and air quality law requires that transportation improvements included in the RTP be financially constrained. Much of the available funding for transportation projects is committed to specific types of improvements or projects as the result of prior planning and programming funds at the State, County, and local levels. Regional transportation planning and programming in the SCAG region is set forth under federal and state laws and memoranda of understanding with planning partner agencies. This is a cooperative process under which CTCs, Caltrans, and other implementing agencies submit projects to SCAG for inclusion into the RTP and RTIP. SCAG's discretion is limited with respect to excluding any projects from the RTP that would otherwise meet legal requirements. As such, the range of transportation alternatives is limited and the range presented in the PEIR (committed projects only (No Project), 2004 RTP projects and currently proposed



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RTP projects) is reasonable under CEQA and appropriate given the limitations of regional transportation planning and programming.

- 20-4 Page ES-12 has a typographical error in the number cited by the commentor. As correctly mentioned extensively elsewhere in the PEIR and in the comment, the correct number of acres that would be consumed by the RTP including associated growth is 200,000 (not 2,000,000). Comments noted.

While the plan results in an absolute increase in VMT as the comment notes, CEQA requires that an EIR examine project impacts in comparison to current conditions. In that the RTP contemplates growth in population, employment, housing, and associated activity through 2035, it is unlikely that any conceivable alternative would show a reduction in VMT. The Draft Plan, it should be noted, does show a decrease in VMT compared to the No Project Alternative.

- 20-5 See Master Responses 1 and 3 regarding growth and SCAG authority. With regard to incorporating specific strategies into the RTP as suggested by the commentor: SCAG does not have the authority to impose such conditions on local governments. Further, comprehensive policy discussion and debate needs to occur at the regional level regarding these issues. Note that SCAG intends to conduct a comprehensive regionwide study on congestion pricing over the next three years that will provide direct input to the next update of the RTP.

Metropolitan planning regulations and guidance are in place, along with SCAG policy, that require the evaluation of multimodal improvements to address mobility needs. Proposals for general purpose lane capacity must be carried through such comprehensive planning assessments as part of the metropolitan planning process.

While SCAG encourages and supports local government commitment to implementing Blueprint strategies, it does not have land use authority and cannot require local government action as part of the RTP.

The Draft 2008 RTP includes the proposed extension of the Red Line. The RTP assumes an extension along Wilshire Blvd from its current terminus at Western to La Cienega. This alignment may be updated in a future RTP upon completion of the specific transit planning study currently underway for this project.

SCAG is not a transit operator nor does it have the authority to deregulate private transit. Further, comprehensive policy discussion and debate needs to occur at the regional level regarding these issues.

The Draft 2008 RTP includes over \$208.1 billion in funding towards transit through 2035, which is more than the amount dedicated towards highway improvements.

- 20-6 See Master Responses 1 and 3 regarding growth and SCAG's role and authority. The PEIR includes reasonable feasible mitigation to address identified impacts given current understandings of the issues, projects and currently available



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mitigation at a programmatic level. Given the nature of the RTP that many of the anticipated impacts are related to project implementation and growth that is the responsibility of other agencies, most mitigation measures are directed at entities responsible for carrying out the projects with the potential to have impacts. Nonetheless, SCAG plays a vital role in coordinating and facilitating communication among agencies and in providing regional policy guidance. There are many mitigation measures in the PEIR directed at SCAG (see EN.3 through 12, LU.1 through 9, OS.8 through 10, OS.18 through 21, OS.26 through 30, OS.37 and 38 POP.1, PS.25 and 26, SEP.1 through 20, W.24 and 25, W.33 and 34).

- 20-7 The inability to meet AB 32 mandates is a combination of growth and associated stationary source emissions and growth in VMT. See Master Response 3 role of SCAG and SCAG's Authority. See also response 20-6 above.
- 20-8 As noted above, much of the available funding for transportation projects is committed to specific types of improvements or projects as the result of prior planning at the State, County, and local level. As such, the range of transportation alternatives is limited and the range presented in the PEIR is sufficient under CEQA and appropriate given the limitations of regional transportation planning. In deciding which projects to include in the RTP, general impact to the environment including to sensitive habitats are one of the many factors taken in to consideration. Environmental impacts are considered in increasing depth at every step of the RTP project approval process, culminating in detailed project impact analysis at the project specific level prior to approval of any individual project.
- 20-9 See Master Responses 1 and 3 regarding Growth Forecasts and SCAG's Role and Authority. In addition, as required by SAFETEA-LU, SCAG consulted with and will continue to consult with resource agencies as part of the RTP development process. See also changes to mitigation measures regarding wildlife corridors and buffers.
- 20-10 See Response 20-8 above.
- 20-11 Comment noted. Commentor opinions on RTP projects to be included in the RTP will be forwarded to the Regional Council for consideration in making their decision on whether to approve adoption of the RTP as currently drafted.
- 20-12 For response to comments on the RTP that are not related to the PEIR see Responses to RTP Comments, Public Participation and Consultation Report, Final 2008 RTP letter (08-038).

21. City of Laguna Woods

- 21-1 On March 6, 2008 SCAG's Regional Council (RC) voted in favor of including the Baseline Growth Forecast rather than the Policy Growth Forecast as the growth forecast in the 2008 Final RTP. The RC also voted in favor of including a set of

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advisory growth policies. See Master Response 1 regarding growth forecasts and Section 2 Changes Since Publication of the Draft EIR.

