Appendix A

Notices of Preparation and Responses Received

NOTICE OF PREPARATION

TO: **Interested Agencies and Individuals**

SUBJECT: **NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE 2012 REGIONAL TRANSPORTATION PLAN (RTP) INCLUDING A SUSTAINABLE COMMUNITIES STRATEGY (SCS)**

DATE: **MAY 10, 2011**

LEAD AGENCY:

Southern California Association of Governments (SCAG)
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435
2012PEIR@scag.ca.gov

The Southern California Association of Governments, as Lead Agency, is publishing this Notice of Preparation (NOP) to prepare a Program Environmental Impact Report (PEIR) in accordance with the California Environmental Quality Act (CEQA) for the 2012 Regional Transportation Plan (RTP), which will include a Sustainable Communities Strategy (SCS).

This NOP is being circulated to obtain input into the scope and content of the environmental information that will be evaluated in the PEIR regarding the RTP. SCAG seeks input from local, state and federal agencies as well as other interested parties on issues relevant to the RTP (including the SCS).

The project location, description, and the expected scope of environmental analysis are described on the following pages.

Two scoping meetings will be held at SCAG's Main Office (Los Angeles office, see above), Board Room, Thursday, May 26, 2011, at 2 pm to 4 pm and at 4 pm to 6 pm. Videoconferencing will also be available from SCAG's regional offices in Imperial, Orange, Riverside, San Bernardino, and Ventura Counties (see last page for addresses).

Due to the time limits mandated by state law, your response must be sent at the earliest possible date, but **not later than thirty (30) days** after the date of this notice (**JUNE 8, 2011**).

Please send your response to **Christine Fernandez, Senior Regional Planner,** at the address shown above or visit our website at http://www.scag.ca.gov/rtp2012/peir.htm. Please include a return address and the name of a contact person in your agency. Please send your comments electronically to 2012PEIR@scag.ca.gov if possible.

INTRODUCTION

The California Environmental Quality Act (CEQA) and its implementing regulations (CEQA Guidelines) require the Southern California Association of Governments (SCAG) as the Lead Agency to prepare an EIR for any discretionary government action, including programs and plans that may cause significant environmental effects. Specifically, the 2012 Regional Transportation Plan necessitates preparation of a Program EIR (PEIR), which is a "first-tier" CEQA document designed to consider "broad policy alternatives and programwide mitigation measures" (*CEQA Guidelines* §15168). The programmatic environmental analysis for the PEIR will evaluate environmental effects, such as direct and indirect effects, growth-inducing impacts, and cumulative impacts, and will include mitigation measures to offset any identified potentially significant adverse environmental effects. In addition, the PEIR will supply the foundation for the subsequent, site-specific environmental reviews that will be conducted by implementation agencies, as projects in the RTP are developed (*CEQA Guidelines* §15385).

In addition to fulfilling legal requirements, the RTP PEIR will provide an opportunity to inform decision-makers and the public about potential environmental effects associated with the implementation of the RTP and Alternatives. This first-tier regional-scale environmental analysis will also help local agencies evaluate and reduce direct and indirect impacts, growth-inducing impacts, and cumulative environmental effects with respect to local projects.

This Notice of Preparation is intended to alert responsible agencies, interested agencies, organizations, and individuals of the preparation of the 2012 RTP PEIR. Comments regarding the scope of the PEIR received during the 30-day NOP review period will be used to refine the scope and content of the PEIR, as appropriate.

PROJECT LOCATION AND BACKGROUND

SCAG is comprised of six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 190 cities in Southern California (Figure 1), and is the organization charged with addressing and resolving short- and long-term regional policy issues. The SCAG region also consists of 14 subregional entities recognized by the Regional Council as partners in the regional policy planning process. The SCAG region has more than 19 million residents and encompasses more than 38,000 square miles, representing the largest and most diverse region in the country.

SCAG's governing body, the Regional Council, is composed of 84 elected officials representing cities, counties, tribal governments, county transportation commissions, and other related organizations throughout the region. In addition to the Regional Council, there are four committees responsible for guiding policy direction: Executive/Administration Committee, Transportation Committee, Community, Economic and Human Development Committee, and Energy and Environment Committee. In addition to these four standing committees, there are various task forces, subcommittees and groups that address specific regional policy, technical planning, and air quality conformity issues.

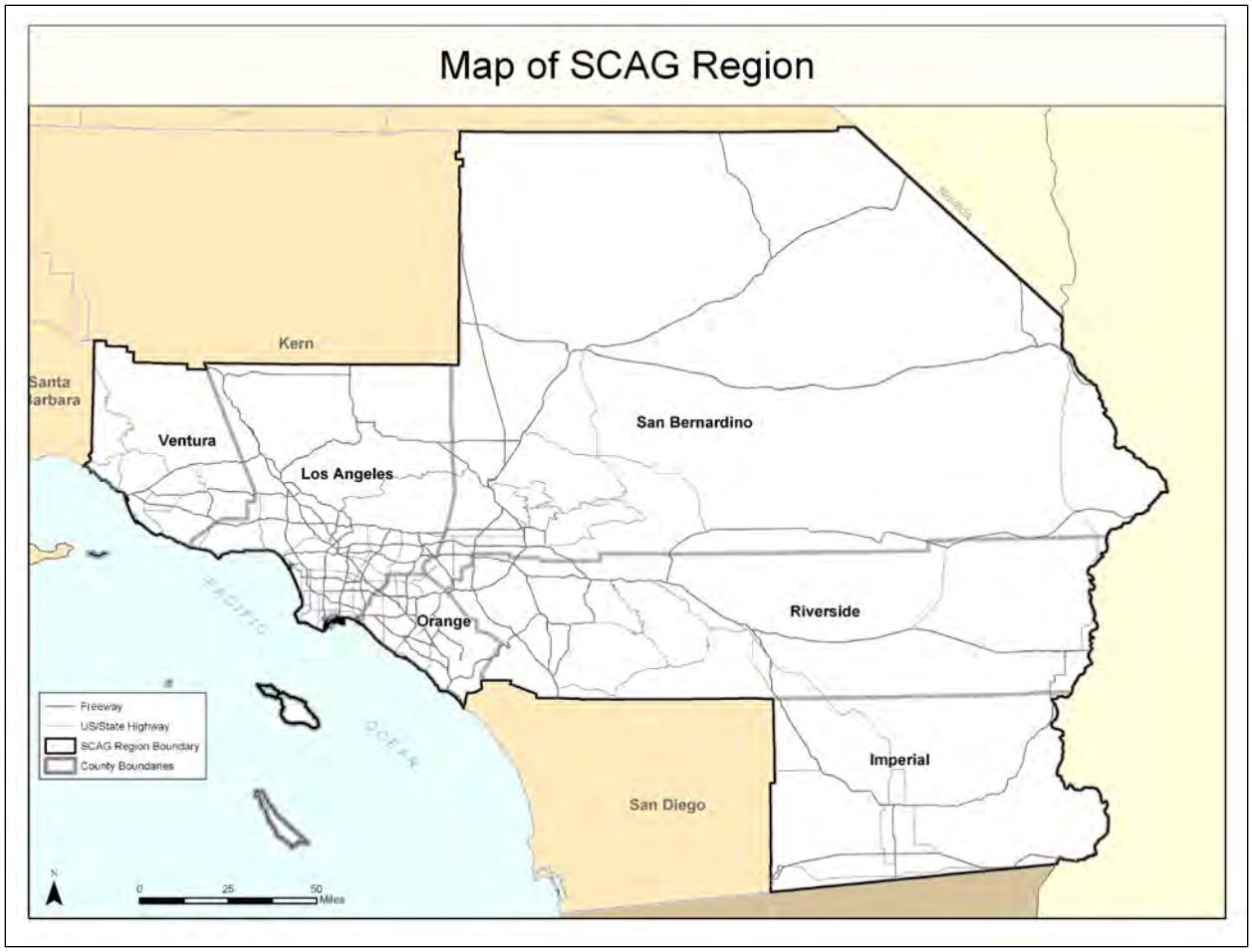


FIGURE 1. Map of SCAG Region

SCAG is officially designated by federal law as the Metropolitan Planning Organization (MPO) for the Southern California region. Additionally, under State law, SCAG is designated as a Council of Governments (COG) and a Multi-County Designated Transportation Planning Agency. As such, SCAG has a number of formal authorities and responsibilities, including:

- Conducting continued, comprehensive, and coordinated transportation planning and programming processes that result in a Regional Transportation Plan and a Federal Transportation Improvement Program (FTIP) for the region. Together these documents serve as the legal basis for transportation decision-making in the region.

- Preparing a Sustainable Communities Strategy (SCS) in accordance with the Sustainable Communities and Climate Protection Act of 2008 (SB 375), as part of the RTP. If the SCS does not meet greenhouse gas (GHG) emission reduction targets, SCAG will prepare an Alternative Planning Strategy (APS) which would show how the greenhouse gas emission targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. It is SCAG's intent to achieve the targets with the SCS.

- Conducting a comprehensive environmental planning process, including a Program Environmental Impact Report for the RTP and conducting inter-governmental review for all projects of regional significance.

- Determining, pursuant to the Federal Clean Air Act, the conformity of SCAG RTPs and FTIPs to air quality planning requirements.

- Developing demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the South Coast Air Quality Management Plan.

PROJECT DESCRIPTION

Pursuant to the federal Safe, Accountable, Flexible, Efficient, Transportation Equity Act – a Legacy for Users (SAFETEA-LU), SCAG shall prepare and update a transportation plan for its metropolitan planning area every four (4) years to ensure that the plan adequately addresses future travel needs and is consistent with the federal Clean Air Act. SCAG's last RTP was adopted in 2008 and it is currently preparing the 2012 RTP. The 2012 RTP (also referred to as the "Plan" herein) is the culmination of a multi-year effort that improves the balance between land use and transportation systems, both current and future. SCAG is required by federal law to develop an RTP that determines the needs of the transportation system and prioritizes proposed transportation projects. The RTP is also necessary to obtain and allocate federal funding for regional transportation projects. SCAG does not implement individual projects in the RTP; these projects will be implemented by local jurisdictions and other agencies. SAFETEA-LU modifies existing State and MPO transportation planning processes. Specifically, SAFETEA-LU requires that "a long-range transportation plan shall include a discussion of the types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan." 23 U.S.C. § 134(i)(2)(B). Consultation activities are a part of the 2012 RTP and PEIR development processes, and will be undertaken to the maximum extent practicable.

SCAG is coordinating efforts to comply with SAFETEA-LU planning requirements with efforts undertaken through the CEQA process. As such, particular emphasis in the RTP will be placed on these planning requirements, including those that prescribe coordinated planning and consideration of environmental resources.

RTP Framework

The 2012 RTP's unified strategy would include the following key elements:

- A comprehensive description of the region's current and future **challenges** in accommodating growth and meeting mobility needs.

- A fiscally-constrained **transportation network** that consists of public transit, including high-speed regional transport; highways, including mixed-flow, HOV, HOT, and toll lanes; local streets; goods movement; and a **non-motorized component,** including bikeways and walkways for the movement of both people and goods.

- An integrated **land use** capacity analysis that accommodates the region's future employment and housing needs, and that protects sensitive habitat and resource areas.

- **Transportation Demand Management (TDM)** measures that improve system efficiency by influencing individual travel behavior. TDM measures typically offer programs and incentives to encourage alternatives to the single-occupant vehicle. This includes

reducing or eliminating peak-period demand on the transportation network through carpooling, telecommuting, vanpooling, or other innovative programs such as "parking pay-out".

- **Transportation System Management (TSM)** measures that maximize the efficiency of the transportation network, such as signal timing, freeway ramp metering, and bottleneck relief/auxiliary lane projects.

- A **financial plan** that lays out the funding sources and mechanisms required to implement the strategies of the RTP. The financial plan will also recommend additional innovative financing strategies that can be implemented to carry out additional needed projects and programs. It will include recommendations from the Regional Congestion Pricing Study, a multi-year effort in which SCAG is working with a broad range of stakeholders to identify various congestion pricing strategies that have the potential to reduce congestion and generate much-needed revenue to further improve the transportation system.

- A transportation system **performance evaluation** that lays out the ability of the proposed strategies to address our challenges. It will describe the performance of proposed investments and policies in the RTP based on a set of performance indicators adopted by the Regional Council.

- A **Strategic Plan** that identifies additional strategies and projects beyond the financially-constrained portion of the RTP (referred to as the "Constrained Plan"). The project and strategies included in the Strategic Plan will be explored further if and when additional funds become available. Beyond the Strategic Plan is the Unconstrained Plan, a "wish list" of projects that do not have funding. The projects and policies included in the Strategic Plan and Unconstrained Plan are speculative and therefore not included in the PEIR analysis.

At the core of the Plan is the FTIP, which not only represents the first six years of the Plan, but also represents current commitments. Transportation projects that are federally funded or regionally significant or require federal approval (e.g., permits) must be included in an approved FTIP. Other projects outside of this FTIP core are also included in the fiscally constrained 2012 RTP and will be used to demonstrate transportation conformity. These projects must be reasonably funded within the planning horizon of the 2012 RTP, which is 2035.

The compendium of projects, policies and programs that make up the Constrained and the Strategic Plan together comprise the 2012 RTP that is scheduled to be adopted by the Regional Council.

RTP Goals

The goals of the 2012 RTP demonstrate the need to balance many priorities in the most-cost effective manner:

- Maximize mobility and accessibility for all people and goods in the region;
- Ensure travel safety and reliability for the people and goods in the region;
- Preserve and ensure a sustainable regional transportation system;
- Maximize the security of the regional transportation system through improved monitoring, recovery planning, and coordination with other security agencies;

- Maximize the productivity of our transportation system;
- Protect the environment, improve air quality and promote energy efficiency; and
- Encourage land use and growth patterns that complement our transportation investments.

The 2012 RTP will focus on system monitoring and evaluation, recognizing that maintaining and/or improving mobility will no longer depend solely on expanding the transportation system. Given the region's fiscal constraints, an integrated approach is needed to maximize mobility.

Sustainable Communities Strategy

The 2012 RTP will include a newly required element called the Sustainable Communities Strategy (SCS) pursuant to the requirements of SB 375. Under SB 375, metropolitan planning organizations such as SCAG are required to develop an SCS as part of the RTP to reduce, as feasible, greenhouse gas emissions to meet a specified target for 2020 and 2035. The California Air Resources Board (ARB) issued SCAG a regional GHG reduction target of 8% per capita for the planning year 2020, and a GHG reduction target of 13% per capita for 2035. If the targets cannot be feasibly met, an APS will be prepared by SCAG to show how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. SCAG's intent is to achieve these targets with the SCS. The GHG reductions are to be derived from fewer (and/or shorter) automobile and light truck trips resulting from integrated transportation, land use, housing and environmental planning. The transportation component of the SCS will include the network of road and transit networks, non-motorized transportation and transportation policies, as discussed in the 2012 RTP Framework. Furthermore, SB 375 requires that the SCS shall identify general land uses, residential densities, and building intensities as well as areas to house future residents (see California Government Code Section 65080(b)(2)(B) for the full list of SB 375 requirements). SCAG's Regional Council adopted a technical methodology for estimating GHGs, which includes more detail on the quantification processes, data and models. The document is located on SCAG's website at http://scag.ca.gov/sb375.

Subregional SCS Development

SB 375 allows for subregional councils of governments in the SCAG region to develop a subregional SCS (and APS if necessary) for their jurisdictions. Two subregional agencies are exercising this option: the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG). Each subregion has its own Memorandum of Understanding (MOU) with SCAG that outlines the roles and responsibilities for this process as well as a schedule and data standards for the development of a subregional SCS. SCAG will accept and incorporate the subregional SCS unless it does not comply with SB 375, federal law, the MOU, or SCAG's Subregional Framework and Guidelines.

Data Gathering and Workshops

SCAG is undertaking an extensive public participation process for the development of the 2012 RTP and SCS. To ensure a bottom-up process for developing the growth forecast, SCAG began its regional outreach early. Between August 2009 and February 2010, SCAG staff conducted one-on-one meetings with 170 cities and six counties to gain local input on the population, household and employment growth forecast for the 2012 RTP. Given that this will be SCAG's first time to develop an SCS, SCAG held subregional workshops from February to April 2010 to solicit input on the GHG reduction targets prior to the release of the actual draft targets by ARB in April 2010. From January through March 2011, SCAG conducted planning sessions with

local jurisdictions to gather critical data on transportation and land use that will be used to develop the 2012 RTP and SCS. Through survey instruments and the Local Sustainability Planning Tool, jurisdictions provided information on local transportation investments and TDM strategies, as well as their local land use plans and alternative growth scenarios for the future. This information will be essential to ensure that our regional plan accurately reflects local plans, strategies and realities.

During the coming months, SCAG will revise the region's 2020 and 2035 scenarios based on comments and new data gathered from local jurisdictions and from the public outreach workshops. During the public outreach workshops, residents, local jurisdictions and other stakeholders will be given the opportunity to provide input on a variety of scenarios. This information and input must be reflected in the scenarios to ensure the development of the RTP and SCS is aimed at meeting the 2020 and 2035 GHG reduction targets. Throughout this process, coordination amongst the subregional agencies will occur to make sure they are kept informed of the input that SCAG receives from their local jurisdictions.

Growth Forecast - Reconciling DOF and Census Projections

Population estimates for the SCAG region may change throughout the RTP process as the discrepancy between the California Department of Finance (DOF) projections and the official 2010 Census are reconciled. It is expected that in late 2011, the DOF will revisit the population estimates made between 2001 and 2009 to reflect the 2010 census.

CEQA Streamlining

SB 375 contains CEQA incentives, or streamlining provisions, to encourage coordinated land use and transportation planning. Certain types of development projects (i.e., transit priority projects or residential/mixed use residential projects, as defined by the statute) may qualify for CEQA streamlining as long as the requisite criteria are met. Generally, this means that the proposed project seeking to utilize the CEQA incentives is determined to be consistent with an approved SCS. Consistency will be determined by the local jurisdiction that is the lead agency for each project to be streamlined. SCAG's primary role is to include appropriate information in the SCS, such as land use information as required by SB 375 and/or guidance to aid in interpreting land use information that will allow a jurisdiction to make a consistency determination with respect to appropriate streamlining options on a project by project basis.

Environmental Justice

The 2012 RTP will include an environmental justice analysis pursuant to Title VI of the Civil Rights Act of 1964 and Presidential Order 12898. The RTP will analyze how the benefits and burdens of transportation investments are distributed among minority and low-income populations in the SCAG region. Outreach efforts are underway to reach environmental justice communities during development of the 2012 RTP and SCS.

PRELIMINARY 2012 RTP ALTERNATIVES

It is anticipated that the 2012 RTP PEIR will evaluate several Alternatives to the Plan (Proposed Project), including the following: No Project, Alternative Build Scenario 1, and Other/Modified 2008 RTP Alternatives. Each Alternative, except the No Project Alternative, will include a wide range of policies and projects including, but not limited to, variations in land use density and intensity, aviation, bus routes, freight rail, high-speed passenger rail, highway/roadway construction and widening, and passenger rail construction.

SCAG has the discretion to select an Alternative in its entirety or to combine elements of various Alternatives to develop the Plan selected for the RTP and PEIR. Alternatives analysis in an Environmental Impact Report are focused on reducing the significant or potentially significant impacts of the project. Therefore detailed alternative descriptions are developed as the impacts of the project are identified through the PEIR process.

