



# CITY OF NEWPORT BEACH

## COMMUNITY DEVELOPMENT DEPARTMENT *Planning Division*

February 14, 2012

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

Dear Mr. Ikhata:

The following comments are offered on the draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (draft RTP/SCS) and the associated Appendices and draft Program Environmental Impact Report (draft PEIR).

We would like to commend SCAG and its staff who worked hard to prepare the draft RTP/SCS, the PEIR, and associated documents as this was a monumental task. We appreciate the continued cooperation of SCAG staff throughout this process and the many mentions throughout the document where the RTP/SCS expressly states that it incorporates the Orange County Sustainable Communities Strategy (OC SCS) into the RTP/SCS document.

The City of Newport Beach has reviewed the draft RTP/SCS and the draft PEIR. However, the length of the comment period was not adequate to allow for a comprehensive review and formulation of detailed comments.

We are aware of the review completed by the Orange County Council of Governments (OCCOG) and the concerns addressed in the letter from OCCOG are consistent with the City of Newport Beach's concerns.

It is requested that the adoption of the growth forecast numbers by the Regional Council and/or Joint Policy Committee be at the county level, consistent with past RTPs. Planning documents need to be flexible. As time passes, what is possible and feasible for any given project changes. These changes can be due to market conditions, new information or data, or infrastructure available that may shift when and where development is possible. Smaller geographic levels, such as at the subregional, city, census tract, TAZ, parcel, or grid cell would limit jurisdictional control over land use.

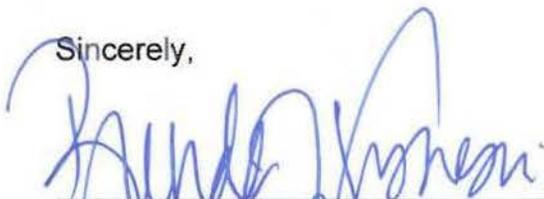
The OCCOG Board approved the update to the OCP-2010 dataset used in the OC SCS. OCP-2010 Modified was officially approved by the OCCOG Board on January 26, 2012, and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with

SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011, which should be incorporated into the 2012 RTP/SCS, PEIR, and related documents. To be consistent with the MOU on subregional delegation between OCTA, OCCOG, and SCAG, all documents, tables, maps, narratives, modeling runs, PEIR alternatives (including Alternate C/3/Envision 2), and datasets should be updated with the OCP-2010 Modified numbers.

As indicated in the PEIR on page 1-6, state law states that it is appropriate to indicate in mitigation measures that they "can and should" be implemented. Under the law, this is explained as the entity has the jurisdiction to implement the measures and, therefore, should implement it. However, due to the assertions throughout the PEIR that mitigation measures have been determined to be feasible, the term "can" could be interpreted to read that the measures are also feasible. In order to make it clear that the mitigation measures are a menu of options for which feasibility has not been established for any given project, it is requested that the "can and should" language be changed in all mitigation measures identifying entities other than SCAG to read "should consider where practical and feasible". It would be appropriate to identify on page 1-6 in the discussion of this language that for all mitigation measures it is assumed by the draft PEIR that the entities identified to implement the mitigation do have the authority to do so.

Again, we thank SCAG for all of the time and effort put into this process. If you have any questions, feel free to contact me at 949-644-3297 or [bwisneski@newportbeachca.gov](mailto:bwisneski@newportbeachca.gov).

Sincerely,



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Brenda Wisneski, Deputy Director  
Community Development Department  
City of Newport Beach



PAUL S. LEON  
MAYOR

SHEILA MAUTZ  
MAYOR PRO TEM

ALAN D. WAPNER  
JIM W. BOWMAN  
DEBRA DORST-PORADA  
COUNCIL MEMBERS

CHRIS HUGHES  
CITY MANAGER

MARY E. WIRTES, MMC  
CITY CLERK

JAMES R. MILHISER  
TREASURER

February 14, 2012

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

RE: Comments on 2012 RTP/SCS and PEIR

Dear Mr. Ikhata:

Thank you for allowing the City of Ontario the opportunity to review and comment on Southern California Association of Government's (SCAG's) draft 2012 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) and the draft Program Environmental Impact Report (PEIR). On behalf of the City of Ontario I would like to express our sincere appreciation to you and SCAG staff for their professionalism, inclusiveness, and dedication to the immense task of coordinating and creating the region's first RTP/SCS regional plan. We support approval of the RTP/SCS Plan with some level of clarification and/or changes described below.

Overall, a recurring theme of our concerns is that the documents need to make clear SCAG's philosophy and intent on maintaining local government's sole control of land use decision making, including the review and establishment of mitigation measures under CEQA. Under your leadership SCAG has forged collaborative efforts with county and local governments to discuss and plan for difficult, complex, regional issues. The success of your approach in recent years, in no small way, can be attributed to the recognition by SCAG of the land use authority of cities and counties within the region and of local home rule. We need to ensure that the RTP/SCS and PEIR reflect that basic understanding.

Specifically, our comments are:

1. We understand and have supported SCAG's efforts to incorporate city growth plans into the regional planning process. However, as in the past, we believe that the RTP/SCS growth forecasts

should be adopted at the county level, not the city or sub-city (TAZ) level. This would allow more flexibility in dealing with inevitable changes in socio/economic trends within the region and sub-region.

2. We have questions regarding the use of TAZ level data in the CEQA Incentive program discussed on page 148. We are not convinced that the land use scenarios and development types created by SCAG for each TAZ are accurate. We also would like to clarify that the only use of TAZ level data to be used by SCAG in the future would be for the CEQA Incentive program and not for growth projections.
3. The draft PEIR is somewhat confusing and problematic. It is our understanding that the mitigation measures were supposed to be designed to be a menu of options available to lead agencies to consider when reviewing and approving local transportation and development projects, but not as mandatory or required. This is critical because specific environmental review of local projects is the appropriate and legal purview of local agencies. The Plan will be implemented over several years and circumstances involved with site specific development will inevitably change over time and must be taken into account by local agencies responsible for carrying out CEQA laws. We recommend that SCAG amend language in the document to specifically and clearly state that the mitigation measures as proposed are intended to assist local agencies in their independent decision making process and are not considered mandatory. We also recommend that the Mitigation Monitoring Program be revised to reduce the burdensome nature of the reporting process.
4. In a separate letter (dated February 13, 2012 from Jerry L. Blum, Planning Director) we requested that two important projects for Ontario be included in the 2012 RTP. These projects were requested via SANBAG and SCAG's consultant previously.

We appreciate your consideration of our comments in the final RTP/SCS and PEIR and look forward to your responses. As always, we commend SCAG for its leadership in these regional activities and the transparent and collaborative manner in which you operate. We share your commitment to a stronger, more cohesive, and prosperous region as expressed in the 2012 RTP/SCS. If you have any questions regarding this matter please contact myself or Jerry L. Blum, Planning Director at 909-395-2199.

Sincerely,



Chris Hughes  
City Manager

- c: City of Ontario City Council  
Otto Kroutil, Development Director  
Jerry Blum, Planning Director  
Louis Abi-Younes, City Engineer  
Jacob Lieb, SCAG



# PALMDALE

*a place to call home*

February 14, 2012

JAMES C. LEDFORD, JR.  
*Mayor*

STEVEN D. HOFBAUER  
*Mayor Pro Tem*

LAURA BETTENCOURT  
*Councilmember*

MIKE DISPENZA  
*Councilmember*

TOM LACKEY  
*Councilmember*

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

RE: Comments of the Draft 2012 RTP/SCS and Related Program EIR

Dear Mr. Ikhata:

The City of Palmdale would like to thank the Southern California Association of Governments (SCAG) and its staff for preparation of the draft 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and related Program Environmental Impact Report (PEIR). Further, we appreciate the opportunity to review and comment on these draft documents and offer the following comments as discussed below.

1. The City worked diligently with SCAG to develop the growth projections for population, housing and employment data for the 2008 (existing), 2020, and 2035 years. These growth projections represent what we feel is a realistic growth rate projection based upon the information available to us as well as our understanding of City and Antelope Valley growth related issues. Further, these numbers also reflect our draft RHNA allocations. Therefore, it is our position that the adoption of the growth forecast numbers continue to be done at the local level and not at a larger sub-regional or county level.
2. The RTP does not mention the Palmdale Energy Action Plan (PEAP) and we feel that there should be some type of reference and/or acknowledgement of the City's efforts to address GHG reduction. This issue was mentioned at several sub-regional coordinator meetings in which SCAG indicated that they would include this in the document but did not.

38300 Sierra Highway

Palmdale, CA 93550-4798

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*Auxiliary aids provided for*

*communication accessibility*

*upon 72 hours' notice and request.*

3. The City is concerned about the methods to be used by SCAG on implementing and monitoring proposed mitigation measures for the RTP/SCS as they apply to local agencies. The document should specify to what extent mitigation measures are to be complied with at the local level. On a project level, certain specific mitigation measures may not be applicable at all to a project or may only be applicable when the mitigation measure is achievable or reasonable. Further, it should be stipulated what the consequences are, if any, for the local governments non-compliance with the mitigation measures.
4. The RTP/SCS identifies strategies to reduce greenhouse gas emissions from cars and light duty trucks. The City has concerns related to the implementation of these proposed strategies. These strategies should not be required individually but with several discretionary options made available to the City to satisfy GHG emission reduction goals.
5. The SED disaggregation at the TIER II TAZ level does not correlate with the City's land use plan. Provide clarification on methodology used. How will our city be able to make the necessary consistency findings for projects that are eligible for CEQA streamlining benefits if the modeling results do not match our locally adopted General plan? This shall be clarified.
6. Page 156 of the Aviation and Airport Ground Access supplemental document should be updated to reflect the California High Speed Rail Authority's January 12, 2012, decision to discontinue the study of the Grapevine alignment and to continue the final study of an Antelope Valley alignment and station in the City of Palmdale.

Ltr. to Hasan Ikhata  
Comments on draft RTP/SCS  
February 14, 2012  
Page 3

We appreciate your review and consideration of the comments provided by the City and look forward to your responses on these items. The larger agencies and councils within the SCAG region will likely have a substantial amount of comments on the draft RTP/SCS plan and EIR. We have attempted to limit our comments to those issues having the greatest potential impact to the City of Palmdale.

Please feel free to contact me at (661) 267-5293 should you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Kite", written in a cursive style.

Richard Kite  
Planning Manager

cc: Mike Behen



OFFICE OF THE MAYOR

February 14, 2012

Jacob Lieb  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

Transmitted via Email to [lieb@scag.ca.gov](mailto:lieb@scag.ca.gov)

**Re: Comments on the Draft 2012 Regional Transportation Plan**

Dear Mr. Lieb:

Thank you for the opportunity for the City of Pasadena to provide comments on the Draft 2012 Regional Transportation Plan (RTP). The City of Pasadena's General Plan promotes the priority of non-auto trips and sets the tone for the Mobility Element with the Guiding Principle "Pasadena will be a city where people can circulate without cars." The Mobility Element relies upon an integrated and multi modal transportation system that provides choices for everyone living and working in the city. Implementing the projects and policies in the RTP will assist Pasadena in becoming a more livable city for the 21<sup>st</sup> Century.

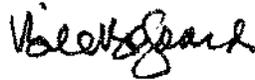
I believe you are aware of the active role Pasadena has played over a long period regarding any freeway connection that traverses our community. The issue of the 710 North extension, albeit being a tunnel alternative as opposed to a surface freeway, continues to be a sensitive topic among our elected officials, neighborhood groups and city residents. We request that the RTP recognize the on-going environmental study for this facility and not presuppose the ongoing studies by defining a route for the 710 north extension project.

The City of Pasadena supports the policies included in the RTP to encourage the expansion of local transit service to serve as feeder systems to the regional transit network. However the RTP does not address the limited funding resources that local agencies have in providing these important transit services. We would like the RTP to identify additional funding resources to expand local transit services and include policies that expand the availability of funding for local transit providers.

The City of Pasadena would like the regional transit connection between the North Hollywood Red Line/Orange Line Station and the Gold Line in Pasadena via Burbank and Glendale included in the RTP. This is an important transit project for our subregion and should be included in the RTP and should be considered for implementation using reasonably available funding sources described in the RTP Financial Plan.

Thank you for your consideration of this request.

Sincerely,



BILL BOGAARD  
Mayor

cc: Michael J. Beck, City Manager, Pasadena  
Frederick C. Dock, Director of Transportation, Pasadena



**Ronald Bates, Ph. D.**  
City Manager

# City of Pico Rivera

## OFFICE OF THE CITY MANAGER

6615 Passons Boulevard · Pico Rivera, California 90660

(562) 801-4379

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### City Council

Bob J. Archuleta

*Mayor*

Gustavo V. Camacho

*Mayor Pro Tem*

David W. Armenta

*Councilmember*

Gregory Salcido

*Councilmember*

Brent A. Tercero

*Councilmember*

February 14, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

*Email: [RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)*

SUBJECT: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS' 2012-2035  
DRAFT REGIONAL TRANSPORTATION PLAN/SUSTAINABLE  
COMMUNITIES STRATEGY

Dear Ms. Lin:

The City of Pico Rivera appreciates the opportunity to provide comments on the 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Associated Draft Environmental Impact Report (PEIR). The City of Pico Rivera respectfully submits comments on the proposals for the East-West Freight Corridor Program and the California High Speed Rail Program

### **East-West Freight Corridor Program**

The City supports the proposal for the East-West Freight Corridor Program. The City agrees the Southern California regional freeway system represents one of the highest volume goods movement corridors in the United States and is of major importance to the distribution of consumer goods. We understand major freeways such as Interstate 605 and State Route 60, are impacted by high volumes of truck traffic and truck volumes that will increase through 2035 by 260% or more. For this reason, the City supports the East-West Freight Corridor Program as the solution to address the goods movement in the region.

We recognize that the RTP/SCS identifies and recommends a corridor concept that would connect to the north end of the I-710 freight corridor, roughly parallel the Union Pacific Railroad (Los Angeles Subdivision) before finally following a route adjacent to SR-60 just east of SR-57. This grade-separated concept considers the use of the Union Pacific Railroad Corridor (UPRR Corridor), between I-710 and I-605, through the City of Pico Rivera.

The RTP/SCS further states that the potential use of two non-roadway routes provides an opportunity to move the facility away from neighborhoods and closer to the industrial activities that it would serve. This could not be further from the truth, especially when considering the existing land uses adjacent to the UPRR Corridor within the City of Pico Rivera. Approximately 80% of the existing land use along said Corridor is residential. The statement that this alignment provides an opportunity to move the facility away from neighborhoods is erroneous as it relates to the City of Pico Rivera.

The proposed dedicated truck lanes, forecasted to carry from 58,000 to 70,000 trucks per day, will result in the rerouting of truck traffic from major freeways through the City of Pico Rivera. In effect, the program would build a new freeway through Pico Rivera dedicated to truck traffic (truck dedicated freeway).

The City of Pico Rivera opposes any corridor alignment that includes the segment of the UPRR Corridor between the 710 Freeway and the 605 Freeway. This proposal splits the City in half, requires significant residential, industrial, and commercial property acquisition, and has aesthetic impacts unacceptable to the City. This proposal is unacceptable to the city and we oppose it.

The City respectfully requests that potential routes for the East-West Freight Corridor be limited to freeway routes only, and the non freeway routes not be further considered. The subject UPRR Corridor segment can be supplanted with the segment of the State Route 60, between the Interstate 710 and the Interstate 605. SCAG should effectively evaluate the connection between the two freeways to make this option feasible.

As stated in the enclosed City Council Resolution approved on October 25, 2011, the City of Pico Rivera supports the East-West Freight Corridor Program and supports alternative regional goods movement plans that equitably distribute truck traffic between the Interstate 710 and Interstate 15 through the expansions of the existing freeway system. However, for the reasons stated above, the City of Pico Rivera opposes any SCAG proposal for dedicated truck lanes along the Union Pacific Railroad Corridor, in the City of Pico Rivera.

### **California High Speed Rail**

The RTP/SCS includes options for high speed rail. The City is concerned about the feasibility of such a project in California. We understand that discussions are ongoing among SCAG, the County Transportation Commissions, and the California High Speed Rail Authority regarding levels of available funding for rail infrastructure improvements within the SCAG region. We look forward to further details about the specific investments that will be made in Southern California's rail infrastructure under the RTP/SCS, particularly those that affect the City of Pico Rivera.

At this time, the RTP/SCS proposes three Passenger Rail strategies that will provide additional travel options for long-distance travel within the region and to neighboring regions. The City understands these improvements to be to the Los Angeles-San Diego (LOSSAN) Corridor,

improvements to the existing Metrolink system, and the implementation of Phase I of the California High-Speed Train project. The City would support such improvements only if to enhance the existing rail system through Pico Rivera, and not add supplementary rail lines within new corridors that would require significant residential/industrial/commercial property acquisition.

### **Goldline Eastside Transit Corridor Phase II**

The RTP/SCS estimates that the Goldline Eastside Transit Corridor will be completed by 2035. However, the need for mass transit in the eastside area is greatly underestimated and should be included as a high priority project. The Goldline Eastside Transit Corridor was also included as a project in the regional SCS as it will greatly help to reduce the effects of greenhouse gases. As such, the City of Pico Rivera requests that the Goldline Eastside Transit Corridor be a high priority project both in the RTP/SCS and in the biennial 2011 Federal Transportation Improvement (FTIP) update.

### **Financial Plan**

Table 3.3, *New Revenue Sources and Innovative Financing Strategies* of the RTP/SCS Financial Plan lists Mileage-Based User Fee as a replacement to the gasoline tax. This is a new fee that may affect lower-income residents within the Gateway Council of Governments region. Please advise how the fees would be implemented and how they may affect lower income residents.

Thank you for your attention to this matter. Should you have any questions, please contact Art Cervantes, Director of Public Works/City Engineer, at (562) 801-4225.

Respectfully,



Ronald Bates, Ph.D.  
City Manager

RRB:AC:RG:lg

cc: Director of Public Works/City Engineer  
Assistant City Engineer

Enclosure (Resolution No. 6646, adopted 10/25/11)

**RESOLUTION NO. 6646**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PICO RIVERA, CALIFORNIA - SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS - EAST-WEST FREIGHT CORRIDOR PROGRAM**

**WHEREAS**, the Southern California regional freeway system represents one of the highest volume goods movement corridors in the United States and is of major importance to the distribution of consumer goods and in facilitating international trade; and

**WHEREAS**, an important part of the movement of goods within the region is accomplished through a complex system of transportation infrastructure; and

**WHEREAS**, the City Council of the City of Pico Rivera is generally supportive of regional transportation alternatives as long as they do not impact or interfere with the quality of life within the City of Pico Rivera; and

**WHEREAS**, the Southern California Association of Governments (SCAG) prepared an analysis to evaluate East-West freight corridor alignment alternatives between the Interstate 710 and west to the Interstate 15. Alignment alternatives were evaluated based on proximity to current and future freight markets, feasibility and right-of-way constraints, and corridor operational characteristics which considers truck traffic volumes and frequency of truck-involved accidents; and

**WHEREAS**, SCAG is proposing certain conceptual alignments that involve installing dedicated truck lanes along the Union Pacific Railroad (UPRR) Corridor, between the Interstate 710 and the Interstate 605, on at-grade or elevated structures. Such alignments involving the UPRR Corridor severely impact the City of Pico Rivera and require significant industrial/commercial and residential property acquisition; and

**WHEREAS**, the proposed UPRR alignment alternatives are forecasted to carry over 57,000 trucks per day. Any alignment involving the UPRR Corridor in the City of Pico Rivera would result in the rerouting of truck traffic from major freeways thru the City of Pico Rivera thereby severely impacting the City; and

**WHEREAS**, there is currently insufficient engineering and environmental review of any alignment involving the UPRR corridor to warrant the inclusion in any long-term transportation planning document, including the 2012 Regional Transportation Plan (RTP).

**NOW, THEREFORE, BE IT RESOLVED** that the Pico Rivera City Council does hereby find and determine as follows:

**Section 1.** That the City of Pico Rivera supports the East-West Freight Corridor Program.

**Section 2.** That the City of Pico Rivera supports alternative regional goods movement plans that equitably distribute truck traffic between the Interstate 710 and Interstate 15 through the expansions of the existing freeway system.

**Section 3.** That the City of Pico Rivera opposes any SCAG proposal for dedicated truck lanes along the Union Pacific Railroad Corridor.

**Section 4.** The City Clerk shall attest and certify to the passage and adoption of this Resolution and it shall become effective immediately upon its approval, with a certified copy of this Resolution being forwarded to the Southern California Association of Governments, Los Angeles County Board of Supervisors.

APPROVED AND ADOPTED this 25 day of October, 2011.

  
David W. Armenta, Mayor

ATTEST:

APPROVED AS TO FORM:

  
Daryl Betancur, City Clerk

  
Arnold M. Alvarez-Glasman, City Attorney

AYES: Camacho, Contreras Rapisarda, Salcido, Archuleta, Armenta  
NOES: None  
ABSENT: None  
ABSTAIN: None



*Mayor*  
L. Anthony Beali

*Mayor Pro  
Tempore*  
Steven Baric

*Council Members*  
Carol Gamble  
Jerry Holloway  
Jesse Petrilla

*City Manager*  
Steven E. Hayman

February 9, 2012

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

**Subject: Comments on the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and Program Environmental Impact Report (PEIR)**

Dear Mr. Ikhata:

The City of Rancho Santa Margarita appreciates the opportunity to review and provide comments on the draft 2012 RTP/SCS and the PEIR. The City has completed its review of these documents and provides the following general comments:

- **Concern with the timeline.** We recognize the immense efforts it took to prepare these documents. They are incredibly complex documents establishing important and far-reaching policy for the region. However, because of this importance and complexity, we would like to express concern about the timing of the release of the documents and hope that preparation of future RTP/SCS documents will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline of document releases, public comment period, and time allowed for the response to comments results in an inability to have credible discussion regarding possible changes because the timeline does not allow for recirculation or full discussion of requested changes. The documents were released over the holiday season and included the release of draft PEIR document on December 30, 2011. The minimum 45-day public comment period closes on February 14, 2012. Only a few weeks are provided to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS on April 4, 2012.



- **It is requested that the adoption of the growth forecast numbers by the Regional Council and/or Joint Policy Committee be at the county level, consistent with past RTPs.** Planning documents need to be flexible. As time passes, what is possible and feasible for any given project changes. These changes can be due to market conditions, new information or data, or infrastructure available that may shift when and where development is possible. Smaller geographic levels, such as at the subregional, city, census tract, TAZ, parcel, or grid cell would limit jurisdictional control over land use.
  
- **Please define what is meant by various terms in the RTP/SCS and draft PEIR.** Because mitigation measures are intended to be implementable and measurable in order to evaluate the effectiveness of the measures, it is important for the measures to clearly indicate what actions are expected to be undertaken. These include, but are not limited to:
  - Urban Growth Boundary
  - Parking Cash Out
  - References to benchmarks
  - Smart growth principles
  - SCRIP
  - Active Transportation
  - Gentrification
  - Greenfield
  - Open space
  
- The OCCOG Board approved the update to the OCP-2010 dataset used in the OC SCS. OCP-2010 Modified was officially approved by the OCCOG Board on January 26, 2012 and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this is the formal notice of the update which should be incorporated into the 2012 RTP/SCS, PEIR, and related documents. To be consistent with the MOU on subregional delegation between OCTA, OCCOG, and SCAG, all documents, tables, maps, narratives, modeling runs, PEIR



alternatives (including Alternate C/3/Envision 2), and datasets should be updated with the OCP-2010 Modified numbers.

- Finally, the City has participated in providing comments through the OCCOG Technical Advisory Committee (TAC). Rather than incorporating those comments into this comment letter verbatim, the City requests that the comments provided by the OCCOG TAC be incorporated into the City's comments by reference.

The City plans to continue its active participation in the 2012 RTP/SCS approval process through OCCOG TAC; however, the City requests that SCAG continue to provide the City with any additional information on the project as it becomes available. Should you have any questions, please call me at (949) 635-1800 x6704.

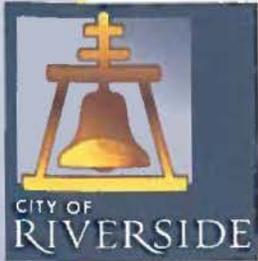
Sincerely,

A handwritten signature in black ink, appearing to read "Nate Farnsworth", written over a horizontal line.

Nate Farnsworth  
Senior Planner, AICP

cc: Steven E. Hayman, City Manager  
Kathleen Haton, Development Services Director  
E. Max Maximous, City Engineer  
Jacob Lieb, SCAG  
Peter Herzog, OCCOG Board of Directors Chair  
Dave Simpson, Executive Director for OCCOG





Community Development  
Department  
Planning Division

February 14, 2012

Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Jacob Lieb  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**SUBJECT: NOTICE OF AVAILABILITY (NOA) OF DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN (RTP)/SUSTAINABLE COMMUNITIES STRATEGY (RTP/SCS) AND DRAFT 2011 FEDERAL TRANSPORTATION IMPROVEMENT PROGRAM AMENDMENT #11-24 (FTIP) AND DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE 2012 – 2035 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES STRATEGY**

Dear Ms. Lin and Mr. Lieb:

Thank you for the opportunity to comment on the two Notices of Availability (NOA) for the above noted projects. As a member organization of the Southern California Association of Governments (SCAG), the City of Riverside has been and continues to participate in the development of the RTP and SCS including reviewing and providing input on the documents and the Draft PEIR. City staff is aware of the hard work that has resulted in these two documents and commends SCAG for preparing a forward thinking plan for our region, where 1 in 17 Americans live and 40 percent of all shipping containers west of the Mississippi River enter the country through the ports of Los Angeles and Long Beach.

On February 8, 2012, SCAG staff graciously held a teleconference meeting with the Planning Directors Technical Advisory Committee of the Western Riverside Council of Governments (WRCOG). During the teleconference meeting, many of City staff's questions were answered. However, some unanswered questions remain and need to be addressed due to the importance of the RTP/SCS and the SCS's connection to Compass Blueprint funding and CEQA streamlining advantages, both stemming from SB 375 and SB 226 for cities whose general plans are consistent with the SCS.

For these reasons City staff has the following questions concerning the documents:

1. The SCS includes projected land use patterns for 2035 using High Quality Transportation Corridors. In the City of Riverside, this includes Bus Rapid Transit (BRT) and Metrolink Lines similar to the City's General Plan 2025. However, the land use patterns in the SCS were applied at the Transportation Analysis Zones (TAZ), which incorporate large areas of land that may contain drastically varying land uses or developable land. Using this map for consistency with the City's General Plan 2025 would be very problematic. For instance, maintaining land use consistency between the General Plan and the prescribed TAZ map along the Alessandro Boulevard BRT corridor would force the City to direct growth to areas such as the Sycamore Canyon Wilderness Park (a natural open space conserved by the County Multiple Species Habitat Conservation Plan) and along hillsides and arroyos, which have already been developed to their maximum density based upon their natural characteristics. The area near the La Sierra Metrolink Station is another part of the City where increasing density using the prescribed TAZ map would result in directing density into a protected area. The City's

Greenbelt, a protected agricultural area which lacks the infrastructure to support the proposed density, encompasses a large section of the City in this area and would be impacted by the proposed growth. Other specific comments related to the proposed TAZ map are as follows:

- a. Generally, the SCS map is in conformance with the City's General Plan 2025 and its intent. However, using TAZ's rather than parcels and following the logistics of the City's natural characteristics causes some problems in creating General Plan consistency.
  - b. Page 148 of the RTP/SCS describes how consistency within a TAZ can be averaged. However, the projected growth in some of the TAZ's located within the City of Riverside is not feasible due to various constraints, including a lack of infrastructure, habitat conservation efforts, and topography. The City's General Plan accounts for these constraints and is consistent with the overall intent of the SCS, however it directs density to where it is appropriate along these same corridors. This is consistent with Smart Growth principles, which advocate for protecting sensitive open space areas and placing density in urban areas where infrastructure already exists.
  - c. The City aims to be consistent with the SCS but cannot achieve this at the TAZ level. Is there another option? Especially since the City's General Plan 2025 currently meets the overall intent of the SCS, but does so based upon the City's natural characteristics.
2. Socio-economic Data for Riverside County was revised by SCAG based upon the 2010 Census. These revisions were presented to the Executive Committee of WRCOG and approved in December of 2011. Will the plans and Draft PEIR be updated to reflect this new information?
  3. Page 3.13-25 of the Draft PEIR, Table 3.13-6 incorrectly reflect data on the City of Riverside Wastewater Plant. This data should be updated to reflect that the City's Plant has a current flow of 34 mgd with a capacity flow of 40 mgd and will have a capacity flow of 52 mgd by 2035.

The City is deeply concerned about being able to meet consistency with the SCS in order to take advantage of Compass Blueprint Programs and CEQA streamlining provisions in the future. The current draft, unfortunately, creates conflicts with the City's existing land uses. SCAG's equal commitment to this goal for all cities would be deeply appreciated.

Should you have any questions regarding this letter, please contact Gus Gonzalez, Associate Planner, at (951) 826-5277 or by email at [ggonzalez@riversideca.gov](mailto:ggonzalez@riversideca.gov).

Sincerely,



Steve Hayes, AICP  
Interim City Planner

- c: Ronald Loveridge, Mayor  
Riverside City Council Members  
Scott Barber, City Manager  
Belinda Graham, Assistant City Manager  
Deanna Lorson, Assistant City Manager  
Kristi Smith, Supervising Deputy City Attorney  
Anthony Beaumon, Deputy City Attorney  
Dan Chudy, Interim Community Development Director  
Tom Boyd, Interim Public Works Director/City Engineer  
Steve Libring, Traffic Engineer  
Rick Bishop, Executive Director, WRCOG, 4080 Lemon Street, 3<sup>rd</sup> Floor, MS1032, Riverside, CA 92501-3679



# City of San Clemente City Manager

George Scarborough, City Manager  
Phone: (949) 361-8322 Fax: (949) 361-8283  
scarboroughg@san-clemente.org

February 14, 2012

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

Subject: Comments on Draft 2012 SCAG RTP/SCS/PEIR

Dear Mr. Ikhata,

Thank you for the opportunity to provide comments on the Draft 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (DPEIR) for the 2012 SCAG RTP/SCS. The City of San Clemente requests a response to the following comments:

### **The City concurs with OCCOG and OCTA comments**

The City of San Clemente concurs with the comments SCAG will receive from the Orange County Council of Governments (OCCOG) and Orange County Transportation Authority (OCTA). The City requests SCAG to respond all of their comments and to act upon any changes advocated by these agencies, of which the City is a member agency.

### **The General Plan and Zoning maps for the City are not accurate.**

SCAG's website allows member agencies to review the maps that would be used for the Draft RTP/SCS and PEIR. We reviewed the latest map files and concluded they are not accurate. The City worked closely with SCAG staff on several occasions to ensure SCAG has accurate maps for the City of San Clemente. Please update the map files to reflect the comments we previously provided.

**Growth forecast numbers should be at the county level consistent with previous RTPs.**

The 2012 RTP-SCS, like other planning documents, has been written based on assumptions, market conditions, forecasts, projects lists, budgets, datasets, public opinion, and other information that can change after the 2012 RTP-SCS is adopted. Therefore, it is important for the 2012 RTP-SCS to project growth at the county level so cities and counties have the flexibility to respond to these changes when future land use decisions are made. If smaller geographic levels are used (e.g. subregions, cities, census tracts, Transportation Analysis Zones, parcels, or grid cells), it is less likely the 2012 RTP/SCS will forecast actual growth patterns. Therefore, please keep all growth forecast numbers at the county level. This has been the precedent for previous RTPs.

**OCP-2010 modified numbers should be used**

On January 26, 2012, the OCCOG Board of Directors approved an updated version of the OCP-2010 dataset for use in the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The updated OCP-2010 dataset was provided to SCAG staff in December 2011. The City requests for all 2012 Draft RTP/SCS/PEIR documents, tables, maps, narratives, modeling runs, PEIR alternatives (including Alternate C/3/Envision 2), and datasets to be updated with the latest OCP-2010 numbers per the OCTA/OCCOG/SCAG Memorandum of Understanding (MOU) that established Orange County's subregional delegation.

**The OC SCS should be fully integrated into the regional RTP/SCS**

The RTP and appendices include numerous references to the OC SCS and SCAG's total use of the document. Yet numerous other references suggest SCAG may have modified elements of the OC SCS data. SCAG should include a statement, maps, tables, charts, and other information that is necessary to confirm all of the OC SCS land use, socioeconomic and transportation data was incorporated into the regional RTP/SCS without changes. SCAG staff told the OCCOG Board (at several meetings) the OC SCS data has not been and will not be altered. The OC SCS is to be integrated into the regional SCS without changes per the Memorandum of Understanding (MOU) between OCCOG and SCAG.

**Mileage-based user fee**

The draft RTP suggests \$127.2 billion of the approximately \$219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a \$0.15 gas tax increase between 2017 and 2024. After that, the draft RTP assumes the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.05 per mile, beginning in 2025, or further increase fuel taxes to

generate revenues equivalent to the mileage-based user fee. The City of San Clemente cannot support an increase in fees, including the introduction of a mileage-based user fee, until further economic analysis is completed and presented to the City for discussion. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on the need for a return-to-source criteria, as well as a process for recognizing and rewarding areas which commit additional local revenues.

#### Draft Program Environmental Impact Report

- The Draft PEIR states that SCAG "has made a preliminary determination that the proposed mitigation measures are feasible and effective. Therefore, it is reasonable to expect that local governments will actually implement them." It is unclear how this determination was made. Was this studied? If so, please provide the analysis that was used to prove cities and counties have the ability, staffing, and financial resources to implement all of the mitigation measures.
- At the January 26, 2012 SCAG workshop, and at other meetings, SCAG explained that **"This PEIR offers a "toolbox" of mitigation measures** for future project-level environmental analyses." . . . It also includes suggested mitigation measures for local agencies to consider for implementation, if appropriate and feasible." The PEIR contains text that contradicts this. The document states local agencies *"can and should"* implement the mitigation measures SCAG proposes. The use of the words *"can and should"* implies local agencies have the feasibility and obligation to implement the mitigation measures. SB 375 is not to supersede local agencies' authority to regulate land uses. California Government Code section 65080(b)(2)(K) states ". . . Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. . ." To address these inconsistencies, the "can and should" language should be changed in mitigation measures to read "~~can and~~ should consider where applicable and feasible" when local and regional agencies, other than SCAG, are identified. This will clarify SCAG's intent to make the mitigation measures a menu of options for local agencies to use when land use decisions are made on projects.
- Several of the mitigation measures that identify SCAG as the acting agency propose measures that appear to exceed the authority of SCAG.
- SCAG must be mindful and use great discretion when making commitments and/or suggesting policies and strategies that may impact and encroach upon local and county agencies' responsibilities. Any such changes should be evaluated and supported by local agencies. Commitments should not be made on behalf of local agencies without the consent of City Councils and County Supervisors.

- Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus not be approved. They also represent prescriptive means to accomplish the mitigation. It is requested that such measures be reworded to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. Also, please clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

**Indicate local jurisdictions are not required to demonstrate compliance with the PEIR.**

Please amend the text on page 1-5 of the draft PEIR to indicate that local jurisdictions are not required to demonstrate compliance with the PEIR. The document currently reads: "Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process."

The City of San Clemente appreciates SCAG's work on the RTP and PEIR. Again, thank you for the opportunity to comment on the planning documents. We look forward to the adoption of a complete and accurate 2012 RTP and PEIR in April. If you have further questions, please contact Jim Pechous at (949) 361-6195.

Sincerely,

George Scarborough  
City Manager

cc: City Council  
CDD (Jim Holloway, Jim Pechous, Jeff Hook, Christopher Wright)  
Margaret Lin, SCAG  
Dave Simpson, OCCOG  
Marika Modugno, OCCOG TAC Chair

MAYOR  
Miguel A. Pulido  
MAYOR PRO TEM  
Claudia C. Alvarez  
COUNCILMEMBERS  
P. David Benavides  
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Michele Martinez  
Vincent F. Sarmiento  
Sal Tinajero



INTERIM CITY MANAGER  
Paul M. Walters  
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February 14, 2012

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments (SCAG)  
818 West Seventeenth Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-2435

**RE: Comment on the Draft 2012 Regional Transportation Plan and Program  
Environmental Impact Report (EIR)**

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2012 Regional Transportation Plan (RTP) and related Program Environmental Impact Report (EIR). We would like to also acknowledge the significant effort made by SCAG, in cooperation with the Orange County Council of Governments (OCCOG), in crafting the "first" SB 375 Sustainability Communities Strategy (SCS) for incorporation into the 2012 Regional Transportation Plan.