- 21-2 “Shall” is changed to “should” as suggested by the commentor. See Master Response 4 regarding mitigation measures. For revisions to individual mitigation measures see Section 6, Corrections and Additions.
- 21-3 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-150).
- 21-4 See response to comment 21-1 above
- 21-5 See response to comments from Orange County Council of Governments (OCCOG), Letter 24
- 21-6 See response to comments from the Center for Demographic Research (CDR), Letter 45.

22. City of Laguna Woods

- 22-1 On March 6, 2008, SCAG’s RC voted in favor of adopting the Baseline Growth Forecast as the growth forecast in the 2008 Final RTP, and to include nine advisory land use policies. See Master Response 1 regarding Growth Forecast and Section 2 regarding Changes since Publication of the Draft EIR.
- 22-2 See response to comments below, Orange County Council of Governments (OCCOG) Letter 24.
- 22-3 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-056).

23. Los Angeles County Department of Public Works

- 23-1 SCAG thanks the Department of Public Works for its review of the PEIR.

24. Orange County Council of Governments

- 24-1 Comments noted. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-075).
- 24-2 See Master Responses 1 regarding Growth Forecast(s) in the RTP.
- 24-3 through 9 See Master Response 1 regarding Growth Forecast(s) in the RTP, Master Response 2 regarding SCAG’s Role and Authority and Master Response 4 regarding the relationship between transportation planning, growth and mitigation. For response to comments on the RTP that are not related to the

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PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-075).

24-10a. See Master Response 4 regarding Mitigation Measures. Mitigation measures included in the 2008 RTP PEIR are generally of two types. Those that directly mitigate transportation related impacts and those that reduce impacts of growth associated with transportation projects included in the Plan. The RTP includes hundreds of transportation projects and has a horizon year of 2035; as such the Plan was found to be both growth inducing and growth accommodating (PEIR p. 5-10). CEQA requires comparison of existing conditions to 2035 with the Plan, in nearly every case, 2035 would be worse than today, including more vehicle miles traveled, more hours in delay, etc. Part of the reason for the impact is due to the transportation projects and part of it is due to increased growth in the region. This inability to separate the land use and transportation necessitates the inclusion of mitigation measures that address both transportation impacts and cumulative growth impacts. The inclusion of mitigation measures to reduce impacts associated with growth is appropriate for a regional scale, long-range plan such as the RTP. Please also refer to Master Response 2 regarding SCAG's Role and Authority.

24-10b Comments noted.

24-10c. SCAG has an oversight role for regionally significant developments and reviews regionally significant development through its Intergovernmental Review program to ensure consistency with the RTP and the Regional Comprehensive Plan and Guide. The RTP PEIR Mitigation Monitoring and Reporting Program (MMRP) requires each lead agency to submit a mitigation compliance report for transportation projects subject to an EIR or a Mitigated Negative Declaration. This report must include the lead agency's decision as to whether or not a mitigation measure is appropriate.

24-10d. The RTP PEIR includes mitigation measures that would reduce impacts associated with the Plan. Some of these measures relate to housing and land use and promote mixed use and compact growth patterns as a way to reduce impacts of improvements to the transportation system.

24-10e. SCAG is the lead agency for the RTP under CEQA. CEQA requires lead agencies preparing EIRs to mitigate the impacts of proposed projects to the maximum extent feasible. As such, SCAG is authorized and required under state law to include all feasible mitigation measures that could feasibly reduce a significant impact associated with the RTP. CEQA does not require project sponsors to include in their mitigation programs measures that are either infeasible or impractical. See also Master Response 3 regarding SCAG's Role and Authority.

24-10f. See Master Response 4 regarding Mitigation Measures and Response 24-10a above. Transportation and land use are inextricably intertwined. Further, CEQA requires project sponsors mitigate impacts to the maximum extent feasible and include all feasible and practical mitigation measures. Project sponsors should

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implement the mitigation measures included in the RTP PEIR as appropriate. The mitigation measures are not intended to be paired with any one specific growth forecast; rather they should be viewed as a holistic program to reduce significant impacts associated with the RTP. See also Master Response 3 regarding SCAG's Role and Authority.

24-10g, h. See Master Response 4 regarding Mitigation Measures. See also Section 6, Corrections and Additions where, as appropriate, the implementing agency is revised for clarification to include those agencies that can or should implement the measure.

24-10i. Project sponsor and project implementing agency are used interchangeably in the document. Either term should be taken to mean the entity responsible for carrying out a project such as a city or county preparing a general plan, a transportation authority implementing a project or a developer of a project of regional significance as defined by SCAG's Intergovernmental Review Guidelines.

24-11 -- 23. See responses to individual letters submitted by each agency to SCAG. For PEIR comments, see Responses: letter 47, City of Brea; letter 38, City of Anaheim; and letter 37, City of Mission Viejo. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments: Letters 08-075; 08-021; 08-006; 08-029; 08-031; 08-040; 08-045; 08-046.

24-24 See Master Response 4 regarding mitigation measures and Section 6 Corrections and Additions for revisions to specific mitigation measures.

MM-EN.26 is edited to refer to recommend that local governments seek funding through utility-sponsored programs to conduct energy efficiency projects, as practical and feasible.