The Preliminary 2012 RTP Alternatives include:

No Project Alternative

The No Project Alternative consists of all major transportation projects that are reasonably foreseeable and reasonably expected to go forward without the 2012 RTP and SCS, including all projects that have already received funding, are scheduled to receive funding, and/or have received environmental clearance by December 2011. The No Project Alternative will assume that no safety-related maintenance would be deferred, but the overall appearance and function of the transportation system would be expected to deteriorate. This alternative would also assume conditions without the SCS or APS.

Alternative Build Scenario 1

SCAG anticipates that this alternative will vary from the proposed 2012 RTP and SCS by analyzing a more intensely developed urban form and more transportation measures and policies to reduce GHG emissions. This alternative could include more mixed-use, infill development and increased densities in urban cores. This alternative could also include analysis of an APS as appropriate. However, as previously noted it is SCAG's intent to achieve the GHG emission reduction targets with the SCS.

Other/Modified 2008 RTP

As part of the RTP and PEIR development and scoping process, an additional alternative will be developed and considered which will be a variation on the 2008 RTP such as:

- A modified 2008 RTP alternative using the policies and projects from the 2008 RTP, updated with more recent population information;
- A modified 2008 RTP alternative using the policies and projects from the 2008 RTP focused on reducing one or more impacts identified through the PEIR analysis; or
- A modified 2008 RTP alternative incorporating both approaches above

SCAG has preliminarily identified the above alternatives and is seeking input on the alternatives through the NOP process which could result in modifications to the number of alternatives analyzed in the PEIR, or modifications to the alternatives identified above. Furthermore, the PEIR will identify all alternatives that were initially considered, but rejected for reasons including infeasibility or inability for a particular alternative to meet the project objectives or reduce environmental impacts beyond that of the project.

SCOPE OF ENVIRONMENTAL ANALYSIS

The impact categories listed below have been preliminarily identified for analysis in the 2012 RTP PEIR.

- Aesthetics and Views
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gases (for years 2020 and 2035) and Climate Change
- Hazardous Materials
- Land Use (including Open Space)
- Noise
- Population, Employment, and Housing
- Public Services and Utilities (including Energy)
- Transportation (including Security)
- Water Resources

In addition, the EIR will address cumulative impacts, growth inducing impacts, and other issues required by CEQA.

MEETING LOCATION

SCAG Los Angeles Office
818 West 7th Street, 12th Floor
Los Angeles, CA 90017
(213) 236-1800

The meeting will be held at the SCAG Los Angeles Office (Main office) with videoconferencing made available from the other sites, as listed below.

VIDEOCONFERENCE SITES

- SCAG Imperial County Regional Office
1405 N. Imperial Avenue, Suite 1
Imperial, CA 92243
(760) 353-7800

- SCAG Orange County Regional Office
OCTA Building
600 South Main Street, Suite 906
Orange, CA 92868
(714) 542-3687

- SCAG Riverside County Regional Office
3403 10th Street, Suite 805
Riverside, CA 92501
(951) 784-1513

- SCAG San Bernardino County Regional Office
1170 West 3rd Street, Suite 140
San Bernardino, CA 92410
(909) 806-3556

- SCAG Ventura County Regional Office
950 County Square Drive, Suite 101
Ventura, CA 93003
(805) 642-2800

http://www.scag.ca.gov/regional-offices/

- City of Palmdale
Planning Department
Development Services Conference Room
38250 Sierra Highway
Palmdale, CA 93550
(661) 267-5337

- Coachella Valley Association of Governments (CVAG)
73-710 Fred Waring Drive
Palm Desert, CA 92260
(760) 346-1127
http://www.cvag.org/
This office is only available for the 2 pm to 4 pm meeting.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: June 8, 2011 June 8, 2011
fernande@scag.ca.gov

Ms. Christine Fernandez, Senior Planner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Notice of Preparation of a Draft Program Environmental Impact Report (draft EIR) for the 2012 Regional Transportation Plan

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The AQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft program environmental impact report (draft EIR). Please send the AQMD a copy of the draft EIR upon its completion. Note that copies of the draft EIR that are submitted to the State Clearinghouse are not forwarded to the AQMD. Please forward a copy of the draft EIR directly to AQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the AQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Regional Air Quality Goals

As stated in the recent brochure[1] co-authored by AQMD, SCAG and CARB, "Emissions from cars, trucks, trains, ships, aircraft and other mobile equipment account for 90 percent of key types of air pollution and about 40 percent of greenhouse gas emissions." The draft 2012 Regional Transportation Plan (draft 2012 RTP) will form the foundation for improving transportation system performance while at the same time assuring the timely attainment of air quality goals within the South Coast Air Basin. Therefore, it is critical that the lead agency place an emphasis on regional air quality goals and promote feasible projects that result in criteria pollutant emissions reductions and greenhouse gas reductions. Specifically, as part of the 2012 RTP development process, the AQMD staff urges Southern California Associate of Governments

[1]Powering the Future - A Vision for Clean Energy, Clear Skies, and a Growing Economy in Southern California available at: http://www.aqmd.gov/pubinfo/Publications/PoweringTheFuture/powering_the_future.htm

(SCAG) to develop a transportation plan that goes beyond just meeting transportation emissions budgets and instead develop a plan that seeks to achieve attainment of the National Ambient Air Quality Standards (NAAQS). SCAG should include an aggressive set of transportation policies, programs, and projects that achieve the fast-approaching PM 2.5 standard by 2014 and the even more challenging 8-hour ozone deadline by 2023. While we understand there are obvious funding constraints to achieving the NAAQS, there needs to be greater public discourse on the ramifications for failing to achieve the federal air quality standards. Furthermore, to meet state and federal air quality mandates an accelerated and deliberate effort to promote near-zero and/or zero emission transportation technologies in this region are required.

Public Health Effects from Toxic Air Contaminants

The recently completed MATES III Study shows that diesel is by far the most dominant driver of the overall cancer risk from toxic air contaminants released in the South Coast Air Basin, contributing more than 80 percent of the estimated cancer risk. Given the growing body of evidence which shows severe, long-term health effects associated with proximity of transportation facilities and the disproportionate impact to low-income communities, the AQMD staff urges SCAG to conduct health risk assessments in advance (i.e., upon identification in the draft RTP) of siting any new transportation facilities and/or sensitive land uses within close proximity of one another. Any potential health-related impacts associated with toxic air contaminants resulting from the draft RTP must be fully disclosed and mitigated as part of the 2012 RTP final EIR. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") for projects that generate or attract vehicular trips, especially heavy-duty diesel-fueled vehicles, can be found on the AQMD's CEQA web pages at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html.

Greenhouse Gas Emissions

The draft 2012 RTP will include a newly required element called the Sustainable Communities Strategy (SCS) pursuant to the requirements of SB 375. Under SB 375 SCAG is required to develop an SCS as a part of the 2012 RTP that achieves regional GHG reduction targets of 8% per capita for the planning year 2020 and 13% per capita for 2035. Further, SB 375 allows for sub-regional councils of governments in the SCAG region to develop a sub-regional SCS (and Alternative Planning Strategy if necessary) for their jurisdictions, as a result, the Orange County Council of Governments and the Gateway Cities Council of Governments have drafted SCSs. AQMD staff looks forward to SCAG's incorporation of the sub-regional SCSs into the full 2012 RTP/SCS for further public review. Also, in the spirit of SB 375's collaborative process in reducing greenhouse gas (GHG) emissions, we request that SCAG staff be fully transparent in the use of modeling for the regional SCS, by providing all data inputs, the model outputs, and the performance indicators used. This will help the public, AQMD staff, and ultimately CARB with the technical understanding of the methods used to quantify GHG emissions.

Available Sources of Data

AQMD rules and relevant air quality reports, data, and guidance are available by calling the AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available online via AQMD's webpage (http://www.aqmd.gov).

The AQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, evaluated and appropriately mitigated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:DG

LAC110510-10
Control Number

PUBLIC COMMENT CARD

SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

Please complete this card and submit it to the Committee Secretary prior to the Public Comment Period. Comments are limited to three (3) minutes.

Total Comment Period may be limited to 20 minutes at the discretion of the Committee Chair.

Committee: RTP - PEIR Scoping Meeting Date: 5/26/11

Name: Andrea HRICKO, Prof. of Preventive Medicine Phone: 323-442-3077

Agency or Affiliation: USC CHP 236

Address: 1540 Alcazar St. City: Los Angeles CA Zip: 90033

Item #: Item Title:

COMMENTS: 1) Pls consider new science + emerging research findings: health impacts of going to school or living close to busy roads + freeways + hot spots e.g. I-710 Fwy expansion, BNSF SCIG, UP ICTF. 2) Analyses needed of congestion caused by ↑ RR activity related to port expansion, blocking of intersections. 3) Analysis of congestion + delays + mobility caused by goods movement - e.g. truck accidents on I-710 + I-5.

Ora

4) Need for zero emissions goods movement technology.

5) Please take <u>measurements</u> of noise do not just model.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0362
FAX (213) 897-0360
TTY (213) 897-4937

Flex your power
Be energy efficient

June 7, 2011

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

Attention: Christine Fermamdez

RE: Southern California Association of Governments (SCAG) NOP for the 2012 RTP/SCS PEIR

Dear Mr. Ikhrata:

The California Department of Transportation (Department) appreciates the opportunity to review and comment on the Southern California Association of Governments (SCAG) Notice of Preparation (NOP) for the 2012 Regional Transportation Plan (RTP). The following includes comments on the Notice of Preparation and the 2012 Draft Regional Transportation Plan, which is currently under development.

1. The Department wishes to see policies in the RTP that prioritize system and service improvements that serve places with good regional accessibility, higher densities of population and jobs, and mixed land uses, or improvements that support the evolution of these characteristics.

2. The 2012 RTP should consistently support lower personal vehicle use while meeting objectives for accessibility, equity, and economic growth. It should advocate the creation of secure funding sources for both transit capital improvements and operations, in light of the extremely significant role of transit in the future, as opposed to the construction of new highways in the SCAG region.

3. The Strategic and Unconstrained Plans of the RTP should favor transportation investments where existing or planned locations offer multimodal benefits, support interregional and interstate travel with investments sustain economic activity, and seek to avoid capacity increases likely to induce additional vehicle travel.

4. The RTP should acknowledge the Department of Transportation Corridor System Management Plans (CSMPs) which focus on reducing congestion and increasing mobility through capital and operational strategies, while addressing pedestrian, bicycle and transit components and seeking to manage and improve the highway network as an interactive system.

5. The Department supports the use of Multi-modal Level of Service (LOS) for arterial evaluations within the region, reflecting that in these environments arterials support other modes beyond private and commercial vehicles, including pedestrians, bicycles, and local transit with frequent stops.

6. The RTP should promote a transportation system with facilities and services that offer meaningful travel choices using highly-connected networks with complete streets and quality transit services. The system includes freeways, toll roads, express lanes, arterial and local roadways, transit facilities, bicycle facilities and pedestrian trails.

7. The RTP should also promote development of urban design characteristics that create communities where walking, bicycling, and transit use are common choices and where these choices contribute to compact development patterns. The Department views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system.

8. The Sustainable Communities Strategy (SCS) should focus on a supply of housing that allows people of all incomes and abilities to live within reasonable distance of jobs, schools, shopping, and other important destinations, in order to reduce vehicle miles traveled (VMT).

9. The RTP should also address how the SCAG region works to achieve an inter-regional network for longer-distance travel and freight movement, connecting towns, cities, and regions to each other, to major intermodal freight transfer points, and to national and international destination reached via air and ground transport.

10. The RTP should reflect that the Department has a similar strategy to Senate Bill (SB) 375 and that would be SB 391. SB 391 requires that the California Transportation Plan (CTP) identify the "statewide integrated multimodal transportation system" needed to reduce greenhouse gas (GHG) emissions from current levels by 2020, from current levels and 80-percent below the 1990 levels by 2050. As a result of SB 391, the Department is preparing a state level transportation blueprint focused on the State's role with regards to the interregional movement of people and goods. The California Interregional Blueprint will help the Department and regional agencies evaluate how well State and regional plans address the future demand for interregional travel, while meeting goals for a sustainable transportation system.

11. On page nine of the Notice of Preparation there is a list of impact categories that have been identified for analysis in the 2012 RTP PEIR. However, it is missing some of the other categories that are usually discussed in CEQA analyses. These are: Agriculture and Forestry Resources, Hydrology and Water Quality, Mineral Resources, and Recreation. If the RTP has any potential significant impacts to any of the above topics, they should be included in the scope of the PEIR.

12. The Department would like to extend its support for the integration of transportation and land use planning and Sustainable Communities Strategies that could achieve and surpass the adopted greenhouse gas (GHG) reduction targets for the region. It is suggested that SCAG incorporate into its environmental analysis a regional health risk assessment for all alternatives. This is a crucial element due to an increase of public concern over transportation and land use planning and their potential impacts to human health and quality of life. The Department is looking forward to coordinating with SCAG and other agencies in their efforts to implement the Sustainable Communities and Climate Protection Act of 2008 (SB 375).

If you have any questions, please contact Melissa Joshi, Senior Transportation Planner at (213) 897-1347.

Sincerely,

James J. McCarthy

JAMES J. McCARTHY,
Deputy District Director
Planning, Public Transportation
and Local Assistance
Caltrans District 7

Christine Fernandez

From: Melissa Joshi [melissa_joshi@dot.ca.gov]
Sent: Thursday, June 09, 2011 12:56 PM
To: Christine Fernandez
Subject: Fw: CALTRANS COMMENT LETTER ON THE 2012 NOP FOR THE PEIR
Attachments: Document.pdf; RTP Paragraphsfnl.docx

Christine - our Deputy Director of Environmental Planning, Ron Kosinski just sent me the following comment that he would like to have included with our joint letter which I sent to you already. I realize that your official comment period is over, but possibly this could just be stapled to our letter as supplemental comments.

Please let me know if there is any problem with including this? Thank you.

MELISSA H. JOSHI, MBA
Branch Chief
Regional Planning and Planning Professional Development Branch
California Department of Transportation, District 7
Mail Station 16 100 South Main Street, Cubicle 12-263
Los Angeles, CA 90012
(213) 897-1347
fax (213) 897-1337

----- Forwarded by Melissa Joshi/D07/Caltrans/CAGov on 06/09/2011 12:51 PM -----

Melissa Joshi/D07/Caltrans/CAGov

06/08/2011 09:58 AM

To fernandez@scag.ca.gov
cc ikhrata@scag.ca.gov
Subject Fw: CALTRANS COMMENT LETTER ON THE 2012 NOP FOR THE PEIR

Christine - attached in the email below please find the Caltrans joint comment letter on the SCAG NOP for the 2012 RTP/SCS PEIR. As this is the deadline date for comments please confirm receipt of my email.

Thank you.

MELISSA H. JOSHI, MBA
Branch Chief
Regional Planning and Planning Professional Development Branch
California Department of Transportation, District 7
Mail Station 16 100 South Main Street, Cubicle 12-263
Los Angeles, CA 90012
(213) 897-1347
fax (213) 897-1337

----- Forwarded by Melissa Joshi/D07/Caltrans/CAGov on 06/08/2011 09:55 AM -----

"MELISSA_JOSHI@DOT.CA.GOV"
<MELISSA_JOSHI@DOT.CA.GOV>

06/08/2011 09:54 AM

To "MELISSA_JOSHI@DOT.CA.GOV" <MELISSA_JOSHI@DOT.CA.GOV>
cc
Subject CALTRANS COMMENT LETTER ON THE 2012 NOP FOR THE PEIR

RTP Paragraphs:

As referenced in the Notice of Preparation for the Program Environmental Impact Report (PEIR), the 2012 Regional Transportation Plan (RTP) includes a Sustainable Communities Strategy (SCS) developed in response to SB 375. EPA scoping comments on recent regional transportation projects have included requests to conduct Health Impact Assessments (HIA) in an effort to address health impacts, as well as opportunities for health improvements, in communities along transportation corridors.

Although Caltrans acknowledges there is scientific evidence that health effects are associated with proximity to transportation sources, Caltrans believes HIAs are most effectively conducted at the programmatic rather than project level. Therefore, we request that, in addition to the SCS, SCAG consider developing health impact principles and objectives for evaluation of projects under consideration for inclusion in the Regional Transportation Planning process.

A 2009 National Research Council document entitled "Science and Decisions: Advancing Risk Assessment" advises EPA that risk assessment (which includes health impact) should be viewed by decision-makers as a method "for evaluating the relative merits of various options for managing risk rather than [be] an end in itself". Other reasons health impact principles and objectives should be considered at the program level in the RTP process include:

- HIAs can be effective in minimizing social impact through qualitative or semi-quantitative assessment of design alternatives
- Most HIAs increase public awareness of health issues as well as community acceptance of well-designed projects
- Cross-functional and inter-agency approaches to implementing improvements in social equity may be necessary (e.g., through public health departments)

Christine Fernandez

From: Karen Pulvers [kpulvers@chinohills.org]
Sent: Tuesday, June 07, 2011 12:27 PM
To: 2012 PEIR
Subject: Notice of Preparation of a Program Environmental Impact Report (PEIR) for the 2012 Regional Transportation Plan (RTP) including a Sustainable Communities Strategy (SCS)
Attachments: 20110607122010054.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----
From: G1-PRT-CD-WKGP
Sent: Tuesday, June 07, 2011 12:20 PM
To: Karen Pulvers
Subject:

This E-mail was sent from "G1-PRT-CD3-WKGP" (MP C4500/LD445c).

Scan Date: 06.07.2011 12:20:09 (-0700)
Queries to: G1-PRT-CD-WKGP

The information contained in this e-mail message is intended only for the use of the individual or individuals named, above. If the person actually receiving this message or any other reader of this message is not the named recipient or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution, or copying of the communication is strictly prohibited. If you received this communication in error, please notify the sender immediately.

City of
Chino Hills

June 6, 2011

Christine Fernandez, Senior Regional Planner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, California 90017-3435

Subject: Notice of Preparation of a Program Environmental Impact Report (PEIR) for the 2012 Regional Transportation Plan (RTP) including a Sustainable Communities Strategy (SCS)

Dear Ms. Fernandez:

Thank you for the opportunity to review and comment on the Notice of Preparation for the Program Environmental Impact Report (PEIR) for the 2012Regional Transportation Plan (RTP), which will include a Sustainable Community Strategy (SCS). The NOP provides an appropriate scope and content outline for the 2012 RTP and SCS. The City of Chino Hills requests that the PEIR, RTP, and SCS evaluate the potential for increased transit opportunities for the City. The provision of increased transit opportunities would enable the City to participate more fully in the achievement of the goals and benefits of the RTP and SCS.

Please include the City in any future communications concerning the PEIR, RTP, and SCS.

If you have any questions, please feel free to contact me at (909) 364-2742.

Sincerely,

Joann Lombardo
Community Development Director

JL:rg
By email (2012PEIR@scag.ca.gov)

Christine Fernandez

From: Shelby Williams [SWilliams@covinaca.gov]
Sent: Wednesday, June 08, 2011 12:39 PM
To: 2012 PEIR
Subject: Response to the Notice of Preparation Of A Program Environmental Impact Report (PEIR) For the 2012 Regional Transportation Plan (RTP) Including a Sustainable Communities Strategy (SCS)

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Ms. Fernandez, we have reviewed the Notice Of Preparation for the 2012 Regional Transportation Plan including a Sustainable Communities Strategy and we do not object at this time. We also understood from reading the Profile of the City of Covina prepared by SCAG May 2011 that the discrepancies in the 2010 population estimates between the U›S› Census Bureau and the Department of Finance (DOF), in fall 2011 will be taken into consideration. It is our hope that the appropriate adjustments are made in the updated Local Profile report for Covina. Thank you.