In review of the draft 2012 SCAG Regional Transportation Plan and Program EIR, the following are three key areas we would like bring to your attention:

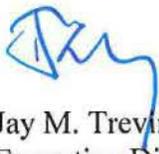
1. The growth forecast numbers included the draft 2012 Regional Transportation Plan should allow for reasonable market flexibility. Thus, it is recommended that the growth projections be incorporated and adopted at a County level. Adoption of population, employment and housing growth projection at any smaller geography could introduce unnecessary and unintended challenges for cities and the development community to make reasonable adjustments to land use approvals; and potential inconsistency with the adopted Regional Transportation Plan.
2. The Orange County Projections (OCP) are developed every three to four years in cooperation with each individual jurisdictions in Orange County, to reflect the anticipated growth for our communities. We respectfully request that the Regional Transportation Plan be refined to include the latest "OCP 2010-Modified" version that incorporates the 2010 Census and more recent State employment data.

Mr. Hasan Ikhata  
February 14, 2012  
Page 2

3. Several mitigation measures within the RTP Program Environmental Impact Report inappropriately uses the terms “will and shall” in describing the measures. For example, Mitigation Measure 76 (M-TR76) states, “Street standards will include provisions for bicycle parking within the public right of way.” Given local policies and ordinances to support them are not in place at this time, stating “will include” in these mitigation measures in the Program EIR are not appropriate. It is suggested that this language in the measures be replaced with “can and should”.

The City of Santa Ana appreciates the significant resources and collaborative effort required to develop the 2012 SCAG Regional Transportation Plan; particularly with the SB 375 requirement to incorporate a Sustainability Communities Strategy to integrate land use and transportation planning to promote sustainable communities. We appreciate the opportunity to comment on this landmark regional planning document. Should you needs any clarification regarding our comments, please feel free to contact Associate Planner Melanie McCann at 714.667.2746 [mmccann@santa-ana.org](mailto:mmccann@santa-ana.org).

Sincerely,



Jay M. Trevino  
Executive Director  
Planning and Building Agency

MGM/ GHG/2012RTP/LetterFeb14.2012

cc: Raul Godinez, PWA Executive Director  
David Simpson, Orange County Council of Governments Director



City of  
**SANTA CLARITA**

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196  
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February 10, 2012

Laurie Ender  
Mayor

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

Frank Ferry  
Mayor Pro Tem

SUBJECT: 2012 DRAFT REGIONAL TRANSPORTATION PLAN

Bob Kellar  
Councilmember

Dear Mr. Ikhata:

Marsha McLean  
Councilmember

On behalf of the Santa Clarita City Council, I am writing to request that the Orange Line Development Authority's Northern Corridor be included within Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP) Constrained Projects List.

Laurene Weste  
Councilmember

The Orange Line Development Authority (OLDA), of which the City of Santa Clarita is a member, is committed to the development of a high speed, grade separated, environmentally friendly and energy efficient transportation system. In recent months, the OLDA Northern Corridor, from downtown Los Angeles to Santa Clarita, has been the focus of intense review and investment. These activities position OLDA's Northern Corridor to be placed within the Constrained Projects List, as opposed to the RTP's Strategic Plan.

Los Angeles County Metropolitan Transportation Authority (Metro) is currently conducting the Antelope Valley Line Infrastructure Improvement Strategic Plan. This plan anticipates the identification of specific projects, which can be undertaken in the corridor to enhance service and safety. This study will be completed in spring 2012.

The Regional Council's approval earlier this month of a Memorandum of Understanding (MOU) with the California High Speed Rail Authority and transportation commissions paves the way for placement of the statewide high speed rail project within the RTP Constrained Projects List, as the alignment for the high speed rail project falls within the OLDA Northern Corridor. Furthermore, the \$1 Billion included within the Memorandum of Understanding contemplates expenditures within the OLDA Northern Corridor during the 2012 RTP horizon. It is also widely anticipated that some of the recommendations identified in the Antelope Valley Line study will also be incorporated into the project list that serves as the implementation of the MOU.



Mr. Hasan Ikhata, SCAG Executive Director  
February 10, 2012  
Page 2

Finally, the Ground Access Study being conducted by the Burbank-Glendale-Pasadena Airport Authority and OLDA focuses on multi-modal transportation improvements that will enhance the linkage between the airport, the OLDA Northern Corridor, and communities, such as Santa Clarita, located within the corridor.

Clearly, the current study activity along the OLDA Northern Corridor, coupled with specific inclusion of the California High Speed Rail Authority's proposed project along the same corridor, demonstrates that the OLDA Northern Corridor meets the criteria for being included within the RTP Constrained Projects List. Within the foreseeable future, it is reasonable to conclude that significant investments will likely be made in the corridor, in conformance with SCAG's criteria for inclusion of projects within the Constrained Project List

On behalf of the Santa Clarita City Council, I encourage SCAG staff and the Regional Council to include the OLDA Northern Corridor within the 2012 RTP Constrained Projects List. Should you or your staff require additional information regarding this request, please contact me or the City of Santa Clarita Intergovernmental Relations Officer, Michael Murphy, at (661) 259-2489.

Sincerely



Laurie Ender  
Mayor

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cc: Members of the City Council  
Council Member Frank Quintero, OLDA Chairman  
Mayor Mario Hernandez, SCAG District 67 Representative  
Ken Pulskamp, City Manager  
Robert Newman, Public Works Director  
Michael Murphy, Intergovernmental Relations Officer



City of  
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February 14, 2012

Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017

Dear Mr. Ikhata:

Subject: Comments Regarding the 2012 Draft Regional Transportation Plan and Regional Transportation Plan Program Environmental Impact Report

Thank you for the opportunity to provide comments on the Regional Transportation Plan (RTP) and the Program Environmental Impact Report (PEIR) for the Regional Transportation Plan. The City of Santa Clarita (City) has identified questions and comments in three chapters of the RTP and on several mitigation measures included in the PEIR. For ease of reference, comments and questions appear in *italics*.

The purpose of the RTP is to provide a blueprint for future transportation projects and strategies throughout the Southern California Association of Governments (SCAG) region through 2035. Included within the RTP is a financial plan that identifies funding available to support the region's transportation investments, including transit, highways, local road improvements, systems preservation, and demand management goals. Central to the financial plan is the identification of funding resources the RTP identifies as "reasonably available" for future projects. The City has prepared the following comment regarding the financial plan included within the RTP (Chapter 3):

*Based on its identification as a "reasonably available" funding resource, the City requests additional information on increased gas taxes or mileage-based user fees as mandatory action items. Over 50 percent of commuters that live in the City work outside of the Santa Clarita Valley. As a result, an increase in gas tax or a mileage-based user fee could result in significant financial impacts on the local labor pool (Page 95, Table 3.3).*

As required by Assembly Bill 32 and Senate Bill 375, this cycle's RTP includes a Sustainable Communities Strategy (SCS). The SCS functions as a mechanism to ensure the SCAG region can achieve mandated greenhouse gas (GHG) reductions of 8 percent per capita by 2020 and 13 percent per capita by 2035. The draft SCS included in the RTP concludes these targets can be met through a specific land use scenario, called Scenario 2. The scenario was compiled using a variety of data inputs, including a series of workshops hosted by SCAG in a number of



communities throughout the region and by working directly with staff at local jurisdictions. The SCS then models GHG based on a variety of factors. Central to Scenario 2 is a shift from larger lot residential development to smaller lot residential development, including more emphasis on multifamily housing. In addition, the scenario assumes a much higher level of infill and mixed-use development than historical development patterns. The City has prepared the following questions and comments regarding the SCS (Chapter 4) of the RTP:

*For clarity, the scenarios in the RTP should be titled in a consistent manner with the alternatives included in the Sustainable Communities Strategy (SCS) background documentation. The City assumes "Scenario 2" from the RTP is the same as "Alternative B" in the SCS Background documentation.*

*Throughout the chapter, the RTP refers to Appendix 19. SCAG staff has indicated Appendix 19 is now referred to as the "SCS Background Documentation," however, this is not reflected in the current draft (Page 112).*

*Whereas, Santa Clarita agrees with the assumptions contained in land use Scenario 2 for the region, it should be noted it is unlikely a similar pattern will occur in the Santa Clarita Valley. Although the City's new General Plan, adopted in June 2011, stresses mixed-use and transit-oriented development, significant green-field development is still contemplated within the time horizon of the RTP (Page 115, Figure 4.3).*

*It is unclear how the two areas identified in Ventura County can be considered "urban areas" on par with those identified in Los Angeles, Orange, Riverside, and San Bernardino counties. By comparison to those areas identified in Ventura County, the State Route 14 (SR-14) corridor between the cities of Santa Clarita, Palmdale, and Lancaster services a local population of over 700,000 residents and represents a substantial proportion of the new growth in Los Angeles County (Page 125, Exhibit 4.5).*

*One of the three High Quality Transit Areas referenced in the exhibit is the Downtown Newhall area. This area is defined by the Downtown Newhall Specific Plan and is the primary focus of the City's former Redevelopment area. However, given the uncertainty surrounding former redevelopment areas, it is unlikely this location will be able to provide the same type of transit-oriented development and infill contemplated by the Downtown Newhall Specific Plan (Page 134, Exhibit 4.9).*

The RTP includes future projects in at least two sections: the Constrained List, which is comprised of projects that have identified funding, and the Strategic Plan, which is comprised of projects requiring more study and which lack identified funding. The City has prepared the following comment regarding projects included in the Strategic Plan and not included in the Constrained List (Chapter 7):

*SCAG should consider including the Orangeline High-Speed Transit Project (Union Station to Santa Clarita) in the Constrained List rather than the Strategic Plan, due to the*

*fact the Los Angeles County Metropolitan Transportation Authority has recently accelerated the evaluation of rail improvements along the Antelope Valley Line (Page 196, Table 7.1.).*

As part of our review, the list of Constrained Projects was compared to the schedule of projects included on page nine of the "Measure R Highway Program" report released in January 2012 by the Los Angeles County Metropolitan Transportation Authority (Metro). The City has identified two discrepancies between the two documents and is seeking clarification. The discrepancies are as follows:

*Metro's list of highway projects indicates completion of Interstate 5 (I-5) truck lanes (Phase 1) from SR-14 to Pico Canyon Road by 2014, while the Financially-Constrained RTP Project List indicates completion of this same project by 2016 (RTP Technical Appendices, page 154).*

*Metro's list of highway projects indicates completion of I-5 truck lanes and HOV lanes (Phases 2 and 3) from SR-14 to Parker Road by 2025, while the Financially-Constrained RTP Project List indicates completion of this same project by 2017 (RTP Technical Appendices, page 155).*

The PEIR evaluates potential environmental impacts associated with the adoption of the RTP. The PEIR is a first tier document for later CEQA review of individual projects included in the program. Included in the PEIR is a list of over 500 mitigation measures to help reduce identified impacts.

In general, the document is unclear regarding whether mitigation measures that impact local governments are mandatory or voluntary. It is also unclear which agency will be monitoring mitigation measures that impact local governments and what the process for local governments to demonstrate compliance will be. *As a result, the City seeks clarification on whether potential lack of compliance with mitigation measures impact local government's ability to receive future transportation funding.*

The City has prepared the following questions and comments regarding mitigation measures contained in the PEIR:

Mitigation Measure GHG9 identifies the need for member cities and counties to adopt Climate Action Plans (CAP) and outlines no fewer than 14 information items that should be included in the CAPs. The City is in the process of creating its own CAP with an anticipated completion date of summer 2012 and seeks clarification on the following points:

*It is unclear if and/or how the City should link its current Climate Action Plan (CAP) process with this item and if the City is able to take credit for any GHG reductions included locally within the SCS.*

Mitigation Measure LU84 states that local jurisdictions should provide incentive funding and other incentives to support desired projects. The City is requesting clarification on the following point:

*The City seeks clarification on the definition of "desired land uses and projects."*

Mitigation Measure LU85 calls for local governments to reduce street widths to Pre-World War II dimensions.

*The City feels reducing street widths to Pre-World War II widths is impractical and not financially feasible.*

Mitigation Measure PS78 calls for local governments to encourage green-building practices in development projects and encourages the use of Leadership in Energy and Environmental Design (LEED) standards as models. However, with California's adoption of the CalGreen Building Code in 2010, the LEED model has become largely obsolete. The City has prepared the following comment:

*The City's preference would be for SCAG to incentivize cities to adopt Tier 1 or Tier 2 guidelines included in CalGreen rather than reference a variety of independent programs.*

Understanding the RTP is a regional document encompassing six counties and nearly 200 cities, it is important to note not all of the identified mitigation measures can be applied to each of the member jurisdictions equally given their wide range of socioeconomic, urban, geographic, and demographic conditions. The City has prepared the following comment regarding three mitigation measures:

*The City feels the following mitigation measures are more appropriate for dense, urban centers than for suburban and rural areas of the SCAG region: TR59, TR63, and TR83:*

We look forward to working with you and your staff now and in the future on this and other projects. Should you have questions, please contact me at (661) 284-1429 or at [newman@santa-clarita.com](mailto:newman@santa-clarita.com). I am available at your convenience.

Sincerely,

  
Robert Newman,  
Director of Public Works

RN:DP:lep

S:\CD\Dave Peltz\son\Green Team\375\RTP SCS Document 2012\RTP and PEIR Comments 2.14.12 REDRAFT 1.doc

cc: Jeff Hogan, Interim Planning Manager  
Andrew Yi, City Traffic Engineer



**CITY OF SOUTH PASADENA**  
OFFICE OF THE CITY COUNCIL  
1414 MISSION STREET, SOUTH PASADENA, CA 91030  
TEL: 626.403.7230 FAX: 626.403.7211

February 1, 2012

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

**Re: Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Review (PEIR)**

Dear Mr. Lieb:

On behalf of the City of South Pasadena, we ask you to please accept these comments on SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated Transportation Conformity Report and Draft Program Environmental Impact Review (PEIR).

**I. SCAG's welcome deletion of a surface SR-710 north extension should be accompanied by a land-use action to require State disposition of the hundreds of properties now surplus to the surface route.**

The City expresses appreciation to the Southern California Association of Governments (SCAG) for ending the SR-710 as a surface project in its 2008 RTP and maintaining that standing in the proposed plan and draft PEIR. SCAG should now recognize the California Legislature's intervening repeal of Section 100.4 of the Streets and Highways Code, which deprived the SR-710 corridor cities of their right to disapprove of a street-closing surface freeway, and the attendant legislative findings that the surface route will likely never be built. Under these premises, the RTP's land-use actions and strategies should include a requirement—to attain SB 375 criteria by creating affordable and other housing in transit corridors—that the hundreds of State-owned properties acquired for the surface route be released to private ownership. This overlooked measure affords a rapid means of creating such housing, in a relatively high-density environment, within the Gold Line transit corridor.

**II. SCAG should follow the State's designation of an unbuilt SR-710 project as an extension and not a gap closure.**

In the 1974-1998 EIS/EIR documents on the surface route, the project was characterized as the extension of the 710 north of Valley Boulevard. LA METRO adopted that terminology when the project changed from surface to tunnel and was made a subject of Measure R. Both the Legislature and the Bureau of State Audits continue in 2011 to refer to the unbuilt SR-710 project as an "extension." SCAG however continues, as it did in 2008, to refer to the project as a "gap closure," presumably on the premise that part of the 710 freeway

was completed south of the I-210 interchange. The 1976 judicial order that allowed the freeway component between I-210 and Del Mar Boulevard to be opened to traffic, however, treated this constructed freeway component as part of the I-210 project, as its opening was funded by an I-210 contract, and traffic was allowed not on the (then) route 7 freeway, but instead in the "Route 7 Corridor." In the words of the court, "only the southern portion of the Long Beach Freeway has been completed and it now terminates at Valley Boulevard. . . ." North of Valley to the I-210 interchange is described as the "uncompleted northerly portion." (*City of South Pasadena v. Volpe* (C.D. Cal. 1976) 418 F.Supp. 854, 858.)

Moreover, opening of that freeway portion was conditioned on the premise that opening the freeway segment "will have no effect on the decision as to the ultimate freeway location and will not foreclose reasonable alternatives to the proposed ultimate Route 7 Freeway." (418 F.Supp. at 864.)

To label the uncompleted 710 as a route "gap closure" ignores the reality that the freeway construction north of Del Mar was never accomplished in compliance with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA), and *use* of that portion was only allowed by the court as part of the 210 interchange and not to be used to justify completing a 710 freeway. The term "gap closure," designed to create a sense of inevitability or priority for this project over competing ones, must be removed.

### **III. The Plan and DEIR do not meet the legal requirements of the Clean Air Act, the National Environmental Protection Act or Title 23 of U.S. Code.**

SCAG is the federally designated metropolitan planning organization under U.S. Code Title 23 §134(d)(1) charged with creating the Metropolitan Transportation Plan (MTP). This plan (the RTP), and an affirmation of its conformity with the State Implementation Plan (SIP) for air quality, is required for the utilization of federal aid funding in the Los Angeles region. Regulations require that the plan be financially constrained, cover at least a 20-year horizon, and include all projects of "regional significance." The plan must be updated every 4 years and be responsibly modeled to determine that the proposed network meets air-quality conformity requirements. Based on our review, we do not believe this basic standard has been met.

#### **Test 1: Financial Constraint<sup>1</sup>**

Federal regulations require that the RTP be financially constrained and include specific financial strategies to ensure implementation of all phases of all projects included in the plan to achieve air-quality conformity.<sup>1</sup>

Projects for which the state or region cannot demonstrate adequate anticipated funding may not be included in the air-quality conformity model. To do so would result in incorrect and potentially unattainable air-quality forecasts, which could not rightfully be concluded to meet conformity requirements.

The extension of SR-710, incorrectly referenced as the "SR-710 Gap Closure" project, is included in the Draft RTP/SCS. The project is described as an 8-lane toll facility in a tunnel

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<sup>1</sup> 23 CFR Part 450.

and reported to cost \$5.64B projected for completion in 2030.<sup>2</sup> At present only \$780M has been secured. Tolling authority has been raised as a potential revenue source. However, a robust financial strategy to fully close the \$4.86B financial gap, as is required by federal standards, has yet to be produced.

The financial ability to implement the gap-closure project, as described and modeled in the Plan, is speculative at this point. Based on SCAG's own guidelines,<sup>3</sup> such projects are not eligible for inclusion in the constrained plan but may be maintained in a strategic plan.

The inclusion of speculative projects in the RTP does not meet the federal requirement for a fiscally constrained plan and results in the modeling of a questionable network, thus failing to meet federal or SCS requirements.

### **Test 2: Regional Emissions Analysis**

The emissions generated by the proposed network must be demonstrated to meet the emissions budgets prescribed by the State Implementation Plan (SIP).<sup>4</sup> Additionally, SB 375 requires SCAG to prepare a Sustainable Communities Strategy that achieves (and maintains) greenhouse gas emission reductions of 8% per capita by 2020 and 13% per capita by 2035. A primary goal of SB 375 is to significantly reduce Vehicle Miles Traveled (VMT) as a tool for greenhouse gas emission reductions.

Questionable assumptions are made regarding the air-quality benefits and VMT reductions that may be achieved by a network, including the SR-710 highway expansion. The assumed results include congestion relief, reduced VMT, and lower greenhouse gas emissions. These assumptions are not borne out by recent research<sup>5</sup> and comparable peer regions. Research in California has concluded that a 10% increase in highway capacity leads to a 9% increase in VMT.<sup>6</sup> A recent and extensive study utilizing Federal Highway Administration (FHWA) data also concluded that new or expanded interstate facilities correlate with VMT increases nearly on a one for one percentage basis and that the increase is above and beyond VMT that shifts from alternative routes or other modes.<sup>7</sup> The new facility will attract additional drivers, additional trips, and convert some transit trips to drive trips, eliminating most assumed air-quality benefits.

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<sup>2</sup> SCAG Draft 2112-2035 Regional Transportation Plan, 163.

<sup>3</sup> SCAG 2012-2035 RTP/SCS Draft PEIR, 2-4.

<sup>4</sup> 42 USC § 7506.

<sup>5</sup> Relevant studies include:

- Fulton, Lewis et al. "A Statistical Analysis of Induced Travel Effects in the U.S. Mid-Atlantic Region." *Journal of Transportation Statistics*, Volume 3, No. 1, April 2000.
- Lee, Douglass B., Jr., et al. "Induced Traffic and Induced Demand." *Transportation Research Record*, 1659, 1999, 68-78.
- Johnston, Robert A. et al. "Applying an Integrated Model to the Evaluation of Travel Demand Management Policies in the Sacramento Region." Mineta Transportation Institute, San Jose State University, September 2001.
- Cervero, Robert. "Road Expansion, Urban Growth, and Induced Travel: A Path Analysis." *Journal of the American Planning Association*, Volume 69, No. 2, June 2003, 145-163.

<sup>6</sup> Hansen, Mark. "Do New Highways Generate Traffic?" *Access*, No. 7, Fall 1995, 16-22.

<sup>7</sup> Duranton, Gilles, and Turner, Matthew A. "The Fundamental Law of Road Congestion: Evidence from US Cities." *American Economic Review*, Volume 101, No. 6, October 2011, 2616-52.

A comparable case in the Metropolitan Washington Council of Governments (MWCOC) region had just such a result with the 1991 widening of I-270. This project was included in the regional network and analyzed in the regional air-quality model, which assumed the added capacity would reduce congestion, improve mobility and provide air-quality benefits. It further assumed that the majority of trips on the new facility would be diverted from the smaller streets on the network and therefore assumed no change in VMT projections and no reduction in transit mode share. Within just 8 years of project completion, however, congestion levels had returned to previous levels—in some segments 10 years earlier than the model predicted. Dramatic residential development followed the facility expansion, despite regional modeling assumptions that local land-use plans could control such growth. The corridor paralleled the heavy rail transit “red line,” and despite increases in population along the transit corridor, transit ridership dropped by more than 6% during the first three years after the additional lanes opened. The added cars and early congestion meant air-quality impacts were worse than the model had predicted. In 2001, 10 years after the widening opened, for the first time ever, the regional transportation plan for the Washington Region failed to meet federal Clean Air requirements and all planning had to be put on hold.<sup>8</sup>

Given this research and evidence, the plan has not demonstrated that the regional emissions analysis is reasonable and based on justified and demonstrated assumptions and cannot be concluded to meet air quality conformance standards.

**IV. By erroneously specifying only one SR-710 extension alternative—a straight line tunnel—the Plan and DEIR threaten program-level conformity and unlawfully prejudice future project-level environmental analyses.**

The draft PEIR should assess impacts of the proposed system as a whole. Although it does not isolate the impacts of individual projects nor differentiate their unique impacts or benefits to the system as a whole, regulations require consistency between the project described and analyzed at the program level and analysis at the project level.<sup>ii</sup>

A project design concept and scope must not have changed significantly from that included in the metropolitan transportation plan for which the determination of conformity was made, and projects must be described in sufficient detail to determine emissions.<sup>9</sup>

Once included in an approved plan, the lead agencies may include, by reference, the program level PEIR purpose and need in their project-level environmental clearance documents and may further use the PEIR as the basis for their regional and cumulative impacts analysis.

NEPA and CEQA regulations prescribe a rigorous and transparent process that explores and objectively evaluates a number of project alternatives capable of meeting the project purpose and need. This process for the SR-710 extension project remains in its early stages, and an agency-preferred alternative has not yet been determined or stated, as several viable alternatives are still under consideration. The proposed Plan includes the toll-tunnel alternative

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<sup>8</sup> “Clean Air Issues Put Transportation Planning Process on Hold.” *The Region*, National Capital Region Transportation Planning Board, Volume 41, 2002, 10-15.

<sup>9</sup> 42 USC §7506.

in the constrained plan while the transit and “tunnel alternative” options remain in the strategic plan.

According to NEPA, “interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives.”<sup>10</sup>

Given the requirement for program-level conformity consistent with project-level analysis, inclusion of the SR-710 extension as portrayed as a straight-line tunnel route is not appropriate. LA METRO has yet to propose a specific tunnel alignment, or for that matter any preferred project in the corridor. Even if LA METRO does advance a tunnel, the straight-line route is likely not to emerge as the most favorable of the tunnel alternatives, and indeed, LA METRO's environmental review may end up rejecting the tunnel option entirely. A tunnel option that avoids the steep grade rising into Pasadena and that avoids the Raymond Fault could emerge as more favorable both environmentally and economically, and earn less community opposition, than the direct route. That routing should produce different traffic patterns and modeling outcomes than a project on the assumed direct route.

Therefore, SCAG's inclusion of a single alternative to the SR-710 project in its RTP and draft PEIR would prejudice the environmental review process. This circumstance additionally establishes why a specific SR-710 project cannot be included in the constrained plan at this time.

**V. Even though the proposed RTP and its shift of truck traffic to the East-West Corridor vitiates the asserted need for an SR-710 tunnel, the plan and draft PEIR should emphasize elimination of non-local truck traffic in preference to a direct rail loading at the ports.**

In promoting the SR-710 tunnel within the last decade, officials have emphasized the need for truck-borne freight to move out of the LA Basin, claiming that such freight haulers (as opposed to commuters or drivers of light trucks) would find the projected tolls acceptable. In light of the draft RTP's emphasis of moving heavy truck traffic originating in the San Pedro Bay ports *not* along the 710 corridor north of I-10, but instead by an East-West Corridor to the Inland Empire, the plan and draft EIR cannot consistently maintain that an SR-710 freeway extension deserves priority or even inclusion.

As beneficial as it may be, in comparison to existing conditions, to shift truck-borne freight traffic off the northern portions of I-710, the RTP and draft PEIR must consider and adopt an even more vigorous approach that is necessary to meet SB 375's mandate of greenhouse gas reduction. Specifically, the plan and PEIR must assess and include the benefits of loading containers onto rail cars directly off the ships at dockside, thereby eliminating even further the case for new highway construction to relieve truck-induced traffic congestion. As pointed out in a recent *The Economist* essay, to maintain their standing in the face of a widened and deepened Panama Canal, “California’s ports must compete on speed. . . .” They cannot do so as long as the RTP and draft PEIR continue to “clog up stretches of the I-710 freeway. . . .” (“California Ports: The Fickle Asian Container.” *The Economist* (Jan. 28, Feb. 3, 2012, 30.)

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<sup>10</sup> 40 CFR §1506.

## Conclusion

The City of South Pasadena requests that the SCAG RTP and PEIR remove the SR-710 north extension. With its inclusion, the Plan has not demonstrated that it can meet two of the four required tests of conformity—sufficient financial resources for the project have not been demonstrated, and assumptions regarding regional emissions are flawed. The reported impacts of the planned network are based on suspect assumptions. Inclusion of the project at this time will bias future project-level NEPA and CEQA review if and when an SR-710 tunnel alignment becomes LA METRO's preferred alternative. Finally, while the circulating draft RTP and PEIR vitiate the need for any SR-710 extension that will produce tolls and relieve congestion, SCAG must discard its emphasis on accommodating any truck traffic from the ports and redraw its plan and assessments to anticipate the direct ship-to-rail transport that enables air-quality conformity and successful port competition.

Sincerely,



Michael A. Cacciotti  
Mayor



Philip C. Putnam  
Mayor Pro Tem



Robert S. Joe  
Councilmember



Marina Khubesrian, M.D.  
Councilmember



Richard D. Schneider, M.D.  
Councilmember

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<sup>i</sup> 23 CFR § 450.322 (b) (11) [the Metropolitan Transportation Plan shall] “Include a financial plan that demonstrates the consistency of proposed transportation investments with already available and projected sources of revenue. The financial plan shall compare the estimated revenue from existing and proposed funding sources that can reasonably be expected to be available for transportation uses, and the estimated costs of constructing, maintaining and operating the total (existing plus planned) transportation system over the period of the plan. The estimated revenue by existing revenue source (local, State, and Federal and private) available for transportation projects shall be determined and any shortfalls identified. Proposed new revenues and/or revenue sources to cover shortfalls shall be identified, including strategies for ensuring their availability for proposed investments. Existing and proposed revenues shall cover all forecasted capital, operating, and maintenance costs. All cost and revenue projections shall be based on the data reflecting the existing situation and historical trends. For nonattainment and maintenance areas, the financial plan shall address the specific financial strategies required to ensure the implementation of projects and programs to reach air quality compliance.” (emphasis added)

<sup>ii</sup> 42 USC §7506 Limitations on certain Federal assistance -- Clean Air Act Section 176(c)

Sec. 7506(c) (2) (C) a transportation project may be adopted or approved by a metropolitan planning organization... only if it meets... the following requirements--

- (i) such a project comes from a conforming plan and program;
- (ii) the design concept and scope of such project have not changed significantly since the conformity finding regarding the plan and program from which the project derived; and
- (iii) the design concept and scope of such project at the time of the conformity determination for the program was adequate to determine emissions.



**SCAG**

FEB 21 2012

**MAIL RECEIVED**

February 14, 2012

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

**RE: Draft RTP/SCS and Draft PEIR**

Dear Mr. Ikhata:

The City of Stanton appreciates the opportunity to comment on the 2012-2035 Draft Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR) and associated appendices. As a member city of the Orange County Council of Governments (OCCOG), the City would like to extend its support of the OCCOG response letter regarding the subject documents in its entirety. In addition, the City would like to provide the following comments regarding the RTP/SCS and PEIR:

It is requested that SCAG continue to utilize growth projection data at the County level as it has done in previous RTP processes. The growth projections for the 2012 RTP identify population, housing and employment data for the six-county SCAG region, from 2008 (existing) to 2020 and 2035. These growth projections represent the best available information from local jurisdictions, the business community and landowners. However, as time passes, what is feasible for any given project can change. The triggers for change to adopted growth projections can range from factors such as market conditions, new information or data, infrastructure availability, changes in funding availability (such as the dissolution of redevelopment agencies statewide), and changes to jurisdictional boundaries resulting from future annexations and incorporations of previously-designated unincorporated territory. SCAG should continue to adopt the growth projections for the 2012 RTP at a countywide level, consistent with past approvals of Regional Transportation Plan growth forecasts. County level geography accommodates internal adjustments to changing conditions as described above, without compromising the integrity of the overall growth projections. However, approving the growth projections at any lower level of geography, such as at the city level, would be challenged with continual revisions and shifts to the total number of housing, population and employment within a city, among cities, and between cities and counties as a result of the factors described above. Adoption of the data at a level lower than the county

would limit jurisdictional control and create inflexibility in a regional planning document. In addition, the level of geography in which the RTP/SCS growth forecast is adopted should not be determined by other processes. For example, the RHNA allocations must be consistent with the RTP/SCS; state law does not require that they be identical. The RTP/SCS can be adopted at the county level and the RHNA process may proceed independently until it is completed after the appeals, trades, and transfers are completed. The RHNA allocations that were derived from the growth forecast can still be determined to be consistent with the RTP/SCS, even if changes are made to the city totals during the appeals, trades, and transfers process.

In regards to the Projection data utilized in the RTP/SCS and the PEIR, on January 26, 2012, the update to the Orange County Projection (OCP-2010) dataset known as "OCP-2010 Modified" was officially approved by the OCCOG Board of Directors and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this letter also serves as the formal notice of the update that should be incorporated into the 2012 RTP/SCS, PEIR, and related documents.

As part of the SCAG SCS, it was indicated that the OC SCS was incorporated in its entirety without modification. However, there are strategies in the Orange County SCS that are not included in the regional SCS. Similarly, there are some strategies in the regional SCS that are not consistent with the strategies in the OC SCS. This creates confusion and clarification is needed. Under SB 375 and only within the SCAG region, subregional councils of government were allowed to prepare subregional SCS's that SCAG is then required to incorporate into the regional SCS. In Orange County, the Orange County Council of Governments (OCCOG) and the Orange County Transportation Authority (OCTA) developed a countywide or subregional SCS (OC SCS) that was to be incorporated in whole into the SCAG SCS. SCAG has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the regional SCS, but it is unclear what the standing is of the OC SCS. The OC SCS contains a set of strategies that were agreed upon by local governments, agencies and other stakeholders within Orange County and was accepted by SCAG and should represent the SCS that is applicable to the Orange County region. Please clarify the roll of the OC SCS in the regional SCS, and when there are inconsistencies in the regional SCS and the OC SCS, whether the OC SCS would be the prevailing document for the Orange County subregion.

In the Mitigation Monitoring Program, it is stated that "Lead Agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process." However, it is unclear how SCAG intends to implement the Mitigation Monitoring Program with regard to the proposed mitigation measures, as may be implemented by local agencies. In addition, it is infeasible for SCAG to require local jurisdictions to report when such mitigation measures are considered for any project. Noting that the SCAG region includes 6 counties, 14 subregional entities and 191 cities, this reporting requirement would surely fall short of expectations. Given this identified infeasibility, please clarify what obligations local agencies may have regarding SCAG's mitigation monitoring efforts.

On pages 1-5 and 1-7 in the introduction of the PEIR, the language should reflect that Lead Agencies will determine the feasibility and applicability of measures and that the measures are intended to offer a menu of options available should a lead agency opt to utilize them. The PEIR makes the assertion on page 1-7 of the Project Description under the Transportation Project Mitigation and Land Use Planning and Development Project Mitigation sections that the draft PEIR has made a preliminary determination that all of the mitigation measures in it are considered feasible. SCAG has not identified any analysis that supports the feasibility of the mitigation measures that are to be undertaken by entities other than SCAG and SCAG staff has stated on numerous occasions that the mitigation measures were intended to be a menu of options for consideration by lead agencies.

As indicated in the PEIR on page 1-6, state law provides that it is appropriate to indicate in mitigation measures that they "can and should" be implemented where the authority to implement the measures rests with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies' regulatory measures. The City recognizes that SCAG's use of the words "can and should" are derived from CEQA, at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitations of SB 375 upon respective local agencies' land use authority, any language seemingly imposing affirmative obligations contrary to SB 375 is inappropriate. As such, the use of the language "can and should" for mitigation measures addressed to local agencies is inappropriate and should be modified to clearly reflect the mitigation measures as a menu or toolbox for implementation where determined feasible by the local agencies.

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus not be approved. They also represent prescriptive means to accomplish the mitigation. As such, any mitigation measure that indicates local agencies should implement new fees should be reworded to indicate the imposing of fees is only an option as a way to implement the mitigation measure.

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the California Environmental Quality Act, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact, and the mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA.

In regards to overall document consistency, the alternatives in the PEIR should be consistently named. Throughout the document, the alternatives are identified with numbers (e.g. Alternative 1, 2, or 3), with letters (e.g. Alternative A, B, or C), or specific names (e.g. Envision 2).

Finally, there are several mitigation measures proposed which may not be applicable to certain projects or local agencies. As such, for project specific mitigation measures, or mitigation measures assigned to local agencies, the mitigation measures should be reworded to include the wording "if applicable."

If you have any questions regarding this matter, please feel free to contact Kelly Hart of my staff at (714) 890-4228.

Sincerely,

A handwritten signature in black ink, appearing to read "Omar Dadabhoy". The signature is fluid and cursive, with a large initial "O" and a long, sweeping tail.

Omar Dadabhoy  
Community Development Director



February 8, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**SUBJECT: REVIEW DRAFT 2012 SCAG RTP/SCS AND DRAFT PEIR**

Dear Ms. Lin:

Thank you for the opportunity to provide comments on the Draft 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (DPEIR) for the 2012 SCAG RTP/SCS.

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

- Most of the proposed mitigation measures go above and beyond the strategies of the Orange County SCS and requirements of the RTP and Senate Bill 375. For example, Mitigation Measure "Greenhouse Gas Emissions 5" states that "SCAG shall assist ARB and air districts in efforts to implement the AB 32 Scoping Plan." Implementation of the AB 32 Scoping Plan goes above and beyond the scope of SB 375 and the RTP. Therefore, this mitigation measure, and others like it that exceed the scope of the RTP and SB 375, should be removed from the PEIR.
- Proposed mitigation measures are already required by State and Federal law or are regulated by other agencies such as the South Coast Air Quality Management District, California Department of Housing and Community Development, California Department of Fish and Game, and the Regional Water Quality Control Boards should be removed from the PEIR.
- Many of the proposed mitigation measures, including "Land Use 3," "Land Use 10" and "Land Use 42" are contrary to local control. Mitigation Measure "Land Use 10" is one of the most compelling examples. It reads "Local jurisdictions can and should provide for new housing consistent with the Regional Housing Needs Assessment (RHNA) to accommodate their share of the forecasted regional growth." This mitigation measure is problematic and should be removed or revised because State Law and the RHNA do not require local jurisdictions to ensure that housing units are actually built.
- Many of the proposed mitigation measures impose taxes or fees that are financially infeasible for local agencies to implement or impose an undue burden on the building industry. For example, Mitigation Measure "Transportation, Traffic and Security 60" states the following: "Transit and Multimodal Impact Fees: Local jurisdictions can and

should assess transit and multimodal impact fees on new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations." A second example is Mitigation Measure "Transportation, Traffic and Security 37" which reads "Local jurisdictions and transit agencies can and should provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers." Requiring these types of fees and incentives will increase the cost of development and negatively impact the local economy. Therefore, all such measures should be removed from the PEIR.