MM-EN.36 is edited to generally refer to land use principles that local governments could voluntarily consider to use resources efficiently, and to the extent practical and feasible, minimize pollution and significantly reduce waste pursuant to CEQA Section 15126.4. MM-EN.17 refers specifically to jobs/housing balance and is therefore, not a duplicate of this mitigation measure. A connection between compact development and reduced vehicle miles traveled was shown in a 2002 U.S. Environmental Protection Agency study. The study found that counties with an inverse proportion of sprawling land use patterns (widely dispersed population in low density residential areas, lack of distinct, thriving activity centers, rigid separation of homes, shops and workplaces) had significantly greater average vehicle ownership, daily VMT per capita, and maximum ozone level days. (Source: Ewing R., R. Pendall, and D. Chen, "Measuring Sprawl and Its Impact," Smart Growth America/U.S. Environmental Protection Agency, Washington DC, 2002). Therefore, this mitigation measure could minimize significant adverse impacts, including inefficient and unnecessary consumption of energy and is thus incorporated.

25 Orangeline High Speed Maglev

25-1 -- 2 See Master Response 2 Program EIR versus Project/Site Specific EIR. SCAG evaluates the impacts at the regional level, as is appropriate in a programmatic document such as the 2008 RTP PEIR. Inclusion or removal of any one project would not significantly change the conclusions presented in the document.

25-3 Air quality conformity in the region does not hinge on any one project, but rather is achieved through a mix of projects. In general, the addition or deletion of any one project would be expected to be within the error margin of the regional-scale modeling techniques and data presentation of the RTP PEIR. See Master Response 2 Program EIR versus Project/Site Specific EIR.

26 Tom Politeo

26-1 Comments noted. Environmental problems are addressed in each environmental issue area within the PEIR. Commentor's views will be forwarded to the decision-maker for use in making the decision on RTP adoption.

26-2 See Master Response 1 regarding Growth Forecasts, and Master response 2 regarding Program EIR versus Project/Site Specific EIR. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-104).

26-3 Comment noted. The socio-economic concerns identified by commentor result in the environmental problems identified in each issue area throughout the EIR. See Master Response 3 regarding SCAG's Role and Authority.

26-4 and 5 See Master Response 3 regarding SCAG's Role and Authority. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-104).

27 Transportation Corridor Agencies

27-1 See the Final Public Participation and Consultation Report for the 2008 RTP for response to comments on the RTP.

27-2 See response above to Comment 22-1. See also Master Response 1 regarding Growth Forecasts and Section 2, Changes Since Publication of the Draft PEIR.

27-3 See Master Response 4 regarding mitigation measures and the need for measures to address growth. CEQA requires a comparison and determination of a significant impact between existing conditions and the year 2035 with the

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proposed plan. In nearly every impact category, 2035 conditions will be worse than today's conditions. The RTP is determined to be both growth accommodating and growth inducing. As such, mitigation measures aimed at reducing growth related impacts associated with the RTP are appropriate and necessary in the PEIR.

Changes were made to mitigation measures EN 15, EN 34 and OS-23 to clarify the measures as appropriate. See Section 6, Corrections and Additions. See also response above to Comment 24-10a.

27-4 See response to Comment 27-2 above

27-5 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-114).

28 City of Tustin

28-1 See response above to Comment 22-1. See also Master Response 1 regarding Growth Forecasts and Section 2, Changes Since Publication of the Draft PEIR.

28-2 -- 5 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-117).

28-6 -- 7 See response to comments, Orange County Council of Governments (OCCOG), Letter 24.

28-8 -- 9 Comments noted. This information as well as the commentor's views will be forwarded to the decision-maker for consideration in the RTP adoption process. The environmental problems that face the region are characterized in the PEIR. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-117).

29 The City Project

29-1 Comments noted. This information as well as the commentor's views will be forwarded to the decision-maker for consideration in the RTP adoption process. See Master Response 3 regarding SCAG's Role and Authority. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-027).

30. City of Diamond Bar

30-1 The 2008 RTP PEIR is a program level document and does not evaluate the impacts of any one project included in the RTP. Rather, the PEIR analyzes the complete mix of projects included in the RTP, and assesses the impacts at the



regional scale. See Master Response 2 Program EIR versus Project/Site Specific EIR.

- 30-2 -- 5 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-034).
- 30-6 Air quality, health risk, noise and transportation impacts, are evaluated at the regional scale in this programmatic EIR. Regional scale impacts are not significantly impacted by the inclusion or removal of any one project. Local or site specific impacts are best analyzed at the project level. See Master Response 2 Program EIR versus Project/Site Specific EIR.
- 30-7 -- 12 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-034).

31 City of Orange

- 31-1 See response above to Comment 22-1. . See also Master Response 1 regarding Growth Forecasts in the RTP and Section 2, Changes Since Publication of the Draft PEIR.
- 31-2 Implementation of Compass policies would result in a more compact landform and therefore a reduction of impacts. These policies are voluntary and SCAG provides them as a service to member agencies; all jurisdictions have the ability to implement the Compass policies to varying degrees; some jurisdictions have already addressed Compass policies. Mitigation measures MM-LU-5, 6, and 7 are intended to require SCAG to work with jurisdictions to provide support and assistance. These measures do not apply to local jurisdictions if they do not want assistance. Measure 12 only requires that local governments “*consider* [emphasis added] shared regional policies as outlined in Compass Blueprint, RTP and other ongoing regional planning efforts, in determining their own development goals and drafting local plans.” It is acknowledged that the feasibility of implementing measures requiring staff time is dependent on jurisdiction resources.
- 31-3 The commentor’s suggested mitigation measure regarding Quiet Zones is noted. The mitigation measure identified by commentor is appropriate for impacts at the project level and should be applied on a site specific basis rather than in a regional scale document such as the 2008 RTP PEIR. Therefore, the mitigation measure is not included. See Section 6, Corrections and Additions for text changes regarding vibration impacts.
- 31-4 See Master Response 2 Program EIR versus Project/Site Specific EIR. Mitigation Measures, MM-CUL.1 through MM-CUL.10 and MM-CUL.17, are included in the PEIR to avoid or reduce impacts to cultural and historic resources. However, impacts to specific individual cultural and historic resources located in local communities are not included as this level of detail is not appropriate for a