Sincerely,

Shelby Williams
City Planner
City of Covina
125 East College Street
Covina, CA 91723
(626) 384-5453

City of Diamond Bar

21825 Copley Drive • Diamond Bar, CA 91765-4178

(909) 839-7000 • Fax (909) 861-3117

www.CityofDiamondBar.com

June 2, 2011

Ms. Christine Fernandez
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

SUBJECT: 2012 Regional Transportation Plan (RTP) Program Environmental Impact Report (PEIR)

Dear Ms. Fernandez:

The City of Diamond Bar appreciates the opportunity to comment on the Notice of Preparation (NOP) for the pending Program Environmental Impact Report (PEIR) for the 2012 Regional Transportation Plan (RTP).

We understand that the 2012 RTP will include a goods movement element. SCAG is currently working on a strategy for goods movement that we understand will form the basis for that section of the RTP. The draft strategy contemplates truck lanes on one or more east/west freeway corridors. We ask that the PEIR thoroughly review the east/west truck lanes in the following manner:

- Clearly identify the purpose and need. In particular, are such facilities needed with a trend of the San Pedro ports serving a reduced share of US goods?
- Identify the risks from hazardous waste accidents on adjacent populations.
- Identify the aesthetic, noise, and air quality impacts to adjacent residents.
- Identify alternatives that would reduce or eliminate environmental impacts, including technology options, modal options, and time-of-day options.
- Determine which corridor(s) would have the least impact on adjacent populations.
- Determine the financial feasibility of east/west truck lanes, in recognition that the RTP needs to be "financially constrained" according to federal statute.

Thank you for the opportunity to submit these comments, and we look forward to the PEIR addressing the issues we raised.

Sincerely,

David G. Liu, P.E.
Director of Public Works/City Engineer

cc: City Council
City Manager

Steve Tye
Mayor

Ling-Ling Chang
Mayor Pro Tem

Ron Everett
Council Member

Carol Herrera
Council Member

Jack Tanaka
Council Member

Recycled paper

CITY OF GLENDALE, CALIFORNIA
Planning Department

633 East Broadway, Room 103
Glendale, California 91206-4385
(818) 548-2140 (818) 548-2144
(818) 548-2115 Fax (818) 240-0392
www.ci.glendale.ca.us

June 2, 2011

Christine Fernandez, Senior Regional Planner
Southern California Association of Governments (SCAG)
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Re: Notice of Preparation of a Program Environmental Impact Report for the 2012 Regional Transportation Plan Including a Sustainable Communities Strategy

Dear Ms. Fernandez:

The City of Glendale Community Development Department appreciates this opportunity to comment on the above referenced project, relative to impacts within in the City of Glendale. We have reviewed the NOP and do not have any comments at this time. Should there be a change in the scope of the proposed project, we would appreciate the opportunity to review and comment at that time. Glendale is requesting to receive all future CEQA notices for the project and is looking forward to commenting on the Draft EIR when it becomes available.

If you have any questions please, contact me at (818) 937-8156. Thank you for this opportunity to provide comment.

Sincerely,

Erik Krause
Senior Planner

EK:ek

WE RECYCLE

Christine Fernandez

From: Councilmember Campbell [councilmembercampbell@yahoo.com]
Sent: Friday, May 13, 2011 8:12 AM
To: 2012 PEIR
Cc: David G. Brownlee
Subject: Program Environmental Impact Report

Southern California Association of Governments (SCAG)

818 West Seventh Street, 12th Floor

Los Angeles, CA 90017-3435

Scoping Outline should Not! should Not! include Greenhouse gas and global climate change. Since this planet was formed there has been climate change! That was before Human activity or mammals existed on the planet. The green house gases actually cool the planet and make it habitable. In fact the largest impact on the climate is the amount of water vapor in the atmosphere at any given moment. The Suns activity controls evaporation and condensing in conjunction with high and low pressure fronts For any human or collective group of humans to think that you are able to control the earths climate is irresponsible and absurd. Global warming or now Climate change advocates have an agenda to control all human activity by controlling hydrocarbons. Photosynthesis is the planets method of absorbing Co2, Carbon dioxide is a food source for plant life and plant convert it into carbohydrates i.e. sugar (ch) and O2 which sustains life.

What was the German's name that said you repeat a lie often enough and the public will believe it (Goebbels).

You as an inter governmental agency should realize, that the truth will prevail in the long run and there will be consequences for those of you who perpetuated the canard.

I will surely hold you responsible.

Terry E. Campbell
Council Member Needles California
MDAQMD board of governors member(Needles)
Retired DWP LA Operations Supervisor
760 326 0981

Christine Fernandez

From: Dave Brownlee [ndlscityproject@citlink.net]
Sent: Thursday, May 12, 2011 1:06 PM
To: Christine Fernandez
Cc: 'Cindy Semione'
Subject: RE: City of Needles Comments

Yes it is a comment.

Thanks

From: Christine Fernandez [mailto:fernande@scag.ca.gov]
Sent: Thursday, May 12, 2011 8:54 AM
To: 'Dave Brownlee'
Cc: 'Cindy Semione'
Subject: RE: City of Needles Comments

Hi Dave,

Can you please confirm that this is a comment in response to the 2012 RTP PEIR Notice of Preparation?

Thank you,
- Christine

Christine Fernandez
Senior Regional Planner
Southern California Association of Governments
818 W. 7th St., 12th Floor | Los Angeles, CA 90017
(213) 236-1923 (direct line) | (213) 236-1963 (fax) | (213) 236-1800 (main office)
fernande@scag.ca.gov

From: Dave Brownlee [mailto:ndlscityproject@citlink.net]
Sent: Wednesday, May 11, 2011 4:08 PM
To: Christine Fernandez
Cc: 'Cindy Semione'
Subject: City of Needles Comments

The City is in the process of rehabilitating the El Garces and developing it as an Intermodal Transportation Facility. The aspect of interconnectivity with various modes of transportation is pivotal to having the Federal Transportation Administration support the City's efforts.

These are the comments from our Assistant Planner – Cindy Semione. If you are unfamiliar with the El Garces Hotel and Santa Fe Depot, please see the attachments.

El Garces intermodal transportation project *should be discussed in the documentation, with the benefits of public transportation being utilized in the region, not just the state. The inclusion of this project in the SCAG planning document should also bolster the argument for the FTA to release the funding. Support for the El Garces project should be requested by every county/city within SCAG, and probably should be added to the SCAG agenda for discussion and member support. The El Garces project will support public transportation, including city/county bus systems, from all communities going/coming to the tri-state area. This strategy will open up the opportunity for the tri-state area communities to utilize resources available in each of the SCAG counties/cities, as well as those L.A./Riverside/S.B communities to access the resources in this region.*

To support this strategy, we should have a meeting to discuss the strategy; I cannot find any documentation or discussion of this ever occurring with the El Garces project.

Cindy

Christine Fernandez

From: Dave Brownlee [ndlscityproject@citlink.net]
Sent: Thursday, May 12, 2011 1:09 PM
To: Christine Fernandez
Cc: 'Cindy Semione'
Subject: FW: City of Needles Comments

Please add Cindy's additional narrative to the City's comments.

Thanks

From: Cindy Semione [mailto:ndlscdda@citlink.net]
Sent: Thursday, May 12, 2011 9:26 AM
To: dave brownlee
Subject: RE: City of Needles Comments

At the core of the Plan is the FTIP, which not only represents the first six years of the Plan, but also represents current commitments. Transportation projects that are federally funded or regionally significant or require federal approval (e.g., permits) must be included in an approved FTIP. Other projects outside of this FTIP core are also included in the fiscally constrained 2012 RTP and will be used to demonstrate transportation conformity. These projects must be reasonably funded within the planning horizon of the 2012 RTP, which is 2035.

From: Christine Fernandez [mailto:fernande@scag.ca.gov]
Sent: Thursday, May 12, 2011 8:54 AM
To: 'Dave Brownlee'
Cc: 'Cindy Semione'
Subject: RE: City of Needles Comments

Hi Dave,

Can you please confirm that this is a comment in response to the 2012 RTP PEIR Notice of Preparation?

Thank you,
- Christine

Christine Fernandez
Senior Regional Planner
Southern California Association of Governments
818 W. 7th St., 12th Floor | Los Angeles, CA 90017
(213) 236-1923 (direct line) | (213) 236-1963 (fax) | (213) 236-1800 (main office)
fernande@scag.ca.gov

From: Dave Brownlee [mailto:ndlscityproject@citlink.net]
Sent: Wednesday, May 11, 2011 4:08 PM
To: Christine Fernandez
Cc: 'Cindy Semione'
Subject: City of Needles Comments

The City is in the process of rehabilitating the El Garces and developing it as an Intermodal Transportation Facility. The aspect of interconnectivity with various modes of transportation is pivotal to having the Federal Transportation Administration support the City's efforts.

These are the comments from our Assistant Planner – Cindy Semione. If you are unfamiliar with the El Garces Hotel and Santa Fe Depot, please see the attachments.

El Garces intermodal transportation project *should be discussed in the documentation, with the benefits of public transportation being utilized in the region, not just the state. The inclusion of this project in the SCAG planning document should also bolster the argument for the FTA to release the funding. Support for the El Garces project should be requested by every county/city within SCAG, and probably should be added to the SCAG agenda for discussion and member support. The El Garces project will support public transportation, including city/county bus systems, from all communities going/coming to the tri-state area. This strategy will open up the opportunity for the tri-state area communities to utilize resources available in each of the SCAG counties/cities, as well as those L.A./Riverside/S.B communities to access the resources in this region.*

To support this strategy, we should have a meeting to discuss the strategy; I cannot find any documentation or discussion of this ever occurring with the El Garces project.

Cindy

CITY OF
RIVERSIDE

Community Development
Department
Planning Division

June 7, 2011

Christine Fernandez, Senior Regional Planner
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

SUBJECT: Notice of Preparation of a Program Environmental Impact Report (PEIR) for the 2012 Regional Transportation Plan (RTP) including a Sustainable Communities Strategy (SCS)

Dear Ms. Fernandez:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) for the 2012 Regional Transportation Plan (RTP) and the 2012 Sustainable Communities Strategy (SCS). As a member organization of the Southern California Association of Governments (SCAG), the City of Riverside wishes to participate in the development of the RTP and SCS including reviewing and providing input on the subsequent Draft PEIR. At this time, City staff offers the following comments on the NOP:

- The City's recently adopted General Plan 2025 employs Smart Growth principals that include the introduction of mixed-use and transportation-oriented land uses and numerous General Plan Objectives and Policies that support the greenhouse gas reduction targets of SCS. City staff requests that SCAG utilize the City's General Plan 2025 Land Use Element as the basis from which growth scenarios are developed to appropriately reflect realistic future development and growth patterns in the City.

- The PEIR for the RTP needs to adequately consider the impacts of port projects and their transportation related impacts to the SCAG region.

Please forward future drafts of the PEIR for the RTP and SCS to the City for review. Should you have any questions regarding this letter, please contact Doug Darnell, Senior Planner, at (951) 826-5219 or by email at ddarnell@riversideca.gov.

Sincerely,

Ken Gutierrez, AICP
Planning Director

c: Ronald Loveridge, Mayor
Riverside City Council Members
Brad Hudson, City Manager
Deanna Lorson, Assistant City Manager
Belinda Graham, Assistant City Manager
Kristi Smith, Supervising Deputy City Attorney
Scott Barber, Community Development Director
Siobhan Foster, Public Works Director
Tom Boyd, Deputy Public Works Director/City Engineer
Steve Libring, Traffic Engineer

G:\GENPLAN\Agency Comments\SCAG\RTP_2012\Comment Letter on NOP.doc

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Guiney, Director

June 8, 2011

2012PEIR@scag.ca.gov

Ms. Christine Fernandez, Senior Regional Planner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Dear Ms. Fernandez:

NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE 2012 REGIONAL TRANSPORTATION PLAN (RTP) INCLUDING A SUSTAINABLE COMMUNITIES STRATEGY (SCS)

The Notice of Preparation for the above PEIR has been reviewed for potential impacts on the facilities under the jurisdiction of this Department. We offer the following comments for the PEIR:

1. The RTP would likely have a significant impact on open space and recreation lands. Please provide a map identifying the locations of all existing open space and recreation lands in the SCAG region, including public parks, recreational facilities, and other open space and recreational areas owned/maintained by non-profit, local, state, and federal agencies.

For SCS group

2. Element One- Land Use Designations and Densities under the Sustainable Communities Strategy should also identify open space and recreation lands within the region as a basic component of a sustainable community.

SCS, demographics, & EIR

3. The accessibility to parks and recreation lands should also be considered when projecting population growth and future housing needs to maintain quality of life.

   At a minimum, mitigation measures should:

   - Reduce conflicts between transportation uses and open space and recreation lands;
   - Minimize the loss or displacement of existing park land or open space through the acquisition of replacement land, dedication, or payment of in-lieu fees;

- Require project implementing agencies to conduct the appropriate project specific environmental review, including consideration of loss of open space and recreation lands prior to final approval of each project;
- Require project implementing agencies to ensure that projects are consistent with local, regional, state, and federal plans to preserve parks and open space;
- Require the use of corridor realignment, buffer zones, setbacks, berms, and fencing to avoid open space and recreation land;
- Ensure the access to parks and public space is provided along with future housing development through dedication of parkland or payment of in lieu fees; and
- Ensure that future impacts to open space and recreation lands would be minimized through cooperation, information exchange, and program development.

Thank you for including this Department in the review of this environmental document. If you have questions, please contact Ms. Jui Ing Chien at (213) 351-5129 or jchien@parks.lacounty.gov.

Sincerely,

Joan Rupert
Section Head
Environmental & Regulatory Permitting Section

JR:JC:tls/gResponse to SCAG 2012PEIR-NOP

c: Parks and Recreation (N. E. Garcia, J. Barber, J. Chien)

Christine Fernandez

From: Joyce Dillard [dillardjoyce@yahoo.com]
Sent: Wednesday, June 08, 2011 4:30 PM
To: 2012 PEIR
Subject: Comments to SCAG NOP 2012 Regional Transportation Plan PEIR due 6.8.2011

Follow Up Flag: Follow up
Flag Status: Flagged

Comments to SCAG NOP 2012 Regional Transportation Plan PEIR due 6.8.2011

PROPOSAL:

RTP Framework

The 2012 RTP's unified strategy would include the following key elements:
♣A comprehensive description of the region's current and future challenges in accommodating growth and meeting mobility needs.
♣A fiscally-constrained transportation network that consists of public transit, including high-speed regional transport; highways, including mixed-flow, HOV, HOT, and toll lanes; local streets; goods movement; and a non-motorized component, including bikeways and walkways for the movement of both people and goods.
♣An integrated land use capacity analysis that accommodates the region's future employment and housing needs, and that protects sensitive habitat and resource areas.

COMMENTS:

Missing in the transportation is the watersheds identification, impacts and mitigation in relationship to transportation. Ecosystems need to be laid over any transportation plans to evaluate and mitigate the natural resource flows to maintain standards in both the Clean Air Act and the Clean Water Act.

In the City of Los Angeles, we have Total Daily Maximum Load compliance issues from the State Regional Water Quality Control Board. The City has a local bond program funded by parcel tax in the amount of $500,000,000-Proposition O-to address some of these needs.

This is a substantial amount of investment that should not be ignored.

Analysis of vehicles is underemphasized. Bus transportation is for the few, not the majority, and congestion continues to be problematic. End-of-trip destinations are never considered seriously.

The makeup of the population, including children, should be considered when planning trips. How does one carry groceries on a bus with three children accompanying you. How does one travel with children and store purchases during the morning commute or the evening commute on public transportation. There are no plans for any space, other than one seat per person.

Public transit is so poorly planning that the use of the bathroom is completely negated. People must be robots made of machine with no need of the toilet.

Any pay road planning must be considered in a realistic fashion. Can the populous afford privatization of roads and highways and pay gasoline tax?

The Public-Private Partnership expectation to finance infrastructure needs to be address in an open and transparent manner with agreement by the public, even if that agreement includes the right to vote for such privatization.

Goods movement is underemphasized when the Panama Canal is an economic threat to the region's ports.

Roads are full of potholes. Oversized trucks are allowed on City of LA streets without regard to the destruction of infrastructure and the financing of operations and maintenance.

Housing is bound by the General Plan, Land Use Element and Housing Element, yet General Plan Amendments are executed at will without the proper processes for public involvement.

Keep in mind, that municipal budgets do not consider Operations and Maintenance as important a category as Capital Assets. The emphasis to build is a replacement technique for improper economic planning and employment opportunities. The public cannot afford capital projects to replace proper infrastructure planning and realistic life cycles of that infrastructure.

This allows only a few political players to determine the pace of opportunity of a Metropolitan region.

With that, federal funding is emphasized as an "out" for capital investment. That direct line from federal agency to metropolitan area disregards State law and public expectation of representation and due process.

More than housing, jobs are needed and we see little commercial and industrial land use planning. Again, the federal picture of housing opportunities blinds the need for local businesses to locate and thrive within the region.

Small business is an important driver of state revenue and of employment. Because of congestion, businesses can expect only local traffic, or else, they must be savvy enough to operate their businesses in the internet world and connections to merchandise shipping. This model needs to be addressed.

PROPOSAL:

♣Transportation System Management (TSM) measures that maximize the efficiency of the transportation network, such as signal timing, freeway ramp metering, and bottleneck relief/auxiliary lane projects.

♣A financial plan that lays out the funding sources and mechanisms required to implement the strategies of the RTP. The financial plan will also recommend additional innovative financing strategies that can be implemented to carry out additional needed projects and programs. It will include recommendations from the Regional Congestion Pricing Study, a multi-year effort in which SCAG is working with a broad range of stakeholders to identify various congestion pricing strategies that have the potential to reduce congestion and generate much-needed revenue to further improve the transportation system.

COMMENTS:

The transportation system here should be the example to the rest of the world, but it is not. That

neglect in innovation leaves the region in a lager position. The electric vehicle is viewed as an opportunity, yet the supply of natural gas or renewables and their transmission costs have not been thoroughly analyzed to determine if there is a cost-benefit ratio. Coal is still abundant as an energy source to power electric vehicles, yet the City of Los Angeles has not faced the reality of the high costs and operation of replacement. Those costs need to be addressed as they can make of break the future economic picture of a business-friendly region. The environmentalists may be correct in their abhorrence of the use of coal, but no one has addressed the region if the electric vehicle becomes widely acceptable and gasoline and its tax base recedes.

PROPOSAL:

•A Strategic Plan that identifies additional strategies and projects beyond the financially constrained portion of the RTP (referred to as the "Constrained Plan"). The project and strategies included in the Strategic Plan will be explored further if and when additional funds become available. Beyond the Strategic Plan is the Unconstrained Plan, a "wish list" of projects that do not have funding. The projects and policies included in the Strategic Plan and Unconstrained Plan are speculative and therefore not included in the PEIR analysis.

COMMENTS:

Here Federal meets Local. Strategic Plans have been the federal requirement, yet they are not vetted in the public. This is a huge mistake on the agencies' part.

The realistic execution of projects that have no financing attached make unrealistic promises and politics as a means of entertainment not public service.

The Health and Public Safety is a key governance issue for the Municipalities. All Strategic Plans must tie into existing laws and the methods of execution for compliance and monitoring.