- The use of the words "can and should" throughout the PEIR and the Draft RTP/SCS implies that the proposed mitigation measures are feasible, and that local jurisdictions are expected to implement them. The following statement from page 1-7 of the Introduction makes this intent clear: "Local governments routinely implement the types of mitigation measures identified in this Draft PEIR during project design, CEQA review, and/or project construction. This Draft PEIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that local governments will actually implement them." There is no analysis in the Draft RTP/SCS to demonstrate that every local jurisdiction within the SCAG region has the ability, staffing, and financial resources to implement all of the mitigation measures. SCAG should replace the words "can and should" with "should" in all of the mitigation measures in the PEIR and throughout the SCS Chapter of the Draft RTP/SCS. This change in wording would be consistent with SCAG staff's representation at the Orange County Council of Governments January 26, 2012, Board meeting that the mitigation measures are intended to be a "tool box" of options.
- The Draft RTP/SCS assumes that the transportation projects outlined in the document have the potential to induce growth in certain parts of the region. This concept is evidenced by Mitigation Measure "Biological Resources and Open Space 47" which reads "Project sponsors can and should ensure that transportation systems proposed in the 2012-2035 RTP/SCS avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from growth associated with transportation projects and improvements." This measure is not consistent with the OCSCS and the approved growth projections and patterns embodied within the Orange County Projections 2010 Modified. Therefore, all references to induced growth should be removed from the PEIR.
- It is stated on page 80 of the Draft RTP/SCS that "the RTP has the ability to affect the distribution of that growth." This statement appears to contradict SCAG's agreement pursuant to the Memorandum of Understanding with the Orange County Council of Governments (OCCOG) that the strategies and local land use policies of the Orange County SCS will be respected. The RTP/SCS should acknowledge that the local land use plans in Orange County will not be changed through the RPT/SCS.
- Many of the mitigation measures in the Draft PEIR are draconian and need to be removed and/or revised. One prime example is Mitigation Measure "Land Use 85." It reads in part "Local jurisdictions can and should reduce heat gain from pavement and other hardscaping including: Reduce street rights-of-way and pavement widths to pre-World War II widths (typically 22 to 34 feet for local streets, and 30 to 35 feet for collector streets, curb to curb)..." Although reduced street widths may be appropriate in some

cases and have been implemented in many jurisdictions, it is inappropriate and counterproductive to require reduced street widths as a mitigation measure in the PEIR. Reduced street widths, for example, generally do not provide space for on-street parking which may result in greater, additional paved areas provided in separate parking lots.

- The Draft RTP/SCS suggests that \$127.2 billion of an approximately \$219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a \$0.15 gas tax increase between 2017 and 2024. After that, the report assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.05 per mile, beginning in 2025, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee.

The City of Tustin cannot support an increase in fees, including the introduction of a mileage-based user fee, until further economic analysis is completed and until and unless there can be an explanation of the return to source principles which will be used for the distribution of funds collected thereunder. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on a process for recognizing and rewarding areas which commit additional revenues.

- The Draft RTP/SCS proposes a number of investments that affect Orange County and go beyond the Long-Range Transportation Plan (LRTP). The City will only consider additional investments after revenues are identified to account for these commitments. The regional strategies identified by SCAG do not have clear funding mechanisms, and it must be made clear that their inclusion in the RTP/SCS does not constitute a commitment to fund and/or implement the improvements.
- The Sustainable Communities Strategy ("SCS") is recognized as a key portion of the 2012 RTP/SCS, and serves to meet responsibilities associated with SB 375. It is clear the SCS "Goals and Benefits" involve significant local jurisdiction participation and efforts. It is critical for the RTP/SCS to recognize the need to sufficiently fund local agency efforts to assure successful outcomes.
- Tables 4.3 - 4.7 of the RTP/SCS identify "Action/Strategy" efforts related to the SCS, with local jurisdictions being identified as responsible parties for many of the tasks. Without proper funding for local jurisdiction efforts we believe the effectiveness of the "Action/Strategy" measures will be compromised.
- In general, current policies and goals of the RTP/SCS identify projects and funding necessary to successfully implement elements of the RTP/SCS. There are also RTP/SCS goals which essentially require development "from the ground up" at the local level. We agree the most efficient and effective efforts toward meeting these RTP/SCS goals will begin with the local jurisdictions.

There needs to be sufficient levels of funding (which do not appear to be addressed in the current RTP/SCS draft) to allow local jurisdictions to adequately initiate these specialized efforts. From a practical perspective, this funding would be expected to yield some of the most immediate and timely results in meeting RTP/SCS goals. They would consider measures which could include, but not be limited to:

- Programs for improved use of public transit
  - Responsiveness to demographic changes
  - Improved management of existing transportation infrastructure and roadways
  - Employer-based Transportation Management Plans
  - Trip-reduction efforts including promotion of telecommuting
  - Carpool/transit parking near transportation corridors
  - Better "place marking" which includes an increase of walkable environments
  - Support of bicycle programs including bicycle storage and bike lanes
  - Bridging gaps between mass transit options and shipping and service centers
  - Programs for new construction and reconstruction of non-motorized transportation paths
- Measures to reduce vehicle miles traveled will involve local jurisdictions and employers to implement many strategies which include but are not limited to measures such as:
    - Increasing rideshare and work-at-home
    - Investing in non-motorized transportation facilities
    - Developing appropriate land use strategies
    - Encouraging universal employee transit access passes
    - Synchronizing traffic signals
    - Using LED technology for new traffic signals and street lights
    - Allocating convenient parking areas, loading areas and larger parking spaces for vans and HOV
    - Creating ride-sharing programs and provide parking near public transportation
    - Enhancing safety and cleanliness at transit stations
    - Providing shuttles to transit
    - Providing incentives, education and publicity to encourage use of transit

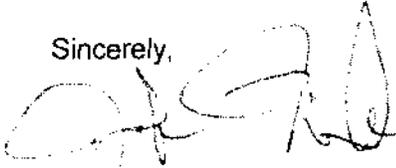
It will be necessary to provide funding to local jurisdictions for implementation and/or management of these and other associated measures.

- Table 3.6 shows that the 2012 RTP/SCS anticipates relatively low levels of funding for local streets and roads, including \$1.1 billion for FY2011-FY2015, \$1.1 billion for FY2016-FY2020, and \$1.2 billion for FY2021-2025. Funding is increased to \$7.9 billion for FY2026-FY2030 and \$9.6 billion for FY2031-FY2035. However, local street and road improvements offer the best opportunity for quickly improving mobility and realizing RTP/SCS goals. They also provide economic benefits which could translate into additional funding in the future. Funding for these programs should be increased and accelerated in the near future.
- One City of Tustin project which has both local and regional significance does not appear to be included in the RTP/SCS. It is therefore requested that the following project be added to the RTP/SCS:
  - Tustin Ranch Road extension from Walnut Avenue to Warner Avenue, including a new grade separation over Edinger Avenue and the OCTA/SCRRA Railway.
- In addition, the RTP/SCS should identify the regional transportation infrastructure deficiencies broken down by county for purposes of transparency.

Ms. Margaret Lin  
SCAG 2012 RTP/SCS and DPEIR  
February 8, 2012  
Page 5

Again, thank you for the opportunity to review and comment on the Draft 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (DPEIR) for the 2012 SCAG RTP/SCS. If you have any questions regarding the City's comments, please call Elizabeth Binsack, Community Development Director at (714) 573-3031.

Sincerely,

A handwritten signature in black ink, appearing to read "John Nielsen". The signature is stylized and somewhat cursive.

John Nielsen  
Mayor

cc: Hasan Ikhata, SCAG  
Dave Simpson, OCCOG  
Tustin City Council  
Jeffrey C. Parker  
Doug S. Stack  
Elizabeth A. Binsack  
Dana Ogdon  
Scott Reekstin

3020 Old Ranch Parkway, Suite 400  
Seal Beach, California 90740 USA  
562.493.2804 fax: 562.493.4956

www.cleanenergyfuels.com

Todd R. Campbell, MEM, MPP  
Vice President, Public Policy and Regulatory Affairs



February 14, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

**Re: Clean Energy's Comments on the Southern California Association of Government's 2015-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).**

Dear Ms. Lin,

Clean Energy appreciates the opportunity to submit comments on the Southern California Association of Government's (SCAG) 2015-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Clean Energy considers itself a partner of SCAG in that we are a local company that provides a near-zero emissions solution to many transportation sectors that can have a direct and significant impact on the region's air quality. Specifically, we offer clean transportation solutions through the use of natural gas and renewable natural gas (i.e., biogas) for regional fleets that include: taxis, airport shuttles, local delivery fleets, refuse trucks, transit buses, and heavy-duty trucks in the goods movement sector. As you know, many of the aforementioned fleets made a shift over to natural gas either due to rules developed by the South Coast Air Quality Management District or as part other regional efforts to reduce air pollution such as the San Leandro Port's Clean Truck Program.

Upon review of the proposed RTP/SCS, we felt compelled to comment on the document in its current form as it appears to overemphasize electric and zero emission vehicle strategies without any apparent back up documentation regarding the cost-effectiveness and feasibility of such strategies. Clean Energy strongly recommends that SCAG meet with Clean Energy to discuss our experience within the Industry and share with you how we, as a company, intend to help SCAG reach regional air quality attainment.

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## ABOUT CLEAN ENERGY



Clean Energy (Nasdaq: CLNE) is a Southern California-based company and the largest provider of natural gas fuel for transportation in North America. We are also a global leader in the ever expanding natural gas vehicle market. It has operations in CNG and LNG vehicle fueling, construction and operation of CNG and LNG fueling stations, biomethane production, vehicle conversion and compressor technology.

Clean Energy fuels over 25,000 vehicles at 280 strategic locations across the United States and Canada with a broad customer base in the refuse, transit, trucking, shuttle, taxi, airport and municipal fleet markets. We are building "America's Natural Gas Highway," a network comprised initially of approximately 150 LNG truck fueling stations connecting major freight trucking corridors across the country.



We own (70%) and operate a landfill gas facility in Dallas, Texas, that produces renewable natural gas, or biomethane, for delivery in the nation's gas pipeline network, and we plan to build a second facility in Michigan. We own and operate LNG production plants in Willis, Texas and Boron, Calif. with combined capacity of 260,000 LNG gallons per day and that are designed to expand to 340,000 LNG gallons per day as demand increases. NorthStar, a wholly owned subsidiary, is the recognized leader in LNG/LCNG (liquefied to compressed natural gas) fueling system technologies and station



construction and operations. BAF Technologies, Inc., a wholly owned subsidiary, is a leading provider of natural gas vehicle systems and conversions for taxis, vans, pick-up trucks and shuttle buses. IMW Industries, Ltd., a wholly owned subsidiary based in Canada, is a leading supplier of compressed natural gas equipment for vehicle fueling and industrial applications with more than 1,200 installations in 24 countries. For more information, visit [www.cleanenergyfuels.com](http://www.cleanenergyfuels.com).

### **An Abundant and Economical Domestic Resource**

Reliance on foreign oil exacts a high toll on the U.S. in terms of direct economic costs and indirect energy security costs. During the three-year period from 2008 through 2010, the U.S. spent nearly \$700 billion on imported petroleum. More recently, the cost of imported oil has been much higher as oil prices have once again exceeded \$100 per barrel. In the coming decade, the U.S. Energy Information Agency (EIA) forecasts total expenditures for petroleum imports to top \$3.3 trillion dollars.<sup>1</sup> America's reliance on oil not only affects our trade balance but makes the U.S. vulnerable to price spikes and supply disruptions. And high oil prices results in a windfall for regimes that may not be friendly to the America

Fortunately, the U.S. has an unprecedented opportunity to displace petroleum with domestic natural gas. As President Obama recently declared, the U.S. is "the Saudi Arabia of natural gas." The EIA, the Potential Gas Committee and other expert bodies now estimate that the U.S. has up to a 100 year supply of natural gas. The Potential Gas Committee's 2011 bi-annual report indicates that the U.S. now has a total future supply of 2,170 trillion cubic feet of natural gas. This is 89 Tcf more than estimated in the 2009 report. As was the case with the 2009 report, the 2011 report includes the highest resource estimate in the Committee's history. The availability of this significant domestic resource provides an unprecedented opportunity to solve a number of pressing national objectives like transforming the transportation sector.

Increasing the use for natural gas in transportation will keep our economy growing by supporting new jobs and economic development. In 2008, U.S. production of 20 Tcf of natural gas supported nearly 3 million jobs.<sup>2</sup> In his State of the Union remarks before Congress, the President indicated that new development of natural gas could result in 600,000 new jobs in this decade alone. Thus, increasing demand for natural gas as a

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<sup>1</sup> See EIA, *2011 Annual Energy Outlook*, Table 11 (April 2011).

<sup>2</sup> "The Contributions of the Natural Gas Industry to the U.S. National and State Economies," IHS Global Insight 2009, p.1.



transportation fuel will help put more people to work and ensure that we put this natural gas to good use.

Natural gas also benefits our economy because it is a low cost energy that helps businesses grow while at the same time controlling costs. Natural gas is priced much lower than petroleum. The two fuels no longer track one another -- and haven't for many years. The current contract price for natural gas (NYMEX) is trading at less than \$3.00 per million Btu, and some analysts believe it could go below \$2 per MMBtu. At \$3.00 per MMBtu, the price of natural gas equates to a per-barrel of oil price of only \$17.40 at a time when oil is trading near \$100 a barrel. The low price of natural gas translates into significant savings for fleets and consumers who use natural gas to fuel their vehicles. In most areas of the country, natural gas sells at about a \$1.50 discount compared to gasoline and diesel fuel. EIA's long-term forecast projects that differential between natural gas and petroleum fuels will remain as high as \$2 per energy-equivalent unit.

### **Environmental Benefits**

The same clean burning properties that make natural gas an excellent fuel for traditional applications like electricity generation, residential heating, and industrial applications, also make it an excellent fuel for transportation. Natural gas burns cleaner than gasoline and diesel fuel and most other transportation fuels as well. Not surprisingly, the first vehicles certified to the U.S. Environmental Protection Agency's (EPA) ultra-low emission, super-ultra low-emission and Tier 2/Bin 2 standards were NGVs. The natural gas-powered Honda Civic GX has won numerous awards for its outstanding environmental performance. In 2011, the Civic GX was rated the "Greenest Car in America" by the American Council for an Energy-Efficient Economy – for an amazing eight years in a row! It also was named the 2012 car of the year by the Green Car Journal. Compared to the gasoline Civic, the natural gas-powered Civic produces 95 percent fewer emissions of volatile organic compounds and 75 percent less emissions of nitrogen oxides – pollutants that contribute to ozone formation.

The environmental benefits of NGVs are expected to continue to improve as new automotive technologies become available. EPA's website describes natural gas as an inherently cleaner transportation fuel. That means that given the same amount of emissions control and technological advancement, natural gas should always produce lower emission than comparable gasoline and diesel-fueled vehicles. As long as the internal combustion engine is with us and as long as refinements to it are made, natural gas will be the cleanest transportation fuel to use in it. A National Academy of Science



(NAS) report<sup>3</sup> that analyzed vehicle technologies as of 2005 and expected by 2030, projected that, with further expected improvements in vehicle technology and fuel efficiency, natural gas powered vehicles will provide superior benefits in terms of criteria pollutant reductions compared to nearly all other types of vehicles, even electric and plug-in hybrid electric vehicles. The reason, in part, is due to the fact that the internal combustion engine will continue to get much more fuel-efficient and cleaner, and internal combustion engines can always use natural gas. Electric vehicles sometimes use electricity produced from cleaner natural gas but they will likely continue to use electricity produced from coal and increasingly natural gas, offsetting the benefits that otherwise would be provided by such vehicles. Electric vehicles also require more energy to produce them.

Natural gas vehicles will play a key role in reducing greenhouse gas emissions. Per unit of energy, natural gas contains less carbon than any other fossil fuel, and, therefore, produces lower carbon dioxide (CO<sub>2</sub>) emissions per vehicle mile traveled. While NGVs do emit methane, another principal greenhouse gas, the increase in methane emissions is more than offset by a substantial reduction in CO<sub>2</sub> emissions compared to other fuels. The California Air Resources Board (CARB) has conducted extensive analyses on this issue, and has concluded that burning compressed natural gas produces about 22 percent less GHGs than burning diesel, and 29 percent less than burning gasoline.<sup>4</sup> The comparisons are based on well-to-wheels analyses, and include methane emissions. These reductions are equal to -- or better than -- some renewable liquid fuels. Most of the available studies show that given similar fuel efficiency, NGVs fueled by domestic natural gas will deliver about 20–30 percent improvement in GHG emissions. Another important benefit of NGVs is that, in addition to the tailpipe reductions, they also provide upstream emission reductions of greenhouse gases.

These are real greenhouse gas benefits and Clean Energy's California operations has allowed the company to capture more than 9 percent of the California Air Resources Board's Low Carbon Fuel Credits in the first quarter of 2011.

### **The Potential for Natural Gas Vehicles**

The current market for NGVs here in the U.S. is relatively small. Today, NGVs (and electric vehicles) are not yet economic for most owners of light-duty vehicles. The primary reason is that these vehicles have higher initial purchase costs than

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<sup>3</sup> National Research Council, *"Hidden Costs of Energy: Unpriced Consequences of Energy Production and Use."* Washington, DC: The National Academies Press, 2010.

<sup>4</sup> See California Low Carbon Fuel Standard; [http://www.arb.ca.gov/fuels/lcfs/121409lcfs\\_lutables.pdf](http://www.arb.ca.gov/fuels/lcfs/121409lcfs_lutables.pdf).



conventionally fueled vehicles, but are not driven enough miles or consume enough lower-cost fuel for the fuel cost savings that they offer to offset this higher purchase cost in a reasonable number of years. In fleet applications, however, where fuel consumption per vehicle is much greater, NGVs can be economically attractive to an increasing percentage of businesses and government agencies.

Recent events are clearly pointing to a viable domestic market for light-duty NGVs. We are particularly encouraged by the unprecedented Memorandum of Understanding (MOU) concerning NGVs that has now been signed by ten state governors. The MOU urges U.S. automakers to expand their offerings of NGVs and attempts to stimulate the market for such vehicles by signaling the intent of these states to purchase NGVs. As noted above, in just the past two years, GM and Chrysler have announced plans to produce NGVs for the U.S. market. Honda also has expanded its production capacity for the Honda NGV offering, and is now marketing the car to consumers as well as fleets. Another telling factor is the significant growth in the aftermarket offerings here in the U.S., where nearly a dozen manufacturers offer systems to retrofit light-duty vehicles to operate on natural gas. These offerings include systems for the Fusion, Focus, Impala, Malibu, Milan, Transit Connect, in addition to a variety of popular pickup truck offerings. Ford, while not offering a factory NGV, has been working closely with the aftermarket industry to ensure that aftermarket systems offered for its vehicles meet its demanding standards for quality. These activities clearly show that there is very strong interest in bringing more NGV products to the U.S. passenger car and light-duty segment.

Clean Energy believes that there could be a substantial market for NGVs in all applications, including the light-duty passenger car market. The most immediate opportunity for displacing petroleum and increasing the use of natural gas as transportation fuel lies with light-, medium- and heavy-duty fleets – especially trucks, buses and other heavier vehicles. America currently has a large selection of medium- and heavy-duty NGVs available in the U.S. and the market for natural gas trucks is beginning to ramp up. As a result, natural gas fueling infrastructure development is once again on the rise, recently exceeding 1,000 stations. More importantly, Clean Energy and other major industry partners are now laying the groundwork for a national fueling infrastructure connecting major transportation routes across the country. Furthermore, President Obama's Blueprint for Energy, announced on January 26th, now calls for development of additional natural gas corridors. In that announcement, the President also called upon the Energy Department and national laboratories to focus their energies on bringing about technological breakthroughs in the use of natural gas as a transportation fuel (transcript attached).



These efforts will directly benefit the NGV market since increased fueling infrastructure is one of the key factors limiting the market for NGVs. The economic outlook appears to be excellent. Lower natural gas prices and lower first cost premiums (brought about by mass production, economies of scale and more competition) mean that, in the future, even passenger cars could become economic. Adopting an RTP/SCS that encourage manufacturers to produce both NGVs and EVS are critically important.

### **Conclusion**

We strongly urge SCAG to modify its current draft RTP/SES to specifically highlight natural gas vehicles, in addition to electric and hybrid options, amongst the near zero-emission to zero emission technologies that will help the region meet its criteria air emissions goals under the federal Clean Air Act and greenhouse gas emissions goals under the state's AB 32 – The Global Warming Solutions Act of 2006. Not only does Clean Energy believe that NGVs will continue to be some of the cleanest options, particularly for medium- and heavy-duty vehicles, on the road, they will most likely will also benefit from hybridized platforms, biomethane and hydrogen-blending, and other advancements that may come to market over the next 20 years. We would like to formerly offer an invitation to senior SCAG staff to visit our offices in an effort to better understand our plans to help the region meet its clean air and greenhouse gas goals prior to the finalization of the RTP/SES. Please do not hesitate to contact us directly at (562) 546-0338.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd R. Campbell", written over a circular stamp or seal.

Todd R. Campbell

THE WHITE HOUSE  
Office of the Press Secretary

For Immediate Release

January 26, 2012

REMARKS BY THE PRESIDENT  
ON AMERICAN-MADE ENERGY

UPS Las Vegas South  
Las Vegas, Nevada

10:11 A.M. PST

THE PRESIDENT: Hello, Nevada! (Applause.) It is great to be back in Las Vegas. (Applause.)

AUDIENCE MEMBER: I love you!

THE PRESIDENT: I love you back. (Laughter.) Although I always say, when we stay here for the night, I've got to watch my staff to make sure that they get on the plane when we leave. (Laughter.) Sometimes they conveniently miss the flight. (Laughter.)

But everybody please have a seat, have a seat. It is great to see you. Joe, thanks for the introduction. Scott, thank you and the folks at UPS for hosting us today. I want to thank all of the elected officials and the tribal leaders who took the time to join us.

Before I get into the core of my remarks, I just want to mention something that I said to Scott and I said to Joe, and that is that UPS I think deserves just extraordinary credit for being the best in its space, one of the best businesses we have in the United States. But the reason is because it's got such outstanding workers -- (applause) -- and the relationship between its workforce and management, cooperating, constantly figuring out how to make things better is just an outstanding organization. And so you guys all need to be congratulated for everything that you do. (Applause.)

Now, I'm here to talk a little more about what I talked about at the State of the Union on Tuesday night. And what I want to focus on is how we're going to restore the basic promise of America, something that folks at UPS understand, which is, if you work hard, if you do the right thing, you should be able to do well enough to raise a family and own a home and send your kids to college and put a little away for retirement. That's the American Dream. That's what most people are looking for.

They don't expect a handout. They don't expect anything to come easy. They do expect, if they're willing to work hard, to try to get ahead. If they're doing the right thing, then they can have a sense of security and dignity, and help make sure that their family is moving forward. That's what Americans are looking for. That's what Americans deserve.

And today, three years after the worst economic storm in three generations, our economy is growing again. Our businesses have created more than 3 million jobs. (Applause.) Last year, businesses created the most jobs since 2005. American manufacturers are hiring again and creating jobs for the first time since the 1990s.

Now, we've got more work to do. But what we can't do is go back to the very same policies that got us into a mess in the first place. We can't go backwards. We have to move forward. I said on Tuesday, and I will repeat today, we will not -- we cannot -- go back to an economy weakened by outsourcing and bad debt and phony financial profits. So on Tuesday, at the State of the Union, I laid out my vision for how we move forward. I laid a blueprint for an economy that's built to last, that has a firm foundation, where we're making stuff and selling stuff and moving it around and UPS drivers are dropping things off everywhere. (Applause.)

That's the economy we want, an economy built on American manufacturing with more good jobs and more products made here in the United States of America. (Applause.) An economy built on American energy, fueled by homegrown and alternative sources that make us more secure and less dependent on foreign oil. (Applause.) An economy built on the skills of American workers, getting people the education and the training they need to prepare for the jobs of today, but also to compete for the jobs of tomorrow. (Applause.)

And most importantly, I talked about an economy that's built on a renewal of American values -- hard work, responsibility, and the same set of rules for everybody, from Wall Street to Main Street. (Applause.) That has to be our future. That's how we restore that basic American promise.

Now, part of my blueprint and what I want to focus on a little bit today is for an economy built to last with American energy. That's why we're here. For decades, Americans have been talking about how do we decrease our dependence on foreign oil. Well, my administration has actually begun to do something about it.

Over the last three years, we negotiated the toughest new efficiency standards for cars and trucks in history. We've opened millions of new acres for oil and gas exploration. Right now, American oil production is the highest that it's been in eight years. Eight years. Last year, we relied less on foreign oil than in any of last 16 years. That hasn't gotten a lot of attention, but that's important. (Applause.) We're moving in the right direction when it comes to oil and gas production.

And today, I'm announcing that my administration will soon open up around 38 million acres in the Gulf of Mexico for additional exploration and development, which could result in a lot more production of domestic energy. (Applause.)

But as I said on Tuesday, and as the folks here at UPS understand, even with all this oil production, we only have about 2 percent of the world's oil reserves. So we got to have an all-out, all-in, all-of-the-above strategy that develops every source of American energy -- a strategy that is cleaner and cheaper and full of new jobs.

Now, a great place to start is with natural gas. Some of you may not have been following this, but because of new technologies, because we can now access natural

gas that we couldn't access before in an economic way, we've got a supply of natural gas under our feet that can last America nearly a hundred years. Nearly a hundred years. Now, when I say under our feet, I don't know that there's actually gas right here. (Laughter.) I mean in all the United States.

And developing it could power our cars and our homes and our factories in a cleaner and cheaper way. The experts believe it could support more than 600,000 jobs by the end of the decade. We, it turns out, are the Saudi Arabia of natural gas. (Applause.) We've got a lot of it. We've got a lot of it.

Now, removing that natural gas obviously has to be done carefully. And I know that there are families that are worried about the impact this could have on our environment and on the health of our communities. And I share that concern. So that's why I'm requiring -- for the first time ever -- that all companies drilling for gas on public lands disclose the chemicals they use. We want to make sure that this is done properly and safely. (Applause.) America will develop this resource without putting the health and safety of our citizens at risk.

But we've got to keep at it. We've got to take advantage of this incredible natural resource. And think about what could happen if we do. Think about an America where more cars and trucks are running on domestic natural gas than on foreign oil. Think about an America where our companies are leading the world in developing natural gas technology and creating a generation of new energy jobs; where our natural gas resources are helping make our manufacturers more competitive for decades. We can do this. And by the way, natural gas burns cleaner than oil does, so it's also potentially good for our environment as we make this shift.

So last April, we issued a challenge to shipping companies like UPS. We said if you upgrade your fleets to run on less oil or no oil at all, we're going to help you succeed. We want to help you with that experiment. So we started out with five companies that accepted the challenge. And of course, UPS was one of the first. That's how they roll. (Laughter and applause.)

So less than a year later, we've got 14 companies on board, and together they represent 1 million vehicles on the road. That's a lot of trucks.

We should do more, though. And that's why we're here today. First, let's get more of these natural gas vehicles on the road. Let's get more of them on the road. (Applause.) The federal fleet of cars is leading by example. Turns out the federal government has a lot of cars. (Laughter.) We buy a lot of cars. So we've got to help not only the federal government but also local governments upgrade their fleet. If more of these brown trucks are going green, more city buses should, too. There's no reason why buses can't go in the same direction.

Second, let's offer new tax incentives to help companies buy more clean trucks like these. (Applause.)

Third, let's make sure all these new trucks that are running on natural gas have places to refuel. That's one of the biggest impediments, is the technology. We know how to

make these trucks, but if they don't have a place to pull in and fill up, they got problems.

So we're going to keep working with the private sector to develop up to five natural gas corridors along our highways. These are highways that have natural gas fueling stations between cities, just like the one that folks at UPS, South Coast Air and Clean Energy Fuels are opening today between Los Angeles and Salt Lake City. That's a great start. (Applause.) So now one of these trucks can go from Long Beach all the way to Salt Lake City. And they're going to be able to refuel along the way.

And finally, to keep America on the cutting edge of clean energy technology, I want my Energy Secretary, Steven Chu, to launch a new competition that encourages our country's brightest scientists and engineers and entrepreneurs to discover new breakthroughs for natural gas vehicles.

So we're going to keep moving on American energy. We're going to keep boosting American manufacturing. We're going to keep training our workers for these new jobs. But an economy that's built to last also means a renewal of the values that made us who we are: hard work, fair play and shared responsibility.

Right now, that means, first of all, stopping a tax hike on 160 million working Americans at the end of next month. (Applause.) People cannot afford right now losing \$40 out of each paycheck. Your voices convinced Congress to extend this middle-class tax cut before. I need your help to make sure they do it again. No drama, no delay. Let's just get this done for the American people and for our economy as a whole. (Applause.)

But we've got a longer-run issue -- Scott and I were talking about this before we came out -- and that is how do we get America's fiscal house in order. And we're going to have to make some choices. The reason that we've got these debts and deficit is because we're not making hard choices. Right now, we're supposed to spend nearly \$1 trillion more on what was intended to be a temporary tax cut for the wealthiest 2 percent of Americans. Supposed to be temporary. Back in 2001. (Laughter.) That's a long time ago. (Laughter.) A quarter of all millionaires pay lower tax rates than millions of middle-class households. Warren Buffett pays a lower tax rate than his secretary. I know because she was at the State of the Union. (Laughter.) She told me.

Now, that's not fair. That doesn't make sense. And the reason it's important for us to recognize that is, if we're going to reduce our deficit, then we've got to have a balanced approach that has spending cuts -- and we've already agreed to \$2 trillion worth of spending cuts. We've got to get rid of programs that don't work. We've got to make government more efficient. I have asked Congress for authority to consolidate some of these agencies to make them run better. We're going to have to be much more effective when it comes to government spending. We all acknowledge that and we're making progress on that front.

But that alone doesn't do it. So if we want to actually deal with the deficit, we've got to look at the other side of the ledger. Do we want to keep these tax cuts for the wealthiest Americans? Or do we want to keep investing in everything else -- like

education, like clean energy -- (applause) -- like a strong military, like caring for our veterans who are coming home from Iraq and Afghanistan? (Applause.) We can't do both. We can't do both.

So what I've said is let's follow the Buffett Rule: If you make more than a million dollars a year, you should pay a tax rate of at least 30 percent -- (applause) -- which, by the way, is lower than you would have been paying under Ronald Reagan. Nobody is talking about anything crazy here. On the other hand, if you make less than \$250,000 a year, which 98 percent of all Americans do, then your taxes shouldn't go up. (Applause.) I think that's a fair approach.

And a lot of folks have been running around saying, well, that's class warfare. Asking a billionaire to pay at least as much as his secretary in taxes, that's just common sense. (Laughter.) And I promise you, if we make this change, Warren Buffett will be doing fine. (Laughter.) I will be doing fine. Scott will be doing fine. (Applause.) We don't need more tax breaks. You're the ones who have seen your wages and your incomes stall while the cost of everything from groceries to college to health care have been going up. You're the ones who deserve a break. (Applause.)

And I want to make one last point: We do not begrudge success in America. We aspire to it. We want everybody to succeed. We want everybody to be rich. We want everybody to be working hard, making their way, creating new products, creating new services, creating jobs -- that's the American way. We don't shy away from financial success. We don't apologize for it.

But what we do say is when this nation has done so much for us, shouldn't we be thinking about the country as a whole? When Americans talk about folks like me paying their fair share of taxes, it's not because they envy the rich. Just yesterday, Bill Gates said he agrees with me that Americans who can afford it should pay their fair share. I promise you, Bill Gates does not envy the rich. (Laughter.) He doesn't envy wealthy people.

This has nothing to do with envy. It has everything to do with math. It's what I talked about earlier. We've got to make choices. Americans understand if I get a tax break I don't need and a tax break the country can't afford, then one of two things are going to happen. Either it's going to add to our deficit or somebody else is going to have to make up the difference.

A senior suddenly is going to have to start paying more for their Medicare, or a student is going to have to pay more for their student loan, or a family that's trying to get by, they're going to have to do with less. And that's not right. That's not who we are. Each of us is only here because somebody somewhere felt a responsibility to each other and to our country and helped to create all this incredible opportunity that we call the United States of America.

Now, it's our turn to be responsible. And it's our turn to leave an America that is built to last for the next generation. That's our job and we can do it. (Applause.) We can do it. We can do it. And I know we can do it, because I've seen in states like Nevada and with people like you that I meet all across this country, you understand the history of this country, generations of Americans working together, looking out for each other,

living by the idea that we rise or fall together. Those are the values we have to return to.

I mentioned praise for our military at the State of the Union and the incredible work that they do. And the reason our military is so good, the reason why they're so admired is because they -- it's not like everybody in the military agrees on everything. You got Democrats in the military. You got Republicans in the military. You've got folks who are conservative or liberal -- different races, different religions, different backgrounds -- but they figure out how to focus on the mission. They figure out how to do their job.

And that sense of common purpose is what we're going to need to build an economy that lasts. And if we work together in common purpose, we can build that economy and we can meet the challenges of our times. And we'll remind the entire world once again just why it is that the United States is the greatest country on Earth.

Thank you, everybody. God bless you and God bless the United States of America. (Applause.)

END

10:33 A.M. PST



## Memorandum of Understanding

This Memorandum of Understanding (MOU) describes a coordinated effort between the undersigned States (States) to attract automobile manufacturers in the U.S. to develop a functional and affordable original equipment manufacturer (OEM) fleet natural gas vehicle (NGV) that will also meet public demand. The States recognize the benefits and unique attributes of clean burning natural gas and understand the significant opportunity compressed natural gas (CNG) presents to save State and taxpayer dollars by encouraging an energy future that utilizes domestic energy resources to fuel our nation's transportation needs. Through the joint solicitation of a Multi-State Request for Proposal (Joint-RFP) that aggregates annual State fleet vehicle procurements, the States will endeavor to provide a demand base sufficient to support the design, manufacture, and sale of functional and affordable OEM NGVs by automotive manufacturers in the United States.

In anticipation of soliciting a Joint-RFP, the States will endeavor to coordinate with local agencies, municipalities, and companies to determine the number of NGVs each State can commit to purchase and the required specifications necessary to meet fleet needs. The Joint-RFP shall require that the ultimate cost of an OEM NGV should be comparably priced to an equivalent gasoline powered model and that warranty and reliability concerns are not compromised. Simultaneously, the States understand the need for continued development and expansion of CNG fueling infrastructure and should endeavor to encourage private investment, predicated on demonstrating an anticipated increase in State NGVs, to meet growing demand.

Pursuant to the terms of the Joint-RFP, to be executed at a later date, the States intend, where practical, to transition new fleet vehicle acquisitions, in committed volumes, to a resulting OEM NGV. Such future acquisitions should, when economically feasible, rely on traditional distribution channels that incorporate local businesses in procurement processes. In continued recognition of the benefits of CNG, the States should also endeavor to pursue fleet vehicle conversions to CNG, where economically compelling, based on a life-cycle cost analysis. The States will also reach out to fellow Governors to determine broader interest and participation in the principles and process outlined in this MOU.

This MOU embodies the principle understandings of the States but shall not create any legal relationship, rights, duties, or obligations binding or enforceable at law or in equity. Notwithstanding the foregoing, each State shall in good faith endeavor to reach a mutually agreeable and economically beneficial Joint-RFP, as contemplated herein. This MOU does not create additional state power, enhance existing state power, or interfere with federal authority or law. This MOU shall continue to demonstrate the States' understanding until execution of the Joint-RFP, or until otherwise discontinued by either State.