regional and programmatic discussion of cultural and historic resources in a program level EIR. Further discussion of project-level impacts to cultural and historic resources will be appropriately disclosed as individual projects, such as the Metrolink Orange County Line, are planned, designed, and implemented

- 31-5 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-078).

32 City of Seal Beach

- 32-1 See Master Response 4 regarding Mitigation Measures. See also response to comments, Orange County Council of Governments (OCCOG) -- Letter 24.
- 32-2 SCAG will work with the City of Seal Beach to present the findings of the screening risk assessment, as requested by the City.
- 32-3 Comment noted. Four copies of the 2008 Regional Transportation Plan PEIR will be provided to the City of Seal Beach upon adoption.

33. City of Chino

- 33-1 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-024)
- 33-2 The RTP PEIR is a program level document and as such does not evaluate project specific impacts, but rather evaluates the entire mix of RTP projects as a whole. See Master Response 2 Program EIR versus Project/Site Specific EIR. See also Master Response 1 regarding Growth Forecasts.
- 33-3 SCAG works with cities and counties as part of its Integrated Growth Forecast process to obtain the most up-to-date information on regional growth and General Plans. The City of Chino is encouraged to provide SCAG with its updated General Plan as it becomes available. See also Master Response 1 regarding Growth Forecasts.
- 33-4 See response to comment 33-2 above.

34. South Pasadena Preservation Foundation

- 34-1. The PEIR is revised to refer to the proposed 710 tunnel as SR-710 rather than I-710.
- 34-2 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-108).

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- 34-3 See Master Response 2 Program EIR versus Project/Site Specific EIR. Project level impacts for projects such as the proposed SR-710 will be evaluated on a site-specific basis.
- 34-4 See response to comment 34-3.
- 34-5 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-108).
- 34-6 Commentor included a list of historic properties along the 710 corridor. This information will be forwarded to the decision-maker for their consideration in making their decision on adoption of the RTP.

35 City of South Pasadena

- 35-1 The PEIR is revised to refer to the proposed 710 tunnel as SR-710 rather than I-710.
- 35-2 See Master Responses 2 Program EIR versus Project/Site Specific EIR. The SCAG region is rich in historic and cultural resources, ranging from the prehistoric and protohistoric periods to the Spanish, Mexican, and American periods. Chapter 3.4 provides an overview discussion of historic and cultural resources on a region-wide scale. Table CUL-1 includes, by county, all historic and cultural resources currently listed in the National Register while Tables 3.4-6 to 3.4-8 include, also by county, resources currently listed in the California register. In addition, Tables CUL-2 and CUL-3 list National Historic Landmarks and California Points of Historic Interest found in the SCAG region, respectively. Properties *eligible for listing* in the National or California Registers for each city were not included as this level of detail is not appropriate for a regional and programmatic discussion of cultural and historic resources in a program level EIR. Further discussion of project-level impacts to cultural and historic resources will be appropriately disclosed as those individual projects are planned, designed, and implemented.
- 35-3 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-109).
- 35-4 Commentor included a list of historic properties along the SR-710. This information will be forwarded to the decision-maker for their consideration in making their decision on adoption of the RTP.
- 35-5 Commentor includes as Attachment B legal information relating to the 710 tunnel. This information will be forwarded to the decision-maker for their consideration in making their decision on adoption of the RTP.

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- 35-6 Commentor includes as Attachment C a letter from EPA regarding the 710 freeway. This information will be forwarded to the decision-maker for their consideration in making their decision on adoption of the RTP.
- 35-7 Commentor includes as Attachment D an article regarding the impacts of goods movement on communities. This information will be forwarded to the decision-maker for their consideration in making their decision on adoption of the RTP.

36. City of San Clemente

- 36-1 See response above to Comment 22-1 See also Master Response 1 regarding Growth Forecasts in the RTP and Section 2 Changes Since Publication of the Draft EIR.
- 36-2 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-093).

37. City of Mission Viejo

- 37-1 Comments noted. See Master Response 1 regarding Growth Forecast(s) in the RTP. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-072).
- 37-2 See Master Response 3 Role of SCAG and SCAG Authority and Master Response 4 Mitigation Measures. See also response to comments to Orange County Council of Governments, Letter 24.
- 37-3 through 8 Mitigation measures are revised based on comments received. See Master Response 4 Mitigation Measures. See Section 6 Corrections and Additions for revisions to individual mitigation measures.

38. City of Anaheim

- 38-1 -- 8 See Master Response 1 regarding Growth Forecasts.
- For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-006).
- 38-9 See Master Response 1 regarding Growth Forecasts in the RTP and Master Response 4 regarding Mitigation Measures.
- 38-10 See Master Response 1 regarding Growth Forecasts. For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, for response to comments on the RTP and growth forecasts included in the RTP, letter (08-006).