"Wish Lists" are a waste of taxpayer dollars but the fuel of the billionaires who know how to work the system.

PROPOSAL:

At the core of the Plan is the FTIP, which not only represents the first six years of the Plan, but also represents current commitments. Transportation projects that are federally funded or regionally significant or require federal approval (e.g., permits) must be included in an approved FTIP. Other projects outside of this FTIP core are also included in the fiscally constrained 2012 RTP and will be used to demonstrate transportation conformity. These projects must be reasonably funded within the planning horizon of the 2012 RTP, which is 2035.

COMMENTS:

Twenty-three years differ from 2012 and 2035. The Census from 1980 to 1990 grew, in the City of Los Angeles, 17.39% and from 1990 to 2000, 6.01%. That 24.44% growth from 1980 to 2000 appeared as a boom town.

But the circumstances have changed. The growth, in the City of Los Angeles, from 2000-2010 was 2.65%. If the County of Los Angeles grew by 656,286, then 2.65% of that amount is 17,392 people.

We are in a reverse growth mode.

PROPOSAL:

RTP Goals

The goals of the 2012 RTP demonstrate the need to balance many priorities in the most-cost effective manner:

- Maximize mobility and accessibility for all people and goods in the region;
- Ensure travel safety and reliability for the people and goods in the region;
- Preserve and ensure a sustainable regional transportation system;
- Maximize the security of the regional transportation system through improved monitoring, recovery planning, and coordination with other security agencies;
- Maximize the productivity of our transportation system;
- Protect the environment, improve air quality and promote energy efficiency; and
- Encourage land use and growth patterns that complement our transportation investments.

COMMENTS:

Charter schools, its transportation issues and land use issues, have been ignored. Transportation is not supplied.

Public facilities are now becoming housing ie SELMA COMMUNITY HOUSING LP on LAUSD land. There are no analysis of PF Public Facilities land use changes and its implication.

Land use needs to be combined with watershed analysis. Here is where the breakdown of the natural environment, and no conservation plans in force, have a destructive element on water supply and water quality.

Water move the economic engine.

PROPOSAL:

The 2012 RTP will focus on system monitoring and evaluation, recognizing that maintaining and/or improving mobility will no longer depend solely on expanding the transportation system. Given the region's fiscal constraints, an integrated approach is needed to maximize mobility.

COMMENTS:

How is system monitoring and evaluation established. With what qualified personnel, with what reporting period, with what forms, with what agencies and oversight and with what enforcement?

PROPOSAL:

Sustainable Communities Strategy

Under SB 375, metropolitan planning organizations such as SCAG are required to develop an SCS as part of the RTP to reduce, as feasible, greenhouse gas emissions to meet a specified target for 2020 and 2035.

COMMENTS:

How is this being incorporated into the General Plan and its Elements and with what monitoring and mitigation.

Even though there a groups like the LARC Los Angeles Regional Collaborative, the process is not brought to the public. In the case of the City of Los Angeles, the Mayor is in control of the issue. This is not a chartered duty of the Mayor.

PROPOSAL:

The California Air Resources Board (ARB) issued SCAG a regional GHG reduction target of 8% per capita for the planning year 2020, and a GHG reduction target of 13% per capita for 2035. If the targets cannot be feasibly met, an APS will be prepared by SCAG to show how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. SCAG's intent is to achieve these targets with the SCS.

COMMENTS:

Transportation is not the only driver of Greenhouse Gas Emissions. All factors must be included.

PROPOSAL:

The GHG reductions are to be derived from fewer (and/or shorter) automobile and light truck trips resulting from integrated transportation, land use, housing and environmental planning. The transportation component of the SCS will include the network of road and transit networks, non-motorized transportation and transportation policies, as discussed in the 2012 RTP Framework.

COMMENTS:

From the conference "Keeping Our Heads Above Water-Adapting to Climate Change in Southern California" at Northrop Grumman, water vapor is a GHG.

How are you addressing and including the science and the impacts including economic impacts.

PROPOSAL:

Furthermore, SB 375 requires that the SCS shall identify general land uses,
residential densities, and building intensities as well as areas to house future residents (see California Government Code Section 65080(b)(2)(B) for the full list of SB 375 requirements).

COMMENTS:

The California Climate Change Portal lists the following:

Required Elements:

- Circulation
- Land Use
- Housing
- Noise

- Safety
- Conservation
- Open Space

Optional Elements:

- Agriculture
- Climate Change Global Warming
- Economic
- Flood Control
- Hazardous Waste
- Water Resources
- Air Quality
- Community Design
- Energy
- Growth Management
- Public Health

How do you plan to incorporate this guidance to the entire picture including the threat of sea-level rise and its consequences and impacts.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

PUBLIC COMMENT CARD

SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

Please complete this card and submit it to the Committee Secretary prior to the Public Comment Period. Comments are limited to three (3) minutes.

Total Comment Period may be limited to 20 minutes at the discretion of the Committee Chair.

Committee: PEIR Scoping Meeting

Date: 5/26/11

Name: Keith Hanks, Councilmember, Azusa

Phone:

Agency or Affiliation: EEC / RC

Address:

City:

Zip:

Item #:

Item Title:

COMMENTS: Identify aggregate resource maps (permitted resources, siting mines, access issues), and address availability of mineral resources. Additionally consider demolition materials, and recycled materials. Consider supply/demand, & impacts. Address in both RTP & PEIR.

Metro

Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

June 8, 2011

Ms. Christine Fernandez
Senior Regional Planner
Southern California Association of Governments
818 West Seventh Street. 12th Floor
Los Angeles, CA 90017-3435

Ms. Fernandez,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the 2012 Regional Transportation Plan. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic);
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections;
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour; and
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please call Scott Hartwell at 213-922-2836 or by email at hartwells@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Sincerely,

Scott Hartwell
CEQA Review Coordinator, Long Range Planning

Attachment

APPENDIX

D

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- ❑ Evidence that affected transit operators received the Notice of Preparation.
- ❑ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ❑ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both "peak hour" and "daily" refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ❑ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - ➢ Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - ➢ For each time period, multiply the result by one of the following factors:

    3.5% of Total Person Trips Generated for most cases, except:

    10% primarily Residential within 1/4 mile of a CMP transit center
    15% primarily Commercial within 1/4 mile of a CMP transit center
    7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
    9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
    5% primarily Residential within 1/4 mile of a CMP transit corridor
    7% primarily Commercial within 1/4 mile of a CMP transit corridor
    0% if no fixed route transit services operate within one mile of the project

  To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- ❑ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

PUBLIC COMMENT CARD

SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

Please complete this card and submit it to the Committee Secretary prior to the Public Comment Period. Comments are limited to three (3) minutes.

Total Comment Period may be limited to 20 minutes at the discretion of the Committee Chair.

Committee:

Date: 5/26/11

Name: Beth Breckler

Phone: (310) 310 2390

Agency or Affiliation: Move LA

Address: 506 Santa Monica Blvd, Suite 223, Santa Monica 90401

Item #:

Item Title:

COMMENTS:

Comment was related to performance measures on housing affordability & health

1) Housing affordability should be a performance measure.
2) Displacement of lower income peoples (gentrification) from areas with increased transit investment should be looked at.

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

May 27, 2011

Ms. Christine Fernandez, Senior Regional Manager
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Re: SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the: **"2012 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) Project;"** located in Imperial, Orange, Riverside, San Bernardino and Ventura Counties, California

Dear Ms. Fernandez:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources. The NAHC wishes to comment on the above-referenced proposed Project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted in; **Native American cultural resources were not identified** within the 'area of potential effect (APE), based on the USGS coordinates of the project location provided.. However, there are Native American cultural resources in close proximity to the APE. The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254.10.

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American

contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to C"A Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore we recommend, also, that you contact the California Historic Resources Information System (CHRIS) California Office of Historic Preservation for pertinent archaeological data within or near the APE, at (916) 445-7000 for the nearest Information Center in order to learn what archaeological fixtures may have been recorded in the APE.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

The response to this search for Native American cultural resources is conducted in the NAHC Sacred Lands Inventory, established by the California Legislature (CA Public Resources Code 5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code 6254.10) although Native Americans on the attached contact list may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places and there may be sites within the APE eligible for listing on the California Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Charles Cooke
32835 Santiago Road
Acton , CA 93510
suscol@intox.net

(661) 733-1812 - cell
suscol@intox.net

Chumash
Fernandeno
Tataviam
Kitanemuk

Patrick Tumamait
992 El Camino Corto
Ojai , CA 93023
(805) 640-0481
(805) 216-1253 Cell

Chumash

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Ferrnandeño

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil
1030 Ritchie Road
Grover Beach CA 93433
cheifmvigil@fix.net
(805) 481-2461
(805) 474-4729 - Fax

Chumash

Santa Ynez Band of Mission Indians
Vincent Armenta, Chairperson
P.O. Box 517
Santa Ynez , CA 93460
varmenta@santaynezchumash.
(805) 688-7997
(805) 686-9578 Fax

Chumash

Owl Clan
Qun-tan Shup
48825 Sapaque Road
Bradley , CA 93426
mupaka@gmail.com
(805) 472-9536 phone/fax
(805) 835-2382 - CELL

Chumash

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait
365 North Poli Ave
Ojai , CA 93023
jtumamait@sbcglobal.net
(805) 646-6214

Chumash

Stephen William Miller
189 Cartagena
Camarillo , CA 93010
(805) 484-2439

Chumash

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Santa Ynez Tribal Elders Council
Adelina Alva-Padilla, Chair Woman
P.O. Box 365
Santa Ynez , CA 93460
elders@santaynezchumash.org
(805) 688-8446
(805) 693-1768 FAX
Chumash

Carol A. Pulido
165 Mountainview Street
Oak View , CA 93022
805-649-2743 (Home)
Chumash

Randy Guzman - Folkes
655 Los Angeles Avenue, Unit E
Moorpark , CA 93021
ndnRandy@yahoo.com
(805) 905-1675 - cell
Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

Melissa M. Parra-Hernandez
119 North Balsam Street
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964
Chumash

Coastal Band of the Chumash Nation
Vennise Miller, Chairperson
P.O. Box 4464
Santa Barbara CA 93140
805-305-5517
Chumash

Frank Arredondo
PO Box 161
Santa Barbara Ca 93102
ksen_sku_mu@yahoo.com
805-617-6884
ksen_sku_mu@yahoo.com
Chumash

Charles S. Parra
P.O. Box 6612
Oxnard , CA 93031
(805) 340-3134 (Cell)
(805) 488-0481 (Home)
Chumash

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Cabazon Band of Mission Indians
David Roosevelt, Chairperson
84-245 Indio Springs — Cahuilla
Indio , CA 92203-3499
(760) 342-2593
(760) 347-7880 Fax

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resource Center
P.O. Box 1477 — Luiseno
Temecula , CA 92593
(951) 770-8100
pmacarro@pechanga-nsn.gov
(951) 506-9491 Fax

Los Coyotes Band of Mission Indians
Francine Kupsch, Spokesperson
P.O. Box 189 — Cahuilla
Warner , CA 92086
loscoyotes@earthlink.net
(760) 782-0711
(760) 782-2701 - FAX

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 — Cahuilla
Anza , CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax

Pala Band of Mission Indians
Tribal Historic Preservation Office
35008 PalaTemecula Rd, PMB — Luiseno
Pala , CA 92059 — Cupeno
sgaughen@palatribe.com
(760) 891-3515
(760) 742-3189 Fax

San Manuel Band of Mission Indians
James Ramos, Chairperson
26569 Community Center Drive — Serrano
Highland , CA 92346
(909) 864-8933
(909) 864-3724 - FAX
(909) 864-3370 Fax

Pauma & Yuima Reservation
Randall Majel, Chairperson
P.O. Box 369 — Luiseno
Pauma Valley CA 92061
paumareservation@aol.com
(760) 742-1289
(760) 742-3422 Fax

Soboba Band of Mission Indians
Scott Cozaet, Chairperson
P.O. Box 487 — Luiseno
San Jacinto , CA 92581
dhill@soboba-nsn.gov
(951) 654-2765
(951) 654-4198 - Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Torres-Martinez Desert Cahuilla Indians
Mary Resvaloso, Chairperson
PO Box 1160 Cahuilla
Thermal , CA 92274
(760) 397-0300
mresvaloso@torresmartinez.org
(760) 397-8146 Fax

Fort Mojave Indian Tribe
Tim Williams, Chairperson
500 Merriman Ave Mojave
Needles , CA 92363
(760) 629-4591
(760) 629-5767 Fax

Twenty-Nine Palms Band of Mission Indians
Darrell Mike, Chairperson
46-200 Harrison Place Chemehuevi
Coachella , CA 92236
tribal-epa@worldnet.att.net
(760) 775-5566
(760) 808-0409 - cell - EPA
(760) 775-4639 Fax

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
6515 E. Seaside Walk, #C Gabrielino
Long Beach , CA 90803
calvitre@yahoo.com
(714) 504-2468 Cell

Joseph R. Benitez (Mike)
P.O. Box 1829 Chemehuevi
Indio , CA 92201
(760) 347-0488
(760) 408-4089 - cell

Juaneno Band of Mission Indians Acjachemen Nation
David Belardes, Chairperson
32161 Avenida Los Amigos Juaneno
San Juan Capistrano CA 92675
(949) 493-4933 - home
chiefdavidbelardes@yahoo.com
(949) 293-8522

Chemehuevi Reservation
Charles Wood, Chairperson
P.O. Box 1976 Chemehuevi
Chemehuevi Valley CA 92363
chair1cit@yahoo.com
(760) 858-4301
(760) 858-5400 Fax

Colorado River Indian Tribe
Ginger Scott, Museum Curator; George Ray, Coor
26600 Mojave Road Mojave
Parker , AZ 85344 Chemehuevi
crit.museum@yahoo.com
(928) 669-9211-Tribal Office
(928) 669-8970 ext 21
(928) 669-1925 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Torres-Martinez Desert Cahuilla Indians
Diana L. Chihuahua, Vice Chairperson, Cultural
P.O. Boxt 1160 Cahuilla
Thermal , CA 92274
dianac@torresmartinez.
760) 397-0300, Ext. 1209
(760) 272-9039 - cell (Lisa)
(760) 397-8146 Fax

Agua Caliente Band of Cahuilla Indians
Richard Milanovich, Chairperson
5401 Dinah Shore Drive Cahuilla
Palm Springs, CA 92262
lfreogoz@aguacaliente-nsn.gov
(760) 325-3400
(760) 325-0593 Fax

Fort Mojave Indian Tribe
Nora McDowell, Cultural Resources Coordinator
500 Merriman Ave Mojave
Needles , CA 92363
g.goforth@fortmojave.com
(760) 629-4591
(760) 629-5767 Fax

Morongo Band of Mission Indians
Robert Martin, Chairperson
12700 Pumarra Rroad Cahuilla
Banning , CA 92220 Serrano
(951) 849-8807
(951) 755-5200
(951) 922-8146 Fax

Juaneno Band of Mission Indians
Alfred Cruz, Culural Resources Coordinator
P.O. Box 25628 Juaneno
Santa Ana , CA 92799
alfredgcruz@sbcglobal.net
714-998-0721
714-998-0721 - FAX
714-321-1944 - cell

Pechanga Band of Mission Indians
Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula , CA 92593
tbrown@pechanga-nsn.gov
(951) 770-6100
(951) 695-1778 Fax

Juaneno Band of Mission Indians
Adolph 'Bud' Sepulveda, Vice Chairperson
P.O. Box 25828 Juaneno
Santa Ana , CA 92799
bssepul@yahoo.net
714-838-3270
714-914-1812 - CELL
bsepul@yahoo.net

Willie J. Pink
48310 Pechanga Road Luiseno
Temecula , CA 92592
wjpink@hotmail.com
(909) 936-1216
Prefers e-mail contact

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Serrano Nation of Indians
Goldie Walker
P.O. Box 343 Serrano
Patton , CA 92369

(909) 862-9883

Fort Mojave Indian Tribe
Esadora Evanston, Environmental Coordinator
500 Merriman Ave Mojave
Needles , CA 92363
region9epa@ftmojave.com
(760) 326-1112
(760) 629-4591
(760) 629-5767 Fax

Cocopah Museum/Cultural Resources Dept.
Jill McCormick, Tribal Archaeologist
County 15th & Ave. G Cocopah
Sommerton , AZ 85350
culturalres@cocopah.com
(928) 530-2291 - cell
(928) 627-2280 - fax

Juaneño Band of Mission Indians
Sonia Johnston, Tribal Chairperson
P.O. Box 25628 Juaneno
Santa Ana , CA 92799
sonia.johnston@sbcglobal.net
(714) 323-8312

Agua Caliente Band of Cahuilla Indians THPO
Patricia Tuck, Tribal Historic Perservation Officer
5401 Dinah Shore Drive Cahuilla
Palm Springs, CA 92264
(760) 699-6907

ptuck@augacaliente-nsn.gov
(760) 699-6924- Fax

Juaneno Band of Mission Indians
Anita Espinoza
1740 Concerto Drive Juaneno
Anaheim , CA 92807
(714) 779-8832

Augustine Band of Cahuilla Mission Indians
Karen Kupcha
P.O. Box 846 Cahuilla
Coachella , CA 92236
(760) 398-6180
916-369-7161 - FAX

Quenchan Indian Nation
Bridget Nash-Chrabascz, THPO
P.O. Box 1899 Quechan
Yuma , AZ 85366
b.nash@quechantribe.com
(928) 920-6068 - CELL
(760) 572-2423

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Ah-Mut-Pipa Foundation
Preston J. Arrow-weed
P.O. Box 160 Quechan
Bard , CA 92222 Kumeyaay
ahmut@earthlink.net
(928) 388-9456

SOBOBA BAND OF LUISENO INDIANS
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 Luiseno
San Jacinto , CA 92581
jontiveros@soboba-nsn.gov
(951) 663-5279
(951) 654-5544, ext 4137

Cahuilla Band of Indians
Luther Salgado, Sr., , Chairperson
PO Box 391760 Cahuilla
Anza , CA 92539
tribalcouncil@cahuilla.net
915-763-5549

Pechanga Cultural Resources Department
Anna Hoover, Cultural Analyst
P.O. Box 2183 Luiseño
Temecula , CA 92593
ahoover@pechanga-nsn.gov
951-770-8100
(951) 694-0446 - FAX

Ernest H. Siva
Morongo Band of Mission Indians Tribal Elder
9570 Mias Canyon Road Serrano
Banning , CA 92220 Cahuilla
siva@dishmail.com
(951) 849-4676

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Torres-Martinez Desert Cahuilla Indians
Ernest Morreo
PO Box 1160 Cahuilla
Thermal , CA 92274
maxtm@aol.com
(760) 397-0300
(760) 397-8146 Fax

Augustine Band of Cahuilla Mission Indians
Mary Ann Green, Chairperson
P.O. Box 846 Cahuilla
Coachella , CA 92236
hhaines@augustinetribe.
(760) 398-6180
760-369-7161 - FAX

Fort Yuma Quechan Indian Nation
Michael Jackson., President
PO Box 1899 Quechan
Yuma , AZ 85366
qitpres@quechantribe.com
(760) 572-0213
(760) 572-2102 FAX

Juaneno Band of Mission Indians Acjachemen Nation
Anthony Rivera, Chairman
31411-A La Matanza Street Juaneno
San Juan Capistrano CA 92675-2674
arivera@juaneno.com
(949) 488-3484
(949) 488-3294 - FAX
(530) 354-5876 - cell

AhaMaKav Cultural Society, Fort Mojave Indian
Linda Otero, Director
P.O. Box 5990 Mojave
Mohave Valley AZ 86440
(928) 768-4475
LindaOtero@fortmojave.com
(928) 768-7996 Fax

Morongo Band of Mission Indians
Michael Contreras, Cultural Heritage Prog.
12700 Pumarra Road Cahuilla
Banning , CA 92220 Serrano
(951) 201-1866 - cell
mcontreras@morongo-nsn.
gov
(951) 922-0105 Fax

Santa Rosa Band of Mission Indians
Mayme Estrada, Chairwoman
P.O. Box 609 Cahuilla
Hemet , CA 92546
srbcioffice@yahoo.com
(951) 658-5311
(951) 658-6733 Fax

San Manuel Band of Mission Indians
Ann Brierty, Policy/Cultural Resources Departmen
26569 Community Center. Drive Serrano
Highland , CA 92346
(909) 864-8933, Ext 3250
abrierty@sanmanuel-nsn.
gov
(909) 862-5152 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

Native American Contact List
Imperial, Orange, Riverside, San Bernardino and Ventura Counties
May 27, 2011

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno -
Pine Valley , CA 91962
(619) 709-4207

Ah-Mut-Pipa Foundation
Preston J. Arrow-weed
P.O. Box 160 Quechan
Bard , CA 92222 Kumeyaay
ahmut@earthlink.net
(928) 388-9456

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
P.O. Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
(619) 478-2113

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011051018; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR; located in Imperial, Orange, Riverside, San Bernardino and Venura counties, California.