Set forth by:

State of Oklahoma

Mary Fallin, Governor

State of Colorado

John Hickenlooper, Governor

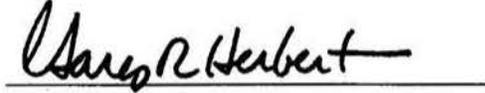
November 9, 2011

State of Wyoming



Matthew H. Mead, Governor  
November 9, 2011

State of Utah



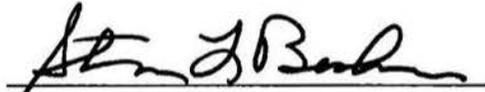
Gary R. Herbert, Governor  
November 16, 2011

State of New Mexico



Susana Martinez, Governor  
December 22, 2011

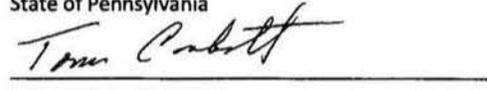
State of Kentucky



Steven L. Beshear, Governor  
January 27<sup>th</sup>, 2012

November 9, 2011

State of Pennsylvania



Tom Corbett, Governor  
November 9, 2011

State of Maine



Paul R. LePage, Governor  
December 2, 2011

State of West Virginia



Earl Ray Tomblin, Governor  
January 16<sup>th</sup>, 2012

State of Texas



Rick Perry, Governor  
February 6, 2012



February 14, 2012

President Pam O'Connor  
Board of Directors  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Re: Draft Regional Transportation Plan/Sustainable Communities Strategy 2035 (RTP/SCS)

**Dear President Pam O'Connor and Honorable Members of the SCAG Regional Council:**

Congratulations on the successful completion of a draft Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This represents the culmination of three years of hard work by your staff, committees, and Regional Council to understand and merge together the land use and transportation plans of hundreds of local governments and agencies. This is a very significant effort that can substantially improve the quality of life, public health, long-term economic competitiveness, and environmental sustainability of the region. Southern California has made some impressive strides in this direction, as reflected in these successes of the plan:

- Meets the greenhouse gas reduction targets established by the California Air Resources Board
- Reduces overall traffic congestion and allows residents to spend less time in their cars
- Triples spending on bike and pedestrian projects and increases transit investments by 13%
- Meets the projected economic market demand by planning for a diversity of housing types, including a more adequate number of small-lot single family homes and dwellings in mixed-use, walkable neighborhoods
- Addresses habitat loss via planning for more cost-effective future environmental mitigation

As organizations that work across the state, we want to recognize and thank SCAG for the enormous progress that Southern California has made in recent years. This is a large and diverse region that has long lacked a transit system with regional reach. Yet Southern California is taking actions that can be a model for regions elsewhere in the state. For example, Los Angeles County's Measure R will generate up to \$40 billion, most for transit, and an effort is now underway to accelerate those 30 years of spending into the early years, when jobs are most needed. SCAG has proactively engaged many communities to create a vision for smart growth, first through the Compass Blueprint program and now with the creation of this SCS. This regional plan builds on an innovative model program from Orange County that will address potential habitat impacts in a way that improves environmental benefits while reducing costs through careful, upfront planning. The success of this plan is built upon just these instances of great local and regional leadership.

However, amidst this plan's successes, there are important ways that this plan can make additional strides. The plan as written reveals that on the current course, there are parts of the region making significant investments in transit, bicycle, and pedestrian infrastructure and thereby receiving great benefits, while other areas are making lesser investments, particularly those in Inland Empire counties. We believe SCAG should pursue additional strategies to expand transit and active transportation opportunities that could have great economic and health benefits for the entire region. We are also concerned that several vulnerabilities in this plan may cause it to not succeed at the level it intends.

## **I. Create greater opportunity for all Southern Californians**

As noted above, the growth and investments in this plan have many benefits for the region as a whole. However, transit and active transportation investments are uneven, and as a result, not everyone in the region will receive the same opportunities and benefits. For instance, this plan reveals that per capita, residents in Los Angeles and Orange County will cut the time they spend driving by about 20%, while residents of Imperial, San Bernardino, and Riverside will receive reductions that are half that, or less. In addition, vulnerable populations across the region will face greater risks. Before finalizing the plan, we ask that the Regional Council and staff take some simple steps to allow the region to move forward together.

***Expand transit service in key areas:*** This plan expands a network of transit choices, giving many people easier access to multiple transportation options, and taking cars off of the roads so that those who do drive spend less time stuck in traffic. Augmenting these with some additional transit investments would provide more options in currently less-served parts of the region.

Expanding bus service levels is the least expensive transit option, and well over 80 percent of those riding transit now do so on bus. The fast-growing Inland Empire counties could particularly benefit from this strategy. The plan shows that only 10% of Riverside County will be served by high-quality bus service (buses every 15 minutes during peak periods). But since about 40% of residents will live near bus lines with a slightly lower level of service (15-30 minute headways), increasing bus travel frequencies would be a relatively low-cost way to greatly expand the number of residents within walking distance of high-quality public transportation. This would not only help those who choose to take the bus, but it will also relieve traffic for those who still need to drive.

Rural parts of the region, such as the eastern Coachella Valley and the North Shore of the Salton Sea, have particularly low access to transit choices even as housing and jobs begin to move into those rural areas. Extending existing bus service to currently unserved rural areas of the Coachella Valley, or exploring options such as local circulators to meet unmet transit needs in rural areas, would also improve access to services and decrease vehicle miles traveled for farmworkers and other rural residents. Additionally, extending planned BRT from Indio to Coachella would make it possible to address the needs of a growing population to access health care, groceries, or good jobs via public transit.

Finally, enhancing and expanding the region's MetroLink system, as well as the BRT and bus system that connect to it, can bring to the full Southern California region the world-class transportation network that it deserves. Such enhancements could create greater economic

opportunity over the long run, more well-paying jobs during the transit construction, and additional opportunities for creating mixed-income walkable neighborhoods.

***Expand funding and policies for bicycles and pedestrians:*** This plan could also take one step further toward providing residents with safe routes for walking and biking. While the plan does triple the previous expenditures, it still devotes less than 1.5% of its funds to safe streets, despite the fact that over 20% of all travel trips in the region are on foot or by bike. According to a poll of Southern California voters by Move LA, NRDC, and the American Lung Association last year, if given the choice, voters would spend significantly more of the region's transportation dollars on bicycle and pedestrian investments.

The L.A. Department of Public Health recently reported that the funding need could be as high as \$40B, yet this plan currently devotes \$6B and estimates another \$4B is available. This gap should be reduced by increasing regional combined bike and pedestrian funding to at least \$12B, in addition to the estimated additional \$4B. These funds should create "first mile / last mile" linkages near transit, address safety problems in areas of high injury and fatality rates, provide sidewalks and bike lanes in places with lower car ownership rates or where basic infrastructure is currently lacking, and help children use Safe Routes to Schools.

In addition, we ask SCAG to commit to working with its local governments and agencies to embed a "complete streets" policy in local and regional transportation project planning, to systematize the inclusion of pedestrian and bicycle safety features in road construction and maintenance projects. Doing so will make cost-effective use of these limited funds.

Finally, we ask that SCAG undertake a regional bike/ped master planning effort, similar to the assessment of unmet road maintenance costs that SCAG currently manages. Before the next RTP, SCAG should work with partner agencies and jurisdictions to identify local needs, funding strategies, and revenue sources to create a completed network of safe routes for walking and biking.

***Further study and aggressively address disparate exposure to air pollution and noise:*** While this plan would improve air quality in the region overall, we are greatly concerned that air pollution levels would still be highest in areas close to freeways, and that levels in some places could be higher than the "business as usual" or baseline scenario. The Environmental Justice Appendix to the Plan shows that 25% - 27% of households living within 500 feet of freeways could face greater exposures to CO and PM, with high concentrations of minority and low income residents disproportionately affected. The Appendix further highlights that all environmental justice populations except the elderly currently have higher risk of cancer and respiratory disease than the region as a whole, and that the "highest areas of respiratory risk are the segments that closely follow major freeways in the most urbanized portions of the region." Non-English-speaking, foreign born populations have the highest risk. Before finalizing this plan, SCAG needs to study where and how disproportionate impacts will occur, by providing a map showing where this will be happening, and then identify a complete suite of mitigations to ensure that air pollution and noise impacts do not get worse for the most vulnerable while getting better for others. One possible tool is the list of model "Health and Equity metrics,"

including a methodology for calculating those metrics, created by Human Impact Partners in partnership with other health experts and organizations.

***Monitor the plan’s impacts on key indicators of health and equity, and improve tools for future planning:*** Addressing inequalities requires understanding them. Particular trends that this plan has a limited ability to project and mitigate – such as the risk of gentrification and displacement near transit stations, injuries / fatalities to pedestrians and cyclists, asthma incidence and exacerbations due to NOx, and the balance of wages to housing costs – should be actively monitored.

To carry this out, SCAG should monitor these issues at a regional scale and also identify particular places to monitor, including areas near transit stations – where shifting demographics suggests that gentrification may already be underway – and also a selected group of areas known to have particularly vulnerable populations.

In addition to tracking this plan’s performance, SCAG should commit to developing specific tools to project future plans’ impact on critical issues, such as the fit between job wages and housing costs; physical activity; the health impacts of the physical activity and air quality created by the plan; and other measures from the “Health & Equity metrics” mentioned above.

## **II. Ensure the Regional Transportation Plan’s Strengths Become Reality**

This plan has much good news for the region, and the recommendations below are designed to help the plan’s strengths become reality.

***Ensure revenues materialize:*** Significant new resources are needed for the plan to come to fruition. We ask SCAG to take a leadership role in convening other agencies and jurisdictions to generate the revenues that this plan depends on for success. In developing this plan, the region was faced with a large funding shortfall. The Regional Council made the policy decision not to cut projects but to find additional revenue sources to pay for its infrastructure plans. The current plan assumes that these needed funds will come from state and federal governments, but as history shows, this is not guaranteed. We hope the region will focus on what it can do to raise money via a combination of regional and local fees or taxes. These new revenue sources should be chosen to avoid adverse impacts to the region’s lower-income populations.

As funding gaps are likely to continue over the long run, we would also recommend that the region follow the example of other regions in considering how to systematically prioritize those expenditures that most contribute to a sustainable, healthy, and equitable region. Between now and the next SCS, SCAG and its partner agencies could develop a systematic method for prioritizing projects, such as the Project Performance Assessment conducted at the Bay Area’s Metropolitan Transportation Commission.

***Frontload and expand funds for transit and bike / pedestrian linkages, and for road and bridge safety projects:*** We ask that in collaboration with its partner agencies and jurisdictions, SCAG lead an effort to accelerate the transit, bike/ped, and road maintenance projects that are essential to meeting the region’s goals into earlier years when revenue is more reliable. Making transportation investments in a

timely way ensures that they have maximum impact. Yet, this plan accelerates road construction projects while delaying essential investments in road maintenance, bike and pedestrian safety, and transit to the late years of this 24-year plan.

Delaying road repairs is a bad idea, because deferred maintenance leads to increasingly costly repair needs. Also, delay endangers road and bridge users – in a region where more drivers already cross structurally-deficient bridges than anywhere else in the United States.<sup>1</sup> Delaying projects that can create a multimodal network with a variety of transportation options also concerns us, because future revenues in this plan are less certain. Transportation investments that not only support driving but also create convenient public transit options and safe routes for walking and biking are essential for achieving the region’s traffic reduction and air quality goals.

***Help local governments plan the transit neighborhoods of the future:*** We ask that SCAG help local governments plan the diverse transit-oriented or transit-ready neighborhoods that this plan relies upon by making a firm commitment to funds for Compass Blueprint. The draft RTP/SCS assumes that many of the region’s homes and jobs will grow as real estate market trends predict they will, in walkable neighborhoods surrounding transit corridors and light rail stations. But many cities are still in the process of updating land use plans to allow that kind of development. Without those plans in place, it is much more difficult for builders to get projects approved and begin construction. With local governments’ planning funds at historic lows, funds to finish this planning may not exist. That makes it essential that the region expands its Compass Blueprint incentive grant program to help local governments plan the kind of neighborhoods that this plan needs to succeed. SCAG should make a clear financial commitment that this will happen.

In doing so, SCAG should use these grants first to fund those local governments that stand ready to create healthy, walkable neighborhoods for households at a range of income levels. SCAG should update its Compass Blueprint grant criteria to ensure that neighborhoods near present or future transit stations or corridors will have safe streets for walking and biking, and a mix of housing types to allow people of a range of incomes to live and work near transit. SCAG’s environmental justice appendix shows that areas near transit are already losing low-income populations. Lower-income households are more likely to utilize transit services that are available to them, so building housing affordable to those households near transit will maximize the benefit of the region’s infrastructure investments. As growth patterns become more compact, SCAG should also carefully monitor and seek resources that could ameliorate and improve rural housing stock.

***Address gaps in the link between growth and transportation planning:*** The success of all regional Sustainable Communities Strategies depends on a well-coordinated link between where growth will happen and where transportation infrastructure will be provided. In places where this link remains weak, SCAG should host conversations between local governments and transportation agencies that will better align transit planning with future growth and housing. Where growth does occur as greenfield development, SCAG should make sure that this habitat and farmland loss is adequately mitigated by ensuring regional mitigation planning includes not only critical habitat and lands within Habitat Conservation Plan / Natural Communities Conservation Plan Areas but all important undeveloped lands, through an inclusive public process. Finally, to make sure the region’s analysis

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<sup>1</sup> October 2011. Transportation for America. The Fix We’re In For: The State of Our Nation’s Busiest Bridges. <http://t4america.org/docs/bridgereport/bridgereport-metros.pdf>

rests on a solid foundation, SCAG should ensure that its High Quality Transit Area calculations accurately includes only the geography around bus stops, not the entire corridor adjacent to a highway that a bus travels along.

Thank you very much for your consideration of these comments, designed to strengthen and support the success of your work in Southern California. We want to again express our appreciation and gratitude to SCAG's Regional Council, committees, and staff. Your efforts to implement SB 375 can help reduce climate change and ensure that future generations of Californians have cleaner air and water, healthier places to live, a stronger and more resilient economy; and greater opportunity for people across the economic spectrum.

**Sincerely,**

Matthew Baker  
Habitat Director: ECOS  
The Environmental Council of Sacramento

Chandra Krout  
Principal  
Krout & Associates

Autumn Bernstein  
Director  
ClimatePlan

Alexis Lantz  
Planning & Policy Director  
Los Angeles County Bicycle Coalition

Jeremy Cantor  
Program Manager  
Prevention Institute

Elyse Lowe  
Executive Director  
Move San Diego

Pauline Chow and Rye Baerg  
Southern California Regional Program Managers  
Safe Routes to School National Partnership

Patricia Ochoa  
Environment and Health Coordinator  
Physicians for Social Responsibility, LA Chapter

Stuart Cohen  
Executive Director  
Transform

Dr. Robert Ogilvie, PhD.  
Program Director, Planning for Healthy Places  
Public Health Law & Policy

Steven Frisch  
President  
Sierra Business Council

Stephen C. Padilla  
Consultant / Director  
Sustainable San Diego

Kim Gilhuly  
Project Director  
Human Impact Partners

James J. Provenzano  
President  
Clean Air Now

Bonnie Holmes-Gen  
Executive Director For Air Quality and Health  
American Lung Association in California

Shamus Roller  
Executive Director  
Housing California

Phoebe Seaton  
Program Director, Community Equity Initiative  
California Rural Legal Assistance, Inc.

Sarah Sharpe  
Director  
Fresno Metro Ministry

Jim Stone  
Executive Director  
WalkSanDiego

Will Wright  
Director of Government & Public Affairs  
American Institute of Architects / LA Chapter

Denny Zane  
Executive Director  
Move LA



February 14, 2012

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

**Subject: CVAG and WRCOG Comments on the Draft 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS)**

Dear Mr. Ikhata:

On behalf of the Coachella Valley Association of Governments (CVAG) and the Western Riverside Council of Governments (WRCOG), we commend SCAG for its undertaking of an update to the Regional Transportation Plan (RTP), and for preparing the region's first Sustainable Communities Strategy (SCS) pursuant to SB 375. CVAG and WRCOG are taking this opportunity to express our collective comments on the Draft 2012 RTP/SCS, and on the future use of the SCS within Riverside County.

CVAG, WRCOG and our respective member jurisdictions worked with SCAG representatives to develop growth projections for the Coachella Valley and Western Riverside County subregions, and we appreciate SCAG's acceptance of our local input on these overall growth projections. These growth forecasts for population, housing, and employment in Riverside County underwent extensive review by both Agencies' members. Both the CVAG Executive Committee and the WRCOG Executive Committee adopted subregional growth forecasts at the jurisdictional (i.e. City and County) level. The Riverside County Board of Supervisors also approved growth forecasts for Riverside County at the jurisdictional level. Neither CVAG, WRCOG, nor the Board of Supervisors have endorsed or approved subregional growth projections at the TAZ level, nor were any more ambitious TAZ level plans made generally available to and generally accepted by the local planners in Riverside County.

We acknowledge SCAG's usage of TAZ-level data for scenario modeling purposes during the development of the Draft 2012 RTP/SCS. However, we did not anticipate the TAZ data that was recently released by SCAG; nor do we agree that they depict a realistic land use pattern that can or will be achieved in Riverside County by 2035. In most cases, the 2035 TAZ maps substantially deviate from our jurisdictions' adopted General Plans, and also deviate from other land use approvals.

We are also concerned that these maps were only recently made available to us for review. Due to the schedule of the Draft RTP/SCS public comment and review period, CVAG and WRCOG were not given substantial time to analyze this information and consult with our member jurisdictions regarding the potential implications of the growth projections depicted in the 2035 TAZ maps.

Accordingly, although CVAG and WRCOG support the use of the underlying projected population, household, and employment counts for policy purposes at jurisdictional levels, we do not support the

Hasan Ikhata  
February 14, 2012  
Page 2

use of the counts reflected in the recently-disclosed TAZ maps as a basis for CEQA streamlining or SCS consistency review under CEQA. Nor do we support the use of these maps for purposes of determining future infrastructure planned in Riverside County. Furthermore, we do not support the use of this information for the purpose of land use regulation or regulatory purposes of any kind. Finally, CVAG and WRCOG do not support SCAG's use of the TAZ maps and supporting data for determining future allocation of Compass Blueprint Program funds or any other funding incentives administered by SCAG or others.

We strongly urge that SCAG clarify that the use of TAZ-level data is for SCS modeling purposes only, and remove any language and policy statements from the Draft 2012 RTP/SCS that otherwise strengthen the standing of these unapproved data.

Thank you very much for your time and consideration of these issues. Please do not hesitate to contact Tom Kirk, CVAG Executive Director at (760) 346-1127 or by email at [tkirk@cvag.org](mailto:tkirk@cvag.org), or Rick Bishop, WRCOG Executive Director, at (951) 955-8303 or by email at [bishop@wrcog.cog.ca.us](mailto:bishop@wrcog.cog.ca.us) should you have any questions on this correspondence.

We look forward to hearing from you.

Sincerely,



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Tom Kirk  
CVAG Executive Director



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Rick Bishop  
WRCOG Executive Director



# Board of Supervisors County of Los Angeles

MICHAEL D. ANTONOVICH  
SUPERVISOR

February 28, 2012

The Honorable Alan Wapner  
Chairman, Regional Transportation Plan Subcommittee  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear Chairman Wapner:

As a Los Angeles County Supervisor, Vice-Chair of the Los Angeles County Metropolitan Transportation Authority (MTA), and SCAG Board Director, it is my pleasure to request that this subcommittee recommend to the SCAG Regional Council the inclusion of a high speed rail study within the proposed High Desert Corridor project between Victorville and Palmdale as part of the Constrained Regional Transportation Plan.

The importance of the High Desert Corridor has been well-noted by the federal government, which designated the project as a "Corridor of National Significance" with its "E-220" designation in SAFETEA-LU. Support for this project started with the Counties of Los Angeles and San Bernardino partnering to create a Joint Powers Authority (JPA) to oversee the development of this corridor. Since this time the project has also been endorsed in the constrained portions of SCAG's Regional Transportation Plan, the Regional Transportation Improvement Plan, and the MTA Long Range Transportation Plan. The potential for this corridor to divert car and truck trips from the heavily-populated, congested and emissions-plagued Los Angeles and San Bernardino basins has gained national attention as a vital solution to the confluence of local, regional and national car and truck traffic within the region's current freeway system.

The High Desert Corridor JPA Board of Directors has always envisioned this corridor as a public-private partnership that would require multiple elements to create a multi-modal corridor that met the region's needs for car, truck and transit infrastructure improvement. Inclusion of a high-speed rail component within the right-of-way of the High Desert Corridor reflects the desire of the JPA Board of Directors to connect Palmdale and Victorville with at minimum an enhanced 110 mile-per-hour high speed Metrolink corridor, and potentially a 220 mile-per-hour high speed rail corridor compatible with both the California and DesertXpress High Speed Rail systems. Currently the JPA Board has not entered into any agreement with Metrolink, California High Speed Rail,

The Honorable Alan Wapner  
February 28, 2012  
Page 2

Amtrak or DesertXpress to partner with the JPA in operating service on this high speed rail corridor. Rather, the JPA will remain partner-neutral until which time the Public-Private Partnership Request for Proposals process calls for a decision to be made by the High Desert Corridor JPA and its partners in MTA and SANBAG.

By combining the environmental study of this high speed rail component of the High Desert Corridor into the current environmental work for the highway portion of the project, the JPA Board strives to provide a cost-effective manner of implementing this transit aspect of the project as cost-effectively as possible while staying within SCAG's envelope of \$8.2 billion in the proposed Regional Transportation Plan. By including a vital high speed rail component, the High Desert Corridor stands poised to become a model public-private partnership project which captures the multi-modal requirements of AB 32 and SB 375 while leveraging private capital and improving the national movement of truck freight as encouraged by federal transportation policy.

Thank you for your support of the inclusion of the High Desert Corridor, including the environmental study of a high speed rail component within its right-of-way, in the Constrained portion of SCAG's Regional Transportation Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Antonovich". The signature is fluid and cursive, with a large initial "M" and "A".

MICHAEL D. ANTONOVICH  
Supervisor

MDA:mcc

c: Members of the Regional Transportation Plan Subcommittee



JONATHAN E. FIELDING, M.D., M.P.H.  
Director and Health Officer

JONATHAN E. FREEDMAN  
Chief Deputy Director

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Paul Simon, M.D., M.P.H.  
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February 14, 2012

Pam O'Connor, President  
Regional Council  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear President O'Connor:

We thank the leadership and staff of the Southern California Association of Governments and its Regional Council members for developing the agency's first-ever Sustainable Communities Strategy (SCS) and 2012 Regional Transportation Plan. This task was especially challenging given that it is the first time the region has put together an SCS.

The Department of Public Health supports many aspects of the RTP which will improve public health and air quality and lower greenhouse gas emissions by expanding public transit, promoting new development near transportation, and increasing investments for bicycle and pedestrian infrastructure.

The following recommendations are made to strengthen the RTP/SCS this year and in future years.

#### **1. Target and increase investment for active transportation**

We applaud SCAG's proposed increased investment in active transportation, from \$1.8 billion in the 2008 RTP (less than .5 %) to \$6 billion (1.3%) in the current draft plan. DPH strongly encourages that the final plan:

- Prioritize (i) first-mile/last-mile connections to transit stations which will help support the increased investment in the transit system; (ii) projects that close gaps in key bicycle and pedestrian corridors; and (iii) communities with high numbers of bicycle and pedestrian injuries and high rates of chronic disease.
- Front load active transportation funding so it is available to jurisdictions to build walkable and bikeable communities early on in the 25 year RTP period.
- Provide funding and technical assistance for cities to create bicycle and pedestrian plans and city-wide safe routes to school plans.
- Offer support to County Transportation Commissions (CTCs) and local jurisdictions to adopt a complete streets policy so that pedestrian and bicycle improvements can be made routinely and more economically when streets are improved or built.

In addition, the plan should include further investments in active transportation to create 1) basic bicycle and pedestrian infrastructure in key areas in every city in the SCAG region; 2) bikeable and walkable neighborhoods within ½ mile of all TODs, existing and planned; 3) complete routes to public schools throughout the region that children can walk and bike to; 4) sidewalks repair throughout the region; and 5) improved continuity in county bike networks.

This recommendation for additional investment is based on a recent DPH examination of cost data from local cities' bike and pedestrian plans and CalTrans Safe Routes to Schools grants in LA County, cost of sidewalk repairs in LA City, and costs for building pedestrian and bicycle improvements in Transit Oriented Districts. DPH used this data to estimate costs for needed bike and pedestrian improvements across the SCAG region.

Given that cities' bicycle and pedestrian master plans have a range of costs for proposed improvements, we present a range for the estimated amount of active transportation funding needed to generate these improvements across the region, from a low of \$37 billion (7.1%) to a high of \$60 billion (11.4%) over 25 years, adjusted for inflation. We recognize that there are many factors that must be considered in your resource allocation decisions and, therefore, do not provide these estimates as a recommendation for funding. However, given the region's long standing underinvestment in bike and pedestrian infrastructure, we feel this is an appropriate range of investment options for your consideration.

### **2. Build healthy neighborhoods around transit stations that protect existing low-income residents**

The area around rail stations offers a unique opportunity to create safe access to transit and to address key community needs such as mixed-income housing and business/retail corridors within a walkable and bikeable community setting. However, without careful planning, the people in neighborhoods adjacent to rail stations can be displaced as real estate prices rise in response to new development, triggering corresponding increases in residential and commercial rents for low-income families and small business owners. DPH encourages that the plan:

- Prevent displacement of existing low-income residents, fund jurisdictions to create transit-oriented development (TOD) plans that include policies to preserve existing affordable housing and small business store fronts and to ensure the provision of affordable housing and small business store fronts in new developments.
- Whenever possible, locate housing, child care facilities, schools and other sensitive-use development far enough away from sources of pollution to decrease exposure that can negatively affect health.

### **3. Strengthen public health modeling and monitoring**

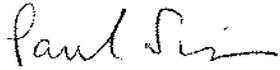
We encourage SCAG to measure the public health impacts of transportation investments. For example, the RTP could be analyzed for its potential to reduce chronic diseases in the SCAG region, such as heart disease and breast cancer, based on increases in walking and biking, linked to active transportation scenarios. Specifically, DPH encourages SCAG to:

- Measure the health benefits of transportation plans by integrating health outcomes into SCAG's modeling approaches.
- Measure and report on additional public health indicators including but not limited to: bicycle and pedestrian injuries and collisions by geographic areas; percentage of households that can walk or bike within 10 minutes to reach their daily destinations, e.g. transit, schools, childcare, parks; percent of income consumed by housing and transportation costs.
- Conduct targeted analyses in neighborhoods adjacent to rail stations to determine if displacement of existing residents is occurring as development occurs.

Pam O'Connor  
February 14, 2012  
Page 3

We express our appreciation to the SCAG Regional Council and staff for your hard work to develop this RTP/SCS and to guide Southern California's land use and transportation investments wisely. We look forward to working with you to make our neighborhoods and our region healthier for existing and future residents.

Sincerely,

A handwritten signature in cursive script that reads "Paul Simon".

Paul Simon, M.D., M.P.H.  
Director, Division of Chronic Disease and Injury Prevention



County of Orange  
California

Thomas G. Mauk  
County Executive Officer

February 10, 2012

Hasan Ikhata, Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

Re: Orange County Comments to the Draft 2012 Regional  
Transportation Plan/Sustainability Communities  
Strategy

Dear Mr. Ikhata,

The County of Orange (County) has reviewed the 2012 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and associated Program Environmental Impact Report (PEIR). SCAG staff should be commended for the effort put into these regionally significant documents that put forth goals, policies and strategies intended to meet the provisions of SB 375. The County appreciates the opportunity to provide comments and suggested revisions to these documents.

Upon review of these documents, the County has determined that there are a number of policies, strategies and measures within the draft RTP/SCS and PEIR that detrimentally affect the County's local land use control and future transportation funding, and that the documents are legally inadequate under CEQA, SB 375, and applicable law. The overarching issues are described below and specific technical details are provided in the attached matrices. The County requests that all of the following changes be made so that the RTP/SCS and PEIR conform to existing law and County land use policies, and that the RTP/SCS and PEIR be recirculated for public review and comment.<sup>1</sup>

#### Orange County Sustainable Communities Strategy

In 2010, the Orange County Council of Governments (OCCOG) requested delegation to develop a subregional Sustainable Communities Strategy (SCS) for Orange County. OCCOG entered into a Memorandum of Understanding (MOU) with SCAG that has allowed OCCOG to develop the Orange County Sustainable Communities Strategy (OC SCS) which will be incorporated into SCAG's 2012 RTP/SCS. The OC SCS, approved by the OCCOG Board of Directors on June 23, 2011, describes the policies and programs that Orange County local jurisdictions will

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<sup>1</sup> This letter is not intended as an exhaustive discussion of the PEIR's compliance with State law, particularly the California Environmental Quality Act (CEQA) and SB 375. The County further adopts and supports the comments of other local agencies, such as the Cities of Irvine and Anaheim, OCTA, and others, to the extent those comments are consistent with this letter.

implement to reduce greenhouse gas (GHG) emissions to 2005 levels by the year 2035 and reflects current land uses, existing entitlements, proposed development (e.g., general plans, zoning maps, etc.) and forecasted population, housing and employment growth in Orange County (i.e., Orange County Projections [OCP] 2010 – Modified, January 2012).

Pursuant to the MOU between SCAG and OCCOG, the OC SCS is to be fully incorporated without change. Although there are several references to the OC SCS in both the RTP/SCS and PEIR, it remains unclear whether the data contained in the OC SCS has remained unchanged in each proposed alternative. Without the underlying data for each alternative available for review, this cannot be confirmed. It is requested that language, maps, tables, and charts be added to demonstrate that the underlying land use, socioeconomic, and transportation data for Orange County (OCP 2010 – Modified) has been incorporated into the regional RTP/SCS and each of its plan alternatives without alteration as agreed to in the MOU. It is also requested that the adoption of the growth forecast numbers by SCAG’s Regional Council and/or Joint Policy Committee be at the county level, consistent with past RTPs.

A review of the policies and strategies contained in the RTP/SCS has revealed the potential for inconsistency with land use policies and/or County operations in the unincorporated area. The County requests that the RTP/SCS include language that acknowledges and incorporates the fifteen “OC SCS Sustainability Strategies A through O,” contained in Chapter Three, and the “Sustainability Strategies,” contained in Appendix F, of the OC SCS as specifically appropriate for the Orange County Subregion.

#### Land Use/Local Control

Several policies in the RTP/SCS and dozens of mitigation measures in the PEIR, appear to go beyond the requirements of SB 375 and extend SCAG’s purview into local land use control, which under law is exclusively vested with the local jurisdiction in most cases. The police power vests a county or a city with local land use regulation and control to protect the public health, safety and welfare of its residents.<sup>2</sup> This is specifically set forth in the California Constitution Article XI, Section 7, which reads that “A county or a city may make and enforce within its limits all local police, sanitary and other ordinances and regulations not in conflict with general laws.” Under this power a county is entitled to tailor regulations to suit the ever changing needs and interests of its population, which will be done through local ordinances and applicable CEQA processes (which are addressed below). Certain measures set forth in the PEIR will in effect usurp this local control that is enshrined in the California Constitution and preserved in SB 375.

The PEIR also contains measures that will affect County operations which are federally or state regulated. There are at least 180 mitigation measures related to existing federal and state regulations with which local jurisdictions must comply (see attached matrix).<sup>3</sup>

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<sup>2</sup> *Berman v. Parker*, (1954) 348 U.S. 26, 32-33.

<sup>3</sup> The attached matrix contains the collective comments of all County agencies that are impacted by the RTP/SCS and PEIR. Although some comments recommend edits to the mitigation measures, it is the overriding contention of the County that certain mitigation measures be completely removed. Those measures include, but are not limited to, mitigation measures as to what other local agencies “can and

These mitigation measures contain the phrase “local jurisdictions can and should” which both assumes the local jurisdiction has the authority to implement the measure and is required to do so. Inconsistency between proposed mitigation measures and existing mandates is of great concern to the County. For example, there are five California Regional Water Quality Control Boards (RWQCB) in the SCAG region, including two in Orange County, that have issued individual and locally-specified water quality permits. Local jurisdictions, including the County, would be unable to implement several of the mitigation measures in PEIR section “3.13 Water Resources” due to their inconsistency with the requirements of their local water quality permit. The County requests that mitigation measures related to existing federal and state mandates be removed and language added to the beginning of each PEIR section that states that local jurisdictions must comply with existing applicable laws and regulations. Should SCAG not delete the measures that restate existing federal, state, and local laws and regulations, the County recommends a statement that the proposed mitigation measures would be superseded by such.

Several mitigation measures will impose both funding priorities and financial obligations upon local jurisdictions at a time when budgets are tight and some funding sources are no longer available. Other measures will shift the financial obligation to project sponsors and residents by proposing that new taxes and fees be levied to fund programs or projects that “support a shift from private passenger vehicles to transit and other modes of transportation.” New taxes will require voter approval and new fees are subject to Proposition 26. This analysis is outside the scope of SB 375 and SCAG is unable to make that determination. If a tax is defeated, the local jurisdiction cannot implement it as a mitigation measure which could only have been implemented with a new funding source. Finally, the assessment of impact fees upon new development to fund these measures will result in an increase in the cost of housing and infrastructure and create an even more difficult environment for construction to resume, particularly for affordable housing throughout the region.

### CEQA Considerations

The PEIR fails to comply with the fundamental requirements of CEQA, which must be corrected by SCAG and recirculated for additional public review and comment.<sup>4</sup> The timeframe for review of a document as large as the PEIR is inadequate considering that the SCS is one of the first documents of its kind and may be subject to considerable comment by impacted jurisdictions, legally necessitating another round of review.

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should” do, project level mitigation measures, mitigation measures duplicating federal and state law, and those measures that are beyond SCAG’s authority to analyze under SB 375.

<sup>4</sup> We acknowledge that some of the CEQA issues discussed herein are currently being litigated by SANDAG. The County believes that the SANDAG DEIR properly deferred many mitigation measures to local agencies and that it is reasonable and legally defensible to do so.

### *Project Description Is Inadequate*

It is not possible from reading the Project Description section of the PEIR to determine what actions SCAG proposes to take that constitute the “project” as defined by CEQA.<sup>5</sup> The PEIR for the RTP/SCS is unreasonably broad, addressing both program level and project level mitigation measures, as well as subject areas beyond the scope of SB 375. This causes confusion as to what the actual “project” is under CEQA. Program level environmental documents by their nature consider initial broad policies for later projects or are designed to address a series of project approvals that will occur over time. By and large, it appears that the “project” here is something akin to adopting a range of policies to be imposed on activities of other entities that will promote compliance with SB 375 and other GHG reduction legislation. In any event, the project description is so uncertain that it cannot be determined what actions SCAG might take, and therefore, it cannot be determined what potential impacts the RTP/SCS might have on the physical environment. When future project development is unspecified and uncertain, as is noted throughout the PEIR, the project description should not supply extensive detail or ambiguity beyond that needed for evaluation and review of the environmental impact.<sup>6</sup>

### *Project Level Mitigation Measures Are Improper*

The PEIR states that certain projects have not been specifically analyzed or that projects and project impacts are better addressed at the lead agency or local agency level. The PEIR also states that mitigation measures are drafted in less detail than those that would be part of a project EIR. However, the PEIR contains 550 detailed mitigation measures; nearly double that from the previously approved 2008 RTP PEIR. Of foremost concern are a broad array of proposed project level mitigation measures that SCAG asserts lead agencies “can and should” adopt. There are a number of legal and policy reasons in favor of deleting these mitigation measures from the PEIR, and instead, including them as an appendix of suggested project level considerations for a local agency in determining SCS consistency.

The use of the words “can and should” in the PEIR and SCS are being interpreted by many local agencies as mandates to be implemented at the local project approval level in order to be consistent with the SCS. The PEIR is not clear about what “can and should” means. CEQA Guidelines section 15005 defines “must,” “should” and “may” to indicate whether a particular subject in the CEQA Guidelines is mandatory, advisory or permissive, respectively. Section 15005(b) states that “should” identifies policy considerations under the Guidelines, legislative history of the statute and court decisions that public agencies are advised to follow in the absence of compelling, countervailing considerations. Common use of the word “can” is used to express ability or opportunity, although this term is not defined under CEQA or any case law. It is not clear what SCAG’s intent is in using “can and should,” and whether usage is intended to be mandatory, advisory or permissive. Based on a definitional interpretation of “can and should,” the phrase appears in this context to mean that the lead agency is able to and recommended that the mitigation measures be imposed. Should this be SCAG’s intent, the County notes that SCAG has no authority under any applicable law to prescribe or

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<sup>5</sup> All references to “project” in parentheses mean SCAG’s RTP/SCS program as it is a “project” defined by CEQA pursuant to Pub. Res. Code § 21065 and CEQA Guidelines § 15378.

<sup>6</sup> *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 199; CEQA Guidelines § 15124.

enforce such mitigation measures. Furthermore, under CEQA, local agencies are not bound by the PEIR's mitigation measures as project level mitigation will be addressed by a lead agency at the time of project approval to the extent the mitigation is determined by that lead agency through the CEQA process to be feasible, effective and enforceable.

SCAG has stated at public meetings and workshops on the RTP/SCS that the mitigation measures are intended as a "toolbox" or "menu" of policy considerations from which lead agencies could choose in approving a project.<sup>7</sup> Even with this clarification in the PEIR, "can and should" is used inconsistently throughout the documents. On page 1-5 of the Introduction, the PEIR expressly states that mitigation measures can be implemented at the project level and that local lead agencies "shall be responsible for ensuring adherence to the mitigation measures . . ." The Introduction goes on to state that "it is reasonable to expect that other agencies will actually implement the mitigation measures assigned to them."