38-11 See Master Response 4 regarding Mitigation Measures.

38-12 -- 16 Mitigation measures are revised based on comments. See Section 6 Corrections and Additions for revisions to individual mitigation measures. With regard to MM-EN.25, the information contained in the last sentence supports the mitigation measure and will remain. With regard to MM-EN.35, the last two sentences provide clarification for lead agencies and therefore should not be deleted. The mitigation measure refers to “carbon offsets” for which a definitive program has yet to be determined. Carbon offsets do not necessarily involve a “regional” carbon trading system as suggested by the commentor, therefore, this information was not deleted. See also Master Response 4 Mitigation Measures.

39. Port of Long Beach

39-1 The last sentence of the first paragraph on page 3.14-15 of the PEIR is revised to reflect the comment, see Section 6, Corrections and Additions.

39-2 -- 4 For the response to comments on the RTP Goods Movement Report, see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments, letter (08-151).

40. City of Irvine

40-1 Comment noted. Commentors position will be forwarded to the decision maker for their consideration in making the decision on adoption of the RTP.

40-2 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-050). See also Master Response 3 regarding SCAG’s Role and Authority, and Master Response 1 regarding the Growth Forecast in the RTP.

40-3 See Master Response 1 regarding the Growth Forecasts. As noted in response 40-2 above, the City of Irvine was invited to participate in the growth forecasting process. As explained in Master Response 1 SCAGs process is one of forecasting not planning.

40-4 See Master Responses 1, and 3 regarding Growth Forecasting and SCAGs Role and Authority. Land use maps showing anticipated land uses and population densities are forecasts, not plans. See also Master Response 4 regarding mitigation measures and the need to address impacts related to growth because of the inextricably intertwined relationship between transportation and land use planning. The growth forecasting process is extremely detailed and some errors in both forecasts are to be expected.

40-5 and 6 See Master Response 1 regarding Growth Forecasts. SCAG now intends to adopt the Baseline forecast for the 2008 RTP (see Section II of this Final PEIR regarding changes made since publication of the Draft EIR). See also Master Response 4 regarding the need for Mitigation Measures to address land use

related impacts, due to the close relationship between transportation planning and land use.

- 40-7 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-050).

41. Shute, Mihaly and Weinberger, on behalf of the City of El Segundo

- 41-1 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-037).

- 41-2 The PEIR provides sufficient detail on the anticipated aviation concept (decentralization) to allow, in combination with other RTP components, sufficient analysis for the level of analysis presented in this program EIR. See Master Response 2 Program EIR versus Project/Site Specific EIR. The PEIR analyzes regional changes in transportation and related impacts as a result of the RTP including the decentralized aviation concept.

As indicated on p. 2-17 of the PEIR, the 2008 RTP includes a decentralized aviation strategy, an overview of which is presented on p. 2-17 of the Draft PEIR. See additional information added to page 2-17 in Section 6 Corrections and Additions. The RTP PEIR provides a programmatic discussion of impacts of the RTP (including the decentralized aviation strategy) at the regional scale and provides sufficient detail to inform decision makers on the severity of the broad range of impacts associated with implementing the 2008 RTP.

- 41-3 -- 4 See PEIR Section 6, Corrections and Additions regarding changes made to the description of the aviation strategy on page 2-17. The RTP includes hundreds of specific projects and programs; the PEIR analyzes these programs and projects, not individually but as a whole. It does not include project specific impacts, nor is the analysis of project specific impacts appropriate for a programmatic document such as the RTP PEIR. Analysis of specific ground access changes at individual airports in the PEIR would be far more detailed than appropriate for this regional level programmatic document.

SCAG completed a list of updated airport ground access projects for the 2008 RTP, including arterial, intersection and interchange projects for each airport. The list has been updated since the 2004 RTP with the identification of those projects that have been completed, as well as projects that are no longer needed since forecasts were reduced (such as at March Inland Port). The project list is very similar to the list included in the 2004 RTP Airport Ground Access Element, as the 2035 forecasts for most airports are very similar if not identical to their 2030 forecasts included in the 2004 RTP (e.g., LAX is 78 MAP for both RTPs). The entire updated list is included in the final 2008 RTP technical appendix. The financially constrained airport ground access projects are contained in the 2008 Final RTP Project List, contained in RTP Supplemental Report 1: Project List.

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The PEIR presents analysis of the RTP including the hundreds of individual projects as a whole, on a system level. Individual RTP projects are not discussed or analyzed except as part of the overall regional analysis. To do otherwise would require that individual RTP components be developed in more detail (in order to allow specific analysis) requiring a timeframe of more than four years (as the RTP is required to be updated every four years) and resulting in an environmental document that would be extremely voluminous.

- 41-5 See response to comments 41-3 and 41-4 above. The commentor is suggesting detailed ground access studies that are more appropriate to airport specific analysis. Commentor identifies a number of strategies for LAWA and airlines. SCAG works closely with regional planning entities in the region, including LAWA.