DIRECTORS
CLAUDIA C. ALVAREZ, ESQ.
PHILIP L. ANTHONY
DON BANKHEAD
KATHRYN L. BARR
DENIS R. BILODEAU, P.E.
SHAWN DEWANE
CATHY GREEN
IRV PICKLER
STEPHEN R. SHELDON
ROGER C. YOH, P.E.

SINCE 1933

ORANGE COUNTY WATER DISTRICT

ORANGE COUNTY'S GROUNDWATER AUTHORITY

OFFICERS
President
CLAUDIA C. ALVAREZ, ESQ.

First Vice President
PHILIP L. ANTHONY

Second Vice President
DON BANKHEAD

General Manager
MICHAEL R. MARKUS, P.E.

May 27, 2011

Christine Fernandez
Southern California Association of Governments
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017

RE: 2012 Regional Transportation Plan and Sustainable Communities Strategy Program EIR, SCH Number 2011051018

Dear Ms. Fernandez:

Please include the Orange County Water District on the list to receive all environmental documents related to the project listed above. Thank you.

Sincerely,

Marsha Westropp

Marsha Westropp
Senior Watershed Planner

PO Box 8300
Fountain Valley, CA 92728-8300
18700 Ward Street
Fountain Valley, CA 92708
(714) 378-3200
(714) 378-3371 fax
www.ocwd.com

Christine Fernandez

From: Mark Butala
Sent: Thursday, June 09, 2011 8:53 AM
To: Christine Fernandez
Cc: Jacob Lieb
Subject: FW: Child Care and SB-375
Attachments: Child Care and SB-375 Comment Letter (June 7 2011).pdf

Not official NOP comment letter, but does it deserved to be treated as one?

Mark C. Butala
Manager, Comprehensive Planning
Southern California Association of Governments
213.236.1945

From: Karla Pleitez Howell [mailto:khowell@publiccounsel.org]
Sent: Tuesday, June 07, 2011 3:37 PM
To: Mark Butala
Subject: Child Care and SB-375

Mr. Butala

We understand that SCAG is currently in the process of developing a Sustainable Communities Strategy for its six-county region. This is an important opportunity for SCAG to emphasize the importance of child care on a regional basis in a way that will have a lasting, meaningful, impact on the development of new child care facilities. See attached for details.

Please let me know if you have any questions or I can provide additional useful information.

Best,

Karla Pleitéz Howell
Staff Attorney

Public Counsel | Early Care & Education Law Project
610 S. Ardmore Ave. | Los Angeles, CA 90005
T: 213.385.2977 x132 | F: 213.385.9089

www.publiccounsel.org

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail and delete any version, response or reference to it. Thank you.

610 SOUTH ARDMORE AVENUE
LOS ANGELES, CA 90005
TEL: 213.385.2977
FAX: 213.385.9089

KARLA PLEITÉZ HOWELL
(213) 385-2977 ext. 132
khowell@publiccounsel.org

June 7, 2011

Via electronic mail and postal service

Mark Butala
Planning & Programs - Land Use and Environmental Planning Southern California
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Re: **Child Care and SB 375**

Dear Mr. Butala:

Public Counsel, the nation's largest *pro bono* law firm, provides free legal services to non-profit corporations and individuals with low incomes. The Early Care & Education Law Project ("ECE Law Project") is one of nine Public Counsel practice areas. Its mission is to increase the number of desperately needed child care spaces in and around Los Angeles County by, for example, advocating for pro-child care language in general plans and zoning codes. By amending these planning documents, Public Counsel is laying the groundwork for an increase in the number of quality, affordable child care facilities throughout the region.

We understand that SCAG is currently in the process of developing a Sustainable Communities Strategy for its six-county region. This is an important opportunity for SCAG to emphasize the importance of child care on a regional basis in a way that will have a lasting, meaningful, impact on the development of new child care facilities. Toward that end, this letter will briefly discuss the importance of child care, and then make recommendations on ways that SCAG's Sustainable Communities Strategy can prioritize the development of adequate child care facilities.

1. **Economic Benefits of Early Care and Education Programs**

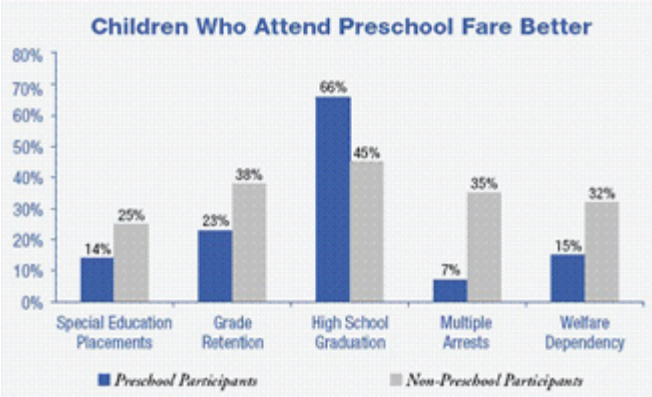
In Los Angeles County alone, child care generates $1.9 billion annually and directly supports over 65,000 full time equivalent jobs. In addition, when communities encourage the growth and development of child care, businesses in those communities see an increase in employee retention and on-the job productivity. They also retain a greater percentage of workers and thus save a considerable amount of resources on retraining. Finally, workers are more likely to relocate to communities or jobs that provide accessible child care.

2. Social Benefits of Early Care and Education Programs

Quality child care is the foundation for success in K-12 education, and can translate to success in life, generally, because children who graduate from high school are more likely to support themselves as adults, to own homes, and to stay out of trouble with the law. Research studies have shown that the reason for such success is that good early care and education programs capitalize on a time when children's brains are developing at an incredibly rapid pace, laying a foundation of social skills, knowledge and self confidence that paves the way for success in kindergarten and beyond.

According to Preschool California, children who enroll in quality preschools are:

- More likely to become good readers in elementary school.
- Less likely to be placed in special education or held back a grade.
- More likely to graduate from high school and attend college.
- Less likely to need public assistance as adults.
- Less likely to be arrested or incarcerated.



Source: Reynolds, et al, and Schweinhart, et al.

As these research results indicate, early care and education programs have a significant impact on a community's quality of life. Having a better educated and better paid population increases a community's tax base. It also shifts public spending from welfare programs to other projects. Child care also reduces juvenile delinquency. Studies have shown that at least 50 percent of youth crime occurs in the hours after school. A study of eighth graders found that children caring for themselves for 11 hours or more per week were twice as likely to smoke cigarettes, drink alcohol, or use drugs.

Risk behaviors such as these during adolescence predict a future of increased criminal behavior and health problems in adulthood. In one survey, 91% of police chiefs nationwide agreed that a greater investment in after-school educational child care programs would lead to a reduction in costs caused by crime. As Lee Baca (Los Angeles County Sherriff) stated: "Keeping kids waiting in line for preschool multiplies the likelihood that I will see them in a police line-up later in life."

3. Sustainable Communities Strategy Suggestions

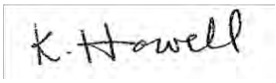
The Sustainable Communities Strategy is intended to demonstrate how SCAG will meet its greenhouse gas reduction target through integrated land use, housing and transportation planning. Public Counsel believes that, as a part of this planning effort, the need for adequate child care facilities must be taken into account. Specifically, we encourage SCAG to use its Sustainable Communities Strategy as a vehicle to promote a range of childcare facilities, including infant care, preschool care and after-school care, to serve the needs of the region's families and workers. A particular emphasis could be placed on the development of childcare facilities near transit oriented development.

4. Conclusion

By prioritizing the development of adequate child care facilities, SCAG can ensure that child care is part of the region's long-range growth strategy. This is particularly important given the serious—and growing—need for child care.

Thank you for this opportunity to provide suggestions in connection with the Sustainable Communities Strategy. I would welcome the opportunity to discuss further with you in person or by telephone.

Yours truly,



Karla Pleitéz Howell, Esq.

The City Project

1055 Wilshire Blvd., Suite 1660 Los Angeles, CA 90017-2499 T: (213)977-1035 F: (213)977-5457 www.cityprojectca.org

June 8, 2011

Christine Fernandez
Southern California Association of Governments
818 West 7th St., 12th Floor
Los Angeles, CA 90017

RE: Public Comment re: 2012 Regional Transportation Plan – PEIR Notice of Preparation

Dear Ms. Fernandez:

We commend the Southern California Association of Governments ("SCAG") for its past commitment to environmental justice, particularly in the of areas equitable access to parks and transit. We urge SCAG to continue its leadership in this area by presenting a region-wide vision and strategic plan for Southern California to alleviate inequities in access to green space and transit in its 2012 Regional Transportation Plan. We also urge SCAG to prioritize equitable outcomes in its Sustainable Community Strategy and accompanying environmental justice analysis.

As SCAG has previously recognized, environmental justice will not be achieved until "everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work." *SCAG Environmental Justice Report* (2008).

The City Project is a multicultural policy and legal advocacy organization that is working to broaden access to parks and open space, especially in underserved communities, and to fight childhood obesity by guaranteeing that students get enough physical education.

Providing equitable transportation and land use planning for the region is good policy—and good law. Federal and state laws prohibit both intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives in the provision of public resources. An important purpose of the statutory civil rights framework is to ensure that recipients of public funds do not maintain policies or practices that result in discrimination based on race or ethnicity. The California statutory definition of Environmental Justice requires "the fair treatment of people of all races, cultures, and incomes." The 2012 SCAG RTP can proactively achieve compliance with civil rights, environmental, and other laws by approaching its plan from an equity standpoint.

Unfair Disparities in Access to Parks and Recreation

We commend SCAG for including a discussion on the need to improve access to park space and transit, particularly among low-income communities of color, and the need for a multi-agency approach to address these inequities in its 2008 Environmental Justice Report. Unfortunately, there is no quick fix to these problems, and four years later, they persist throughout Southern

Equal Justice, Democracy, and Livability for All
Board of Directors: Chris Burrows • Lydia Camarillo • Juan Devis • Robert García • Tom Hayden • Virginia Keeny
Robbie LaBelle • Anne McEnany • Lyndon Parker • Michael Rodríguez
The City Project is a 501c3 Not for Profit Organization

California. We urge SCAG to build on its 2008 analysis and present a region-wide vision and strategic plan for Southern California to alleviate inequalities in access to green space and transit in the 2012 RTP.

Green space provides important advantages: it promotes physical and psychological health, affords youths alternatives to gangs and crimes, celebrates and preserves community pride and cultural heritage, and results in a host of economic and environmental benefits. For those reasons, the National Recreation and Parks Association has recommended ten acres of park space per 1,000 residents. Sadly, this is far from the reality in Southern California.

The City Project has extensively researched and mapped unfair disparities in green access for nine Southern California counties, including those that make up SCAG. See for example, the attached report for Los Angeles County: *Healthy Parks, Schools and Communities: Green Access and Equity for Los Angeles County 2011*. This and other county reports are available on the web at www.cityprojectca.org/greenjustice. We will provide the full reports at the SCAG Environmental Justice Workshop on June 30, 2011.

Our research shows a pattern of inequity in green access throughout the region. Children of color living in poverty with no access to a car in Southern California suffer from the worst access to parks, large school fields, mountains, trails, beaches, and other natural public places and suffer from the highest levels of child obesity. Disproportionately white and wealthy people with fewer children than the county average enjoy the best access to parks, school fields, mountains, trails, beaches, and transportation. Ironically, those who need the most have the least, and vice versa. The SCAG 2012 RTP should highlight these issues and adopt strategies to remedy them.

Environmental Justice in Sustainable Community Strategy

As required under Senate Bill 375 to address the growing problem of greenhouse gas emissions from vehicles used throughout the state, the Sustainable Community Strategy presents an important opportunity to promote equity. We urge SCAG to develop a strategy that reflects and incorporates the goals and principles of environmental health and justice. Studies show that minorities and low-income groups may be particularly vulnerable to the effects of air pollution. The SCS is an opportunity for SCAG to rally local governments and stakeholders to take a collaborative and integrated approach to curing the region's transportation and pollution problems in an equitable manner.

The 2012 SCAG RTP, SCS and environmental justice analysis should present a region-wide vision and strategic plan to alleviate real and perceived inequities in access to green space and transportation. We look forward to working with you to accomplish these goals.

Sincerely,

Robert García
Executive Director and Counsel

Menaka Fernando
Staff Attorney

The City Project

HEALTHY PARKS, SCHOOLS AND COMMUNITIES:

Green Access and Equity for Los Angeles County 2011

ABOUT THIS REPORT

This policy report is a summary for Los Angeles County of The City Project's 2011 report, *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for Southern California,* which maps and analyzes green access and equity in nine counties in Southern California—Los Angeles, Orange, Ventura, San Bernardino, Riverside, San Diego, Kern, Santa Barbara and Imperial—using narrative and legal analyses, geographic information system (GIS) mapping tools, and demographic and economic data.

Unlike other studies, which plot either green space or population, the maps in this report plot green space in relation to population and other metrics that indicate accessibility, such as distance to the park. This report also provides multidisciplinary analyses of the vital benefits of parks and other green space to people and the environment. It describes the consequences of disparities in green access and the benefits that could be reaped in "park poor" and "income poor" communities if resources were fairly allocated. It concludes with recommendations for equitable investments in green space in Los Angeles County and throughout California and the nation.

The goal of this work is to combine research and analyses with effective outreach to provide concerned citizens, community groups, elected and other government officials, planners, funders and other stakeholders with the best available information upon which to prioritize actions and decisions that positively impact green access and quality of life for all.

Together we can help children be active, eat well, stay healthy and do their best in school and life.

For more information on green access and equity in Los Angeles County and Southern California, or to download a copy of this summary or the full nine county policy report, please visit www.cityprojectca.org/greenjustice.
This report is available in English and Spanish.

ABOUT THE CITY PROJECT

The mission of The City Project is to achieve equal justice, democracy and livability for all.

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

The City Project is a nonprofit legal and policy advocacy organization established in 2000 with a grant from the Ford Foundation. Over the past decade, The City Project has worked and published extensively on equal access to parks and green space, physical activity and physical education, transportation, and related issues at the intersection of social justice, sustainable regional planning and human health.

AUTHORS

Robert García, Executive Director, Counsel and Founder, The City Project
Mr. García is a nationally recognized leader in the urban parks, physical education and environmental justice movements and has received numerous awards, including the 2010 Presidential Citation from the American Public Health Association for his dedication and contribution to the field of public health. He received a Bachelor's Degree in Philosophy from Stanford University and a J.D. from Stanford Law School, where he served on the Board of Editors of the Stanford Law Review.

Seth H. Strongin, Director of Policy and Research, The City Project
Mr. Strongin analyzes policy, data and social science research related to public health, the natural environment and civil rights. He writes policy reports on physical education, park access, human health and the built environment. Mr. Strongin received a Bachelor's Degree in Biology from American University and a Master's Degree in Environmental Science and Management from the Bren School at the University of California, Santa Barbara.

Anahid Brakke, Principal, Heed Nonprofit Consulting
Ms. Brakke works to advance the social justice efforts of nonprofits and foundations. She specializes in creating publications that make technical information or complex issues accessible and relevant to the public.

Amanda Recinos, Associate Director of GreenInfo Network and a GIS specialist, prepared the maps and demographics analyses in this report and has worked with The City Project for over ten years.

Cover photo: Mulholland Scenic Parkway, Santa Monica Mountains National Recreation Area.

The City Project
1055 Wilshire Blvd., Suite 1660 | Los Angeles, CA 90017 | (213) 977-1035 | www.cityprojectca.org

Whittier Narrows Regional Park, South El Monte

FOREWORD BY THE CALIFORNIA ENDOWMENT

The California Endowment is a foundation committed to improving the health of all Californians, especially those living in poor and underserved communities. One of the most unfortunate truths of our society today is that when it comes to how long you will live, your zip code may be more important than your genetic code. Being able to breathe clean air, to send our children to school without fear of violence, to have a convenient place to buy fresh and healthy foods, to live near a park where we can walk and play – these are the things that keep us healthy and improve our odds of living a long life.

The California Endowment has worked with The City Project for many years to broaden access to parks and open space for inner-city residents, and to fight childhood obesity by guaranteeing that students get enough physical education at school.

Childhood obesity is an epidemic. The California Endowment believes all California families deserve to live in healthy environments with access to opportunities for physical activity. Improving green access, as called for in this report by The City Project, is a critical strategy in building healthy communities. We must make it easier for children and adults to be more active by eliminating the disparities in access to green space and recreational opportunities.

The California Endowment funded a study in late 2010 that shows nearly all segments of the voting population view childhood obesity as a very serious problem in the state, with African-Americans, Latinos and low-income voters particularly concerned.

Of those surveyed, 89% support requiring physical education classes for four years in high school. A similar percentage (88%) favors requiring school gyms, tracks, playgrounds and fields to be open to children when school is not in session. And 87% back the idea of cities making street improvements so that it is easier to bike, ride and walk. These are all recommendations supported in this report by The City Project.

Whether you are a parent, concerned citizen, educator, elected official or activist, we hope this report will be useful in your efforts to make your community a healthy environment.

Sincerely,

Anthony Iton, M.D., J.D., M.P.H.
Senior Vice President, Healthy Communities
The California Endowment

The work of The City Project is made possible in part by generous support from The California Endowment.

The California Endowment, a private, statewide health foundation, was established in 1996 to expand access to affordable, quality health care for underserved individuals and communities and to promote fundamental improvements in the health status of all Californians. For more information, please visit www.calendow.org.

View of downtown Los Angeles from Elysian Park

A MESSAGE FROM THE ROSALINDE AND ARTHUR GILBERT FOUNDATION

The Rosalinde and Arthur Gilbert Foundation is deeply committed to improving the health of children in Los Angeles County. We hope that escalating rates of childhood obesity and diabetes can be reversed by providing more opportunities for children to play and exercise every day.

The Foundation is a proud supporter of The City Project's efforts to change policy, improve access to green space, and promote healthy, livable communities for all.