SCAG should not attempt to further define what "can and should" is intended to mean or even what it means in every instance, as the current meaning under CEQA and common use of the words indicate a mandate where there is not one under CEQA or SB 375. The applicable mitigation measures should be removed from the PEIR and added to an appendix to the SCS or other policy related document, making clear that they are permissive policy considerations that lead agencies could examine at the project level. The County's recommended reworking of the mitigation measures will avoid misinterpretation and be consistent with CEQA and SB 375's preservation of local control. Again, permissive or advisory policy considerations are not proper mitigation measures for an EIR where mitigation measures must be feasible, effective and enforceable. This would also remove those mitigation measures that are not specific and do not articulate the impacts that will be mitigated.<sup>8</sup>

SCAG states that it is required to find that other jurisdictions can and should implement mitigation measures since many changes and alterations to SCAG's "project" are within the responsibility and jurisdiction of other public agencies.<sup>9</sup> This argument is flawed. If SCAG is to clarify these mitigation measures are advisory or permissive policy considerations to be implemented by the local agency on a "toolbox" or "menu" basis, then the finding under section 15092(a)(2) has not been demonstrated because the measures will not in fact mitigate or avoid significant effects on the environment caused by SCAG's "project" since they are policy tools to be evaluated by local agencies. That is, SCAG should defer all mitigation measures associated with what local agencies "can and should" do to individual project level CEQA processes and only deal with program

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<sup>7</sup> While the County generally supports SCAG's intent to clarify in the PEIR that mitigation measures associated with what a local agency "can and should" do are a "toolbox" of policy considerations to consider at the project level, we believe that under CEQA, the mitigation measures should be removed for the reasons stated herein.

<sup>8</sup> *Endangered Habitats League v. Orange County* (2005) 131 Cal.App.4th 777.

<sup>9</sup> Introduction, page I-6, citing Pub. Res. Code § 21081(a)(2) and CEQA Guidelines § 15092(a)(2) as the basis of its use of "can and should."

level issues that are within SCAG's authority. This approach is consistent with SB 375's preservation of local control.

*Mitigation Measures Have Not Been Demonstrated to be Feasible, Effective & Enforceable*

As discussed above, the PEIR does not analyze specific projects and specific project impacts, yet attempts to implement a variety of project specific mitigation measures. The mitigation measures primarily consist of measures that SCAG thinks should be applied to future projects to be carried out by other entities. Such mitigation measures, of course, have no bearing on whatever "project" it is that SCAG is evaluating, and cannot be evaluated either for feasibility, effectiveness or enforceability since they would apply to as yet unidentified and indescribable future projects by other entities.

An EIR must describe and demonstrate the feasibility of mitigation measures that can minimize the project's significant environmental effects.<sup>10</sup> The PEIR has made a preliminary determination that these mitigation measures are feasible and effective, and therefore, it is reasonable to expect that local governments will actually implement them. The County believes, however, that it has not been demonstrated that each and every project specific measure is feasible, practical and effective, or even that local agencies "can and should" approve such measures. If this was the case, then the mitigation measures would not now be characterized as a "toolbox" or "menu." And despite recognition that the PEIR cannot analyze every future project and impact, the document contains an exhaustive list of mandated or suggested, as the case may be, project level mitigation measures that local agencies "can and should" implement. CEQA, though, does not require analysis of every imaginable mitigation measure unless such measures are feasible and effective.<sup>11</sup> By its own admission, the PEIR has not analyzed and cannot analyze every potential project or impact for which it is attempting to mitigate. Thus, the measures are larger than the program itself and cannot therefore be characterized as feasible and effective.

The County agrees that mitigation measures must be adopted for significant impacts recommended in an EIR unless a lead agency finds that the measure is infeasible. We believe, though, that it can be demonstrated that project level measures as to what local agencies "can and should" do are infeasible as it is outside SCAG's authority to mandate since most SCS determinations will actually be made at the project level. Mitigation measures that are adopted must be enforceable through conditions of approval, contracts or other means that are legally binding.<sup>12</sup> A lead agency is not required to adopt a mitigation measure when it has no ability to enforce the measure.<sup>13</sup> SB 375 is clear that a metropolitan planning organization (MPO) does not have authority to require compliance

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<sup>10</sup> CEQA Guidelines §§ 15121(a), 15126.4(a).

<sup>11</sup> *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 CA4th 911, 935; *San Franciscans for Reasonable Growth v. City & County of San Francisco* (1989) 209 CA3d 1502, 1519.

<sup>12</sup> Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2).

<sup>13</sup> *Tracy First v. City of Tracy* (2008) 177 CA4th 912.

with the SCS, and the legislation suggests that MPOs may have some ability to make determinations as to SCS consistency for purposes of prioritizing state transportation funding allocations. The County recognizes that CEQA allows program level mitigation measures to be incorporated into a policy or plan,<sup>14</sup> but it is beyond SCAG's authority, as it has done here, to approve project level mitigation measures that can only be considered by a lead agency at the project level as such measures are not enforceable by SCAG pursuant to SB 375.

All proposed mitigation measures are subject to the same standard of feasibility under CEQA whether the measure is proposed to be carried out by SCAG or another local agency. The standard does not change for measures outside of SCAG's control. Thus, SCAG's preliminary determination of feasibility as to those mitigation measures that another local agency "can and should" could raise the feasibility thresholds for future lead agencies that actually make those determinations.

*Significant Impacts to the Environment Are Speculative*

Since it cannot be determined from the Project Description exactly what the "project" is, it cannot be discerned what impacts the "project" might have, and therefore, it is impossible to determine whether project level mitigation measures will avoid or otherwise reduce the impacts of the RTP/SCS. Certainly, SCAG relies on the data submitted by all local agencies in its region, and it must take the data at face value and rely upon it as accurate. The PEIR, though, correctly notes that it cannot specifically identify all future projects and it cannot specifically analyze those projects that will later be approved by other lead agencies. Future development in many respects is unspecified and uncertain, and the PEIR is not required to include speculation about future environmental consequences of such development and how it should be mitigated.<sup>15</sup> "No purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences."<sup>16</sup> Project level mitigation measures as to what a local agency "can and should" do are inadequate as sheer speculation because there is no evidence that they will avoid or reduce the impacts of SCAG's program and do not relate to known, identifiable projects.

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<sup>14</sup> CEQA Guidelines § 15126.4(a)(2).

<sup>15</sup> *Laurel Heights Improvement Assoc. v. Regents of the Univ. of Calif.* (1988) 47 Cal.3d 376, 395.

<sup>16</sup> *Christward Ministry v. Superior Court* (1986) 184 Cal. App. 3d 180, 193.

### *Mitigation Measures That Are Already Required by Law*

Another reason to exclude project level mitigation measures is that many of them are already required by law. Although environmental documents often cite existing laws as mitigation measures for significant environmental impacts, this is often done at the project level where specific laws and regulations can be analyzed to determine whether the regulation or practice will actually mitigate the impact. SCAG's region lies across six large counties that have varying land use circumstances. For instance, the SCAG region encompasses five regional water boards with differing NPDES permit requirements, such as low impact development requirements that are implemented differently depending on geotechnical issues. The PEIR mitigation measures should not overly generalize or speculate as to which laws and regulations should be followed, which can only be determined by the actual regulating body on a specific basis.

### SB 375 Considerations

The County is deeply concerned with the broadness of the PEIR and RTP/SCS. At a presentation held at the CEHD meeting on January 8, 2009, SCAG then interpreted SB 375 to only include VMT associated with vehicles and light trucks, and went on record that green buildings, energy efficiency, municipal operations, waste management, water and technology programs and measures were not within the purview of the SCS. The draft RTP/SCS and PEIR, however address all of these subject areas. We believe that SCAG's original 2009 interpretation is the legally correct one under SB 375 and that SCAG should amend the document to delete all references and measures to items outside of SB 375 that do not directly relate to VMT from vehicles and light trucks. The RTP/SCS and PEIR should not be used as an umbrella document for all things SCAG considers sustainable.

The legislative text of SB 375 states that state transportation funding will be prioritized and allocated to those local agencies that are consistent with an approved SCS. The actual SB 375 statutes do not specifically state how this will be done and what exact funding will be subject to SCS prioritization. There has been no follow-up legislation or other policy of which the County is aware that clarifies this issue. Due to this, SB 375 enforcement is unclear.

We believe that SCAG should clarify and elaborate on its understanding of this issue. Much more information is needed as to the process, if any, that SCAG will employ to make SCS consistency findings. Will SCAG make SCS consistency findings for individual programs and projects? Will a subregional delegate who has prepared its own SCS, like OCCOG has with the OC SCS, have the authority to make such findings? Will the local programs and projects within Orange County boundaries also be subject to consistency findings by SCAG under its approved SCS? What types of local programs and projects will be subject to a SCS consistency review? These questions and many other must be answered prior to effective implementation of the policies set forth in SB 375.

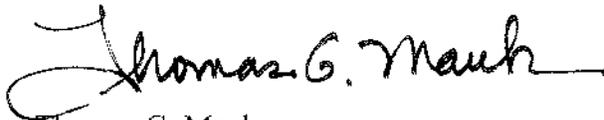
The PEIR states in one sentence that "Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring

efforts, including SCAG's Intergovernmental Review (IGR) process."<sup>17</sup> However, SCAG's approved 2008 PEIR devotes several pages to what a RTP consistency process entails. SCAG also devotes a portion of its website to an overview of the IGR process, but this does not appear to incorporate SCS issues and has not been recently updated. The County encourages SCAG to revise the SCS/PEIR to specifically define such a process in enough detail and with sufficient public comment to ensure that any such oversight is consistent with SB 375 and is not arbitrary or capricious under State law. On this issue, the County recommends that there be consideration for a consistency process by the subregional delegate who has prepared its own SCS, like OCCOG.

In short, many of the mitigation measures appear to go beyond SB 375's focus on transportation and housing, and could potentially be outside the scope of SCAG's authority. Again, the SCS and its mitigation measures should not be a "kitchen sink" approach to sustainability, but should endeavor to examine actual programmatic ways to reduce GHG within SCAG's control. The County is very concerned with mitigation measures that state local agencies "can and should" pass new taxes and fees. Such measures are beyond the scope of SCAG's authority to examine under SB 375 and are infeasible mitigation measures under CEQA.

The County respectfully requests that Southern California Association of Governments review and incorporate our comments/responses into the final 2012 RTP/SCS and PEIR. Further, as a member of the OCCOG, the County actively participated in the development of and supports the comments submitted by the OCCOG Executive Director. If you have any questions regarding this matter please call Rick LeFeuvre at (714) 955-0124.

Sincerely,



Thomas G. Mauk  
County Executive Officer

Attachment

cc: Orange County Board of Supervisors  
Alisa Drakodaidis, Deputy CEO, OC Infrastructure  
Jess A. Carbajal, Director, OC Public Works  
Rick LeFeuvre, Director, OC Public Works/Planning

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<sup>17</sup> Introduction, page I-5.

**County of Orange**  
**Review of Draft 2012 Regional Transportation Plan/Sustainable Communities**  
**Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR)**

<b>AREA OF CONCERN: AIRPORT OPERATIONS</b>	
Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy	
<p>Chapter 2 – Transportation Investments</p> <p>Page 60-62</p>	<p>Information is presented on airport ground access and airport financial and marketing strategies. These strategies identify potential sources of funding such as: a) charging fees for private vehicles picking up and dropping off passengers at congested airports; b) a regional funding mechanism using revenues generated at congested airports to support facilities and development at alternate airports (requiring new legislation); and c) funding a region-wide marketing effort through sources such as airport parking and rental car transactions. Including these specific strategies in the RTP document may raise expectations that these strategies are supported by airports in the region. However, due to the competitive nature of most airports, it may be difficult to achieve such support. It may also be challenging to garner airline and FAA support.</p> <p>It is suggested that the airport strategies text be revised to recognize that any incentives or funding mechanisms that are proposed, and which affect other airports in the region, should be developed through regional consensus. Although many of the SCS "Airport Policies and Action Steps" suggest such an approach, this should be stated in the strategies text as well, and it should be clear that while these strategies may be explored, they may or may not be pursued. Additionally, SCAG should invite the FAA and airline representatives to be part of any discussions which address the concept of using revenues from one airport to benefit another.</p>
<p>Chapter 2 – Transportation Investments</p> <p>Page 61</p>	<p>A revision to the <i>Airport Ground Access Strategy</i> section (end of the first paragraph) is suggested as follows: "Potential sources of funding could include charging fees for private vehicles picking up and dropping off passengers at the congested airports. This <del>would not adversely impact existing airport revenues and would</del> could have a number of advantages...."</p> <p>This revision is proposed because, with respect to the third bullet, a case could be made that although there are advantages to passengers using public transportation, it is possible that parking revenues would be adversely impacted.</p>
<p>Chapter 2 – Transportation Investments</p> <p>Page 61</p>	<p>The <i>Airport Financial Strategy</i> section should be revised to avoid making inferences that an issue "should not be controversial," especially related to a strategy that identifies a requirement for legislative changes allowing funds from one airport to be used at another airport(s) not operated by the same entity. It should also be clarified that such legislative changes would be needed at both the state and federal levels.</p>
<p>Chapter 2 – Transportation Investments</p>	<p>The <i>Airport Marketing Strategy</i> section suggests that SCAG work with regional stakeholders to develop region-wide marketing efforts to promote alternatives to the use of congested airports. A variety of funding sources is suggested; however, airport parking and rental car transactions are specifically mentioned. These funding sources may or may not be supported by airports in the SCAG region and should be thoroughly</p>

Page 62	discussed and, as stated in the document, a consensus of the region's airports should be developed before proceeding with such a strategy.
Chapter 2 – Transportation Investments	The <i>Airport Policies and Actions Steps</i> identify certain actions that are recommended by SCAG. The sub-section, <i>Airspace Planning and New Technologies</i> , identifies policies related to modifications to the regional airspace system, and airspace capacity and constraints. It is suggested that the wording, "in coordination with the FAA," be added to each of the bullet points in this section.
Page 62	

### AREA OF CONCERN: PUBLIC HEALTH

#### Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy

Chapter 1 – Vision	Note, via additional check, connection between "Safety and Health" and "Encourage land use and growth patterns that facilitate transit and non-motorized transportation."
Page 15, Table 1.3	
Chapter 2 – Transportation Investments	The collection of additional data on active transportation, including greater specificity in destinations, geographic detail, and types of active transportation, is important in ensuring data driven transportation systems.
Page 53	
Chapter 2 – Transportation Investments	The proposed expansion of bikeways represents an exciting opportunity to facilitate active transportation, improve air quality, and reduce chronic disease risk. The connectivity of such an expanded bikeway network with transit systems, centers of employment, and residential areas, particularly those most likely to use and benefit from such assets, is also an important part of such a plan.
Page 53	
Chapter 2 – Transportation Investments	The improvement of sidewalk infrastructure proposed in the RTP/SCS is likely to facilitate walking as sidewalk quality can be a key factor affecting walkability.
Page 53	
Chapter 2 – Transportation Investments	Safe Routes to School: Besides their benefits in reducing congestion related to the drop-off and pick-up of students, Safe Routes to School initiatives can facilitate important daily incidental walking and biking, which can substantially increase the chances of children meeting daily physical activity recommendations. Though the draft RTP/SCS recognizes the importance of Safe Routes to School, it could better detail how Safe Routes to School programs, assets, and principles will be integrated into the plan.
Page 54	
Chapter 2 – Transportation Investments	SCAG's encouragement of Complete Streets is important to the local implementation of Complete Streets policies consistent with AB1358. Augmented and explicit support in the RTP/SCS for physical and engineering changes that facilitate safe multi-modal, multi-user roadway utilization may be beneficial. Consider increasing regional coordination in Complete Street policy implementation to facilitate continuity across

Page 54	local jurisdictions.
Chapter 4 – Sustainable Communities Strategy Page 150, Table 4.3	We would be excited to participate in the Action/Strategy, "Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities." The inclusion of "Local Jurisdictions" in the "Responsible Parties" field would further bolster local collaborations, including those with Public Health Departments.
Chapter 4 – Sustainable Communities Strategy Page 150, Table 4.3	The Action/Strategy "Consider developing healthy community or active design guidelines that promote physical activity and improved health" has considerable promise. The inclusion of "State" in "Responsible Parties" would bolster coordination, collaboration, and support in generating guidelines.
Chapter 4 – Sustainable Communities Strategy Page 150, Table 4.3	In reference to "Engage in a strategic planning process to determine the critical components and implementation steps for identifying and addressing open space resources," please consider including increasing / preserving park space, specifically in park-poor communities.
Chapter 4 – Sustainable Communities Strategy Page 150, Table 4.4	Perhaps the Action/Strategies "Encourage the implementation of a Complete Streets policy" and "Emphasize active transportation projects as part of complying with the Complete Streets Act (AB 1358)" could be tied together somehow given they will likely be implemented in concert.
Chapter 4 – Sustainable Communities Strategy Page 150, Table 4.4	The Action/Strategy "Develop infrastructure plans and educational programs to promote active transportation options" may benefit from engaging local public health departments, walking/biking coalitions, and/or Safe Routes to School initiatives, who may already have components of such educational programs in place.
Chapter 4 – Sustainable Communities Strategy Page 150, Table 4.4	We also had some additional suggested language. The additions are underlined: <ol style="list-style-type: none"> <li>1. Perform and support studies with the goal of identifying innovative transportation strategies that enhance mobility and air quality, and determine practical steps to pursue such strategies. <u>Engage local communities in planning and prioritization efforts.</u></li> <li>2. Continue to work with neighboring Metropolitan Planning Organizations to provide alternative modes for interregional travel, including Amtrak and other passenger</li> </ol>

	<p>rail services, <u>and an enhanced bikeway network, such as on river trails.</u></p> <p>3. Prioritize transportation investments to support compact infill development that includes a mix of land uses and housing options, <u>including park space</u>, where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.</p>
<p>Chapter 4 – Sustainable Communities Strategy</p> <p>Page 152, Table 4.5</p>	<p>We also had some additional suggested language. The additions are underlined: Support work-based programs that encourage emission reduction strategies <u>and incentivize active transportation commuting or ride-share modes.</u></p>
<p>Chapter 5 – Measuring Up</p> <p>Page 162, Table 5.1</p>	<p>Augment Safety and Health indicators within RTP performance measures. Consider measures of obesity, non-motorized commuting, walking and biking behavior, asthma hospitalization rates, etc.</p>

**AREA OF CONCERN: LAND USE POLICIES**

Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy

<p>Chapter 4 – Sustainable Communities Strategy</p> <p>Page 110</p>	<p>The goals and benefits of the SCS listed here go above and beyond the requirements of SB 375. The provisions of SB 375 require the development of a SCS that focuses on a reduction of vehicle miles traveled by cars and light trucks, and greenhouse gas emissions. A presentation made by SCAG in January 2009 indicated that "SB 375 is not about: green buildings, energy efficiency, municipal operations, waste management, water, technology." However, all of these items have been incorporated into the RTP/SCS and PEIR.</p>
<p>Chapter 4 – Sustainable Communities Strategy</p> <p>Page 119</p>	<p>SCAG indicates that the policies of its Compass Blueprint program will be used to determine consistency of private development and public infrastructure projects with the SCS. A statement should be added that will clarify whether or not a project that is determined to be inconsistent with the policies of the SCS (i.e, Compass Blueprint) will be deemed ineligible for transportation funding</p>
<p>Chapter 4 – Sustainable Communities Strategy</p> <p>Page 148</p>	<p>Throughout the document the RTP is described as having "growth inducing impacts." In past iterations of the RTP, its purpose was to mitigate the impacts of growth. If transportation projects identified in the RTP are seen as inducing growth, then the lead agency may be required to mitigate the impacts of perceived subsequent related growth.</p>
<p>RTP/SCS and PEIR</p>	<p>There are several terms contained throughout the RTP/SCS and PEIR that need to be clearly defined including the following:</p> <ul style="list-style-type: none"> <li>• Urban Growth Boundary</li> <li>• Parking Cash Out</li> </ul>

	<ul style="list-style-type: none"> <li>• References to benchmarks</li> <li>• SCRIP</li> <li>• Gentrification</li> <li>• Open space</li> <li>• Smart growth principles</li> <li>• Active Transportation</li> <li>• Greenfield</li> </ul>
RTP/SCS and PEIR	The alternatives discussed in the RTP/SCS, PEIR and SCS Background Document have been inconsistently named. The alternatives are labeled either: 1, 2 and 3, or A, B and C. The appropriate name should be determined for each and these documents revised to ensure consistency.
<p>Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy Program Environmental Impact Report</p>	
Introduction Page 1-5	The statement "Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process," gives the impression that these mitigation measures are mandatory and not merely a list of "menu options." This statement should be revised to reflect that these measures are advisory only.
Project Description Page 1-5, 1-7	The strategies listed in the Project Description section are not consistent with the strategies listed in Chapter 4 of the RTP/SCS. Specifically, the bulleted list on the page is stated to represent the land use strategies of the plan, however, the strategies listed are not specifically identified in the regional SCS. Including different language in the PEIR implies additional policy.
Executive Summary Pages ES-4 through ES-87	The PEIR indicates that the proposed mitigation measures have been determined to be feasible and local jurisdictions "can and should" implement them. However, SCAG staff has indicated that these measures are only advisory. Therefore, this language should be revised to reflect that it will be left to each local jurisdiction to determine the feasibility and applicability of each measure to future projects.
Executive Summary Pages ES-4 through ES-87	The PEIR contains mitigation measures that appear to expand SCAG's overall purview. Several also appear to extend into the purview of local jurisdictions. If so, this may lead to loss of local control over land use policies and/or operations.
Executive Summary Pages ES-4 through ES-87	The PEIR contains several mitigation measures that propose new funding sources including new fees, fines, taxes, incentives, etc., that would impose a financial burden on local jurisdictions and which could result in an increase in the cost of new housing and other development. New taxes or fees could be subject to the voter approval requirements of Proposition 218 as well as Proposition 26, and SCAG has no ability to determine the feasibility of this measure.
Executive Summary Pages ES-4 through ES-87	The PEIR contains 190 mitigation measures that provide very specific requirements in areas that are already regulated by local, state or federal agencies. To avoid the potential for conflicting requirements, the PEIR should only require compliance with existing regulations. Please see the attached matrix that identifies these specific mitigation measures.

<p>Executive Summary</p> <p>Pages ES-4 through ES-87</p>	<p>The PEIR contains over 50 mitigation measures that either reflect SCAG policies or propose new policies intended to be adopted by local jurisdictions or other entities. It is inappropriate to use mitigation measures to adopt policy. Please see the attached matrix that identifies these specific mitigation measures.</p>
<p>Executive Summary</p> <p>Pages ES-4 through ES-87</p>	<p>In several mitigation measures references are made to existing guidance documents. Guidance documents are there as information sources for consideration and do not represent regulation or establish standards that are required to be achieved. For example, MM-AQ19 inappropriately indicates that project sponsors should comply with the CARB Air Quality and Land Use Handbook (June 2005) which is only a guidance document.</p>

**AREA OF CONCERN: STORMWATER RUNOFF**

Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy

<p>Chapter 4 – Sustainable Communities Strategy</p> <p>Page 82-83</p>	<p>The RTP/SCS describes the following measures contained in the “water resources mitigation program:”</p> <ol style="list-style-type: none"> <li>1. “Utilizing advanced water capture and filtration techniques, showing a preference for naturalized systems and designs to control stormwater at the source;”</li> <li>2. “Avoiding any new construction of impervious surfaces in non-urbanized areas, such as wetlands, habitat areas, parks and near river systems;”</li> <li>3. “Avoiding any new construction that provides access to flood-prone areas, such as alluvial fans and slide zones;” and</li> <li>4. “Expansion of (natural flood control systems, such as wetlands and riparian buffers) in areas where they do not currently exist”.</li> </ol> <p>It is unclear how such measures would be implemented if they are included in this document. If they are to be viewed by local jurisdictions as either goals or suggested policies, they could be implemented on that basis to the extent they were deemed feasible in any given case. On the other hand, if listing such measures indicates they are deemed reasonable and feasible to be applied by municipalities in all new road projects, that is quite another matter and not supportable.</p> <p>For example, while it may be desirable to utilize advanced water capture and filtration techniques, there is little documented experience with engineered on-site capture and filtration to support a preference for “naturalized systems and designs” in every case.</p> <p>Similarly, the strongly worded measures against new construction in wetlands, habitat areas, parks, near river systems, and flood-prone areas may be desirable, but should not constitute an outright prohibition, with hundreds of vacant, older but long-established legal building sites situated in such settings.</p> <p>The word “any” should be removed from the mitigation measures to address these concerns.</p> <p>Finally, the suggested expansion of natural flood control systems, such as wetlands</p>
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	and riparian buffers, in areas where they do not currently exist is supportable, as long as it does not in any way mandate removal of existing engineered channel stretches as "mitigation" for road-building. In many cases, the only reason a new road can be built at all is that engineered channels have reduced flood hazards to that area.
Chapter 4 – Sustainable Communities Strategy Page 110	<p>One of the "Benefits to Public Health and the Environment" regards municipal water and sewer systems. The statement "...concrete stormwater channels harm water quality and sprawl eats into open space" is misleading, and is subject to Regional Water Quality Control Board regulations that vary by region. The following alternative language is suggested:</p> <p>Public health and environmental protection have long been linked to the way our region is planned and the way public services are delivered. Municipal water and sewer systems, for example, ensure clean water. At the same time, <u>concrete stormwater runoff channels harm water quality as areas become more urbanized and the percentage of impervious surface is increased, the hydrologic regime is dramatically altered. Drainage conveyances that once were natural and riparian are required to be engineered as hardened flood control channels to provide adequate protection of private property and public infrastructure from the increased frequency, duration, peak flow, and overall volume of stormwater runoff. With this armoring of once natural channels, water quality benefits from biofiltration are lost along with opportunities for infiltration and evapotranspiration, which can lead to hydromodification downstream in sections which are not yet engineered and hardened.</u> Many strategies contained in the RTP/SCS will provide widespread benefits within the region for both public health and environmental protection.</p>
<p>Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy Program Environmental Impact Report</p>	
Chapter 3.13 – Water Resources Pages 3.13-34 through 3.13-46	<p>The PEIR includes 68 mitigation measures in the Water Resources section regarding water quality. At least 35 of these are related to stormwater runoff best management practices (BMPs) that are currently regulated through Municipal National Pollutant Discharge Elimination System (NPDES) Stormwater Permits issued by Regional Water Quality Control Boards. In the SCAG region there are five water quality control boards each with its own Municipal NPDES Stormwater Permit. The regulations and requirements contained in these permits vary from each other. By listing specific measures in the PEIR that are not included in a project's applicable Municipal NPDES Stormwater Permit, the PEIR creates conflicting compliance requirements. To eliminate potential conflict with existing regulations, the mitigation measures regarding specific BMPs should be removed and replaced with a single requirement that each project must comply with its applicable Municipal NPDES Stormwater Permit.</p>
Chapter 3.13 – Water Resources Pages 3.13-34 through 3.13-46	<p>There are no specified limits to how small a project has to be to require mitigation. Measures MM-W9, MM-W24, MM-W32 and MM-W61 all suggest local jurisdictions regulate and limit the installation of new impervious patios, paved courtyards, pools, spas, open stairways, and walkways in private back yards, minimizing these as "non-roof impervious surfaces around the building," or require "mitigation" such as restoring or expanding nearby wetlands or riparian buffer areas, upgrading nearby stormwater drainage facilities, or paying a "mitigation" fee for their related "impacts." However, no court has held that wetlands and riparian buffers are "utilities" for which such fees could</p>

	<p>be imposed without voter approval.</p> <p>MM-W11 further provides that "any areas disturbed along the riparian corridor should be replanted with mature native riparian vegetation." This measure lacks specificity as to the boundaries or width of a riparian corridor.</p> <p>In many cases, areas in Southern California along riparian corridors are infested with invasive periwinkle, and Department of Fish and Game biologists would prefer bare ground after removal so that natural recruitment from the remaining specimens of native groundcover may occur. It is in fact impossible to replace a "mature" native groundcover in a riparian area without further disturbing stream banks. It is also unreasonable to require the replacement of a tree that has been approved for removal by the California Department of Fish and Game.</p>
	<p>MM-W12 provides that roadway construction projects comply with the CalTrans stormwater discharge permit. MM-W20 suggests local road projects both comply with the CalTrans permit and incorporate median strips. Orange County's Municipal NPDES Stormwater Permits, as issued, contain entirely different and conflicting requirements for road projects. Specifically, the County is required to follow the EPA Greenstreets Handbook for road improvement projects. The EPA Greenstreets Handbook does not identify median strips as an option.</p>
	<p>MM-W13 provides that NPDES compliance requires a "Construction-Permit-Phase Stormwater Supplemental Form." MM-W13 further directs "non-landscape based stormwater treatment measures" be compared in each individual case to landscape-based treatment measures. Orange County's Municipal NPDES Stormwater Permit requirements for construction, new development and significant redevelopment, as issued, contain entirely different and conflicting requirements. The County's program utilizes customized forms, procedures, and means of assessment.</p> <p>MM-W17 suggests structural stormwater runoff treatment should be pursued where such treatment facilities will be operated by a municipality. Orange County's Municipal NPDES Stormwater Permit program focuses on the private sector operating all site specific treatment control facilities, unless they are regional in nature.</p> <p>MM-W30 requires filter fabrics over storm drain inlets for all site dewatering. If the approved volume of dewatering is large, it may not be possible to maintain a filter fabric over the inlet at all times. Reference to regional water board-approved general dewatering permits would represent superior language.</p> <p>MM-W48 requires the implementation of water conservation through many measures that are regulated under the Green Building Code.</p>
	<p>The following measures fail to make the critical distinction between regulating runoff from development sites and limiting changes to those sites.</p> <p>MM-W22 also speaks to hydrologic changes "induced" by flood plain encroachment. In fact, flood plain developments are engineered to survive storms of a given size, with protection that properly directs storm flows. There is no mechanism to assume standard flood engineering fails to prevent in-stream hydrologic changes, and then ask for more such engineering.</p>

	<p>MM-W29 requires that stormwater runoff never be increased to adjoining properties or a nearby creek. Engineered runoff flowing in a controlled manner to an adjoining property is almost always allowed, when the owner of that property gives consent.</p> <p>MM-W58 indicates that the purpose of low impact development is to maintain the existing hydrology of the site. LID, as currently practiced, replicates the pre-development runoff from a site by on-site retention, but does not mimic pre-development hydrology within a site.</p>
	<p>MM-W30 requires “replanting of the (graded) area with native vegetation as soon as possible.” Replanting would occur with the approved plant palette, likely with drought-tolerant materials, but not necessarily native vegetation.</p> <p>MM-W48 establishes a minimum irrigation system distribution uniformity of 75%, which would basically prohibit the use of lower cost sprayheads, which rarely attain a “DU” greater than 50%.</p> <p>MM-W51 and MM-W55 provide that homeowners upgrading existing homes would be required to install automatic sprinkler systems and soil moisture controllers. MM-W66 appears to require existing homeowners seeking permits to improve their homes to cover over any area of exposed ground on their properties with mulch, or install edible materials for “local” consumption. All of these measures may go beyond the State Model Landscape Ordinance, absent a definition of significant redevelopment and, in the case of MM-W66, by covering all bare ground, actually prevent natural recruitment from specimens of native groundcover.</p>
	<p>MM-W65 appears to require local jurisdictions to “install forests.” This requirement is extreme and unattainable, particularly in arid climates where forests never naturally existed.</p>

**AREA OF CONCERN: ROAD TRANSPORTATION**

Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy  
Highways and Arterials Supplemental Report

<p>Programmed Commitments</p> <p>Page 2, Table 1</p>	<p>With respect to Orange County, Sample Major Highway Projects listed in Table 1 for in the FTIP identify improvements to I-5 (HOV Lanes from South of Avenida Pico to South of Avenida Vista, completion year 2020) and I-405 (Mixed Flow Lanes from SR-73 to I-605, completion year 2018). It is presumed that Caltrans is lead on these projects and there is no local match/investment requirement.</p>
<p>Programmed Commitments</p> <p>Page 3, Table 2</p>	<p>In Table 2, additional county commitments are identified. Therein, there is reference to:</p> <ol style="list-style-type: none"> <li>1. HOV Lanes - Reconfiguring the Avenida Pico Interchange at the I-5 in San Clemente – completion year 2014.</li> <li>2. Toll Lanes - Constructing HOV/HOT connectors for SR-91/SR241 – completion year 2018.</li> <li>3. Mixed Flow Lanes – Reconfiguring the interchanges at Avery Parkway and La Paz</li> </ol>

in Mission Viejo – completion year 2020. There is also mention of improving the interchange at SR-91/SR-55 and Lakeview Avenue in Anaheim – completion year 2023.

It is presumed that Caltrans is lead on these projects and there is no local match/investment requirement. (These projects are not listed in OC Public Works/7-year Transportation Capital Improvement Program, BOS Approved on 6-28-2011.)

Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy  
Project List Supplemental Report

<p>Page 2, Federal Transportation Improvement Program (FTIP) Project List  (Table)</p>	<ol style="list-style-type: none"> <li>1. FTIP ORA120357 - Orange County, Traffic signal Synchronization for Bus Rapid Transit Corridors, Route 0 <ul style="list-style-type: none"> <li>• Is funding tied to OC Public Works/Road's Antonio Parkway Corridor Traffic Signal Synchronization programmed for FY 2012-13? Coordination between OCTA and OC Public Works/Road is recommended.</li> </ul> </li> <li>2. FTIP ORA120326 Route 5 and FTIP ORA000152, FTIP 120506 and ORA120507 on Route 74 <ul style="list-style-type: none"> <li>• Comment/Question: Is funding tied to OC Public Works/Road's La Pata Avenue (Engineering) and La Pata Avenue NEPA (permitting) projects programmed for FY 2011-12, Pata Avenue Land Acquisition programmed for FY 2012-13 and La Pata Avenue (construction) programmed for FY 2013-14?</li> </ul> </li> <li>3. FTIP 2A0804 and ORA082401 Route 0, Cow Camp Road from FTC to Ortega <ul style="list-style-type: none"> <li>• Is funding tied to OC Public Works/Road's Cow Camp Road Segment 1 (Engineering) programmed for FY 2011-12, Cow Camp Road – Segment 1 (Construction) and Cow Camp Road Segment II (Engineering) programmed for FY 2012-13, and Cow Camp Road – Segment II (Construction) programmed for FY 2013-14</li> </ul> </li> <li>4. FTIP ORA82406 Antonio Parkway Build Out between Ladera Planned Communities to Ortega Highway <ul style="list-style-type: none"> <li>• Not shown listed in OC Public Works/7-year Transportation Capital Improvement Program, BOS Approved on 6-28-2011.</li> </ul> </li> <li>5. FTIP ORA120505 Alton Parkway Improvements - Irvine Blvd to Commercentre Drive <ul style="list-style-type: none"> <li>• Not shown listed in OC Public Works/7-year Transportation Capital Improvement Program, BOS Approved on 6-28-2011.</li> <li>• Coordination with County required – Adjacent to James A Musick Branch Jail</li> </ul> </li> <li>6. FTIP ORA120523 on Route 0, Placentia – Richfield Ave. – Atwood Channel Bridge Widening <ul style="list-style-type: none"> <li>• Coordination with OCFCD required.</li> </ul> </li> <li>7. FTIP ORA020826 on Route 0, Tustin Ave/rose Drive Grade Separation <ul style="list-style-type: none"> <li>• Coordination with County and OCFCD required.</li> </ul> </li> <li>8. FTIP ORA100603 on Route 0, Santa Ana River Trail <ul style="list-style-type: none"> <li>• Coordination with OCFCD required.</li> </ul> </li> <li>9. Financially-Constrained RTP Projects, 210</li> <li>10. RTP ORA120357 Orange County Traffic signal Synchronization for Bus Rapid Transit Corridors – see FTIP Projects above</li> <li>11. RTP ORA120326 Route 5 – see FTIP Projects above</li> <li>12. RTP ORA120523 Richfield Avenue – see FTIP Projects above, completion FY 2012</li> <li>13. RTP 2A0705 Signal Synchronization Program – see FTIP ORA120357 above,</li> </ol>
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	<p>completion FY 2035</p> <p>14. RTP 2L220 Non-motorized, completion FY 2035</p> <ul style="list-style-type: none"> <li>• No projects are identified in OC Public Works/Road 7 year CIP.</li> </ul> <p>15. RTP 2A0804 Cow Camp Road, completion FY 2018 – see FTIP Projects listed above</p> <p>Laguna Canyon Road Projects identified in OC Public Works 7 year CIP for FY 2011-12 (SR-73 to I-405 and SR-73 to El Toro Road) were not identified in the report nor was that for the El Toro Road widening from Glen Ranch Road to Live Oak Canyon currently programmed for FY 2014-15.</p>
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Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy  
Program Environmental Impact Report

<p>Chapter 3.12 – Transportation, Traffic, and Security</p> <p>Pages 3.12-30 through 3.12-43</p>	<p>Several of the mitigation measures include actions on the part of SCAG that appear to be outside of their purview or may result in the loss of local control:</p> <p>MM-TR4 – Emergency repairs are under the purview of local jurisdictions. May be outside of SCAG’s purview.</p> <p>MM-TR5 – Is SCAG making a commitment to provide this technology to local jurisdictions?</p> <p>MM-TR6 – Is SCAG to become another reviewing entity with approval authority of grant funds such as Caltrans and OCTA?</p> <p>MM-TR7 – May be outside of SCAG’s purview to plan for and respond to terrorist incidents and natural or human-caused disasters.</p> <p>MM-TR8 – May be outside of SCAG’s purview to plan for and respond to terrorist incidents and natural or human-caused disasters.</p> <p>MM-TR9 – Purview of Federal and State authorities.</p> <p>MM-TR10 – Purview of Federal and State authorities. May be viewed as another layer of bureaucracy.</p> <p>MM-TR13 – May be outside of SCAG’s purview to plan for regional emergencies.</p> <p>MM-TR17 – Implementing programs to reduce employee trips should be left to the local jurisdictions.</p> <p>MM-TR18 – Providing incentives for employee ride-sharing programs is problematic given the current economy and budget realities.</p> <p>MM-TR19 – Providing incentives for car sharing programs is problematic given the current economy and budget realities.</p> <p>MM-TR20 – Providing incentives for employee vanpool programs is problematic given the current economy and budget realities.</p> <p>MM-TR21 – Regional transportation plans tie inter-modal systems together. SCAG should support revisions to Master Plans of Arterial Highways for local jurisdictions.</p> <p>MM-TR28 – Measures relating to Transportation Demand Management plans are already carried out by local entities.</p>
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MM-TR29 – Measures relating to traffic management strategies are already carried out by local entities.