The decentralized aviation system as reflected in the 2035 forecasts is based on an overall strategy of providing high-speed regional transit to underutilized suburban airports including Ontario and San Bernardino International, as well as providing market incentives and ground access improvements to those and other airports, including Palmdale Regional Airport. This strategy is reflected in the RADAM aviation demand modeling that produced the 2035 forecasts. How to finance and implement the high-speed regional transit system, needed ground access improvements and market incentives that underlie the regional aviation decentralization strategy will be the focus of future SCAG studies and plans including the Regional Airport Management Action Plan.

A number of the strategies identified by the commentor will be addressed by ongoing and future SCAG studies and plans, including the Regional HOV/Flyaway Study (ongoing in coordination with LAWA) and the Regional Airport Management Action Plan (to be initiated in the near future).

Current federal aviation law restricts the use of aviation revenues for off-airport ground access projects, and also restricts the use of peak-hour pricing at airports. The objective of providing more flexibility for using airport revenues for off-airport ground access project is reflected in the Aviation Guiding Principles in the 2008 RTP as well as SCAG's Legislative Program. LAWA currently subsidizes incipient airline service at Palmdale Airport by providing free parking, terminal rental waivers, revenue guarantees, and free marketing of services.

- 41-6 -- 7 The 2008 RTP PEIR is sufficient for the purposes of programmatically analyzing the RTP projects and programs. Minor changes to clarify the PEIR and correct minor errors are made in Section 6, Corrections and Additions. None of these changes result in significant new information and no new significant impacts are identified, therefore recirculation is not warranted or required under CEQA Guidelines Section 15088.5.

- 41-8 Commentor includes as Exhibit an article reviewing SCAG's ability to implement the RTP aviation decentralization strategy. This information will be forwarded to the decision-maker for their consideration in making their decision on adoption of the RTP.

42. BNSF Railway Company

- 42-1 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-009).
- 42-2 The RTP PEIR is a program level document and as such does not evaluate project specific impacts, but rather evaluates the entire mix of RTP projects as a whole. See Master Response 2 Program EIR versus Project/Site Specific EIR.
- 42-3 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-009).

43. City of Cypress

- 43-1 through 3 See response above to Comment 22-1. See also Master Response 1 regarding Growth Forecasts in the RTP and PEIR Section 2, Changes Since Publication of the Draft PEIR.
- 43-4 See Master Response 4 regarding Mitigation Measures and above response to Orange County Council of Governments -- Letter 24
- 43-5 Mitigation measures are revised to use “should” rather than “shall.” See Master Response 4 regarding Mitigation Measures and Section 6 of this Final EIR Addendum, Corrections and Additions for revisions to specific mitigation measures.
- 43-6 Revisions were made to the mitigation measures to clarify “implementing agency.” See Master Response 4 regarding Mitigation Measures and Section 6, Corrections and Additions for revisions to specific mitigation measures.

44. Law Offices of Robert C. Hawkins, Representing the Golden Rain Foundation

- 44-1 See Master Response 1 regarding Growth Forecasts in the RTP.
- 44-2 The RTP is a regional transportation plan. It is not a regional land use plan. The 2008 RTP includes projects that have been submitted to SCAG by county transportation commissions as part of the regional transportation planning process. See also Master Response 1.
- 44-3 As discussed above in response 44-2, the RTP is a regional transportation plan. The Project Listing Report includes the full list of projects included in the RTP. The larger projects are mapped on PEIR graphics. Because the RTP PEIR is programmatic in nature, individual projects are not addressed. See Master

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Response 2 regarding Program EIR versus Project/Site Specific EIR. The overall impact of the list of projects is assessed in the PEIR. See also Master Response 1 and Master Response 3 regarding SCAG's role and authority.

- 44-4 See Master Response 1 regarding the growth forecast in the RTP. The RCP will be a companion document to the RTP and the Compass Blueprint. Similar to how Compass provides advisory strategies to address land use planning in a sustainable manner, the RCP, once adopted by SCAG's Regional Council, will provide a "tool box" of strategies to address environmental issues.
- 44-5 The commenter indicates that the EIR fails to "all necessary and appropriate mitigation measures to lessen the RTP's land use impacts. The commenter goes on to indicate that one way to eliminate RTP inconsistency is to make the RTP mirror local plans. As indicated in Master Response 1, Growth Forecasts in the RTP, SCAG attempts to forecast growth based on local plans as well as input from local jurisdictions. The RTP is updated every four (previously three) years. This is much more frequently than most general plans, and hence SCAG's anticipated growth forecast is likely more up-to-date than most General Plans. However, as noted in Master Response 1, SCAG intends to work with local agencies to refine the forecast to more accurately reflect local planning efforts. SCAG is a regional forum for achieving consensus on broad based regional policies (such as open space preservation), it is not SCAG's intent to change local land use plans (see Master Response 3 regarding SCAG's role and authority), rather SCAG has provided a tool box of strategies to address common problems and achieve common goals.
- 44-6 See Master Responses 1 and 3 regarding the Growth Forecast(s) in the RTP and SCAG's Role and Authority.
- 44-7 As discussed above, many general plans in the region are out of date. SCAG's transportation planning efforts frequently address problems that have not been addressed in general plans, as such there is the potential for inconsistencies with some of the more outdated general plans, and therefore the PEIR calls this impact significant. The potential to divide communities is significant, especially with some of the larger linear transportation projects. This impact must be addressed at the local level to determine actual potential to divide communities. By improving transportation access to some areas of the region and not to others, the RTP influences growth, emphasizing the point that land use and transportation are inextricably linked. Both RTP projects and associated growth would significantly increase urbanization of the region between 2008 and 2035.
- 44-8 Federal requirements for preparation of the RTP require that the future No Project condition be referred to as the Baseline. While the RTP refers to this baseline, the PEIR uses existing conditions as the baseline for CEQA analysis.
- 44-9 Impact 3.3-8, page 3.3-54 addresses impacts to Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs). (No impacts are anticipated.)