Using multidisciplinary research and analyses, like the work reflected in this report, The City Project works to improve and create safe parks, mobilizes community residents to support policies that address equal access to parks and open space, and supports city and school district policies that promote physical activity and healthy choices.

We have seen our investment in The City Project yield impressive returns, such as new urban parks and the Los Angeles Unified School District's adoption of a plan to enforce physical education requirements at all schools, in response to community campaigns led by The City Project with their community allies.

By helping children and their families be physically active, The City Project is setting a precedent for the rest of their lives and a foundation for healthy futures.

Sincerely,

Martin H. Blank, Jr.
Trustee
The Rosalinde and Arthur Gilbert Foundation

This report was sponsored in part by a generous grant from The Rosalinde and Arthur Gilbert Foundation.

The mission of The Rosalinde and Arthur Gilbert Foundation is to invest in programs that promote education, tolerance, social services, healthcare and the arts. The Foundation builds on the ideals and pursuits of its founders, Rosalinde and Arthur Gilbert. For more information, please visit www.thegilbertfoundation.org.

WHY DO PARKS MATTER?

Green space provides places for people of all ages to have fun. The benefits of parks include **improved physical and mental well-being.** Access to green space correlates with **lower obesity rates** in adults and children. Park and recreation programs provide **positive alternatives to gangs and crime.** Parks contribute to **community building** and **bringing people together.** Parks help preserve our **cultural heritage** and **Native American sacred sites.** Green space provides important economic and environmental benefits, such as **green jobs, higher property values, clean air and water,** and a **cool shady place to lie under a tree on a hot day.**

Implementing the Olmsted Vision would have made Los Angeles County one of the most beautiful and livable regions in the world.

THE OLMSTED VISION

In 1930, the firm started by the sons of the great landscape architect Frederick Law Olmsted proposed a comprehensive and coherent network of parks, playgrounds, schools, beaches, forests and transportation to promote the social, economic and environmental vitality of Los Angeles County and the health of its people.

According to the report *Parks, Playgrounds and Beaches for the Los Angeles Region,* in words that remain true today:

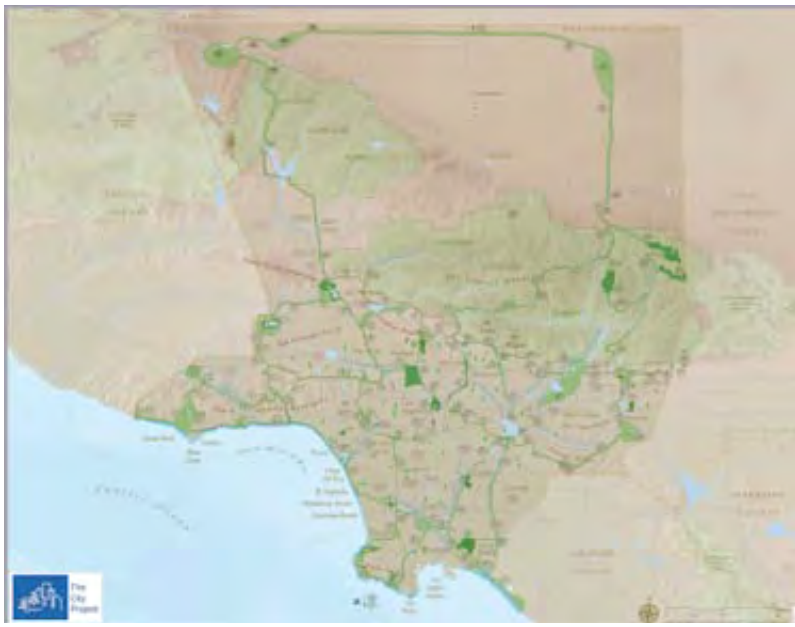
"Continued prosperity in Los Angeles will depend on providing needed parks, because, with the growth of a great metropolis here, the absence of parks will make living conditions less and less attractive, less and less wholesome. . . . In so far, therefore, as the people fail to show the understanding,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

Commissioned by the chamber of commerce, the Olmsted Report recognized that low-income people often live in less desirable areas, have fewer leisure opportunities, and should receive first consideration in parks and recreation. Other recommendations included:

- Shared use of parks and schools to make optimal use of land and public resources
- Greening the Los Angeles and San Gabriel Rivers
- Doubling public beach access
- Integrating forests and mountains within the regional park system
- Multi-benefit projects for park and flood control purposes
- Transportation for people to reach parks, school fields, rivers, beaches, mountains and forests
- A balanced park and recreation system serving diverse needs with active and passive recreation
- Creation of a regional park authority with power to raise dedicated funds to acquire and develop parks and other natural public places

Each of these recommendations remains valid today . . . but unfulfilled.

The Olmsted Plan was never implemented. The report was killed by powerful interests in a triumph of private greed over public space. Today, the Olmsted Vision provides inspiration of what is possible - and necessary - to recapture the lost beauty and healthy environment of Los Angeles County.



Olmsted Plan, 1930.

Santa Monica Mountains National Recreation Area

DEFINING GREEN SPACE AND ACCESS

Green Space: "Green space" refers to all parks, natural open spaces, beaches, school fields, trails and recreational facilities. This term is applied broadly even though some of these areas may not have much greenery. The National Recreation and Parks Association has recommended *ten acres of park space per 1,000 residents.*

Green Access: The presence of green space alone is not enough. In order to truly benefit from these resources, residents must have *access* to green space. Many factors determine the accessibility of green space:

- Distance and time from green space to where people live, whether green space can be reached without a car, and obstacles such as highways.
- Location of natural geographic features and walkability.
- Whether a park is safe, or perceived as safe, by local residents.
- Physical appearance, condition and recreational amenities.
- Whether green space is open to the public, hours of operation and cost of admission.

Park Poor: Refers to any geographic area that provides less than *three acres of green space per 1,000 residents,* as defined by California law. Three acres is the size of approximately one and one half soccer or football fields.

Income Poor: Refers to a median household income of $47,331 per year or less, as defined by California law. In Los Angeles County, the income required to meet basic needs for a family of four is $75,114 as of 2010.

Malibu Beach

Los Angeles County is world famous for its beaches. The Olmsted Report called for the doubling of public beach frontage: "Public control of the ocean shore, especially where there are broad and satisfactory beaches, is one of the prime needs of the region, chiefly for the use of throngs of people coming from inlands." Over eighty years later, the sad reality is not all beaches in Los Angeles County are open to the public. Worse yet, private property owners have tried to cut off public access to public beaches in the City of Malibu.

GREEN ACCESS IN LOS ANGELES COUNTY TODAY

Demographics

Los Angeles County was created in 1850 as one of California's original counties under statehood. Today, there are 88 incorporated cities in the county, including the City of Los Angeles, which is the largest city in both the county and the state.

More than one-quarter of all Californians live in Los Angeles County, and its population is among the most racially and ethnically diverse in the nation. The population is not distributed evenly, however, and groups are often concentrated in distinct communities based on race, color or national origin. For example, a far higher percentage of African Americans live in the neighborhoods of South and Central Los Angeles than the county average. Even within the same city, the differences between neighborhoods can be extreme. Some neighborhoods in the eastern sections of the City of Los Angeles are more than 80% Latino, while other neighborhoods are less than 10% Latino. The population living along the beach in Los Angeles County is disproportionately non-Hispanic white, ranging from 58% to 89% in beachfront communities, and wealthy. The only exception is Long Beach, which has the lowest median income level of all beachfront communities.

Los Angeles County is home to an estimated 10.4 million residents. More than 70% are people of color.

More than 16% of Los Angeles County residents live in poverty, as of 2009. The true cost of living, however, is widely recognized to be 300% of the federal definition of poverty. Fully 85% of households with children in Central Los Angeles and 92% in South Los Angeles fall below the income level required to meet basic needs. Countywide, 91% of Latino families fall below this income level, compared to only 33% of non-Hispanic white families.

Green Access and Equity

As shown by the map on the next page, the communities with the worst access to green space tend to be those with the lowest income levels and the highest concentrations of people of color. Compounding this issue, there is little public transportation to most parks, beaches and open space, so access is limited for low-income people without cars or other personal vehicles.

Los Angeles County Snapshot	
Population	10.4 million (2010 estimate)
Total Land Area	4,084 sq mi / 2,613,760 acres
Total green space	1,366 sq mi / 874,367 acres
Countywide average	84.1 acres of parks per 1,000 residents

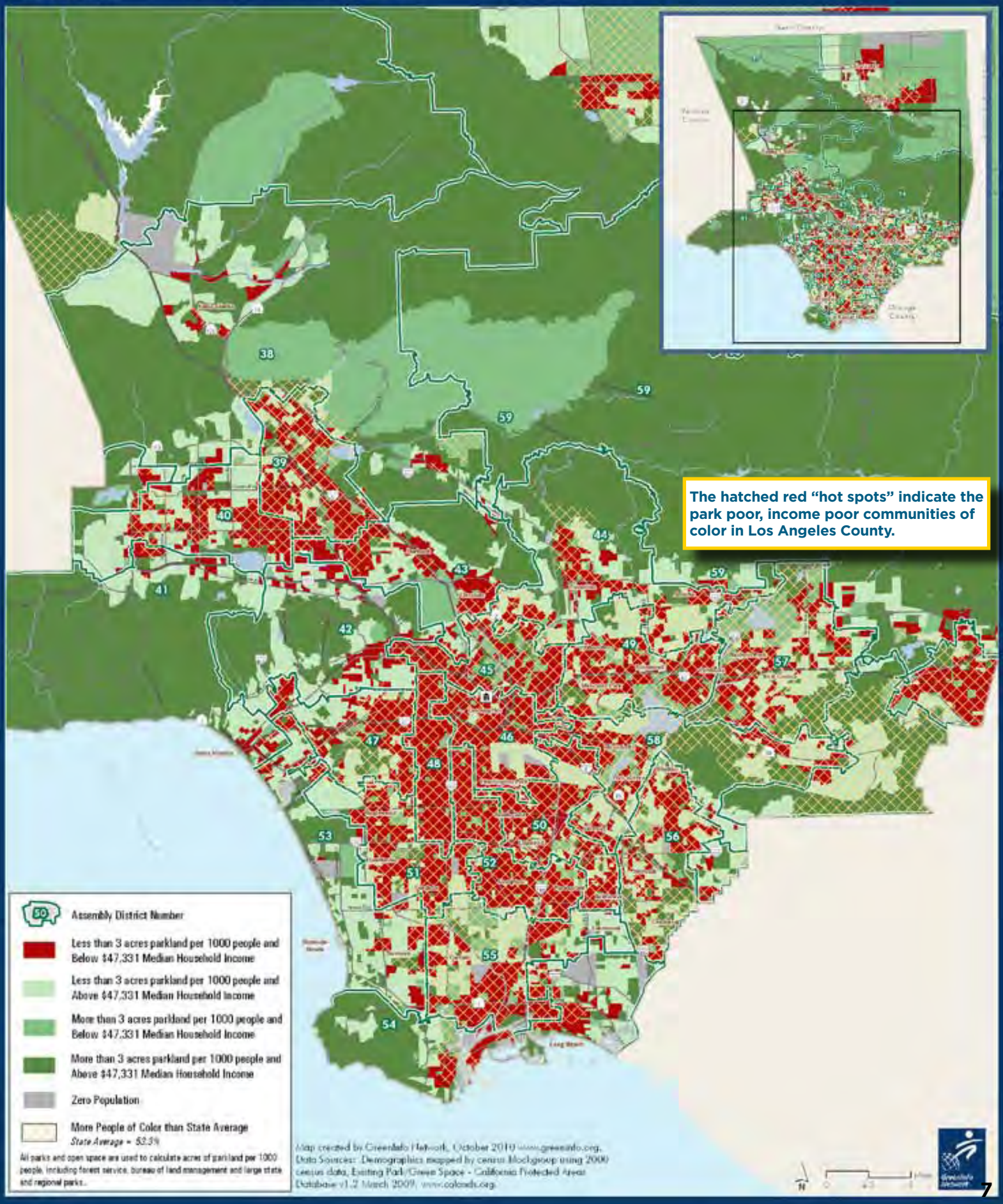
While more than 30% of the land area of Los Angeles County is designated as green space, about 80% of that land is in a small number of large parks: Angeles National Forest, Santa Monica Mountains National Recreation Area, Griffith Park, Elysian Park and Baldwin Hills parklands. Many neighborhoods in the urban core of Los Angeles are densely populated but offer very little green space. Inner city state assembly districts in central Los Angeles have l*ess than one acre of parks per 1,000 residents.* This is in stark contrast to Districts 37, 41 and 54, which are disproportionately non-Hispanic white and wealthy and all have more than 100 acres of parks per 1,000 residents – even after excluding the large parks listed above.

In some neighborhoods, school fields may be the only green space where children can play. In 2006, only 103 out of 605 schools in the Los Angeles Unified School District (LAUSD) had five acres or more of playing fields. The schools with the most acres for play and exercise tend to be located in areas that are disproportionately non-Hispanic white and wealthy, where residents have the best access to neighborhoods parks, as well as personal transportation to reach green space in other areas. A 2004 study reported 71% more acres of school fields for non-Hispanic white elementary school students in LAUSD than for their Latino peers.

The City Project

Park Poor, Income Poor, and People of Color

Los Angeles County



Baldwin Hills Park | Los Angeles

WHY PARKS MATTER: PHYSICAL HEALTH

Children of color living in poverty with no access to a car suffer from the worst access to parks and schools with five acres or more of playing fields in Los Angeles County. Children and adults who live in communities with parks, school fields, pools and other recreational facilities tend to be more physically active than those who lack access to these resources. This is particularly true for low-income communities where car ownership rates tend to be lower. One study found that in low-income areas of the City of Los Angeles, people who live within one mile of a park exercised 38% more than people who lived farther away.

There are profound health implications for communities that lack opportunities for physical activity in parks and schools.

Five Los Angeles County state assembly districts, clustered in the Central and Southern regions, had rates of childhood obesity higher than anywhere else in California. Over 31% of children in Los Angeles County are overweight, but the prevalence of childhood obesity varies significantly among cities and communities, from a low of 4% in Manhattan Beach to a high of 37% in Maywood. The rates of childhood obesity are strongly associated with race and ethnicity and economic hardship.

Seventy percent of overweight adolescents go on to become overweight adults, with increased risk for a variety of diseases and ailments that diminish quality of life and can ultimately lead to premature death. Overweight and obesity, in combination with general lack of physical activity, are estimated to cost California $41.2 billion annually.

Parks, schools and physical activity are integral parts of a comprehensive approach to healthcare and the built environment. As the nation struggles to come to grips with spiraling costs of medical care, improving green access and increasing physical education in schools should be embraced as forms of preventive medicine.

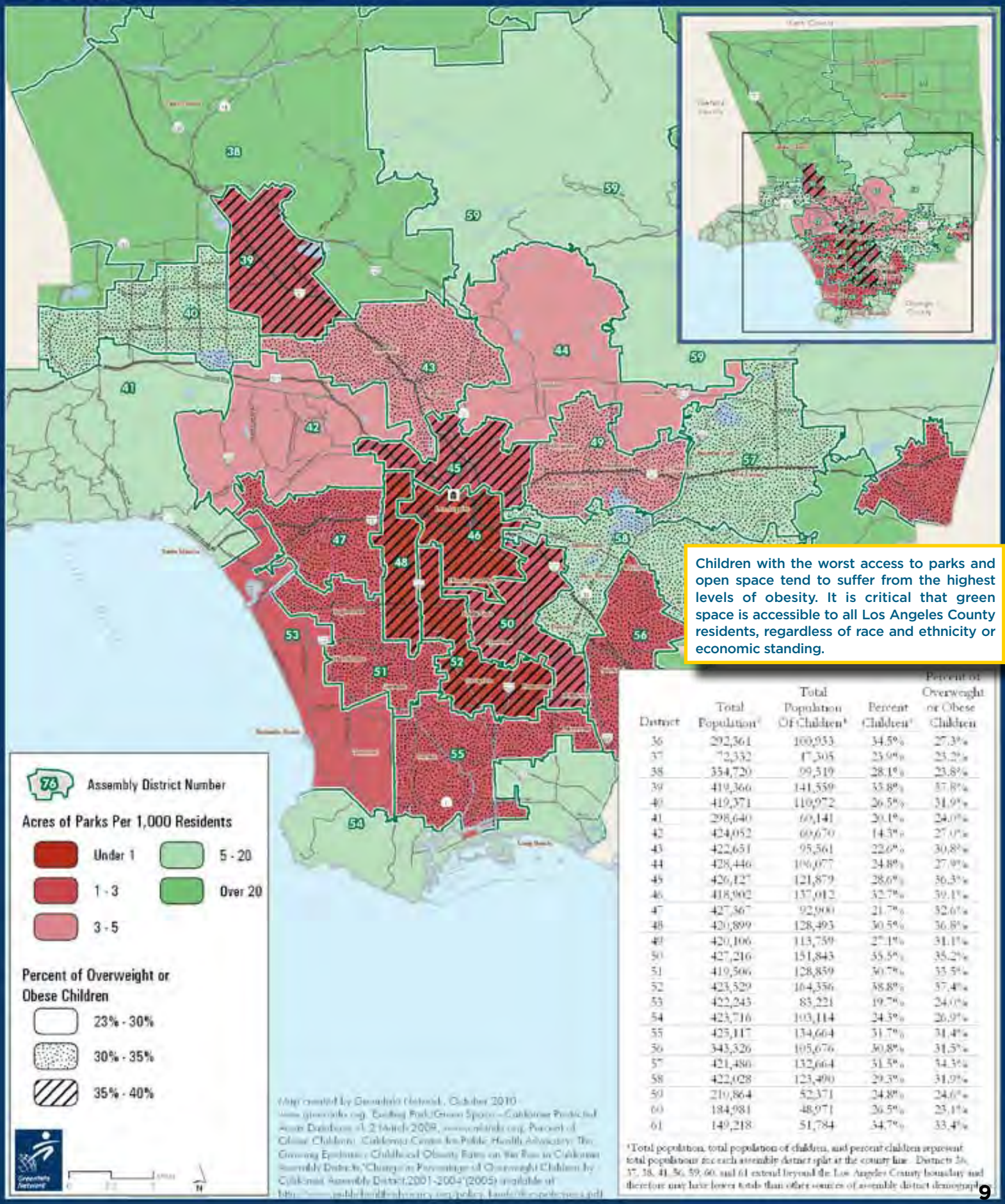
Photos by Tim Wagner for Partnership for the Public's Health (twagnerimages.com)

Norwood Elementary | South Los Angeles

The City Project

Park Access and Child Obesity by State Assembly District

Los Angeles County



Children with the worst access to parks and open space tend to suffer from the highest levels of obesity. It is critical that green space is accessible to all Los Angeles County residents, regardless of race and ethnicity or economic standing.