MM-TR33 – Traffic control plans required for encroachment permits are under the purview of local jurisdictions.

MM-TR34 – What will be the consequence of a local jurisdiction not meeting and identified transportation-related benchmark?

MM-TR35 – What will be the consequence of a local jurisdiction not establishing a parking policy that discourages private vehicle use? How would this be evaluated?

MM-TR55 – Under the purview of regional transportation agencies to conduct public outreach regarding transportation issues.

MM-TR60 – Impact fees on new development will increase the cost of housing.

MM-TR62 – Under the purview of regional transportation agencies to monitor congestion.

MM-TR66 – What will be the consequence of a local jurisdiction not limiting delivery hours for local business? May cause local businesses to relocate elsewhere.

MM-TR76 – Modifying development standards to accommodate bicycle use to this extent will increase costs to the local jurisdiction and increase costs of development.

MM-TR77 – Modifying development standards to accommodate bicycle use to this extent will increase costs to the local jurisdiction and increase costs of development.

MM-TR78 – Local jurisdictions may not have the funding to provide these types of multi-use trails.

MM-TR79 – May be outside of purview of local jurisdiction to provide bicycle safety training.

MM-TR80 – Impact fees on new development to fund bicycle facilities will increase the cost of housing.

MM-TR83 – What will be the consequence of a local jurisdiction not establishing a parking policy that discourages private vehicle use? How would this be evaluated?

MM-TR88 – Local jurisdictions may not have the resources to establish incentives to encourage the use of electric vehicles or to build outdoor wired facilities for these vehicles.

MM-TR92 – Local jurisdictions may not have the resources to purchase expensive electric or hybrid vehicles at the time replacements are needed.

MM-TR95 – Local jurisdictions may not have the resources to provide “bicycle stations” which may not be used by many residents.

MM-TR96 – What will be the consequence of a local jurisdiction not establishing a parking policy that discourages private vehicle use? How would this be evaluated?

MM-TR97 – Local jurisdictions cannot be held responsible for the air travel completed by employees of businesses in their jurisdictions.

#### **AREA OF CONCERN: WASTE AND RECYCLING**

Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy

## Program Environmental Impact Report

The decomposition of municipal solid waste produces landfill gas that can be converted into electricity due its high heating value. Capturing landfill gas reduces emissions into the atmosphere. In addition, generating electricity from landfill gas provides an indirect benefit by avoiding the need to use non-renewable resources such as coal, oil, or natural gas to produce the same amount of energy. The practice of electrical generation from biomass sources has been recognized by the State as a form of renewable energy, similar to solar, wind, and hydro-electric projects. With the passage of SBX1 2 in 2011, investor and publicly owned utility companies will be required to meet a renewable portfolio standard of 33% by 2020. As of 2010, most utility companies were well below 20%. The utilization of landfill gas to energy producing projects will play a prominent role for utility companies to achieve the State mandated renewable portfolio standard. In Orange County alone, the County's three active landfills generate 12 megawatts-hours of electricity, enough to power 9,000 homes. In addition, there are plans to increase that energy output to 64 megawatts-hours within the next few years.

Page 3.11-22 California Integrated Waste Management Act, in 2011 the California Legislature passed and the Governor signed into law AB 341 which established a statewide policy goal of diverting 75% of all waste generated in the State by 2020. AB 341 builds upon AB 939 and establishes a nexus between recycling and AB 32, the Global Warming Solutions Act by reducing five million metric tons of CO<sub>2</sub> equivalent by diverting approximately two million tons of solid waste per year. This will be achieved by requiring cities and counties to work with the business community and multi-family dwelling units to implement commercial recycling programs thereby avoiding the extraction of raw materials, preprocessing and manufacturing of virgin materials. In effect, this ensures that only residual waste that has no economic value will be landfilled. The policy implication of AB 341 is the development of new recycling programs and infrastructure while preserving the capacity of the landfills throughout the State.

Page 3.11-22 The agency name for the California Integrated Waste Management Board has changed to the California Department of Resources Recycling and Recovery (CalRecycle).

Page 3.11-24 Under the subsection "Orange County", CalRecycle approved Orange County's 5-year update of the Orange County CIWMP in January 2011. It should also be noted that there is now an operational materials recovery facility in south Orange County. The facility is located at the County's Prima Deshecha Landfill and is operated by CR&R Disposal. This facility accepts construction and demolition waste materials and has a mandatory diversion rate of 80 percent. It should also be noted that both the Frank R. Bowerman Landfill and the Olinda Alpha Landfill, which are both owned and operated by the County, have already received all necessary permits and entitlements for their expansions. As such, the closure date for the Olinda Alpha Landfill is in December 2021 and the closure date for the Frank R. Bowerman Landfill is in December 2053. It should also be noted that Orange County has sufficient solid waste disposal capacity throughout the RTP/planning period (2012-2035).

Page 3.11-25 Solid Waste Disposal and Transfer Facilities, it should be noted that Orange County can only accept imported solid waste materials from outside of Orange County under the specified terms and conditions of Orange County's bankruptcy recovery. Under the terms and conditions of the bankruptcy recovery, importation of solid waste materials will end in June 2016.

Page 3.11-26	<p>Table 3.11-8: Permitted Active Solid Waste Landfills in the SCAG Region: the following information regarding the Orange County landfill system should be changed to the following: Frank R. Bowerman Landfill, closure date of December 31, 2053, maximum permitted daily tonnage of 11,500 tons per day, total landfill airspace capacity of 266,000,000 cubic yards as of June 30, 2011, remaining landfill airspace capacity of 198,000,000 cubic yards as of June 30, 2011; Olinda Alpha Landfill, total landfill airspace capacity of 148,800,000 cubic yards, remaining landfill airspace capacity of 47,700,000 cubic yards; Prima Deshecha Landfill, total landfill airspace capacity of 172,000,000 cubic yards, remaining landfill airspace capacity of 133,000,000 cubic yards.</p>
Page 3.11-27	<p>Waste Diversion and Recycling: This section appears outdated with the last diversion rate reported in 2002. It is therefore suggested that this section be updated with 2010 information which is available at CalRecycle's website at <a href="http://www.calrecycle.ca.gov/LGCentral/GoalMeasure/DisposalRate/MostRecent/default.htm">http://www.calrecycle.ca.gov/LGCentral/GoalMeasure/DisposalRate/MostRecent/default.htm</a>. In 2010, California's statewide diversion rate was approximately 65% based on the per resident disposal rate.</p>
Page 3.11-28	<p>Impacts: The waste generation and disposal projections for the 2010-2035 timeframe within the SCAG region should be re-evaluated. According to CalRecycle, the amount of waste disposed in landfills for each resident on average was 4.5 pounds of waste per day. Given that the resident "equivalent diversion rate" in 2010 was about 65%, each resident threw away or generated 12.85 pounds per day of waste per day. This equates to Californians generating approximately 85 to 90 million tons of waste and disposing of approximately 30 million of waste in landfills. SCAG's RTP report appears to confuse the terms generation and disposal for purposes of estimating diversion rates and future waste projections.</p> <p>Similarly, the 2035 waste projection of 105.7 million pounds of waste per day within SCAG's region appears to be inflated. This value appears to have been calculated based on adding the 2010 residential and employee disposal rates. Adding these values together double counts the quantity of waste buried since each indicator represents the same waste stream. The residential and employee disposal rate established by CalRecycle was simply to normalize the data based on total statewide generation and disposal. Therefore, these parameters were meant to present different ways of looking at the same data but were not meant to be additive. The amount of waste generated and disposed in 2035 should be based on either parameter but not both.</p>
Page 3.11-30	<p>Mitigation Measure MM-PS37: OC Waste &amp; Recycling does not support this SCAG mitigation measure which discourages the siting of new solid waste landfills. While no new public or private solid waste landfills in Orange County are planned at this time, the siting of public or private solid waste landfills within the SCAG planning area, in the long-term, would provide a beneficial increase in solid waste landfill capacity for those jurisdictions that have limited or no solid waste landfill capacity.</p>
Page 3.11-30	<p>Mitigation Measure MM-PS38: OC Waste &amp; Recycling does not support this SCAG mitigation measure which discourages the exportation of locally generated waste outside of the SCAG region during the construction and implementation of projects. In the long-term, waste-by-rail landfills located outside of the SCAG region may be viable</p>

	long-term options for jurisdictions that have limited or no solid waste landfill capacity.
Page 3.11-30	OC Waste & Recycling strongly disagrees with the portion of this mitigation measure that states: "Disposal within the county where the waste originates can and should be encouraged as much as possible." As stated above, Orange County currently receives imported solid waste materials from private solid waste hauling companies as part of Orange County's bankruptcy recovery. Importation of solid wastes into Orange County will continue until June 2016. OC Waste & Recycling therefore recommends that SCAG revise this mitigation measure.

**Mitigation Measures Duplicative of Existing Laws and Regulations**

<b>Air Quality/ AQMD</b>	<b>California Department of Fish and Game (CDFG)</b>	<b>Federal and State Law</b>	<b>Federal law</b>	<b>Resource Agencies</b>
MM-AQ1	MM-BIO/OS1	MM-HM3	MM-LU14	MM-TR33
MM-AQ2	MM-BIO/OS3	MM-HM4	MM-LU30	MM-BIO/OS29
MM-AQ3	MM-BIO/OS4	MM-HM5		MM-BIO/OS30
MM-AQ4	MM-BIO/OS8	MM-HM6		MM-BIO/OS31
MM-AQ5	MM-BIO/OS10	MM-HM7	<b>NPDES</b>	MM-BIO/OS32
MM-AQ6	MM-BIO/OS11	MM-LU28	MM-AQ16	MM-BIO/OS33
MM-AQ7	MM-BIO/OS17	MM-NO18	MM-BIO/OS19	MM-BIO/OS34
MM-AQ8	MM-BIO/OS18	MM-PS13	MM-GEO5	MM-BIO/OS35
MM-AQ9	MM-BIO/OS21	MM-W36	MM-W1	MM-BIO/OS50
MM-AQ10	MM-BIO/OS22	MM-W37	MM-W13	MM-BIO/OS51
MM-AQ11	MM-BIO/OS23	MM-W38	MM-W58	
MM-AQ12	MM-BIO/OS24			
MM-AQ13	MM-BIO/OS25		<b>Flood control</b>	
MM-AQ14	MM-BIO/OS26		MM-HM8	
MM-AQ17	MM-BIO/OS27			
MM-AQ18	MM-BIO/OS28		<b>Local Agencies</b>	
	MM-BIO/OS14		MM-AV11	
	MM-BIO/OS7			
<b>State Law</b>				
MM-AV3	MM-HM10	MM-PS4	MM-PS107	MM-W25
MM-AV6	MM-HM11	MM-PS8	MM-PS113	MM-W26

MM-AV12	MM-HM12	MM-PS10	MM-PS119	MM-W27
MM-BIO/OS20	MM-HM13	MM-PS12	MM-PS122	MM-W28
MM-CUL1	MM-HM14	MM-PS14	MM-TR29	MM-W29
MM-CUL2	MM-HM15	MM-PS16	MM-TR49	MM-W30
MM-CUL3	MM-HM16	MM-PS35	MM-TR55	MM-W31
MM-CUL4	MM-LU10	MM-PS36	MM-TR75	MM-W32
MM-CUL5	MM-LU11	MM-PS37	MM-TR89	MM-W39
MM-CUL6	MM-LU17	MM-PS42	MM-W6	MM-W43
MM-CUL7	MM-LU19	MM-PS43	MM-W8	MM-W46
MM-CUL8	MM-LU20	MM-PS48	MM-W9	MM-W47
MM-CUL9	MM-LU38	MM-PS55	MM-W10	MM-W48
MM-CUL10	MM-LU43	MM-PS56	MM-W11	MM-W49
MM-CUL11	MM-LU44	MM-PS57	MM-W12	MM-W50
MM-CUL12	MM-LU48	MM-PS59	MM-W15	MM-W51
MM-CUL13	MM-LU58	MM-PS61	MM-W16	MM-W52
MM-CUL15	MM-NO1	MM-PS67	MM-W17	MM-W54
MM-CUL16	MM-NO4	MM-PS69	MM-W18	MM-W55
MM-GEO1	MM-NO8	MM-PS71	MM-W19	MM-W56
MM-GEO2	MM-NO9	MM-PS73	MM-W20	MM-W61
MM-GEO3	MM-POP2	MM-PS77	MM-W21	MM-W62
MM-GEO4	MM-POP4	MM-PS89	MM-W22	MM-W64
MM-GEO6	MM-PS1	MM-PS92	MM-W23	MM-W66
MM-HM9	MM-PS2	MM-PS97	MM-W24	MM-W68

### Mitigation Measures Containing Policies

MM BIO/OS 44	MM LU 56	MM PS 25
MM BIO/OS 45	MM LU 57	MM PS 37
MM BIO/OS 46	MM LU 60	MM PS 39
MM BIO/OS 48	MM LU 61	MM PS 41
MM GHG 3	MM LU 64	MM PS 67
MM GHG 8	MM LU 65	MM PS 68
MM GHG 11	MM LU 69	MM PS 71
MM LU 9	MM LU 71	MM PS 95
MM LU 21	MM LU 74	MM PS 121
MM LU 22	MM LU 75	MM TR 17
MM LU 24	MM LU 77	MM TR 23
MM LU 26	MM LU 80	MM TR 28
MM LU 32	MM LU 81	MM TR 83
MM LU 34	MM LU 82	MM TR 85
MM LU 41	MM LU 83	MM W 34
MM LU 42	MM NO 12	MM W 59
MM LU 47	MM NO 16	MM W 60
MM LU 48	MM POP 1	MM W 65
MM LU 51	MM PS 3	
MM LU 53	MM PS 14	



February 14, 2012

Ryan Kuo  
Transportation Planner  
Southern California Association of Governments  
818 West 7th Street  
12th Floor  
Los Angeles, CA 90017

RE: Comments to 2012 Regional Transportation Plan (RTP) Draft

Dear Ryan:

DesertXpress Enterprises, LLC appreciates the opportunity to provide comments to the 2012 RTP. Enclosed is a comment matrix indicating the volume, page number and suggested revision. Should you have any questions regarding the DesertXpress project or the comments provided, please feel free to contact me at (702) 739-2020.

Best Regards.

A handwritten signature in black ink, appearing to read 'Andrew Mack', written in a cursive style.

Andrew Mack  
Chief Operating Officer  
DesertXpress Enterprises, LLC

Encl. As stated



**SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS ("SCAG")  
2012 REGIONAL TRANSPORTATION PLAN - DRAFT  
COMMENTS SUBMITTED BY DESERTXPRESS ENTERPRISES, LLC  
FEBRUARY 14, 2012**

<b>DOCUMENT</b>	<b>PAGE #</b>	<b>SECTION</b>	<b>PROPOSED REVISION</b>
Chapter 1: Vision	21	Passenger and High Speed Rail	Request adding a discussion of DesertXpress. Although included in the Strategic Plan, as a federally licensed and approved interstate passenger railroad, DesertXpress will help to achieve the vision for high speed passenger rail in Southern California.
Chapter 2: Transportation investments	44	Strategically Expanding Our System	Suggest adding language describing that by diverting automobiles, high speed rail increases the goods movement capacity of the freeway system.
Chapter 2: Transportation investments	50	Passenger and High Speed Rail	Request adding that a connection to the DesertXpress system between Victorville and Palmdale would effectively expand passenger rail service providing interstate high speed rail connectivity.
Chapter 2: Transportation investments	52	Rail Policies	Suggest adding language to explain that DesertXpress is committed to building an interoperable system and welcomes the support of SCAG in working with us to ensure that interoperability between systems is achieved.  The MOU between SCAG, LAMETRO, CAHSRA, SANBAG, SANDAG etc. should be referenced.
Chapter 4: Sustainable Communities Strategy	106	Table 4.4: Transportation Network Actions and Strategies	Suggest including language in table to encourage connectivity with DesertXpress.
Chapter 7: Strategic Plan	201	Long-Term Emission Reduction...	Suggest adding electrified passenger rail in addition to freight rail as a strategy for emission reduction.

DOCUMENT	PAGE #	SECTION	PROPOSED REVISION
Chapter 7: Strategic Plan	204	Ultimate Vision for a High-Speed Rail System	<p>Suggest adding more detail regarding DesertXpress.</p> <p>DesertXpress is a Federally approved and licensed high speed passenger railroad that connects Las Vegas with Southern California. With its Southern California station initially in Victorville, an extension of DesertXpress to Palmdale, 50 miles West, would provide for a cross platform connection to the Metrolink commuter rail system with station stops throughout Southern California. Fully interoperable high speed service would be achieved over the California high speed rail project or upgraded Metrolink system. Environmental work has already begun to analyze and clear the rail connection between Victorville and Palmdale as part of the High Desert Corridor project. The High Desert Corridor Joint Powers Authority (comprising San Bernardino County, Los Angeles County, City of Adelanto, City of Hesperia, City of Palmdale, and City of Victorville) passed resolutions of support for DesertXpress in May 2010 and June 2011.</p> <p>The DesertXpress project specific EIS is complete with the following Federal actions:</p> <p>July 8, 2011: Federal Railroad Administration Record of Decision (ROD)</p> <p>October 26, 2011: Surface Transportation Board issued Certificate of Public Convenience and Necessity.</p> <p>October 31, 2011: Bureau of Land Management ROD</p> <p>November 18, 2011: Federal Highway Administration ROD</p> <p>On December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land.</p> <p>Application for a federal loan under the Railroad Rehabilitation and Improvement Financing program currently under review by US Department of Transportation.</p>
Supplemental Report: Aviation and Airport Ground Access	112	2.3.2 Role of California High-Speed Rail System in Regional Airport Ground Access	Suggest adding discussion of potential for DesertXpress connection at the Palmdale Airport.

DOCUMENT	PAGE #	SECTION	PROPOSED REVISION
Supplemental Report: Passenger Rail	8	Table 2: High Speed Rail Matrix	<p>Suggest revising as follows:</p> <p>PROJECT: DesertXpress</p> <p>PROJECT DESCRIPTION: Las Vegas to Victorville with no intermediate stops generally along I-15 corridor. Phase 2 would connect Victorville with Palmdale. Top speed of 150 MPH using Tier III compliant electric multiple unit trains.</p> <p>PROJECT READINESS: Project specific EIS is complete and federal interstate operating license has been issued. July 8, 2011: Federal Railroad Administration Record of Decision (ROD). October 26, 2011: Surface Transportation Board issued Certificate of Public Convenience and Necessity authorizing DesertXpress as an interstate railroad. October 31, 2011: Bureau of Land Management ROD. November 18, 2011: California and Nevada Federal Highway Administration RODs. December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land.</p> <p>PROJECT CONSENSUS: High - as evidenced by the completed NEPA process, agreements in place with the State of California, Certificate of Public Convenience and Necessity from the Surface Transportation Board, support from Victorville, San Bernardino County, Los Angeles County, City of Adelanto, City of Hesperia, City of Palmdale, the Las Vegas Convention and Visitors Authority, and Clark County, NV.</p> <p>REGIONAL CONNECTIVITY: Good - initially with proximity to Amtrak station in Victorville. Connection to Palmdale would provide for a connection to Metrolink and ultimately to California High Speed Rail.</p> <p>RIDERSHIP POTENTIAL: Sufficient to cover all operating and capital costs.</p> <p>COST: \$6.5 billion.</p> <p>FUNDING: Federal loan and private debt/equity.</p> <p>BUSINESS PLAN: Ridership and revenue report completed for loan application but not yet available.</p> <p>COMMUTER RAIL POTENTIAL: Extension to Palmdale would serve commuter market well.</p> <p>STAFF RECOMMENDATION: Include in Strategic Plan.</p>

DOCUMENT	PAGE #	SECTION	PROPOSED REVISION
Supplemental Report: Passenger Rail	18	the Strategic Plan: Our Ultimate Vision for High Speed Rail	Suggest adding DesertXpress and connection to California High Speed Rail and upgraded Metrolink service as a key component of the Ultimate Vision for High Speed Rail.
Supplemental Report: Passenger Rail	19	Strategic Plan Projects	<p>DesertXpress is a Federally approved and licensed high speed passenger railroad that connects Las Vegas with Southern California. Travelling between Las Vegas, NV and Victorville, CA at a top speed of 150 MPH, DesertXpress will use next generation steel wheel on steel rail fully electric high speed trains. There are no intermediate stops.</p> <p>The DesertXpress project specific EIS is complete:</p> <ul style="list-style-type: none"> <li>• July 8, 2011: Federal Railroad Administration Record of Decision (ROD)</li> <li>• October 26, 2011: Surface Transportation Board issued Certificate of Public Convenience and Necessity.</li> <li>• October 31, 2011: Bureau of Land Management ROD</li> <li>• November 18, 2011: Federal Highway Administration ROD</li> <li>• On December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land.</li> </ul> <p>With its Southern California station initially in Victorville, an extension of DesertXpress to Palmdale, 50 miles West would provide for a cross platform connection to the Metrolink commuter rail system with station stops throughout Southern California. Fully interoperable high speed service would be achieved over the California high speed rail project or upgraded Metrolink system. Environmental work has already begun to analyze and clear the rail connection between Victorville and Palmdale as part of the High Desert Corridor project. The High Desert Corridor Joint Powers Authority (comprising San Bernardino County, Los Angeles County, City of Adelanto, City of Hesperia, City of Palmdale, and City of Victorville) passed resolutions of support for DesertXpress in May 2010 and June 2011.</p> <p>Application for a federal loan under the Railroad Rehabilitation and Improvement Financing program currently under review by US Department of Transportation.</p>



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

75 Hawthorne Street  
San Francisco, CA 94105

February 14, 2012

Margaret Lin and Jacob Lieb  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017

**Subject: EPA Comments on the 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report**

Dear Ms. Lin:

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to provide feedback on the Draft 2012 Southern California Association of Governments (SCAG) 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (PEIR) for the 2012-2035 RTP/SCS. EPA is committed to the goal of incorporating environmental and community considerations early in the transportation planning process. This early coordination results in greater opportunities to avoid sensitive resources and receptors and minimize impacts associated with future transportation projects.

Section 6001 Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) directs metropolitan planning organizations to consult with resource agencies while developing long-range transportation plans. It also states that long range transportation plans must include "a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan." EPA provides the following comments in support of compliance with these requirements.

**Comments on the Draft RTP/ SCS**

***Environmental Justice and Children's Health***

The Draft RTP provides a summary of public involvement efforts and a thorough Environmental Justice Analysis including recommendations from the public outreach meetings. The Environmental Justice Analysis finds many potential disparate impacts on minority, low-income, and other sensitive communities. These impacts are a result of gentrification, air quality impacts, and noise. The Draft RTP provides evidence that environmental justice communities in the SCAG Region are already heavily burdened as a result of exposure to air pollution from transportation related activities. The communities will continue to be impacted with the many projects planned in the SCAG Region. Therefore, all impacts, even seemingly small ones, are important to consider and mitigate in order to offset the project-related impacts to the local communities. EPA is encouraged to see that, new to the 2012 RTP, the

Environmental Justice Analysis considers cancer and respiratory risks and air quality impacts along freeways and highly traveled corridors.

### *Children as Sensitive Age Group*

The Environmental Justice Analysis includes one age variable: population 65 years old and older. Children are another sensitive age group that should be included in the Environmental Justice analysis. Environmental contaminants may harm children more than adults. Minority and low-income children may be exposed to more pollution and therefore, may face higher health risks from exposures. An important indicator in screening for potential environmental justice concerns is the percent of the population under five years old.<sup>1,2</sup> There is a growing body of evidence that environmental justice communities are disproportionately exposed and more vulnerable to pollution impacts than other communities.<sup>3</sup> As discussed in *EPA's Framework for Cumulative Risk*,<sup>4</sup> disadvantaged, underserved, and overburdened communities are likely to come to the table with pre-existing deficits of both a physical and social nature that make the effects of environmental pollution more, and in some cases, unacceptably, burdensome. Thus, certain subpopulations may be more likely to be adversely affected by a given stressor than is the general population.

- EPA recommends that the Environmental Justice Analysis in the Final RTP, and included health analyses, include percent of the population under five years old as a variable to elucidate how young children in environmental justice communities will be impacted by the proposed transportation plan.

### *Environmental Justice Mitigation Toolbox*

The Draft RTP provides an Environmental Justice Mitigation Toolbox with recommended mitigations for noise impacts, air quality, rail related impacts, and road pricing mechanisms. The mitigations are recommendations and are not required through the Draft RTP. The Draft RTP uses the language that the project sponsors should “to the extent feasible and practicable” apply these mitigations to the project. The recommended mitigations are critical to protecting the health of the environmental justice communities in the SCAG region. EPA recognizes the importance of these mitigations and recommends that the project sponsors not only apply these mitigations but also seek out further recommendations from the affected community. The current mitigation toolbox provides a list of broad mitigations that are specific to project construction and implementation.

- Community identified mitigations could include more holistic approaches to protecting health including:
  - Fund proactive measures to improve air quality in neighboring homes, schools, and other sensitive receptors;

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<sup>1</sup> National Environmental Justice Advisory Committee. 2010. *Nationally Consistent Environmental Justice Screening Approaches*. Available at: <http://www.epa.gov/compliance/ej/resources/publications/nejac/ej-screening-approaches-rpt-2010.pdf>.

<sup>2</sup> The Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT) is a tool for the EPA Office of Enforcement and Compliance Assurance to consistently identify areas with potentially disproportionately high and adverse environmental and public health burdens. More information is available at: <http://www.epa.gov/compliance/ej/resources/policy/ej-seat.html>.

<sup>3</sup> Symposium on the Science of Disproportionate Environmental Health Impacts, March 17 - 19, 2010, see the fourteen scientific reviews commissioned by EPA and published in the American Journal of Public Health at: <http://www.epa.gov/compliance/ej/multimedialalbums/epa/disproportionate-impacts-symposium.html>.

<sup>4</sup> Available at: <http://cfpub.epa.gov/ncea/raff/recordisplay.cfm?deid=54944>.

- Provide public education programs about environmental health impacts to better enable residents to make informed decisions about their health and community; and
- Engage in proactive measures to train and hire local residents for construction or operation of the project to improve their economic status and access to health care.
- EPA also recommends that the list of available air quality tools in the Environmental Justice Toolbox - Air Quality Impacts be revised to include near-term advanced technology deployment measures, such as:
  - zero emissions heavy-duty trucks (2013+);
  - Tier 4 marine engine repowers and replacements (2014+); and
  - Tier 4 and zero emissions railyard equipment (2015+).
  - See <http://www.dieselnet.com/standards/us/marine.php> and <http://www.dieselnet.com/standards/us/loco.php>.

*Future Project-level Environmental Justice Analyses*

Additionally, the Environmental Justice Appendix provides detail on how the Environmental Justice Analysis was performed, with the analysis conducted with input from the community.

- EPA recommends that the Final RTP acknowledge that project sponsors should provide a similar level of analysis to identify the Environmental Justice impacts of each project. With consistency in analysis and meaningful involvement from the affected community, mitigation measures can be identified to best address the project’s impacts.

***Sustainable Communities Strategy and Regional Zero Emissions Freight System***

The Draft RTP recognizes that that SCAG region has substantial mobility and air quality challenges, with the most congested roadways in the nation and the worst air quality in the nation. The Draft RTP also identifies its region as the largest international trade gateway in the U.S., supported by marine ports, air cargo facilities, railroads, regional highways and state routes. SCAG has a great opportunity to face these challenges with planning efforts that are underway to establish a regional zero emission freight system and the RTP’s inclusion of a Sustainable Community Strategy (SCS), intended to reduce greenhouse gas (GHG) emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning.

- EPA encourages SCAG to use the current needs for efficient and cleaner freight movement as a catalyst for initiating the most advanced technological solutions to freight movement, including zero emissions technologies, in this transportation planning effort.

Part of SCAG’s Regional Zero Emissions Freight System includes a system of truck-only lanes extending from the San Pedro Bay Ports to downtown Los Angeles along the I-710, connecting to an east-west segment, and finally reaching the I-15 in San Bernardino County. Truck-only lanes add capacity in congested corridors, improve truck operations and safety by separating trucks and autos, and would provide a platform for the introduction and adoption of zero-emission technologies. The 2012 RTP identifies an East-West Freight Corridor concept (Exhibit 2.9 Potential East-West Freight Corridor shows lanes along the I-710, SR 60, and I-15 to just north of I-10), carrying between 58,000 and 70,000 trucks per day, with trucks removed from adjacent general purpose lanes and local arterial roads.

SCAG's SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. EPA is pleased to see that the RTP provides a greater investment in transit projects and an allocation of over \$6 billion for active transportation projects, a 200-percent increase from the 2008 RTP. EPA supports the investment of a greater share of transportation resources to promoting public transit and other alternative modes instead of facilitating single-occupant vehicle use. Efforts to expand transit service, increase rideshare, and integrate bicycle and transit nodes offer the opportunity to support the region's goal of reducing growth in vehicle miles traveled (VMT) and in turn, improve air quality. The emphasis on planning for additional housing and jobs near transit will also assist in decreasing VMT and related pollutant emissions.

While intended to relieve congestion, freeway capacity expansion projects such as truck-only lanes and HOV/Toll Lanes, may have initially beneficial congestion relief that erodes over time, potentially resulting in increased VMT and auto emissions.

- Since the RTP includes several projects that expand freeway capacity, EPA recommends that the Final RTP include a discussion of induced travel to ensure that these projects do not counter the very VMT and emission benefits expected from SCAG's SCS and Regional Zero Emissions Freight System.

#### ***Technologies for Transportation Investments***

This section of the plan cites several compelling strategies, which presumably will result in significant emissions reduction. However, the Draft RTP does not clearly outline what the requisite technologies are in relation to emissions standards for the relevant source categories.

- EPA recommends including clearer descriptions of the technologies listed in the Transportation Investments section of the RTP.

#### ***Definition of "clean truck"***

EPA suggests defining the term "clean truck" in relation to current vehicle emissions standards. This term is listed in the Vision and Transportation Investments sections of the RTP, as well as in the Goods Movement supplemental report. One option for defining this technology would be to compare its emissions to the EPA 2010 heavy-duty truck standard.

#### ***Measuring Environmental Results of the RTP***

The Draft RTP has identified criteria pollutant and greenhouse gas emissions as its sole performance measure and indicator for environmental quality. Given that the region has experienced significant losses to species and habitat from development encroachment and transportation construction, EPA encourages SCAG to consider sensitive habitat as a performance standard and indicator for environmental quality when updating the RTP.

- EPA recommends SCAG consider demonstrating the RTP's effectiveness at protecting species, wildlife or wetland habitat, and/or open space. If additional performance standards are not possible during the 2012 RTP update given the already extensive efforts to develop the identified performance outcomes and measures, the Final RTP should describe if there are appropriate

performance standard surrogates, such as land consumption under Location Efficiency, to measure the RTP's success in protecting sensitive habitat.

### ***RTP Environmental Mitigation Program***

SAFETEA-LU Section 6001 requires long range transportation plans to include a discussion of potential environmental mitigation activities and potential areas to carry out these activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan. The Draft RTP acknowledges that the PEIR includes three categories of mitigation measures (regional, local, and project-specific, as described on p.76); however the Draft RTP identifies a separate, broad strategy to link transportation planning to the environment, such as planning transportation routes to avoid and minimize a number of biological impacts and regional mitigation strategies such as mitigation banking, improving/ retaining habitat linkages, preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. The Draft RTP notes that maps of protected and unprotected areas, representing SCAG's open space infrastructure (from SCAG's 2008 Regional Comprehensive Plan), will be updated as a function of post-RTP planning efforts, that areas that are "unprotected" could be possible locations for mitigation, and that SCAG will continue to work with its regional partners to help facilitate conservation.

- While EPA is supportive of many of the broad mitigation strategies identified, EPA recommends that the environmental mitigation discussion in the Final RTP incorporate specific information from the Regional Comprehensive Plan that will inform regional avoidance and minimization strategies when planning regional transportation networks and possible locations for mitigation.
- The Final RTP should also provide additional information on post-RTP comprehensive and conservation planning efforts and describe how anticipated outcomes and products will be incorporated into long-term planning for transportation infrastructure.

### **Comments on the Draft PEIR for the RTP/SCS**

#### ***Health Risk Assessment***

EPA appreciates that SCAG's 2012-2035 Draft RTP PEIR includes a health risk assessment. During a February 9, 2012 call between SCAG and EPA staff, SCAG indicated that health risk will not be used to measure the RTP's performance.

- EPA recommends that the Final PEIR clarify how the HRA informed both decision-making among Plan alternatives and mitigation for impacts to sensitive populations.
- EPA also encourages SCAG to consider non-cancer risk, such as respiratory risk, in the PEIR HRA, in light of the fact that the RTP environmental justice analysis addressed both cancer and respiratory risks. The HRA could estimate non-cancer risk, or at a minimum, include a discussion on the relative contribution of these different effects, especially to sensitive receptors.

EPA acknowledges that SCAG selected eight segments of freeway corridors to generally represent major transportation corridors in each SCAG county (with two selected in L.A. and San Bernardino) and roadways with the highest total traffic and highest heavy-duty diesel truck traffic in the planning

area. Further, the modeling focused on freeway segments (versus the entire length of each freeway corridor) that exhibited highest daily total traffic volume to assess “probable worst case” risks. However, the HRA does not describe how its limited scope relates to the broader suite of proposed transportation projects in the SCAG region.

- EPA recommends that the HRA identify: 1) what percentage of RTP projects is represented by the selected segments used in the HRA analysis when compared to the total projects included in the RTP, 2) their relative locations to the broader scope of projects, and 3) relative timeframes for construction and implementation. We recommend clarifying if these represent a group of projects with the most impacts, estimating the percentage of the impact, and extrapolating how the examples could potentially inform risk for the broader scope of the RTP.
- EPA recommends that the RTP provide a brief summary of all the alternatives, the additional sources of emission considered in each of them, and the mitigation proposed in each of them. Explain how the examples of the eight operating freeways fit in with the alternatives in terms of source contribution.
- The RTP should identify how these “Highest Volume” Segments (page 4) integrate with the alternatives. EPA recommends providing a summary comparison by volume for the corresponding projects in the RTP, the eight selected operating freeways, and the “Highest Volume” segments in the eight selected freeways. Include a percentage contribution at each level to provide the background perspective of this limited analysis, and to allow an evaluation of the scope of all the projects in the RTP.
- EPA recommends that the data in Tables 5 and 5 (Pages 8 and 9) represent the “Highest Volume” emission for the corresponding segments in Table 4. If the results in Table 5 are for the same freeway fraction as shown in Table 4, they need to be clearly identified. Discuss whether these results are being used for the rest of the freeways as a conservative scenario estimate, then provide the entire length of all the corresponding freeways included in the projects in RTP, the estimated VMT/day for them, and the corresponding emission as shown in Table 5. Also provide similar information for each alternative. This will give a clear picture of the scope of the additional emission sources generated by these projects.
- SCAG should consider regularly revisiting project status of modeled projects for a selected time period (such as, every four years when RTP is updated, or two years when FTIP is updated). For example, at each new RTP update, provide a “reality check” against the previous 4 years of actual construction data impact, and update future RTP projections accordingly. This will also allow inclusion of any new projects.
- The impact of example projects in the HRA should be extrapolated to the entire RTP scope, so that a more systematic and comprehensive health impact can be evaluated at each RTP update for the whole region to allow appropriate consideration for cumulative impacts to sensitive receptors. These projects should be included in all future MATES analyses, which can provide the previously mentioned “reality check”. Each RTP update can then revisit all the previous assumptions using the most recent MATES analysis, and provide the best estimates for the remaining projects.