44-10 Comment noted. Commentor's views will be forwarded to the Regional Council for consideration in the RTP adoption process.

44-11 Comment noted. Commentor's views will be forwarded to the Regional Council for consideration in the RTP adoption process. See above responses to individual point summarized in commentor's conclusions here.

45. Center for Demographic Research

45-1. See Master Response 4 regarding Mitigation Measures. See response to OCTA, -- Letter 11 and response to OCCOG -- Letter 24.

45-2. See response to OCTA comment, letter 11-3

45-3 See Master Response 1 regarding the Growth Forecasts in the RTP. SCAG adopted the Baseline Growth Forecast for the 2008 RTP (see Section 2, Changes Made Since Publication of the Draft PEIR). As stated in Master Response 1, the forecasts are intended to represent a range of development scenarios, with the baseline representing trends and existing land use policies. In some cases, including Orange County, jurisdictions have already adopted policies similar to the Compass strategies. However, many jurisdictions within the SCAG region still have yet to update their general plans. The Baseline Growth Forecast represents a conservative view of sustainability planning and development trends in the region.

45-4 The PEIR analyzed a range of alternatives from the baseline forecast with the baseline projects to the most aggressive infill scenario (Envision) with the plan projects. In addition a discussion of the differences between the baseline growth forecast and the policy forecast is included on pages 2-11 through 2-14 and page 1-2 of the DEIR. See Section 6 for an analysis of the Baseline Growth Forecast with Plan Transportation Projects. This alternative falls within the range of impacts previously analyzed in the PEIR and presents no significant, new information.

46. Orange County Sanitation District

46-1 See response above to Comment 22-1. See also Master Response 1 regarding Growth Forecasts in the RTP and Section 2, Changes Since Publication of the Draft PEIR.

47. City of Brea

47-1 -- 2 See response above to Comment 22-1. See also Master Response 1 regarding Growth Forecasts in the RTP and Section 2, "Changes Since Publication of the Draft PEIR."

48. City of Chino Hills

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48-1 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-025). See also Master Response 2 regarding Program EIR versus Project/Site Specific EIR. The RTP PEIR is a programmatic document that evaluates impacts of the entire RTP at a regional level. The inclusion of individual projects does not substantially affect the analysis, rather removal or addition of individual projects is within the range of impacts analyzed, and within the error margin of the regional modeling tools used in the analysis.

49. Kerrie Hudson

49-1 Commentor summarizes specific concerns with living adjacent to March ARB. Comments noted. Commentor's views will be forwarded to the decision-makers for their consideration in the RTP adoption process.

49-2 Comments noted. In 1997 SCAG conducted a joint use feasibility study of March Air Force Base that concluded that joint military/civilian use of the base was feasibility, and that the base had the greatest commercial potential to serve as an all-cargo airport. This study laid the foundation for the joint use agreement between the March Joint Powers Authority and the U.S Air Force, also finalized in 1997. At that time there was virtually no community opposition to either the joint use study or the joint use agreement.

Socio-economic issues are generally not addressed in CEQA documents. For the information of the commentor, in 2003 the logistics industry, which includes air, rail, and truck transportation and warehousing, had an average annual wage of \$45,314, which equates to more than \$20 and hour.

49-3 SCAG has no authority over on-airport land uses such as fueling facilities, nor does SCAG have any jurisdiction over the preparation of airport emergency response plans.

49-4 See Master Response 2 regarding Program EIR versus Project/Site Specific EIR. SCAG has no authority to implement airport environmental mitigation programs including noise abatement programs.

49-5 The South Coast Air Quality Management District (SCAQMD) has adopted the 2007 Air Quality Management Plan (AQMP) for the South Coast Air Basin (SCAB), which demonstrates how ambient air quality standards for criteria pollutants will be attained in the SCAB. The forecast emission inventory in the 2007 AQMP includes emissions from commercial airports. The SCAQMD has also recently completed the Multiple Air Toxics Exposure Study (MATES 3) which identifies toxic "hot spots" around the region including toxics from diesel emissions.

49-6 Ground access projects designed to mitigate traffic impacts in and around March Inland Port are contained in the Airport Ground Access Element of the 2008 RTP, including financially constrained Baseline projects that are listed in the core plan. Compared to the 2004 RTP, the number of ground access projects for



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March Inland Port, including both constrained and unconstrained projects, are fewer since the forecast for March has been reduced from 8 million air passengers (MAP) in the 2004 RTP to 2.5 MAP in the 2008 RTP, to be consistent with commercial operations allowed under the base's joint use agreement with the Air Force.

- 49-7 Socio-economic analysis is not within the scope of CEQA documents. SCAG is not aware of any studies that have been done to specifically evaluate the impact of commercial aviation activities at March Inland Port on surrounding property values. In general, past studies of this nature have indicated that commercial airports generally have a positive impact on surrounding land values, except for property within critical noise contours (i.e., 65 CNEL), which can be adversely impacted.

SCAG has no authority to prohibit any usages of or activities at airports.