District	Total Population[a]	Total Population Of Children[b]	Percent Children[c]	Percent of Overweight or Obese Children
36	292,361	100,933	34.5%	27.3%
37	72,332	17,305	23.9%	23.2%
38	354,720	99,519	28.1%	23.8%
39	419,366	141,559	33.8%	37.8%
40	419,371	110,972	26.5%	31.9%
41	298,640	60,141	20.1%	24.0%
42	424,052	60,670	14.3%	27.0%
43	422,651	95,561	22.6%	30.8%
44	428,446	106,077	24.8%	27.9%
45	426,127	121,879	28.6%	36.3%
46	418,902	137,012	32.7%	39.1%
47	427,367	92,900	21.7%	32.6%
48	420,899	128,493	30.5%	36.8%
49	420,106	113,759	27.1%	31.1%
50	427,216	151,843	35.5%	35.2%
51	419,506	128,859	30.7%	33.5%
52	423,529	164,356	38.8%	37.4%
53	422,243	83,221	19.7%	24.0%
54	423,716	103,114	24.3%	26.9%
55	425,117	134,664	31.7%	31.4%
56	343,326	105,676	30.8%	31.5%
57	421,486	132,664	31.5%	34.3%
58	422,028	123,490	29.3%	31.9%
59	210,864	52,371	24.8%	24.6%
60	184,981	48,971	26.5%	23.1%
61	149,218	51,784	34.7%	33.4%

[a] Total population, total population of children, and percent children represent total populations for each assembly district split at the county line. Districts 36, 37, 38, 41, 56, 59, 60, and 61 extend beyond the Los Angeles County boundary and therefore may have lower totals than other sources of assembly district demographics.

Map created by Greenfields Network, October 2010
www.greenfields.org, Existing Park/Green Space – California Protected Areas Database v1.2 March 2009, www.calands.org, Percent of Obese Children: California Center for Public Health Advocacy: The Growing Epidemic: Childhood Obesity Rates on the Rise in California Assembly Districts, "Change in Percentage of Overweight Children by Children Assembly District 2001-2004" (2005) available at http://www.publichealthadvocacy.org/policy_kaufs/[illegible]

3 WAYS to INCREASE Children's Physical Activity

ENFORCE PHYSICAL EDUCATION IN PUBLIC SCHOOLS

Evidence shows lifelong benefits of physical activity. Physically fit students tend to do better academically. Students who regularly take part in physical activity, including team sports, tend to stay in school longer and are less likely to get involved with gangs, drugs, crime and violence. Increasing physical education and activity in school can improve academic achievement and graduation rates.

Good schools, a good education and the full development of the child includes making physical education a part of the core curriculum. California public schools are required by state law to provide an average of 20 minutes of physical education per day in elementary school and 40 minutes per day in middle and high school. In addition, civil rights laws require equal access to physical education in California's public schools to alleviate unfair disparities based on race, color or national origin.

Increased pressure to meet academic standards, as measured by standardized tests, has led to a decline in physical education classes. Physical education quality and quantity are particularly deficient for less affluent students and those in racial and ethnic groups at high risk for overweight and obesity. Ninety-one percent of students in the Los Angeles Unified School District (LAUSD) are children of color, and 75% are low-income (qualify for free or reduced price meals). LAUSD serves over 680,000 K-12 grade students in 1,032 schools. Many of these students do not have enough safe places to play and exercise in their neighborhoods, so physical education may be their only opportunity for physical activity.

Half of the California school districts audited from 2005-2009 failed to provide the required amount of physical education. According to the California Department of Education, 66% of fifth, seventh and ninth graders statewide did not achieve minimum physical fitness standards during the 2008-2009 school year. In LAUSD, the rate was even higher, with 75% of students failing to meet physical fitness standards. Not surprisingly, LAUSD is also faced with a growing obesity epidemic.

Fortunately, LAUSD is taking action to correct the problem. In response to an organizing campaign by The City Project and diverse allies, the district voluntarily adopted an implementation plan in December 2009 to provide properly credentialed physical education teachers, meet the physical education minute requirements, maintain reasonable class size averages, and provide quality facilities for physical education.

The wisdom of the district's decision to proactively comply with the education and civil rights laws was reinforced in November 2010 when the California Court of Appeal ruled that public elementary schools must provide physical education to comply with state law, and that parents and students have the right to seek access to justice in court to enforce the law.

"The physical education plan adopted by the Los Angeles Unified School District is a best practice example for districts across the state to provide a quality education for the children of California. Research tells us physically active and fit kids get better grades and have better overall health."

- Dr. Robert Ross, President, The California Endowment

Photo by Tim Wagner for Partnership for the Public's Health (twagnerimages.com)

IMPROVE PARK SAFETY - REAL AND PERCEIVED

Children are kept inside when parents feel neighborhood parks are unsafe.

Access to safe parks and other places for physical activity has an important effect on whether children meet recommendations for physical activity – and whether they get any activity at all. Fear of crime is a major deterrent to the use of parks. On a nationwide basis, 48% of Latino children and 39% of African American children in urban areas were kept inside as much as possible because of the perception that there was no safe place to play in their neighborhoods, compared to 25% of non-Hispanic white children and 24% of Asian children.

Parks and recreation programs can play an important role in reducing crime and violence and making neighborhood parks safer. The City of Los Angeles *Summer Night Lights* program could be a best practice example – but the City is not implementing it widely. The program keeps select parks open from 7 pm until midnight, offering recreational activities, mentoring and counseling programs, meals, and other services, throughout the summer as an anti-gang initiative. There has been a 40% overall reduction in gang-related crime, including a 57% reduction in gang-related homicide, in the neighborhoods where the program operates.

In densely populated urban areas that may lack space for creating new parks, making existing parks safer and seem safer may be one of the best ways to improve green access.

SHARED USE AGREEMENTS

Joint use agreements between schools and parks can help alleviate the lack of places to play and recreate, while making optimal use of scarce land and public resources. Keeping school, pools and parks open to the public after school, on weekends and during breaks provides places for physical activity.

In a 2005 audit of city parks, the Los Angeles City Controller called for the shared use of parks and schools, but this recommendation has not been implemented. As of 2006, there were only 30 joint use agreements between LAUSD and the City of Los Angeles Recreation and Parks Department.

Shared Use is a Win-Win

When the Olympic-sized swimming pool opened at the Miguel Contreras Learning Complex in September 2006, residents of the local community were not allowed to use the downtown Los Angeles facility, despite promises made during the planning process. After a community organizing campaign by The City Project, LAUSD opened the school for community use after school and during breaks.

Santa Monica Mountains National Recreation Area

WHY PARKS MATTER: PSYCHOLOGICAL HEALTH

Children have the right to the simple joys of playing in safe parks and school fields. Fun is not frivolous. The United Nations recognizes a child's right to play as a fundamental human right.

Spending time in parks can reduce irritability and impulsivity. Parks promote intellectual and physical development in children and teenagers by providing a safe and engaging environment to interact and develop social skills, language and reasoning abilities, and muscle strength and coordination.

Green space provides needed reprieve from the everyday pressures that lead to mental fatigue. This improves the health of adults and children by reducing stress and depression and improving focus, attention span, productivity and recovery from illness.

Researchers have also found associations between contact with the natural environment and improvements in the functioning of children with Attention Deficit and Hyperactivity Disorder (ADHD).

Parks provide a place for social support and an opportunity for self-determination, both important factors in reducing stress, lowering anxiety, and improving a person's overall mood. This is true for children and adults, though it is particularly significant for older adults. Social support is derived from the friendship or companionship that comes from the shared experience of participating in activities in a park with other people. Research has also shown that people living in public housing who have contact with natural environments, such as trees, are more likely to make changes that will improve their lives.

Recreation Builds Character

Youth recreational programs, including active recreation and team sports, promote positive choices and help reduce youth violence, crime, drug abuse, and teen pregnancy. Sports and recreation provide life-long lessons in teamwork and help build character.

Anahuak Youth Sports Association playing at Raul Macias Futsal Court at Los Angeles River Center

Judith F. Baca, "Great Wall of Los Angeles: Illusion of Prosperity" from the 1930's section. (Summer 1980)

WHY PARKS MATTER: CULTURAL HERITAGE

Parks provide important places to celebrate diverse culture, heritage and art. Cultural, historical and artistic monuments should reflect the diversity of a place and its people. People of color and women have been vital to the creation of Los Angeles throughout the history of the City and the area. Yet with over 1,000 official cultural and historical landmarks in the City of Los Angeles, only about 10% relate to people of color and women.

Community activists and advocates have identified over 100 recreational, cultural, historical and public art resources along the "Heritage Parkscape." These cultural heritage links serve as a "family album" to revive and honor the forgotten history of Los Angeles, creating a continuous parkway system from the *Great Wall of Los Angeles* to the Río de Los Angeles State Park, the Los Angeles State Historic Park at the Cornfield, and El Pueblo de Los Angeles.

Los Angeles County is home to more than 25,000 Native American people, the largest population of any county in the United States. Native Americans inhabited most of what is now California for more than 10,000 years prior to European contact.

Many of California's 278 State Parks, including Leo Carrillo State Park in Malibu and Deane Dana Friendship Community Regional Park in San Pedro, contain significant numbers of Native American cultural resources including sacred burial grounds and priceless archaeological items. For example, El Pueblo de Los Angeles Historic Monument and University High School in Los Angeles are both located on areas originally occupied by villages of the Tongva or Gabrieleño people. Puvunga, a Sacred Site for the Tongva or Gabrieleño people, the Acjachemen people, and others, is located at what is now California State University at Long Beach. Without adequate maintenance and security services, these cultural resources may be vandalized or destroyed, erasing an important historic link with natural and indigenous California.

Monuments, Diversity and Democracy

"Manzanar National Historic Site preserves the stories and resources of Manzanar for this and future generations. We will facilitate a park experience that weaves the stories of the various occupations of Manzanar faithfully, completely, and accurately. Manzanar Historic Site will provide leadership for the protection and interpretation of associated sites. From this foundation, the park will stimulate and provoke a greater understanding of, and dialogue on, civil rights, democracy, and freedom."

Manzanar National Historic Site Mission Statement, 2001

El Pueblo Plaza | Los Angeles

WHY PARKS MATTER: COMMUNITY PRIDE

Parks satisfy our need for social interaction by enticing residents into public spaces with trees, greenery, and venues for sports and active recreation. People from different racial and ethnic groups use parks differently, constructing meanings for natural space based on their own values, cultures, histories and traditions. According to a UC Los Angeles study of cultural differences in the use of urban parks, Latinos primarily use parks as social gathering places. African Americans, more than any other racial group, tend to engage in team sports in parks. Non-Hispanic whites tend to value a park for its passive qualities – its greenness, landscaping and natural elements – and tend to engage in solitary, self-oriented uses. Asian-American (specifically, Chinese) families were rare in parks studied. This does not mean that Asians do not value parks; this may reflect the failure of the parks to meet the needs of the Asian-American community.

Park and recreation plans, programs, and funding should provide a balanced park and recreation system that offers active recreation with soccer fields, baseball parks, basketball and tennis courts, running tracks or bike paths, as well as passive recreation with wilderness areas, walking trails or picnic areas.

Parks and recreation programs that serve the diverse needs of diverse users bring people together in the public commons for the public good. Social interaction and neighborhood spaces have been identified as key facets of healthy communities. These factors promote social networks, social support systems, and social integration, all of which contribute to a sense of belonging and community. Parks become a source of community building, pride, and inspiration for further neighborhood improvements and revitalization.

Park poor neighborhoods miss out on opportunities green space provides to increase civic engagement and enhance community wellbeing.

Save Watts Towers!

The extraordinary Watts Towers were built by Italian immigrant and master cement mason Simon Rodia over the course of 34 years from 1921 to 1954, using his own design, labor, materials and money. Now owned by the City of Los Angeles and the State of California, the Towers are a National, State, and City Historical Landmark. A collective symbol of Los Angeles cultural heritage, Watts Towers must be preserved with proper restoration and conservation.

Neighborhood workdays for green space maintenance and improvement foster common purpose and sense of ownership and pride among residents.

Echo Park | Los Angeles

WHY PARKS MATTER: ECONOMIC VITALITY

If you want parks, work for jobs – and justice. Green space is an economic stimulus that creates jobs, boosts local businesses and raises property values. Improving green space and green access can benefit local, state and national economies in the worst economic crisis since the Great Depression.

The New Deal's Civilian Conservation Corps (CCC) is a best practice example for government agencies today to get the nation back to work, while improving green access and quality of life for all. The CCC created 3 million new jobs, established 8,000 new parks including 800 state parks, and planted 2 billion trees. Visits to national parks increased 600 percent from 3.5 million people in 1933, to 21 million by 1941. Other public work projects built 40,000 new schools. Parks and recreation programs and green infrastructure projects – such as developing and enhancing parks or park accessibility via public transit, walkways and bike paths – can be sources of green collar jobs and job training for local workers. Giving priority in contract selection to local small businesses and apprenticeship programs can help ensure benefits are fairly distributed.

Parks are essential to community development and revitalization efforts, drawing new visitors to existing businesses and new businesses to the area. Parks and recreation also help strengthen and stimulate the economy through the tourism and hospitality industries and recreation-related sales of clothing, equipment, fees and services. Studies from around the country have shown that parks can generate as much as $5 in revenue for every $1 in costs.

A Southern California study found that being located near green space adds five to ten percent to the total value of a home, in both high-income and low-income communities. Higher home prices can also result in higher property tax revenues.

L.A. River Junior Rangers

The Los Angeles River Junior Rangers and Transit to Trails are part of a creative partnership that includes Anahuak Youth Sports Association, Mountains Recreation Conservation Authority, and The City Project. Transit to Trails takes inner city children and their families and friends on fun, healthy and educational mountain, beach, and river trips, while teaching about the environment, wildlife, culture, history, physical health, and healthy eating.

Baldwin Hills Park | Los Angeles

WHY PARKS MATTER: ENVIRONMENTAL BENEFITS

Parks and green space provide many important environmental benefits. The ground in parks and school fields acts as a natural filter that absorbs rainwater directly, or from runoff, and prevents pollutants from entering our rivers or ocean. This can help reduce flooding while also improving water quality after heavy rainfall. Clean water compliance and flood control projects should be combined with efforts to improve green access through multipurpose projects, such as the Sepulveda flood control basin recreation areas along the Los Angeles River.

Parks can help offset the adverse effects of climate change, including global warming and dirtier air. Low-income communities of color already experience more heat-related deaths during heat waves, and higher rates of asthma and other respiratory illnesses associated with air pollution. A canopy of trees provides shade and cooler temperatures that moderate the effect of asphalt, concrete, and other man-made building materials that trap heat. Trees and other vegetation also filter out harmful pollutants, improving the air we breathe.

Green access can often be improved by providing alternative transportation options, such as public transit, complete streets and bicycle paths. Transportation resources are generally spent in a way that encourages people to drive more. Currently, more than 80% of gas taxes go to highways and bridges, while less than 20% goes to transit. Developing sustainable infrastructure that people can use to get to parks and school fields without a car can also reduce transportation-related greenhouse gas emissions and improve local air quality.

Another important ecosystem benefit of green space is habitat for plants and animals. For many individuals, particularly in low-income urban areas, parks represent their only opportunity to escape from concrete, play on grass and experience a diversity of wildlife. Green space promotes environmental conservation values including the protection of clean air, water and land, and climate justice.

Complete Streets Improve Green Access

"Complete streets" ensure safe and convenient access to public transit and promote active transportation, both of which can help people get to parks, schools and pools without a personal vehicle. Gas tax and public transit funding can improve green access when invested in new buses, extended transit services, and active transportation resources such as bicycle racks, sidewalks, bicycle lanes, and trails. Programs such as *Safe Routes to School* can make bicycling and walking to school safer, thus encouraging a healthy and active lifestyle from an early age.

Río de Los Angeles State Park

Judith F. Baca, "Great Wall of Los Angeles: Division of The Barrios and Chavez Ravine" from the 1950's section. (Summer 1983)

GREEN ACCESS AND EQUAL JUSTICE

Low-income communities and communities of color suffer from disparities in access to green space and from the health and social problems that stem from the lack of places for physical activity and recreation.

The fact that low-income people of color disproportionately lack equal access to parks, school fields, beaches, trails and forests is not an accident of unplanned growth or the outcome of an efficient free market distribution of land, housing, transit and jobs. Disparities in green access are the result of a history and continuing legacy of discriminatory land use, and housing, school and economic policies and practices.

The history of Southern California is relevant to understand how the region came to be the way it is, and how it could be better.

Los Angeles pioneered the use of racially restrictive housing covenants, which prevented people of color from buying or occupying property in many areas of Los Angeles County and led to segregated neighborhoods. As a result, African Americans became concentrated in South Central Los Angeles, Chinese Americans in Chinatown, Mexican Americans in East Los Angeles, and Japanese Americans in Little Tokyo. As the decades passed, property values in Los Angeles skyrocketed. When housing restrictions were prohibited in the 1950s and 60s, purchasing land in beach communities and other desirable areas of Los Angeles County was cost-prohibitive for the people who were denied access when property values were lower.

The destruction of Chavez Ravine is another example of historical discrimination that has contributed to the lack of green space in the Los Angeles urban core today. In the 1950s, the City forcibly evicted residents of the Mexican-American community with promises of affordable housing. Generations of residents left their homes, but then the City abandoned the housing plans and sold the land to the Dodgers. Chavez Ravine was buried by Dodger Stadium and its 16,000-space parking lot.

Even in recent history, discriminatory policies and practices continue to affect green access. Recipients of federal and state funds, including cities in Los Angeles County and their park and recreation agencies, are prohibited from engaging in practices that have the intent or *the effect* of discrimination based on race, color or national origin. As a matter of simple justice, parks, school fields and other green space are public resources, and their benefits must be distributed equally.

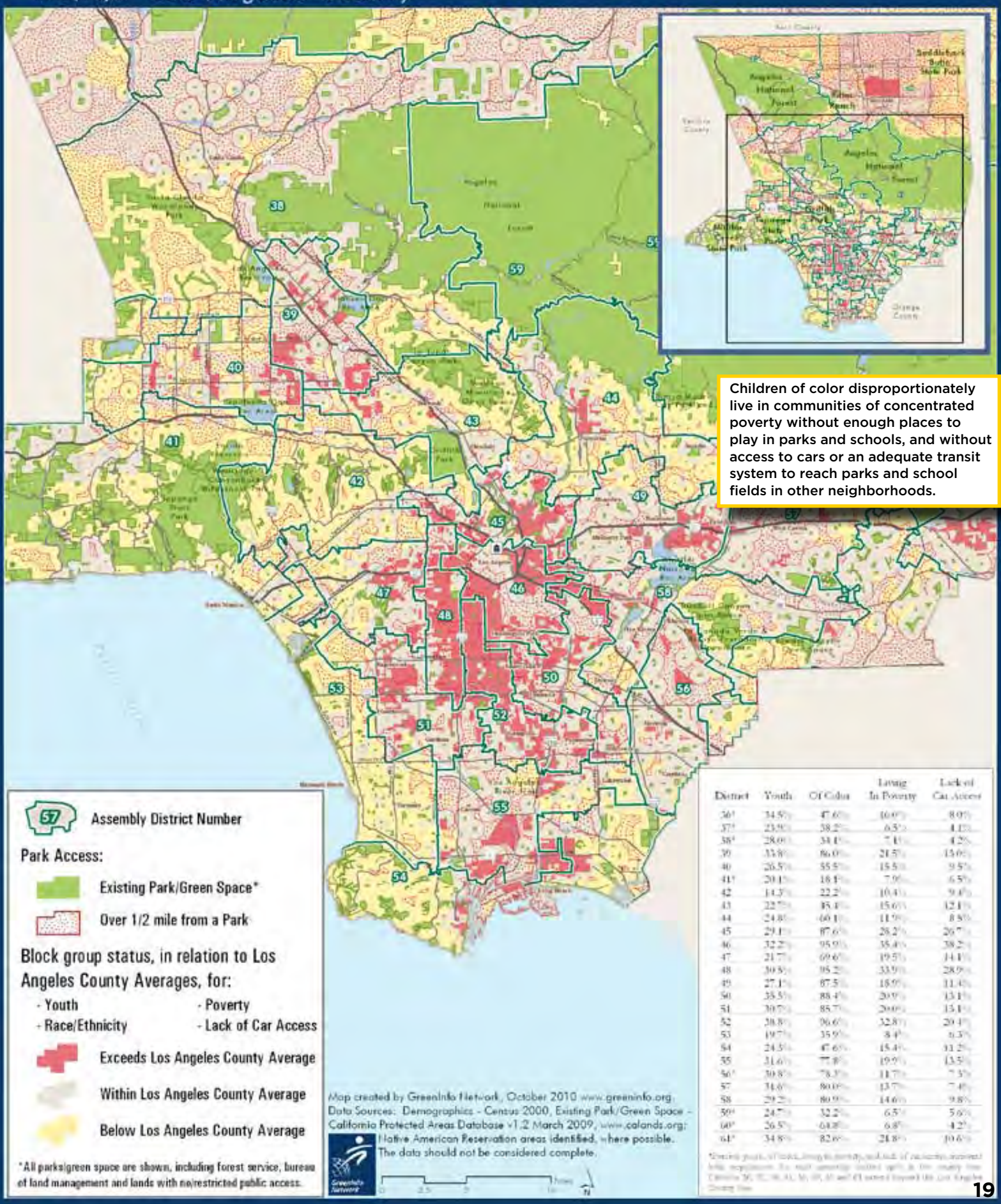
From 2005 to 2008, the Los Angeles City Controller published several audits of the Recreation and Parks Department. The audits showed that more high quality recreation programs are available in wealthy communities than in low-income communities, and the policies and formulas for distributing public funding exacerbate rather than alleviate inequities. The audits also documented systemic management failures and disparities in green access that City officials have known about for decades. The City has failed and refused to implement the Controller's recommendations to improve parks in every neighborhood.