### *Risk Emissions*

It is not clear how Table 6 (page 10) relates to Tables 4 and 5 and the assumptions (Table 9) are not clearly described to support the results. Further, it is not clear how Table 14 (page 17) relates to Tables 9 and 11.

- EPA recommends providing a summary of the emissions for all the alternatives, which can be more useful than presenting the number of vehicles. This will provide the basis to move into the next Risk calculation.
- EPA recommends providing a summary of the assumptions used in each alternative for the estimation of the cancer risk.
- EPA recommends that even in a limited scope, SCAG should identify any potential cumulative impact of two or more projects that might intersect, and identify areas of dense population that might be subjected to this cumulative impact, as well as the impact on any potential sensitive population.

### **Mitigation Measures**

#### ***Section 3.2 Air Quality Mitigation Measures***

- ***Mitigation Measure MM-AQ19 – Protecting Sensitive Receptors from Air Quality Impacts***  
EPA recommends the implementation of MM-AQ19 in plan-related projects. Given the current air quality conditions in the Southern California region, project sponsors should be strongly encouraged to reduce the air quality risk to sensitive receptors by implementing the strategies listed in this mitigation measure.
- ***Mitigation Measure MM-AQ11***  
EPA suggests that this mitigation measure be revised to include the following:  
Project sponsors can and should ensure that all construction equipment meets or exceeds equivalent emissions performance to that of EPA Tier 3 standards for non-road engines. From January 1, 2015 onward, project sponsors should ensure that all construction equipment meets or exceeds equivalent emissions performance to that of EPA Tier 4 standards for non-road engines. See <http://www.dieselnet.com/standards/us/nouroad.php>.
- ***Mitigation Measure MM-AQ15 - Also reflected in Mitigation Measures MM-TR49 and MM-TR89 (Section 3.12 Transportation, Traffic, & Security)***  
U.S. EPA suggests that this mitigation measure be revised to read as follows:  
Local jurisdictions can and should set and enforce limits on idling time for commercial vehicles, including delivery and construction vehicles, which prohibit vehicle and engine idling in excess of five minutes. See <http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm>.

#### ***Section 3.6 Greenhouse Gas Emissions Mitigation Measures***

- ***Mitigation Measures MM-GHG7 and MM-GHG8***  
EPA strongly supports the implementation of these mitigation measures as the related technologies will play a constructive role in reducing greenhouse gas and criteria pollutant emissions throughout the Southern California region.

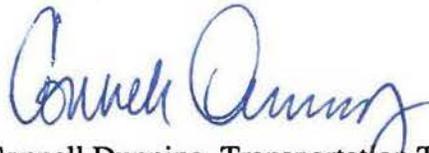
- *Mitigation Measure MM-GHG10*  
EPA recommends that provision “b)” of this mitigation measure be revised to read as follows:  
“Solicit preference construction bids that use BACT, particularly those seeking to deploy zero emissions technologies”.

***Section 3.12 Transportation, Traffic & Security Mitigation Measures***

- *Consumer Education – Mitigation Measures MM-TR44, MM-TR45, MM-TR46, and MM-TR87*  
U.S. EPA strongly supports the implementation of these measures by local jurisdictions as the related activities will play a constructive role in encouraging consumers to adopt transportation techniques, alternatives, and technologies that will significantly reduce criteria and GHG emissions in the Southern California region.
- *Advanced Vehicle & Fuel Technology Deployment – Mitigation Measures MM-TR47, MM-TR50, MM-TR51, MM-TR86, MM-TR88, and MM-TR92*  
U.S. EPA strongly supports the implementation of these measures by local jurisdictions as they will support the commercialization of advanced transportation technologies that will significantly reduce criteria and GHG emissions in the Southern California region.

EPA values the opportunity to be involved in the regional transportation planning process. We hope that this involvement will lead to more efficient project planning and improved environmental and public health outcomes. When the Final RTP/SCS and PEIR are available, please send a copy of each to the address above. If you have any questions about our comments, feel free to contact me at [dunning.connell@epa.gov](mailto:dunning.connell@epa.gov) or by phone at 415-947-4161.

Sincerely,



Connell Dunning, Transportation Team Supervisor  
Environmental Review Office  
Communities and Ecosystems Division



## Four Corners Coalition

LOS ANGELES, ORANGE, RIVERSIDE,  
AND SAN BERNARDINO COUNTIES

### RE: SCAG's draft Regional Transportation Plan 2012-2035

February 14, 2012

Dear Ms. Lin,

The Four Corners Coalition has a 20 year history of supporting regional solutions to the transportation challenges that occur in the heart of Southern California. The jurisdictional coordination where four of your six counties come together can be a challenge. We are very pleased with the cooperation that has occurred in the region over the past several years and the continuing efforts that are represented in the Regional Transportation Plan (RTP). For example: the Universal Transit Fare Cards (Smart Cards) are the exact type of regional alignment that is necessary for increasing the overall effectiveness of our transportation system.

- We would suggest that the various TSM strategies capture the essence of this by adding such phrases as:
  - **Multi jurisdictional** traffic signal synchronization, and
  - **Region wide** advanced traveler information,
  - **Multi agency** improved data collection,

We also support the principles outlined by the Global land use and Economics committee of SCAG:

- Provides Positive Economic Impacts – Pro Economic Growth and Job Creation
- Provides Local Control:
  - Any new transportation revenues or fees collected must be under the control of the local transportation agency/authority
  - Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use and transportation
- Is CEQA Compliant and Defensible – The RTP/SCS is built to withstand a CEQA Challenge
- Is Balanced – The plan's call for New Revenue is balanced with Performance Measures, Reforms and Guarantees that assure the RTP is Effective, Efficient and Responsible
- Align the plan investments and policies with improving regional economic development and competitiveness. Avoid costly projects like a light rail desert connect that helps move money out of the southern California region to Nevada and does not address the immediate needs of the region's existing transportation needs.
- Maximize the productivity of our transportation system. Look at peak time pricing and transportation demand management (TDM) cost recovery approach.

- Encourage land use and growth patterns that facilitate transit and non motorized transportation. Efficient use of transit and transient oriented development will help balance the jobs/housing disparity among communities in the Four Corners Region.

**We continue to support the improvements to those freeways that carry significant intra-county traffic flow:**

- SR 71
  - SR 57 up to and including the SR 60 / SR 57 intersection
  - SR-91
  - I-15
  - I-10
- SR-71-Addition of one HOV lane in each direction from I-10 to SR-60
  - SR-91-Addition of one HOV lane in each direction from Adams to SR-60/21
  - I-10-Addition of one HOV lane in each direction from Haven to Ford
  - Addition of HOT lanes on I-10
  - SR-91-Conversion of HOV lanes to tolled express lanes and addition of direct connector
  - SR-91-Addition of one eastbound mixed-flow lane from SR-91/55 connector to SR-241 and one westbound mixed-flow lane from SR-241 to Imperial Highway
  - SR-91-Addition of one mixed-flow lane in each direction at various locations from SR-241 to Pierce Street
  - I-15 Construction of New Schleisman Rd IC and ramps with a NB/SB Auxiliary lane between Schleisman Rd IC and Limonite Rd IC.
  - SR-71- Pine Avenue connector from the SR-71 off-ramp to Pine/Schleisman Road for convertibility to the I-15, through Chino and Eastvale

If you have any questions regarding the comments, please feel free to contact me at any time.

Sincerely,



Gwenn Norton-Perry  
Chairperson  
Four Corners Coalition

## SAVE Coyote Hills!

Friends of Coyote Hills P.O. Box 5267, Fullerton, CA 92838 [www.coyotehills.org](http://www.coyotehills.org)

Feb. 10, 2012

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)  
Via email

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). Friends of Coyote Hills is based in Fullerton, and our mission is to permanently protect all 510 acres of West Coyote Hills, one of the last remaining natural open spaces in north Orange County, from development through acquisition, to ensure a lasting public park for recreation and enjoyment. Our organization includes support from 20,000 residents in Orange and Los Angeles Counties. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR).

We are so pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is a remarkable first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership.

Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas **that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of *critical habitat* to mitigate impacts related to future transportation projects" [emphasis added].** We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the **language to incorporate all "important habitat lands."**

Because this program is directly tied to the implementation of transportation projects there is a clear connection to the County Transportation Commissions (CTCs). We do however, respectfully request that conservation-focused organizations and conservation focused state agencies, conservancies, and joint power authorities be included in the discussions regarding setting priority conservation areas. For example, Friends of Coyote Hills has specific knowledge about lands and linkages in and near West Coyote Hills. We offer our expertise to you during this process. In addition, we also believe targeted outreach efforts in each of the SCAG counties would create an open and transparent process for setting priorities. **This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (page 128 of the Draft 2012 RTP/SCS).**

### **Locations for Mitigation (pg. 78 of the Draft 2012 RTP/SCS)**

On page 78 of the Draft 2012 RTP/SCS, the document mentions the 2008 Regional Comprehensive Plan that inventoried protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park and recreation areas. We were pleased that SCAG completed this Plan showing what areas are protected and critical to maintaining functioning habitat reserves. We agree that the planning efforts SCAG undertakes in the future should

involve updating the maps, but recommend expanding the language in this section to include all forms of protected lands. By limiting the acquisition and management opportunities of conservation lands to just Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) areas, decisions about priority conservation areas will be misinformed. In fact, it no longer demonstrates a comprehensive plan because of the limited scope (of pre-established mitigation sites, which are likely unrelated to transportation projects). Protected areas (e.g., National Forests, State Parks, Regional Parks, etc.) not in an NCCP/HCP are excluded from the big picture, yet they have extensive benefits to the entire open space system and often times link important habitat areas throughout the region. Consequently, we recommend having this updated map and mitigation site locations expanded to include more than just NCCP/HCP areas and instead include all levels of protected lands (federal, state, regional, and local).

We hope you utilize the experience and expertise of already-established programs in both Orange and San Diego Counties. The language, as it exists now ("**achieved through already-established programs**") implies no other transportation agency in the region can adopt or implement an advanced mitigation program. We recommend rephrasing this sentence to be more clear about the eligibility of transportation agencies and utilizing the experience existing regional programs.

On page 79 of the Draft 2012 RTP/SCS we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use decisions. We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Unfortunately, we noticed the lack of inclusion of **wildlife linkages in this section**. **Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well.**

Renewed Measure M in Orange County incorporated language that demonstrates a net environmental benefit in conjunction with a net benefit in the delivery of transportation improvement projects. Some of the environmental benefits include: landscape level acquisition, restoration, and management. Some of the transportation benefits include: streamlined permitting, involvement of the resource and permitting agencies, and reduced project delays. **We believe there is an opportunity to incorporate similar "net environmental benefit/net benefit of transportation projects" language in the Draft 2012 RTP/SCS. To that end, we recommend the language from the Orange County Transportation Authority's Ordinance #3 Section 2, Item A.5.iii (page B-5) as a starting place.**

We **appreciate SCAG's effort to create a** strategic planning process that would document important conservation lands in the region. We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values, historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this policy. Should you need to contact me, I can be reached at 714-870-9777.

In addition, we **request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation**, please send information to [sgregg411@roadrunner.com](mailto:sgregg411@roadrunner.com)

Sincerely,  
Friends of Coyote Hills  
Shirley Gregg, Secretary



February 7, 2012

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Los Angeles, CA 90017  
[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). Friends of Harbors, Beaches, and Parks (FHBP) is based in Newport Beach and we work to protect the natural lands, waterways, and beaches of Orange County. Our organization includes support from more than 80 conservation and community groups in the regional and thousands of Orange County residents.

FHBP would like to applaud SCAG's efforts to include a regional advanced mitigation component in the RTP/SCS. This letter serves to offer suggestions mainly to strengthen this component, which closely links with the sustainability principle listed in the document's vision statement. We do, however, offer a few other suggestions as it relates to other projects we are interested in.

**Active Transportation (p. 21 of the Draft 2012 RTP/SCS)**

In 2011, FHBP completed a study documenting the Walk Score for the city hall of each Orange County city as well as the city-wide average. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for walking. According to its website, WalkScore.com uses Google maps to compute the distance between residential addresses and nearby destinations. The algorithm looks at 13 categories and awards points for each between ¼ to 1 mile. Amenities within ¼ mile receive maximum points, while no points are awarded for amenities further than one mile. The categories include, grocery store, coffee shop, movie theatre, park, bookstore, drug store, clothing and music store, restaurant, bar, school, library, fitness, and hardware store.<sup>1</sup> See attachment #1 for the results of this Walk Score study.

**Recommendation #1**

We recommend utilizing this tool as a measurement of how and where walkable, bikable communities may be most relevant. This information may serve SCAG well in determining or prioritizing funding for more active transportation opportunities. Of course, we understand that many factors are at play including site development, existing stable neighborhoods, transit areas and more, but including as a metric how communities are doing already is helpful information to have in the overall analysis.

**Regional HOT Lane Network (p. 58 of the Draft 2012 RTP/SCS)**

We disagree that the Toll Road Agencies proposed extension of the 241 South be included in the Regional HOT Lane Network. The RTP includes the proposed 16-mile Foothill-South Toll Road extension, which would run through the heart of San Onofre State Beach Park, a beloved and popular recreation spot in south Orange County that serves more than 2.4 million visitors each year. Both the California Coastal Commission and the U.S. Department of Commerce have rejected the Foothill-South project on the basis of its devastating projected impacts on coastal resources.

**Recommendation #2**

The continued inclusion of this unbuildable project as a baseline roadway changes the transportation modeling for southern Orange County transportation projects. The Foothill-South should be eliminated from the baseline scenario and removed from the RTP, especially since it is in the unconstrained plan of the Orange County Transportation Authority's Long Range Transportation Plan.

**Conservation Planning Policy (p. 76 of the Draft 2012 RTP/SCS)**

While we wholeheartedly support the concept of the conservation planning policy, which helps demonstrate progress and safety in SAFETEA-LU requirements, however we do not agree large-scale

<sup>1</sup> Walk Score. Retrieved 2 Feb 2012 from the WalkScore website: <http://www.walkscore.com>.

acquisition and management of *critical habitat* be the only type of mitigation opportunity utilized. We note however, this may simply be a word choice issue. According to the U.S. Fish and Wildlife Service: "when a species is proposed for listing as endangered or threatened under the Endangered Species Act (Act), we must consider whether there are areas of habitat we believe are essential to the species' conservation. Those areas may be proposed for designation as "critical habitat."<sup>2</sup> Essentially, we firmly believe there are other important natural lands deserving of conservation/preservation, but do not or may not contain a "critical habitat" designation (as defined by the Service).

### **Recommendation #3**

With this in mind, we suggest changing the reference from critical habitat to important natural lands. This comment also applies to the Resource Area and Farmland section (pg. 128 of the Draft 2012 RTP/SCS).

#### Engage in a Strategic Planning Process

We would also like to offer that it may be an important first step to create a regional Greenprint in addition to a map of regional priority conservation areas. According to Oregon State University: "A Greenprint is a non-regulatory vision to help communities make informed decisions about land conservation, scenic values, and recreation priorities. Components include:

- A comprehensive overview of important natural resources, wildlife habitat, historic sites, scenic values, and potential/existing trail connections in the region
- Maps that highlight the ecological and recreation priorities of the region, while respecting property rights and creating awareness around public access
- An inclusive vision to foster discussion of the diverse conservation and recreation needs of the region."<sup>3</sup>

### **Recommendation #4**

We request a region-wide Greenprint be conducted to document the natural, recreational, agricultural, and other resources in the SCAG jurisdiction as part of the conservation policy planning.

#### Identify Map Priority Conservation Areas and Engage Various Partners

While we understand the RTP is directly related to County Transportation Commissions (CTCs) we would respectfully request that conservation organizations and other related agencies, conservancies, and joint power authorities, like the Santa Monica Mountains Conservancy, Mountains Recreation and Conservation Authority, and the Wildlife Corridor Conservation Authority, be included in determining priority conservation areas and plan development. CTCs, with all due respect, do not tend to focus on conservation of natural lands.

As the Orange County Transportation Authority will confirm, it relied upon many sources for establishing its priority conservation areas under the Environmental Mitigation Program of Renewed Measure M. To that end, FHBP would like to offer its assistance with Orange County's potential conservation lands as we've created a county-wide map, the Green Vision Map, that documents important conservation lands and existing privately or publicly protected lands. In addition, we believe there are similar conservation non-profit organizations and entities throughout the SCAG region that could provide useful, beneficial, and relevant information about their on-the-ground priorities.

### **Recommendation #5**

We recommend that SCAG incorporate public workshops and outreach to effectively gather information from conservation organizations and other related agencies on conservation priorities. This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (pg. 128 of the Draft 2012 RTP/SCS).

#### **Locations for Mitigation (pg. 78 of the Draft 2012 RTP/SCS)**

We are pleased that SCAG has already inventoried the locations of the protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park, and recreation areas. We agree the maps should be updated as a function of the post-RTP planning efforts but qualify this statement with the caveat that not all of the protected, or undeveloped unprotected lands, in Southern California are within a Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) area.

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<sup>2</sup> United States Fish and Wildlife Service (USFWS). "Critical Habitat: What Is It?" Retrieved 1 Feb 2012 from the USFWS website: [http://www.fs.fed.us/r9/wildlife/tes/docs/esa\\_references/critical\\_habitat.pdf](http://www.fs.fed.us/r9/wildlife/tes/docs/esa_references/critical_habitat.pdf).

<sup>3</sup> Oregon State University Libraries. "What is a Greenprint?" Retrieved 1 Feb 2012 from the Deschutes Basin Explorer Natural Resources Digital Library website: <http://oregonexplorer.info/deschutes/Greenprint/WhatisaGreenprint>.

### **Recommendation #6**

We recommend not only updating the maps to include more recent acquisitions in the NCCP/HCP areas, but also recommend including preserved lands not in the NCCP/HCP areas. For example, most of Chino Hills State Park is not included in an NCCP/HCP but this park offers more than 14,100 acres of natural lands to the inventory. To exclude non-NCCP/HCP lands would misinform decisions about conservation priorities and exclude an entire network of preserved lands outside of, but often times critical to the functioning of, our entire open space system.

In addition, the Orange County Transportation Authority has created a county-wide NCCP/HCP for its Environmental Mitigation Program. This new NCCP/HCP is above and beyond the existing NCCP/HCP areas (Central/Coastal and Southern). By limiting the view of where mitigation can occur (to only existing NCCP/HCP areas), SCAG is considerably reducing its potential mitigation sites especially in light of the broad and expansive nature of the RTP. Freeways crisscross the entire SCAG region and have impacts that cannot or may not be able to be mitigated in an existing NCCP/HCP, nor may SCAG or CTCs be able to add themselves as a partner this late in the NCCP/HCP process.

### **Recommendation #7**

Instead of dictating the conservation mechanism or program to be used by the individual CTCs, we recommend allowing the implementing CTC determine the best conservation mechanism for its region with appropriate public input and guidance from the resource and permitting agencies.

We agree SCAG does not have the authority to purchase or manage these conservation lands, but disagree that the conservation areas will be “achieved through already-established programs.” This statement limits the opportunities for conservation to just Orange County as it is the only transportation agency in the SCAG region to have an advanced mitigation component. Should you mean you will use already-established programs to build upon SCAG’s efforts, we agree with this approach, but it is not clearly stated and should be revised.

### **Recommendation #8**

We recommend augmenting the statement to include not only already-established programs, but also programs that may be developed in the future or created within existing transportation measures (where appropriate). Additionally, it may be a good exercise to understand what modifying existing transportation measures to incorporate a regional advanced mitigation program would entail.

### **Types of Mitigation Activities (pg. 79 of the Draft 2012 RTP/SCS)**

By reducing transportation impacts to sensitive lands and encouraging smart land use decisions SCAG is moving in a direction that we believe will become the norm and an adopted policy at the statewide level—planning our transportation projects with a comprehensive mitigation program that ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity.

### **Recommendation #9**

We did notice the lack of mention of wildlife linkages in this section and based on our experiences in Orange County recommend their inclusion. Wildlife linkages are also an important conservation component to ensure the health of our open space areas.

We are pleased to say that the Renewed Measure M Ordinance defines Programmatic Mitigation as “permanent protection of areas of high ecological value, and associated restoration, management and monitoring, to comprehensively compensate for numerous, smaller impacts associated with individual transportation projects. Continued function of existing mitigation features, such as wildlife passages is not included.”<sup>4</sup> In other words, if freeway projects impact existing wildlife corridors, funding to ensure its continued function may not come from the programmatic mitigation component. In addition, the program will establish an “accounting process for mitigation obligations and credits that will document *net environmental benefit* from regional, programmatic mitigation in exchange for *net benefit in the delivery of transportation improvements* through streamlined and timely approvals and permitting” [emphasis added].<sup>5</sup>

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<sup>4</sup> Orange County Local Transportation Authority. “Ordinance No. 3.” 24 July 2006. Section I, Item P, page B-2.

<sup>5</sup> Orange County Local Transportation Authority. “Ordinance No. 3.” 24 July 2006. Section II Item A.5.iii, page B-5.

### **Recommendation #10**

We do, therefore, recommend that maintaining existing and future wildlife corridors or linkages be included as a type of mitigation activity and that the advanced mitigation program incorporates language to ensure a *net* environmental benefit as there will be a *net* benefit in completing the transportation projects.

### **Recommendation #11**

While we recognize there are many options to how the mitigation program gets developed, we do recommend that the summary language acknowledges that the list of types of measures is not exhaustive.

### **Farmland and Agricultural Resources**

We urge you to consider adding farmland and other agricultural resources to the conservation policy. In comparing acreages of farmland in the SCAG region, there was a loss of nearly 64,000 farmland acres because of its conversion to urban uses between 2002 and 2008. There was also a 47,000 acre decline in prime statewide important and unique farmlands (as designated by the Farmland Mapping and Monitoring Program classification system).<sup>6</sup> Urban uses generally equate to additional greenhouse gas emissions due to auto-centric developments and therefore go against the mandate of SB 375.

We believe existing agricultural lands play into the larger network of open spaces. Farmlands, like natural lands, create opportunities for natural recharge of the groundwater, reduce the effects of urban heat islands, and provide refuge and foraging areas for wildlife. Of course, agricultural lands also provide food production (worth \$4.6 billion per year in the SCAG region) and jobs (67,000 with an annual payroll of \$800 million), while producing many times less greenhouse gases than the urban development that has been supplanting them.

### **General Mapping**

It unfortunately seemed to be a trend that the maps in the RTP/SCS were illegible in both printed and digital form. It would be helpful to revise the maps contained within the documents so that the public can accurately read and understand what the maps are trying to show. We were particularly interested in the following maps but our comments are limited due to readability (pixelation) issues: the projected population growth (Exhibit 4.1), housing growth (Exhibit 4.2), employment growth (Exhibit 4.3), natural resource areas (Exhibit 4.6), open space (Exhibit 4.7), and farmland maps (Exhibit 4.8).

### **Forecasted Growth**

We applaud your goal of the RTP/SCS to focus on (among other goals): A land use growth pattern that accommodates the region's future employment and housing needs, and protected sensitive habitat and natural resource areas. We agree land use, transportation AND habitat protection can all be achieved through innovative, smart and new programs like the proposed advanced mitigation policy.

We also appreciate that the land consumption of the greenfield areas consumes 408 square miles less than the baseline. And yes, we agree it is more expensive to develop in greenfield areas because of the lack of infrastructure and services. We are pleased to see SCAG promoting infill projects and protecting our remaining greenfields through compact development and improved land use planning. We believe these concepts are all moving in the right direction toward achieving our mutual goals and the goals outlined in the RTP/SCS for mobility, economy, and sustainability.

### **Rapid Fire Model**

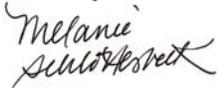
Rapid Fire Model Regional Scenarios Summary which outlines the results of the impacts of varying land use patterns, transportation investments, and policy directions on greenhouse gas emissions, air pollution, water and energy use, land consumption, and infrastructure cost is an excellent method to evaluate how decisions will impact the region. We are pleased to see SCAG utilizing this tool.

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<sup>6</sup> U.S. Census of Agriculture; Cal Farmland Mapping & Monitoring Program.

Thank you for the opportunity to provide feedback on the Draft 2012 RTP/SCS and the PEIR. We look forward to working with you in the future on the SCS and the conservation policy.

Sincerely,

A handwritten signature in black ink that reads "Melanie Schlotterbeck". The signature is written in a cursive style with a large initial 'M'.

Melanie Schlotterbeck  
Green Vision Outreach Coordinator  
Friends of Harbors, Beaches and Parks  
714-779-7561

cc: Jacob Lieb, SCAG

# Orange County Walk Scores



## ORANGE COUNTY'S TOP 3 MOST WALKABLE CITIES

1. Costa Mesa (76)
2. Stanton (74)
3. Cypress (70)



## Walkable Neighborhoods

Imagine living in a community that's design and layout allowed you to get to the bank, the grocer, and the post office without your car. Imagine not only asking your realtor about the number of bedrooms and baths, but also what the Walk Score is for the property.

"Walkable neighborhoods offer surprising benefits to the environment, our health, our finances, and our communities," according to Walk Score, a consortium of planners and environmental experts whose mission is to promote more walkable neighborhoods. It further explains that towns that have walkable neighborhoods experience reduced pollution, increased public health, higher property values, and more community involvement.



## Walkable Neighborhood Features

- They have a "center," be it a main street or public space
- There are enough people to allow businesses to thrive and transit to operate frequently
- Mixed income and mixed uses are near businesses
- People have nearby places to recreate in
- Buildings are close to the street and parking is in the rear
- Residents can walk to work and school
- Streets accommodate bicyclists, walkers, and transit



## Orange County Walk Scores

For our purposes Friends of Harbors, Beaches, and Parks looked at the Walk Score for the city hall for each Orange County city because it is often in the "downtown." And then we looked at the average that was calculated by the Walk Score website. Interestingly, these numbers may be very different numbers. For each city's Walk Score (both city hall and the city's average) see the reverse side of this flyer.



## Measuring Walk Scores

Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for walking. "Walk Score uses Google maps to compute the distance between residential addresses and nearby destinations." The algorithm looks at 13 categories and awards points for each between ¼ to 1 mile. Amenities within ¼ mile receive maximum points, while no points are awarded for amenities further than one mile. The categories include, grocery store, coffee shop, movie theatre, park, bookstore, drug store, clothing and music store, restaurant, bar, school, library, fitness, and hardware store.

For a detailed description of the algorithm, please see the Walk Score Methodology white paper found at:

<http://www.walkscore.com/professional/methodology.php>.



*Friends of Harbors, Beaches, and Parks works to protect the natural lands, waterways, and beaches of Orange County.*

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



Dayle McIntosh Center

# City Hall and City Average Walk Scores

City	Walk Score of City Hall	Average Walk Score for the City
Aliso Viejo	85	52
Anaheim	94	63
Brea	82	63
Buena Park	63	68
Costa Mesa	71	76
Cypress	63	70
Dana Point	51	61
Fountain Valley	72	65
Fullerton	86	69
Garden Grove	71	69
Huntington Beach	72	67
Irvine	72	60
La Habra	82	68
La Palma	72	67
Laguna Beach	98	53
Laguna Hills	80	59
Laguna Niguel	72	53
Laguna Woods	55	52
Lake Forest	35	53
Los Alamitos	68	49
Mission Viejo	75	53
Newport Beach	100	63
Orange	92	63
Placentia	51	60
Rancho Santa Margarita	91	46
San Clemente	78	55
San Juan Capistrano	74	47
Santa Ana	82	65
Seal Beach	95	52
Stanton	71	74
Tustin	88	64
Villa Park	65	49
Westminster	78	66
Yorba Linda	83	46

Note: These Walk Scores were calculated via the [www.WalkScore.com](http://www.WalkScore.com) website tool.



GATEWAY CITIES  
COUNCIL OF GOVERNMENTS

February 9, 2012

Mr. Hasan Ikhata, Executive Director  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

Dear Mr. Ikhata:

**Gateway Cities Comment to SCAG on Draft 2012 RTP/SCS**

Thank you very much for the opportunity to review and comment on the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated draft Program Environmental Impact Report (PEIR). It is clear that a great deal of hard work and successful stakeholder involvement have gone into creating these very impressive documents. SCAG has done an extraordinary job of meeting multiple planning requirements and has produced an innovative and visionary plan.

The Gateway Cities respectfully submits the following comments and questions for your consideration and response:

- **Growth Forecast**

- We understand that SCAG staff is recommending that the growth forecast be adopted at the city level rather than at the county level, which has been the practice in the past. We request that SCAG continue the past practice of adopting the growth forecast at the county level to allow for much-needed flexibility as local jurisdictions implement their general plans.

- **Financial Plan**

- The draft Financial Plan includes over \$110 billion to come from new mileage-based user fees that would be implemented to replace and augment gasoline taxes. This is the largest single element of the overall new revenue sources anticipated for the RTP. We would like additional information on how these fees might affect lower-income residents of the SCAG region, particularly since many such residents are concentrated within the Gateway Cities.

- The Financial Plan envisions a future split among local, state, and federal funding sources that is quite different from the current split, in which over 70% of all transportation funding is of local origin. In the future, the Plan shows 22% from federal and 25% from state, leaving only 53% from local sources. Can SCAG present a chart or plan showing how and when this transition would occur between 2012 and 2035?
  - Table 3.4.1 presents Core and Reasonably Available local sources of revenue and includes development mitigation fees for Orange and Riverside Counties. Does the revenue estimate include any assumption of funds from the potential adoption of a development fee in Los Angeles County?
- Major Highway Projects
  - Exhibit 2.1 and Exhibit 4.12 show major highway projects under the Regional Transportation Plan. Some major Gateway Cities projects – notably those along I-5 between I-605 and the County line – are not indicated on these exhibits. We understand that this is because the exhibits show only Plan projects and do not show projects in the current Federal Transportation Improvement Program (FTIP). We suggest that the exhibits be amended to include FTIP projects over a certain cost threshold so as to show a more complete picture of regional highway infrastructure investments.
- High-Speed Rail
  - We understand that discussions are ongoing among SCAG, the County Transportation Commissions, and the California High Speed Rail Authority regarding levels of available funding for rail infrastructure improvements within the SCAG region. We look forward to further details about the specific investments that will be made in Southern California's rail infrastructure under the 2012 RTP, particularly those that affect the Gateway Cities.
- Express/HOT Lane Network
  - Table 2.6 lists several potential routes for Express/HOT Lane development. Two of these run through the Gateway Cities: I-405 from I-5 to the LA/OC County line; and SR-91 from I-110 to SR-55. What is the anticipated timeframe or years of construction and completion for these projects? Will mixed-flow lanes be added or removed in order to provide the HOT lanes?
- Goods Movement
  - Exhibit 2.8 displays "rising truck volumes in the SCAG region." However, the assumptions underlying the data in this exhibit are not clear, and should be explained in the text. For example, how do these figures relate to the cargo forecast being projected by the San Pedro Bay Ports or the figures assumed in the I-710 Corridor and 91/605/405 Corridor processes? Are the figures in the exhibit based on SCAG's revised truck model? Also, would different truck volumes be found under different RTP alternatives?

- To avoid local impacts to member cities, the Gateway Cities respectfully request that the potential routes for the East-West Freight Corridor be limited to freeway routes only, and that non-freeway routes not be further considered.
- The tables relating to the proposed East-West Freight Corridor present a confusing picture of the plan for implementing reduced-emissions vehicles on the corridor. Table 2.8, Benefits of an East-West Corridor Strategy, mentions "50% clean truck utilization" under Environment, but also lists "Zero-emissions technology" under Community. Table 2.11, Environmental Benefits, shows an "East-West Freight Corridor with 100% Zero-Emission Vehicles." It would be helpful to clarify the timeline on which SCAG anticipates low- or zero-emission trucks would be phased in specifically on the East-West Freight Corridor. This implementation timeline should be the same on the East-West Corridor as on the I-710 Corridor through the Gateway Cities, and both should employ 100% zero-emission vehicles.
- Sustainable Communities Strategy
  - Page 79 of the SCS Background Documentation report states that "Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected and integrated into the alternatives (with possible revisions for Alternative C only)." Since the PEIR alternatives are designated by number (1, 2, 3) rather than by letter (A, B, C), please clarify whether this statement refers to Alternative 3, called the "Envision 2 Alternative" in the PEIR. Also, we would appreciate having specific information on where, if anywhere, revisions may have been made to the Gateway Cities' jurisdictional input as reflected in our subregional SCS.

We thank you again for the opportunity to review and comment on these draft documents. We also remain especially grateful to the SCAG staff for all the support they provided to the Gateway Cities as we developed our subregional SCS.

Sincerely,



Raymond Dunton, President, Board of Directors  
Gateway Cities Council of Governments and  
Council Member, City of Bellflower

February 14, 2012

Honorable Pam O'Connor, President  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

RE: Global Land Use and Economic (GLUE) Council Comments to the Southern California Association of Governments (SCAG) Regional Council on the Draft 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR).

Dear President O'Connor:

In April of 2009, the Global Land Use and Economic Council was formed to advise SCAG staff on the economic implications of SCAG's planning activities and to better engage key public and private stakeholders.

At its formation, the focus of the GLUE Council was centered on the implementation of SB 375 and how Southern California could reduce greenhouse gas (GhG) emissions and establish economic co-benefits through better planning for land use, transportation and housing throughout Southern California.

Nearly three years later, the GLUE Council's contributions have grown beyond SB 375 and the partnership has yielded some great success:

- In December 2009, partnering with the Southern California Leadership Council (SCLC) and SCAG, we successfully brought together key business leaders and public officials to voice Southern California's need for flexibility in SB 375 implementation.
- In September 2010, GLUE Council helped articulate to the California Air Resources Board the importance of linking GhG reduction targets for SB 375 to state commitments that will be critical to ensuring goals are met.
- In December 2010, the Southern California Road to Economic Recovery was a great success and the first public step in the development of Southern California's first Economic Growth Strategy.
- In May 2011, the Southern California Economic Recovery and Job Creation Strategy was unveiled and subsequently adopted with great support from GLUE Council.

As Southern California's top four industries are transportation dependent -- trade, technology, tourism and entertainment-- GLUE Council recognizes that investing in the region's transportation system is critical to its economic prosperity.

Over the last several months, GLUE Council has been actively engaged in the 2012-2035 RTP/SCS and applauds the tremendous effort SCAG has put into the process behind this Draft 2012 RTP/SCS & PEIR.

For almost three years, and including hundreds of meetings with its local government constituents and private sector stakeholders, SCAG has honored an inclusive approach to the development of this RTP/SCS.

**GLUE Council Thoughts and Recommendations:**

As a body representative of Southern California's broader business community, the GLUE Council recognizes the crucial roles that transportation and infrastructure play in maintaining this region's economy and quality of life. That is why throughout the RTP/SCS process the GLUE Council has focused on the plan's ability to deliver economic recovery, jobs recovery, and CEQA streamlining to the region.

The following key policies and principles are recommended by the GLUE Council for evaluating the plan as they represent the qualities of a good and sound RTP/SCS:

1. **Provides Positive Economic Impacts**
  - A plan that is pro economic growth and pro job creation – The RTP/SCS must undergo a true economic cost/benefit analysis so that economic impacts are understood and known by SCAG Regional Council members (and stakeholders) before making a final decision on the RTP/SCS.
2. **Provides Local Control**
  - Any new transportation revenues or fees collected must be under the control of the local transportation agency/authority in order to assure local accountability.
  - Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use and transportation.
3. **Assures Revenue Sources are Fair, Understandable and Good for the Economy**
  - Transportation revenue concepts within the RTP/SCS must undergo cost/benefit and other appropriate analysis to assure that they are good for a recovering economy and future growth. They must also be fair and understandable, meaning that an appropriate nexus exists between who/what is being taxed and what is being paid for to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.
4. **Is Balanced and Accountable**
  - Revenues should be balanced with performance measures, reforms and guarantees that assure the RTP is effective, efficient and responsible to the citizens and taxpayers of Southern California.
5. **Is CEQA Compliant and Defensible**
  - The RTP/SCS is processed correctly from an environmental impact perspective, complies with appropriate legal requirements, and is able to withstand litigation challenges.
  - Provides for CEQA streamlining and protects against CEQA abuse

**Economic Analysis** -- Throughout the RTP/SCS process, the GLUE Council has asked for and encouraged SCAG to focus on the plan's benefits and impacts on the regional economy and job creation. The GLUE Council has argued that, done right, the RTP/SCS can be a major catalyst for the region's economic and jobs recovery. Likewise, if not done right, the RTP/SCS could delay recovery or possibly even worsen the region's struggling economy. With this in mind, early on the GLUE Council called for a complete economic analysis of the RTP/SCS, inclusive of a true cost benefit analysis.