- 49-8 -- 9 SCAG has no authority to implement specific mitigation measures at airports, including aesthetic mitigation measures. See also Master Response 2 regarding program EIR versus Project/Site Specific EIR.
- 49-10 -- 11 SCAG has no authority over local land use projects such as the March Business Center. See Master response 2 regarding Program EIR versus Project/Site Specific EIR.
- 49-12 Commentors views will be forwarded to the decision-maker for their consideration in the RTP adoption process. SCAG has no jurisdiction or authority over aircraft flight patterns, which is the responsibility of the Federal Aviation Administration. See Master Response 2 regarding Program EIR versus Project/Site Specific EIR.

50. Hank Fung

- 50-1 The text on page ES-9 is revised to reflect the addition of HSRT as an area of controversy, see Section 6 Corrections and Additions.
- 50-2 See response above to Comment 22-1. See also Master Response 1 regarding Growth Forecasts in the RTP and Section 2, Changes Since Publication of the Draft PEIR.
- 50-3 Comment noted. As described on p. 3.13-6, the National Response Plan is the national plan to respond to national emergencies, such as terrorist attacks, natural disasters or emergency. This National Response Plan is administered by the DHS. The National Response Plan, last updated May 25, 2006, establishes a comprehensive all-hazards approach to enhance the ability of the United States to manage domestic incidents. It forms the basis of how the federal government coordinates with state, local, and tribal governments and the private sector during incidents.

In addition, as described on p. 3.13-9 the National Incident Management System (NIMS) provides a consistent nationwide template to enable Federal, State, local, and tribal governments and private sector and non-governmental organizations to work together effectively and efficiently to prepare for, prevent, respond to, and recover from domestic incidents, regardless of cause, size, or complexity, including acts of catastrophic terrorism.

The PEIR compares alternatives at a regional scale; the policies that encourage denser populations do so in the vicinity of transit stations and other transportation routes. Therefore it is not clear than any one alternative would have different evacuation implications.

51. Imperial County Planning and Development Services

51-1, 3 and 5 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-049).

51-2. A regional level analysis of air quality impacts is presented on pp. 3.2-22 through 3.2-43 of the Draft RTP. An analysis of impacts on low-income and minority people is presented in the Environmental Justice Appendix to the RTP. Criteria mobile source pollutant emissions by County for Existing and Plan Conditions are presented in Table 3.2-5, p. 3.2-26; mobile source criteria emissions by Air Basin for Plan and No Project conditions in 2035 are presented in Table 3.2-6, p. 3.2-27; mobile source emissions by County for No Project and Plan conditions in 2035 are presented in 3.2-7, p. 3.2-28. Mobile source PM10 emissions by County are shown in Table 3.2-8, p. 3.2-31. Other than PM10 and PM2.5 all other mobile source pollutants are expected to decrease between now and 2035. Ozone and its precursors are the main causes of concern with respect to pollutant movement in the region. Mobile source ozone precursors are expected to decrease between now and 2035.

Total emissions in the South Coast Air Basin from a variety of sources are shown in Tables 3.2-12 through 3.2-16 pp. 3.2-38 - 39. Total all sources ozone precursors would increase in the region. This total increase in ozone precursors and movement of pollutants between areas in the region is addressed in the 2007 AQMP

Estimated greenhouse gas emissions by County (excluding certain sources such as industrial processes) are shown in Table 3.2-17, p. 3.2-41, and discussed on pp. 3.2-40 to 3.2-42.

51-4. Estimated greenhouse gas emissions by County (excluding certain sources such as industrial processes) are shown in Table 3.2-17, p. 3.2-41, and discussed on pp. 3.2-40 to 3.2-42. Appendix b Air Quality contains a methodology for how greenhouse gas emissions were calculated as well as the Attorney General List of suggested mitigation measures and how they are addressed in the EIR.



51-5 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-049).

52. Caltrans District 12

52-1 For response to comments on the RTP that are not related to the PEIR see Final 2008 RTP, Public Participation and Consultation Report, Responses to RTP Comments letter (08-017).

53. Imperial Irrigation District

53-1 The level of detail of each map in the PEIR is proportionate to the level of detail of the information shown. Some maps are larger to show more detailed information; some maps are smaller when more regional data is shown. For commentors viewing maps on the PEIR CD and/or the SCAG website maps may be zoomed to allow easier viewing. The commentor does not indicate that any data could not be understood. Therefore no revisions are made to the maps at this time.

The following note is added to Map 3.10-1: See Map 3.15-2 for water bodies in Imperial County; see Map 3.10-5 for Agricultural land use in Imperial County.

53-2 Site or area-specific issues, such as impacts from specific transportation projects, grading, drainage, etc. are too detailed for this Program EIR, which is not intended to analyze or mitigate the impacts of specific projects. Under CEQA, any such project would be required undertake project specific environmental review including identification of appropriate mitigation requirements. See also Master Response 2 regarding Program EIR versus Project/Site Specific EIR.

Project and area specific comments regarding potential impacts to drainage canals and other IID facilities are noted, and will be forwarded to decision makers for their consideration in the RTP adoption process.

53-3 The following footnote is added to Map 3.15-7: The area in Imperial County that covers the open channel network and shows the area as an impaired water body refers to the drains, not the canals.

54. City of San Marino

54-1 Commentor's opinions are noted and will be forwarded to the Regional Council for their consideration in the RTP adoption process.