Public resources must be distributed with the goal of eliminating park, school and health disparities. Investing in park poor and income poor communities not only provides economic stimulus and the additional benefits of green space to underserved communities, it helps achieve compliance with civil rights laws and principles mandating equal access to public resources.

The City Project

Park Access for Children of Color Living in Poverty with No Access to a Car

Los Angeles County


Angeles National Forest
Santa Clarita Woodlands Park
Los Angeles River
Griffith Park
Los Angeles River Park
Ballona Creek
Los Angeles River Park
Los Angeles River Park
Los Angeles River Park

Whittier Narrows Regional Park, South El Monte

RECOMMENDATIONS AND STRATEGIES

Parks and green space are not a luxury. Prioritizing existing public resources for creating and improving access to green space in low-income communities and communities of color offers an exceptional opportunity to improve public health, environmental quality, economic vitality and quality of life for all.

The following strategies are based on the Olmsted Plan, recommendations by the Controller for the City of Los Angeles in audits of the parks and recreation system, and The City Project's research and analysis.

1. Adopt standards to measure equity and progress and hold public officials accountable.

- Park poverty and income poverty criteria under California law are a best practice example for standards to measure green access and equity.
- Identify community-specific standards based on community need, such as the number of existing after-school recreation programs or parks with areas for physical activity.
- Publish a community needs assessment every five years to document progress and ensure public officials meet the needs of the community, as defined by the community.

2. Develop and implement a strategic plan to improve access to parks and recreation programs in every neighborhood.

- Prioritize communities that are "park poor" and "income poor" to eliminate unfair disparities.
- Increase joint use of parks, schools, pools and other recreational facilities to make optimal use of scarce land, money and public resources.
- Improve real and perceived park safety through better lighting, maintenance and upkeep, the visible presence of security officers, and targeted programs to meet the needs of at-risk youth.
- Keep public lands public for all. Reverse the privatization of public green space.
- Meet the diverse needs of diverse users by creating "balanced" parks that offer active recreation with soccer fields, baseball diamonds, basketball and tennis courts, running tracks, and bike paths, as well as passive recreation with natural open space, walking trails, and picnic areas.

3. Create a fair system of park financing and fees that ensures equitable development and access to parks and recreation.

- Invest Quimby park development fees based on need, not based on artificial geographic limitations.
- Hold public agencies responsible for allocating funds in compliance with civil rights laws guaranteeing equal access to public resources.
- Publish reports analyzing investments by park agencies and allocation of resource bonds to get a more complete picture of which communities benefit from the investment of public funds and which do not, in order to help prioritize investments.

Griffith Park | Los Angeles

4. **Frame green access as a multi-benefit solution to a range of issues, including obesity and diabetes, the full development of the child and community, gangs and crime, economic vitality, and environmental degradation.**
   - Combine efforts to improve green access with efforts to prevent obesity and related diseases and improve individual and community well-being. Apply physical, psychological and social health criteria to public infrastructure investments.
   - Ensure that infrastructure projects create green collar jobs for local workers, small and disadvantaged business enterprises, and youth. To ensure benefits are fairly distributed, contracts should be awarded to local small businesses and should hire workers and apprentices from the community where the project is located.
   - Align green access goals with other environmental initiatives to improve water quality, reduce the effects of climate change, promote climate justice, decrease greenhouse gas emissions, and preserve plant and animal habitat.
   - Create complete green streets and safe routes to school. Utilize public transportation resources for infrastructure projects that enable green access without a car, such as Transit to Trails, walking paths and pedestrian bridges.
   - Prioritize cultural, historical and public art projects that reflect the diversity of a place and its people to build community pride and civic engagement.

Griffith Park on the East Bank of the L.A. River

"Public parks are a safety valve of great cities and should be made accessible and attractive where neither race, creed, nor color should be excluded," said Colonel Griffith Jenkins Griffith, who donated Griffith Park to the City of Los Angeles in 1896. With over 4,210 acres, Griffith Park is the largest municipal park with urban wilderness area in the United States. The portion of Griffith Park within reach of the park poor communities on the East Bank of the Los Angeles River, however, is used today as a service yard and junkyard (photo at right). This area should be greened as part of the Los Angeles River Revitalization.

Río de Los Angeles State Park

GREEN ACCESS VICTORIES AND CHALLENGES

The City Project works with diverse allies to implement strategies to improve green access for all through: (1) community organizing and coalition building; (2) multidisciplinary research and analyses, including this report; (3) strategic media campaigns, including new social media; and (4) policy and legal advocacy outside the courts. When necessary, we also seek access to justice through the courts.

Over the past decade, The City Project and its allies have empowered communities to preserve and increase access to parks, rivers, mountain areas and historical sites throughout California. These are a few of the projects in Los Angeles County.

Ascot Hills Park

The planned 140-acre nature preserve in East Los Angeles will provide passive recreation and green space in one of the city's most park poor areas.

Victory: In response to community demands led by The City Project, Concerned Citizens of South Central Los Angeles, PolicyLink and others, as well as hard hitting coverage in the *Los Angeles Times*, the City of Los Angeles held a second ground-breaking celebration for the Ascot Hills Park on June 14, 2010, five years after the City held the first groundbreaking in November 2005, but failed to open the park.

Challenge: Though City officials in 2010 claimed the park would be completed by March 2011, the park is nowhere near finished as this report goes to press. Working with the community, The City Project will continue to serve as watchdog to make sure the City keeps its promises to the children and people of Los Angeles.

Baldwin Hills Park

The community vision for the Baldwin Hills is to create a two square mile park, the largest urban park planned in the U.S. in over a century. The park is located in the heart of Los Angeles's African American community, which has long suffered from environmental degradation and discrimination.

Victory: Over the past decade, The City Project has worked with the community and Concerned Citizens of South Central Los Angeles to stop a power plant and garbage dump and preserve the budget for the park.

Challenge: The City Project and Concerned Citizens of South Central Los Angeles have been working with the community, Community Health Councils, National Resources Defense Council (NRDC), Culver City and Citizens Coalition for a Safe Community since 2006 to regulate the oil fields adjoining the park, both in and out of court. Please see www.greaterbaldwinhillsalliance.org for more information.

El Pueblo Campo Santo

Campo Santo (Spanish for sacred ground or cemetery) is in El Pueblo de Los Angeles Historical Monument and Los Angeles Plaza National Historic District. Located next to La Placita Catholic Church, and at the site of the Tongva village of Yaangna, Campo Santo holds much historical and cultural significance.

Challenge: Campo Santo is being excavated as the site for a new Mexican-American cultural center. One hundred eighteen sets of human remains, including Native Americans, have been excavated since October 2010 without proper protections. The City Project and diverse allies are working together to ensure the respectful reburial of human remains at Campo Santo, protection of the remains still at the site, respectful consultations with Native Americans, and respectful dialogue with Pobladores and others whose ancestors are buried at Campo Santo. Visit www.saveancestors.org.

El Pueblo Father Serra Park

El Pueblo Father Serra Park, a one-acre oasis of grass and trees in the park starved heart of Los Angeles, is a historical and environmental resource that encompasses the rich history of: (1) the site of the Tongva village of Yaangna; (2) the birthplace of Los Angeles; (3) the Zanja Madre or "Mother Canal" that carried water from the Los Angeles River to El Pueblo; (4) the Lugo Adobe, California Historical Landmark 301; (5) the first institution of higher learning in Southern California, which became Loyola Marymount University; (6) Old Chinatown; and (7) the Chinatown Massacre of 1871.

Challenge: The City Project is challenging the piecemeal construction of a war memorial in El Pueblo de Los Angeles Historical Monument without an environmental impact report, on behalf of a diverse group of stakeholders.

Los Angeles River

The Los Angeles River stretches 52 miles and crosses 13 cities, flowing through diverse communities from Canoga Park in San Fernando Valley through downtown Los Angeles to the ocean at Long Beach. In 1930, the Olmsted Report recommended greening the river. The Army Corps of Engineers poured concrete along the length of the river to prevent floods.

Victory: The City and County of Los Angeles have launched river revitalization plans for the next 20 years. The City also published a report on the need to ensure that river revitalization meets the needs of the people as well as the environment. The *New York Times* cites the revitalization of the Los Angeles River as a best practice example for "more sustainable, livable and socially just cities."

Challenge: Communities of color and low-income communities must receive their fair share of the benefits of river revitalization and should be part of the planning process.

Río de Los Angeles State Park

Río de Los Angeles State Park at Taylor Yard is the site of a former rail yard.

Victory: The City Project worked with Anahuak Youth Sports Association and the Coalition for a State Park at Taylor Yard to stop a commercial development in favor of the 40-acre Río de Los Angeles State Park as part of the greening of the Los Angeles River in Northeast Los Angeles. The California Department of Parks and Recreation initially opposed active recreation at Taylor Yard, but relented under community pressure. The balanced park, which opened on Earth Day in 2007, provides active recreation with soccer fields, basketball courts, a running track and bike paths, as well as passive recreation with natural open space and picnic areas.

> Continued on next page

Los Angeles State Historic Park

The Los Angeles State Historic Park lies just south of where the Los Angeles and Arroyo Seco rivers connect, in one of Los Angeles's most culturally, historically, and ethnically diverse – and park poor – communities.

Victory: The diverse Chinatown Yard Alliance created a park and stopped a proposal by City officials and a developer to build warehouses in the last vast open space in downtown Los Angeles. The *Los Angeles Times* called the community victory "a heroic monument" and "a symbol of hope."

Challenge: Ten years after the struggle began, the California Department of Parks and Recreation still has not completed the park. Officials announced they are finally moving forward in December 2010, with the environment impact report process to begin in 2011, construction to begin in 2013, and the park to be completed eighteen months later.

San Gabriel Mountains and San Gabriel River

The San Gabriel Valley severely lacks parks and open space and has some of the highest childhood obesity and diabetes rates in California, despite its proximity to the San Gabriel Mountains.

Victory: *San Gabriel Mountains Forever* (SGMF) is a diverse partnership working to establish a National Recreation Area in the San Gabriel Mountains to increase federal support. The SGMF proposal would improve access to places for physical activity with hiking trails, picnic and camp sites, a series of interconnected parks and trails, and Transit to Trails to better connect the people of Los Angeles County with this magnificent resource.

Challenge: The creation of a National Recreation Area will require Congressional legislation, and San Gabriel Mountains Forever is working to build local grassroots support in many southern California Congressional districts. Please contact The City Project for more information.

Transit to Trails

Transit to Trails provides fun, educational and healthy trips for children and families to parks, beaches and mountains. Although they may live only an hour from the mountains and beaches, many children have never been there, because parents often work two or more jobs, and do not have access to cars or to information to plan trips.

Victory: A successful pilot *Transit to Trails* program has been implemented in Los Angeles County through a partnership between Anahuak Youth Sports Association, Mountains and Recreation Conservation Authority, and The City Project.

Challenge: The goal is to institutionalize and expand *Transit to Trails* in the Santa Monica Mountains and extend the program to other areas, including the San Gabriel Mountains.

Keep Public Lands Public For All!

The City Project has worked with community allies to keep public parks, beaches and trails open for all:

- **Santa Monica Mountains:** Public trails in the Canyon Back area and public parks, overnight campsites and trails in the coastal zone.
- **Millard Canyon:** Public trails that begin in the Angeles National Forest and end at the Arroyo Seco in Altadena.
- **Malibu Beach:** Public campgrounds and public access to the beach.

Millard Canyon

CREDITS

The work of The City Project is made possible in part by the generous support of:

Active Living Research, a national program office of the Robert Wood Johnson Foundation
Baldwin Hills Conservancy
The California Endowment
California State Parks Foundation
Marguerite Casey Foundation
Convergence Partnership
Ford Foundation
The Rosalinde and Arthur Gilbert Foundation
John Randolph Haynes and Dora Haynes Foundation
Impact Fund
The James Irvine Foundation
JiJi Foundation
Kaiser Permanente
The Kresge Foundation
Levi Strauss Foundation
Liberty Hill Foundation
Mountains Recreation and Conservation Authority
Nike, Inc.
PolicyLink
Resources Legacy Fund Foundation
The San Diego Foundation
San Gabriel Mountains Forever Campaign
Santa Monica Mountains Conservancy
Southern California Edison
Surdna Foundation
Surfrider Foundation
Union Bank of California Foundation
Wildlands Conservancy
William C. Kenney Watershed Protection Foundation
Whole Systems Foundation
and individual donors.

Contributors:

Andrea Misako Azuma, Kaiser Permanente Southern California Region
Rajiv Bhatia, University of California, San Francisco
Benny Diaz, California League of United Latin American Citizens (LULAC)
Leo Estrada, University of California, Los Angeles
David Fukuzawa, The Kresge Foundation
Tomas Gonzalez, California League of United Latin American Citizens (LULAC)
Stephen Koletty, University of Southern California
Ruben Lizardo, PolicyLink
J. Eric Lomeli, University of California, Los Angeles
Marty Martinez
Anne McEnany, International Community Foundation
Marisa Aurora Quiroz, The San Diego Foundation
Amanda Recinos, GreenInfo Network

Copy and Design:

Produced by Anahid Brakke (heedconsulting.org) and designed by Black Sheep Ink (blksheep.com).

Invest in justice with a donation to The City Project.

Your generous donation to The City Project ensures that we can continue our work to achieve equal justice, democracy, and livability for all. The City Project is a project of Community Partners, a 501(c)(3) non-profit organization. All donations are tax deductible. Please visit our website to make a secure online donation: www.cityprojectca.org/greenjustice.

© The City Project 2011

"It is very important that our children grow up healthy. The more they run, the happier they are. The more they play together with other children, the better people they will be in the future. Parks and school yards are a place for peace, a place where life-long values are built. Community activism to build parks and schools is a way of saying no to violence, no to war. Peace and hope are part of our children's education and culture."

Rigoberta Menchú Tum, Nobel Peace Prize Laureate, speaking about the work of The City Project and Anahuak Youth Soccer Association to bring parks, school fields, and green space to the children of Southern California.

This report and the underlying nine county Southern California report is made possible in part by the generous support of the following foundations:

The California Endowment | Marguerite Casey Foundation | The Rosalinde and Arthur Gilbert Foundation
John Randolph Haynes and Dora Haynes Foundation | JiJi Foundation | Kaiser Permanente
Kresge Foundation | The San Diego Foundation | Union Bank of California Foundation
William C. Kenney Watershed Protection Foundation | Whole Systems Foundation

For more information on green access and equity in Los Angeles County and Southern California, and to download a copy of this summary and the full policy report, please visit www.cityprojectca.org/greenjustice.

This report is available in English and Spanish.

The City Project

Equal Justice, Democracy, and Livability for All

1055 Wilshire Blvd., Suite 1660 | Los Angeles, CA 90017 | (213) 977-1035 | www.cityprojectca.org

PUBLIC COMMENT CARD

SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

Please complete this card and submit it to the Committee Secretary prior to the Public Comment Period. Comments are limited to three (3) minutes.

Total Comment Period may be limited to 20 minutes at the discretion of the Committee Chair.

Committee:

Date: 5-26-11

Name: Menaka Fernando

Phone: (213) 977-1035

Agency or Affiliation: The City Project

Address: 1055 Wilshire Blvd Suite 1660

City: Los Angeles

Zip: 90017

Item #:

Item Title: Public Comment

COMMENTS:

Going forward we push for more consideration of environmental justice issues specifically in the area of access to parks for low income people and communities of color that have traditionally been ~~disproprio~~ disportionately impacted by lack of access. Secondly, we advocate that SCAG engage in consultation with Native Americans as required under federal and state law throughout the EIR process. More comments to follow ~~but~~ e-mail

Comment on NOP from Gail Shiomoto-Lohr, City of Mission Viejo
P&P TAC Meeting, June 8, 2011

Comment was made during discussion of Item 5.3 – Proposed Draft Alternative Scenarios (for RTP)

1:16:03

Yes, thank you. My name is Gail Shiomoto-Lohr representing the City of Mission Viejo and first of all I really appreciate this item was agendized and discussed today.

1:16:14

I did have an opportunity to look at NOP for RTP and SCS EIR and I understand that comments are due today. And an overview of the RTP alternatives was presented in the NOP but hearing this discussion today helps to frame the context of comments if I can get them in in a couple of hours but if not I would hope that my comments today could help be included in the public record with respect to the NOP comments.

Specifically I wanted to expand a little from the comments that Gloria had made with respect to the land use changes. And the comments that you had made Jacob with respect to the that there could be a very healthy review of the alternatives from a land use perspective.

1:17:05

Representing a local government I am very interested and invested in understanding the degree of change that could be, um, looked at in the different RTP alternatives. And I would hope that the EIR would include two things: Number 1 a spin-off of what Ty had mentioned. As you look at the different components that frame each alternative that specifically the land use component could be identified as to its degree of contribution towards the different performance objectives, whatever they may be. So that if we looked at the shift of land use we would understand that they represent x percent of greenhouse gas reduction or VMT reduction as compared to all the others. Again so that we could sort of understand the larger cost benefit of the shift as we see all the different components.

1:17:55

Number 2 as you go into the RTP workshops with the different subregions and local jurisdictions we will all be very interested in understanding where the change will be. Even if it is available at a Traffic Analysis Zone level so that that way the different jurisdictions can have the concrete information in which to be able to say whether or not the proposed shift represents something that is politically feasible or if that it's even possible given the constrictions of the land by 2035. So that represents my comments and I hope they will be reflected in the NOP document.

Additional Comments (through discussion)

1. Provide discussion of RTP/SCS alternatives with some info that conveys the degree of land use shifts (county/city/intra-city/etc.) /degree of change at a low geographic level in a way that can be understood by stakeholders.
2. Can performance information on land use shifts be provided so that stakeholders understand where land use shifts occur?
3. Can EIR discuss and illustrate shifts in land use?