GLUE Council appreciates SCAG's dedicating resources to fully articulate the net economic benefits of the 2012-2035 RTP/SCS and supports the findings:

- Every \$1 spent on infrastructure investments yields a return of \$2.90
- The projected cost per day/per capita is less than \$2.00
- The projected benefit per day/per capita exceeds \$5.00
- The plan generates an average of 166,000 jobs per year from construction and maintenance expenditures
- Improved transportation benefits in commuting, accessibility and congestion relief yields 354,000 annual jobs

GLUE Council has reviewed the work of SCAG's economic team and their analysis of the RTP/SCS and finds that it does show the plan to be one that "provides positive economic impacts", which is one of GLUE Council's key qualities of a good plan.

**Phase II of the Economic Recovery Strategy** – As part of the adoption of the RTP/SCS, the GLUE Council recommends that the SCAG also adopt Phase II of the Economic Recovery Strategy. The adoption could happen simultaneously with the adoption of the RTP/SCS or at the adoption of the RTP/SCS, SCAG could commit to a subsequent adoption of the Phase II Strategy (within six months).

The Phase II Economic Strategy would be a way for SCAG to take business community concerns with the RTP and turn them into a positive partnership. Working together, SCAG, GLUE and other stakeholders could develop the Phase II Strategy as a way to focus SCAG and local government on critically necessary regulatory reforms and strategies for new out of the box financing, especially in light of the dissolution of redevelopment agencies. The Phase II Strategy would also give SCAG and GLUE a vehicle for establishing a true Regional Economic Plan to go along with SCAG's other regional plans such as the RTP, the SCS and RHNA.

Upon adoption of the RTP/SCS and the Phase II Economic Recovery Strategy, GLUE Council looks forward to partnering with SCAG on actions to encourage increased business investment in Southern California, in order to retain the current business base, to identify opportunities for expediting project delivery, to reduce costs and to realize accelerated plan benefits.

Respectfully,



Greg McWilliams  
Chair, GLUE Council



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

February 14, 2012

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

Dear Mr. Ikhata,

The Governor's Office of Planning and Research (OPR) appreciates this opportunity to provide input on the Southern California Association of Governments (SCAG) 2035 Draft Regional Transportation Plan (RTP). This letter highlights aspects of SCAG's RTP that we think could inform other Metropolitan Planning Organizations' (MPOs') RTPs, and includes some suggestions for possible improvement. Additionally, we enclose comments shared with us by the California Department of Public Health.

Our comments highlight a number of achievements of the plan, and point to some opportunities for further improvement. The plan is grounded in empirical data, using performance measures to guide investment. These metrics are based on transparent modeling, and are broad enough to capture a number of factors important to decision-making. We also point to some opportunities to calculate other important metrics that could be added to even better inform decision-making. The plan also proposes a VMT fee for revenue generation; we suggest that in future analysis SCAG broaden discussion of its benefits and impacts. By showing a path of regional growth in a smaller urban footprint, it makes possible substantial habitat preservation and emissions reduction. We commend SCAG for the extensive technical analysis, policy development, and public outreach process which informed this document, achieving a 16 percent reduction of greenhouse gas emission (GHG) reductions by 2035, among the largest of any MPO's over that timeframe. The RTP estimates a reduction in congestion and an increase in active mode share as well. We look forward to working with SCAG as it proceeds with implementation of this plan.

## **Performance Based Planning**

We are encouraged by SCAG's efforts to develop a plan based on quantitative measures of projected outcomes, or "performance metrics". In this RTP, SCAG provides data and discussion that covers a broad range of stakeholder interests, enabling broadly informed decision-making. We encourage SCAG to continue to develop its capacity to employ sophisticated scenario modeling, and to use that information to enable even better-informed decision-making.

Models used in regional transportation planning are increasingly important in informing transportation and land use decisions. These decisions direct billions of dollars in infrastructure investments and influence regional and local growth patterns. Transparency of models is therefore a prerequisite to transparency in the planning process and decision-making. The 2010 California Regional Transportation Plan Guidelines require MPOs to "disseminate the methodology, results, and key assumptions of whichever models it uses in a way that would be useable and understandable to the public."

We encourage MPOs to display as much information as possible, including model inputs, to help members of both the lay and technical public understand and compare model assumptions and results. Similarly, the model code itself should also be made available to members of the technical public for analysis. Consistent with the Regional Transportation Plan Guidelines, SCAG has appropriately made its modeling work available for public review. We appreciate SCAG's efforts in providing this information.

## **Applying Performance Metrics to Inform Policy**

SCAG's RTP also relies on and discusses useful metrics, and provides clear descriptions of their meaning. One example of a clearly portrayed and useful metric in the SCAG RTP is "reliability." Figure 5.8 and Table 5.2 (p. 172) along with the accompanying narrative convey clearly the concept of reliability and its importance to an efficient transportation system. To explain reliability, the table relates variability in travel time to the time one must leave for a trip in order to have confidence in reaching a destination on time. This demonstrates the time lost by users of an unreliable facility.

Another useful metric in SCAG's RTP is "lost productivity" which measures the reduction in throughput resulting from congested roadways (Figure 5.5, p. 170). Use of this metric allows consideration of the potential benefits to the transportation system of transportation demand management measures. This presents an opportunity to discuss the potential effect of a VMT fee on the transportation system.

We suggest that SCAG provide additional context when using some metrics. For example, death rate listed per VMT (p. 19, fig 1.2) captures factors such as roadway design, but masks the safety benefits of reducing VMT. Similarly, metrics of delay (pp. 164-165) do not distinguish between long and short trips. Such metrics can penalize a short commute in traffic as compared to a long commute on the open highway.

Congestion metrics therefore do not capture the benefits to the transportation system of land use planning strategies that shorten trip lengths. While we believe the RTP would benefit from inclusion of trip length in the metrics used to describe the functioning the transportation network, we note that the RTP captures these by using separate land use metrics.

The RTP also uses safety and health metrics, such as collision rates by severity and by mode and tons of air pollutants emitted. The document provides important information by monetizing potential health benefits of air quality improvement (p. 30). We encourage SCAG to include another key metric, health benefits resulting from active transportation, such as walking and bicycling, in the evaluation. Please see the section "Quantify the Benefits of Active Transportation" below for further discussion.

SCAG's RTP appropriately describes several key co-benefits in the RTP (pp. 175-176). Further, the RTP also quantifies and monetizes those benefits so that they can be considered in cost benefit analyses. We encourage SCAG to clarify how those co-benefits are factored into the decision-making process, and also to expand the scope of co-benefit analyses in its future planning processes.

### **A Vehicle Miles Traveled Fee: a Funding Source with Potential Additional Benefits**

The SCAG region has been a pioneer in the use of roadway tolling in California. Studies suggest that roadway tolling can provide a combination of revenue enhancement, system performance enhancement, human health benefit and environmental benefit. We appreciate SCAG's efforts in modeling and evaluating a VMT Fee as part of the RTP-SCS analysis.

As described in the RTP-SCS (p. 170), overloading a roadway substantially reduces vehicle flow. This in turn reduces the capacity of the roadway at exactly the time that capacity is most needed. One short-run solution is to build additional capacity, but building capacity is costly and the congestion relief is usually temporary. SCAG's consideration of effects of a well-administered VMT fee, including reducing congestion, and possible co-benefits to human health and the environment (e.g. reducing GHG emissions, improving air quality, and reducing collisions), is beneficial for decision-makers and the public. We appreciate SCAG's work in this area.

### **Quantify the Benefits of Active Transportation**

In a letter commenting on RTP-SCS development, the California Department of Public Health points out that "...the potential for reducing chronic disease and greenhouse gases appears to be large on an absolute scale, and far larger than co-benefits from fine particulate matter reductions, which are a traditional focus of health effects" (letter enclosed).

We note that the RTP highlights the link between active transportation and human health (p.30). We recommend that future planning efforts quantify health benefits of

active transportation, so those benefits can be more specifically factored into the transportation planning process. We note that the RTP includes discussions delineating active mode share and accident/fatality rate for cyclists and pedestrians, and elsewhere in the document the expenditure share on active transportation. We recommend that these factors be considered together with active mode health benefits for a comprehensive analysis of this component of transportation plan.

### **System Preservation**

In an era of dwindling transportation budgets, some agencies are deferring roadway maintenance. But doing so leads to more serious wear and damage, and the repairs that are needed as a result are much more expensive than proactive maintenance would have been. For long-run fiscal health, it makes sense to fund full upkeep of existing roadway and highway infrastructure before building more capacity. In this light, we appreciate SCAG's commitment of \$217 Billion (nearly half of total expenditures) to system preservation, maintenance, and operation.

### **Protecting the Natural Environment**

The RTP discusses the direct impact of roadway construction and operation on sensitive species via road wildlife strikes (p. 78). We note that the development that will be served by these roads could have a much greater geographic footprint than the roads themselves. As a result, the RTP should consider the potential the indirect impact roadway construction can have on land development, and in turn the impact of development on habitat. We encourage SCAG's continued engagement and facilitation in implementation of regional conservation plans.

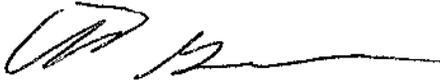
On page 174, the RTP presents the following definition of sustainability: "A transportation system is sustainable if it maintains its overall performance over time with the same costs for its users." The RTP should use a broader definition of sustainability that encompasses the environmental, social and economic metrics used elsewhere in the plan.

### **Implementation Monitoring Tracks Results of the Planning Process**

The RTP anticipates substantial achievement that will be measured by a number of metrics. In order to determine whether these anticipated achievements occur, we suggest SCAG employ an implementation-monitoring program. Such a program would assess the extent to which local jurisdictions within SCAG approve development in accordance with the plan. It would test the assumptions used in the planning process, allowing for corrections to the plan so that it can continue to track a course towards stated targets. Also, it would check the assumptions made in the planning process, allowing calibration with empirical results.

OPR again commends SCAG for developing a high quality RTP-SCS. We hope that our comments are helpful. We appreciate the opportunity to submit these comments, and to offer our assistance in RTP-SCS development and implementation. If you have any questions, please do not hesitate to contact me at 916-324-9236 or [chris.ganson@opr.ca.gov](mailto:chris.ganson@opr.ca.gov).

Sincerely,



Chris Ganson  
Senior Planner

For: Ken Alex  
Director

cc:  
Heather Fargo, SGC  
Linda Rudolf, CDPH  
Doug Ito, CARB  
Terry Roberts, CARB  
Garth Hopkins, Caltrans

Attached: Comments by the California Department of Public Health on the Sustainable Community Strategies (SCS) Process and Plan Content



RON CHAPMAN, MD, MPH  
Director & State Health Officer

State of California—Health and Human Services Agency  
California Department of Public Health



EDMUND G. BROWN JR.  
Governor

January 19, 2012

Christopher P. Ganson, Senior Planner  
Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Dear Mr. Ganson,

We welcome the opportunity to comment on the Sustainable Community Strategies (SCS) that have recently been presented in draft or final formats by the large Metropolitan Planning Organizations. Although the California Department of Public Health does not have a regulatory role in the SB375 process, there are a number of compelling public health interests in the SCSs because of the documented health impacts of housing and transportation in combination with economic development, education, and their interactions to create healthy community environments. As the convener of the Strategic Growth Council's Health in All Policies Task Force, CDPH is working with other State agencies to optimize opportunities to improve public health and sustainability. CDPH staff has also played an educational and technical advisory role in some MPOs' discussions of performance targets and methodologies to assess project performance. CDPH also routinely interacts with local public health departments around the state, many of whom have become involved in regional SCS planning.

Our general and specific comments are detailed in the attached pages. We do note, however, that there are several health issues that fall outside of the current framework of SCSs but are concerns CDPH believes needs more attention. Although greenhouse gas reduction is a goal of the SCSs, climate change will increase risks from higher temperatures on the backdrop of an increasingly urbanized California. We feel there is a critical need to integrate urban heat island (UHI) mitigation strategies into regional and local plans that will implement transit oriented development (TOD) and in-fill development so that UHI risks are reduced as new development takes place. Access to health-promoting features of the built environment, including food systems, parks, and green space also should be integrated into planning.

Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Linda Rudolph, M.D., M.P.H.  
Deputy Director, Center for Chronic Disease Prevention and Health Promotion

## **Comments by the California Department of Public Health on the Sustainable Community Strategies (SCS) Process and Plan Content**

### **General Comments**

Health is a critical component of sustainable communities. The California Department of Public Health encourages regional planning organizations to embrace the concepts outlined in the Healthy Community framework developed by the Strategic Growth Council's Health in All Policies Task Force.<sup>1,p21</sup> Many strategies that increase community sustainability can also support improved health outcomes. For example, policies that support active transportation help Californians incorporate more health-promoting physical activity into their lives, while also advancing goals to achieve greenhouse gas emission reductions. Infill development can help to reduce urban sprawl, reduce greenhouse gas emissions, and support location-efficient housing that promotes active transportation and allows workers to reap both economic and health benefits. Good health is critical for economic sustainability, increasing workforce participation and productivity, and slowing the ongoing rise in medical care expenditures, which diverts resources from other State priorities such as education or investments in green energy.

CDPH staff has reviewed the drafts and final versions of SCSs updates to the Regional Transportation Plans of the 4 large MPOs and the following comments represent a high level synthesis. First, we must laud the MPOs for the diligent work that has gone into these documents, and each represents an improvement from the original RTPs. We note an increasing number of performance measures that go beyond the traditional health focus on traffic injuries and air pollution. We refer to physical activity from active modes of travel, including bicycling, walking, and public transit that includes active transport from and to transit destinations. Noise and other physical hazards are also getting more attention as health performance measures. We also note that discussions of equity increasingly recognize that health inequities are caused and exacerbated by built environment factors and the uneven distribution of community resources. We are supportive of these developments which will deepen the appreciation of how public health is embodied in the many actions outside the field of health or health care.

### **Specific Recommendations**

We have several recommendations that are based on existing trends in the SCSs and recent scientific developments in the transportation and public health fields.

1. Activity time in active transport (walking, bicycling, etc.) is indispensable as a health-related transportation performance measure (e.g., mean daily minutes per person of walking and bicycling). Health co-benefits of active transport in one of the large MPOs (Metropolitan Transportation Commission, MTC) has recently been quantified<sup>2</sup> and the potential for reducing chronic disease and greenhouse gases appears to be large on an absolute scale and far larger than co-benefits from fine particulate matter reductions, which are a traditional focus of health effects. These findings are consistent with emerging evidence from studies of other regions of the United States, London, Barcelona, and the Netherlands.<sup>3-7</sup> Attempts to monetize health co-benefits from active transport suggest savings of billions of dollars in health care costs and the value of statistical lives saved.<sup>5</sup>

2. MPOs should consider new tools that have recently become available to quantify the health co-benefits of active transport in SCS scenarios and projects. This fills a gap in project performance assessment at most MPOs. One such tool co-developed by the CDPH, MTC, the Bay Area Air Quality Management District and other researchers is called the Integrated Transport and Health Impacts Model (ITHIM), which was used to quantify the health co-benefits of active transport and low carbon driving in the San Francisco Bay Area. This tool could function as a post processor to travel demand models that generate miles traveled and activity times by mode. Modelers at several large MPOs are already exploring how it can be used to complement their methods for project performance assessment.
3. As tools such as ITHIM become available to MPOs, health co-benefits can be used as a criterion for a unique project category that *a priori* could get a high priority score in the project assessment methodologies used by MPOs.
4. Likewise, using these tools, health co-benefits can be used as a criterion to screen projects for cost-benefit and other in-depth analysis. In some MPOs current practice is to screen projects based on cost, so that only high cost projects get quantitative assessment. This would allow projects with large health co-benefits to also get additional scrutiny in cost-benefit analyses.
5. Equity/inequity in RTPS is currently framed using title VI of the Civil Rights Act, concepts of "no disparate impacts" and "increase access (to affordable housing/transit) to poor people", participation of communities of concern, environmental justice. In the development of SCSs some MPOs have been exposed to a health-based approach which explicitly calls for ways to narrow existing differences in health status and of determinants of health. The Sustainable Transportation Council (LEED-like approach to rating transportation systems) is considering a goal area in its transportation rating system that explicitly considers reducing health disparities.<sup>8</sup> This is a promising approach that deserves more attention.
6. Local health departments are highly interested and would benefit from mechanisms that enhance their participation in SCS development and follow-up. We noted with interest that SANDAG has a standing Public Health Advisory Committee in which the San Diego County Health Department is a partner, and our staff was able to attend one of their meetings. National organizations like the Transportation Research Board have recently created standing health subcommittees with an expanded focus. It is worth exploring ways local health departments and others interested in public health and equity can stay engaged on an on-going basis.

This is particularly germane to a multidisciplinary approach to address the multiple health issues and the complexity of health impacts. In this setting expertise could be leveraged to explore the potential consequences of different scenarios and SCSs in the context of health risks and benefits, addressing air quality, physical activity, access to health promoting resources (e.g., transportation, food, employment, education), noise, injuries, social networks, etc. for the regional population and vulnerable subgroups.

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FROM: David J. Alba  
Project Designer GRID/ECSTC Systems  
Davidalbal@gmail.com  
February 13, 2012

TO: Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

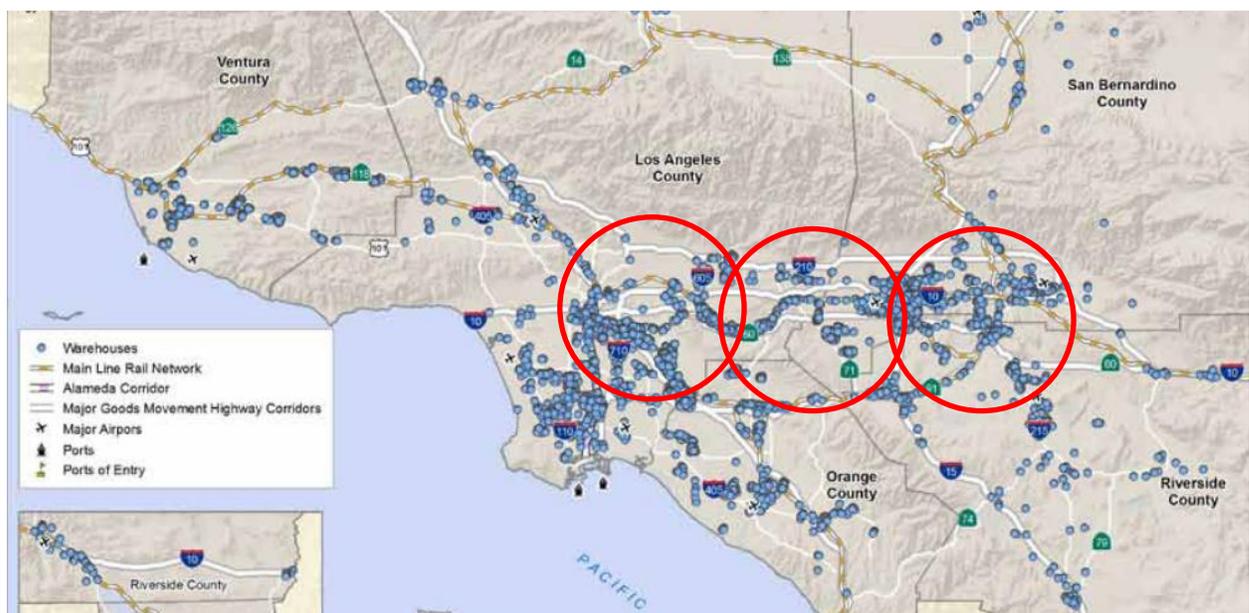
**RE: Official Public Comments made to the 2012-2035 RTP addressing; concerns involving conventional freeway/intermodal/port expansion projects related to goods movement emanating from the San Pedro Bay Ports Complexes.**

Greetings,

I am a native Southern Californian and have had a professional background in commercial logistics for over 20 years, 7 of which involved the tri-modal (vessel, container yard, and on-dock) operations involving container terminals.

In the span of my experience and research seeking solutions to great challenges involving goods movement, the first and most profound discovery emerging obvious and opportune is that over decades of industrial growth, container logistics is no longer “port centric”.

Rather today, goods movement has shifted to become “region centric”. That is to say logistics activity at consolidated warehousing, use of freeway networks and surface freight rail has exploded to support the volumes (in millions of containers each year) emanating from the Ports of Los Angeles and Long Beach. The region now bears the brunt of goods movement and with this brunt comes negative environmental impacts.



This image on the previous page was taken from page 3 (exhibit 1) from the SCAG Goods Movement Supplemental Report illustrating warehousing locations (in blue dots). We have added the 15 mile radius red rings to illustrate where the vast majority of local truck deliveries emanate from the ports. Ideally, if containers could be delivered in a new method of freight transmission to the center of these areas of delivery density, the freeway trucking component could be completely eliminated decongesting freeway traffic measured in the millions of truck trips and in the hundreds of millions in truck vehicle miles travelled (VMT). The idea of a 100% freight dedicated right of way connecting the ports to the Inland regions is the core motivation of the proposed GRID Freight Pipeline system and transportation network.

Among the 2012-2035 Regional Transportation Plan's (RTP), by far, the most ambitious proposed projects specific to goods transportation is the proposed elevated or double decked, East West Freight Corridor. This project calls for a freeway network dedicated to truck drayage from the 710fwy connecting to the IH-15 ultimately linking to areas in the Inland Empire where a high density of container deliveries to consolidated freight service (CFS) warehousing and intermodal yards.

This image on the previous page justifies the central argument for the critical need for a freight dedicated corridor crossing the region through the areas where the highest frequency of port truck deliveries are occurring by the thousands every day here and now. Therefore, this public comment is to agree and concur with SCAG's determination that an east west freight corridor is critical to reduce traffic congestion on surface freeways where our commuter cars use our freeway network.

However, the proposed conventional project solution, connecting forty miles, estimated to cost \$15B, is to build an entirely new freeway network for the purpose of decongesting another parallel freeway network. To some elected officials this project proposal leaves causes for concern. In fact, this proposed mega-project has already received pushback from elected officials whose cities run through these proposed new freeway routes.

To begin, fifteen billion dollars to fund this single project in an RTP involving literally thousands of projects represents 10% of the \$155B dollars SCAG proposes to raise revenues in the form of a future gas tax increases at \$0.30 per gallon or impose a vehicle miles travelled (VMT) tax. These gas tax increases will fill the current gap of budgeting within the RTP's total \$450B plan. The certainty that passage of a national gas tax or VMT is imminent as a solution is considered by some to be somewhat optimistic. The following link referencing these specific issues is an article from the San Gabriel Valley Tribune. LINK: [http://www.sgytribune.com/news/ci\\_19327611](http://www.sgytribune.com/news/ci_19327611)

Another significant issue that rapidly growing concern and in some cases firm opposition from elected and city staff officials of cities, especially those positioned within or nearing the route to the proposed surface solution that describes the proposed design of the E/W Freight Corridor. The following link describes the aligning opposition beginning with

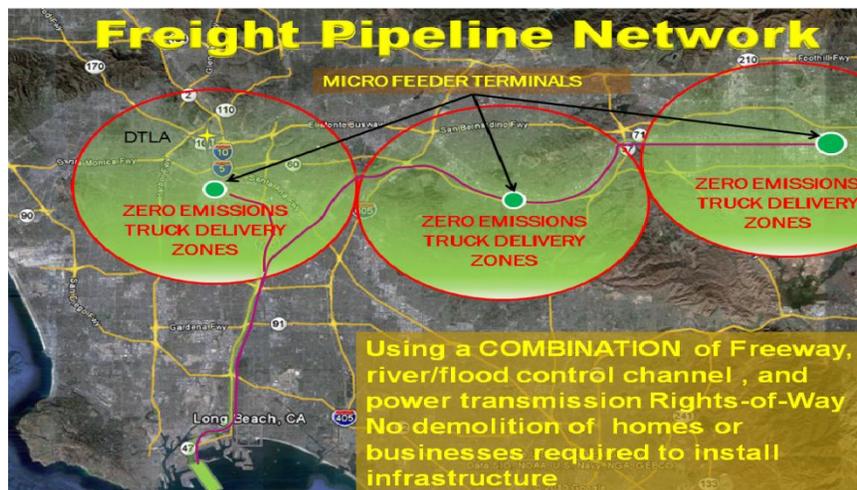
the cities of Diamond Bar, Walnut, West Covina, Chino Hills, Montebello, South El Monte, and Pico Rivera. Article from the Whittier Daily News.

LINK: [http://www.whittierdailynews.com/news/ci\\_19261687](http://www.whittierdailynews.com/news/ci_19261687)

The central motivation of this public comment is to reach out to SCAG strongly urging staff to take bold forward thinking steps, shifting its regional plan with focus to gravitate towards environmentally superior alternatives that actually have superior efficiency and platforms using 21<sup>st</sup> Century thinking to solutions specific to streamlining, even potentially undergrounding the transmission of millions of containers from the 5<sup>th</sup> largest container trade gateway on planet earth significantly decongesting freeway networks on our urban surfaces where human multi-modal transportation is given precious space.

The GRID Project is now participating in its 3<sup>rd</sup> public comments on proposed major transportation infrastructure where one project replaces not one, rather multiple projects. Among the most appealing facets of GRID is that the project pays for itself (economically sustainable). The first three projects GRID has addressed in comment are;

1. Public Comment on the Port of Long Beach Pier S DEIR/DEIS where the SuperDock makes this billion dollar project obsolete
2. The BNSF Southern California International Gateway (SCIG) Project DEIR/DEIS making this controversial development having significant community and environmental justice group and NRDC opposition (saving railroad companies \$500M) with a superior operating facility called GRID SuperDock).
3. The SCAG 2012-2035 RTP where GRID proposes a “Freight Pipeline” connecting the ports to inland areas where containers would emerge from this network of freight tunnels emerging at the center of where the highest concentration of containers are delivered.



Referencing the earlier SCAG image on page 1, the pipeline follows a route where freight warehouse volume density is most concentrated. To date, the GRID Project has been presented to SCAG senior staff. Also GRID proposers were recently invited to present at

the Arroyo-Verdugo SCAG Subregion meeting where the central agenda involved issues pertaining to the 2012-2035 RTP.

We submit for SCAG and committee members consideration a conclusion from a recent CARB/CEPA sponsored study entitled; *“Development of a California Geospatial Intermodal Freight Transport Model with Cargo Flow Analysis”* Contract no: 07-314 (PDF available on CARB website). The Conclusion of the report states the following;

*“The Case Study provides two primary insights. First, the Case Study quantifies port-related intermodal goods movement through the state of California and beyond. Second, the idealized use of least-CO<sub>2</sub> routing constraints illustrates how emissions savings can be achieved through modal shifts. **In terms of savings in emissions, it is estimated that a total of ~60% reduction in CO<sub>2</sub> emissions is achievable by a modal switch from road to rail.** Both of these insights have relevance for consideration of system-wide improvements that may achieve energy savings, CO<sub>2</sub> reductions, and associated benefits for air quality”.*

We urge committee members to please consider ensuring that SCAG staff will agree to draft language within the E/W Freight Corridor section in the 2012-2035 Regional Transportation Plan clearly communicate that the East/West Freight Corridor description within the RTP;

- 1) **Consist of other design alternatives** beyond those of only truck with road and freeway expanding solutions.
- 2) Include rail guideway systems infrastructure to carry freight from the same point to point destinations that define the East/West Freight Corridor even in the form of superior environmental alternative.
- 3) Include rail guideway systems having an underground component consisting of tunneling and/or “freight pipeline” networks included in the RTP language.
- 4) Include design alternatives that appear to have superior environmental alternatives to consider as required by CEQA and NEPA legislation as expressed under section 101 of the National Environmental Policy Act.

In this most perfect storm of economic, environmental, and political drive to create new jobs and industries, SCAG can create a Goods Movement RTP squarely focused on sustainable alternatives both green and economic. We hope that leaders in the region will join other leaders in further investigating the GRID project and grow inspired to its purpose in redefining transportation, smart urban use and economic benefits to the region.

Always Looking Forward,  
Dave Alba  
Project Designer GRID/ECSTC Systems  
[Davidalbal@gmail.com](mailto:Davidalbal@gmail.com) TEL: 626.513.3650



**Richard I. Mueller**  
President

**Ameron International Corporation**  
**Water Transmission Group**  
10681 Foothill Blvd., Suite 450  
Rancho Cucamonga, CA 91730  
Telephone: 909/944-4100. Ext. 192  
Fax: 909/980-7865  
Email: [Richard.Mueller@nov.com](mailto:Richard.Mueller@nov.com)

February 5, 2012

Mr. David Alba  
GRID Logistics, Inc.

Via email: [davidalba1@gmail.com](mailto:davidalba1@gmail.com)

Subject: Constructability of Proposed GRID "SuperDock" and Freight Pipeline

Dear Mr. Alba:

I have been involved in the design, manufacture, installation, operation and maintenance of pipelines made of steel, concrete, and fiberglass, and of diameters from 10" to 252" in diameter. I have been involved in the development of pipelines systems for transfer of solid freight for more than two decades. I was also involved in the design and installation of rail siding and rail loading systems for rail delivery of the wind towers which Ameron International Corporation fabricates at our plant in Fontana, California.

I have discussed the GRID proposal with many of my engineer colleagues, both regarding basic constructability and particularly in regard to maintaining system reliability while crossing southern California's seismic faults even in the event of substantial differential ground movement. Based upon my background and evaluation, and that of the pipe and rail experts with whom I have discussed the GRID project, it is our determination that the GRID freight pipeline is buildable using current technologies.

Ameron International Corporation is now a wholly owned subsidiary of National Oilwell Varco, (NOV). NOV also owns AmClyde, a designer and manufacturer of the most demanding crane systems, including those used for stevedoring. AmClyde engineers have reviewed the proposed design concept for the GRID "SuperDock" and agree it can be designed and built to function as intended for the GRID system.

These engineers and I look forward to building this project for the benefit of southern California and for the reduction of transportation costs for and environmental impact from all freight moved through the ports at San Pedro Bay.

Sincerely,

**Ameron International Corporation**  
**Water Transmission Group**

A handwritten signature in black ink, appearing to read "Richard I. Mueller".

Richard I. Mueller, P.E.  
President

# SCAG RTP PUBLIC COMMENT DISTRIBUTION

2012

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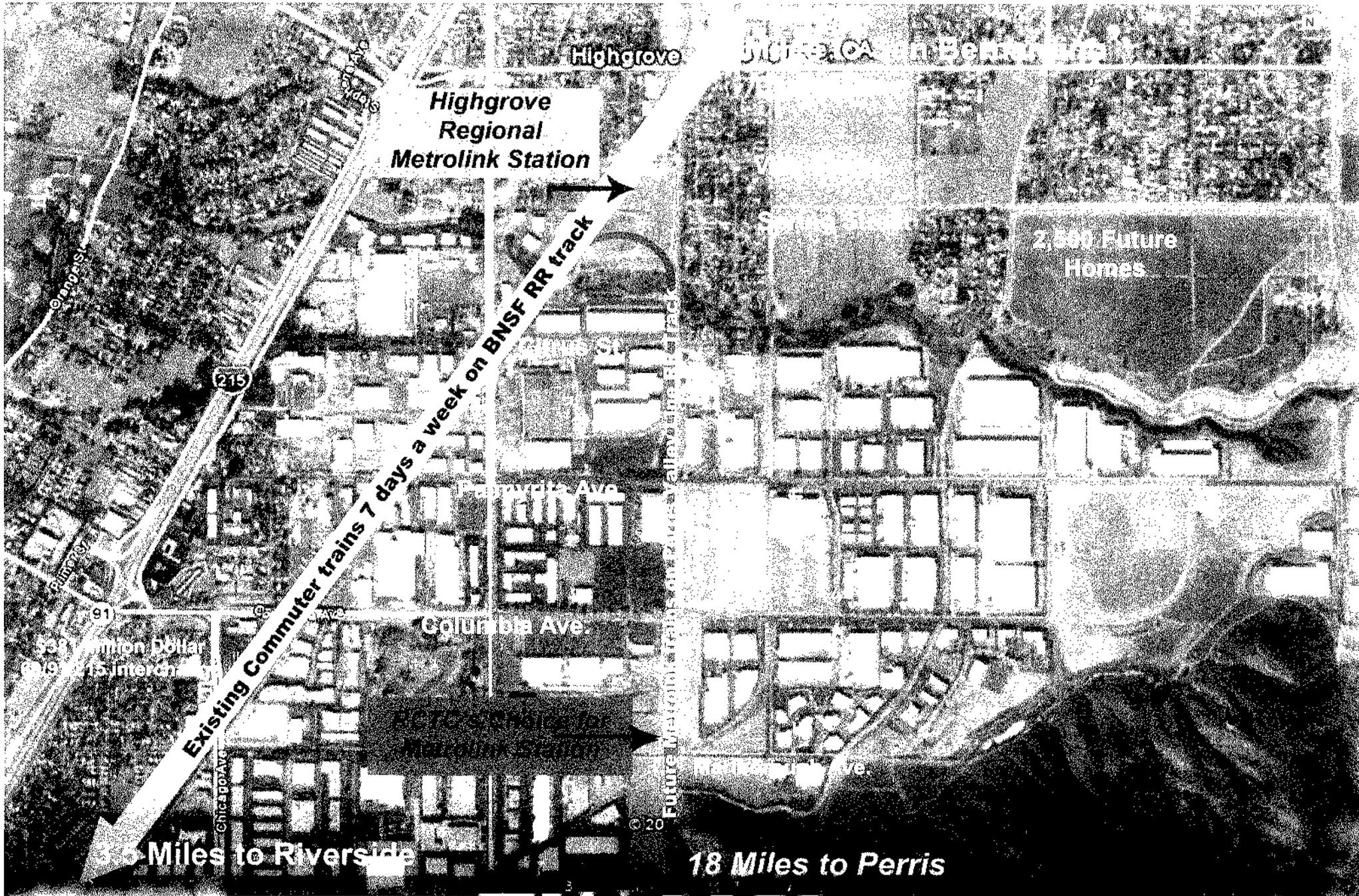
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Paul Glaab  
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Richard Mueller  
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Tim Morgan  
Tom King  
Tom O'Brien  
Tom Soto  
Veronica Chan  
Victor Griego  
Wayne Ratkovich  
Will Wright  
William Burke

William J. Perez

Worku Gachou

Yusef Robb



## HIGHGROVE REGIONAL METROLINK STATION

Index of information given to SCAG for **Regional Transportation Plan**

Jan. 18, 2012

1. Colored map of proposed Highgrove Metrolink Station location
2. Description of map and supporting information
3. Enlarged view of proposed parking lot showing 725 spaces
4. 5 pages of comments over the last 8 years
5. Letter from Supervisor Ashley 10-14-2009
6. Letter from Transit Coalition 9-19-2009
7. Resolution from City of Grand Terrace 12-13-2001
8. Petition from Project Area Committee 1-08-2002
9. Resolution from City of Loma Linda 1-24-2002
10. Letter from Assemblyman Bill Emmerson 8-14-2006
11. Letter from Supervisor Bob Buster 7-17-2006
12. Comments from Buster, Ashley and Haley 10-11-2006
13. Letter from Eric Haley about Hi-Rail tour 11-28-2006
14. Agenda from La Quinta Workshop 9-15-2006
15. Article from San Bernardino Sun 1-1-2007
16. Letter from Riverside Land Conservancy 10-18-2005
17. Letter from Melanie Zimmermann 10-09-2006
18. Letter from Wendy Eads 3-15-2006
19. Letter from University Neighborhood Association 10-21-2005
20. Letter from Byron Matteson 6-23-2006
21. Letter from Tony Petta 6-23-2006
22. Letter from Maryetta Ferre' 3-15-2007
23. Letter from Hugh Grant 6-21-2006
24. Letter from Asst. City Mgr. of Grand Terrace 5-15-2003
25. Letter from Franklin Carpenter Jr. 5-28-2001
26. Letter from JoAnn Johnson 11-04-2006
27. Letter from Bixby Land Co. 12-12-2005
28. Letters from Carol Williams and Clifford Berger 3-30 & 3-31-2007
29. Letter from Dom Betro 3-21-2006



# Highgrove Metrolink comments over the last eight years!

Please look at the dates of the following statements:

Excerpts prepared Jan. 14, 2010

(Not in sequence)

**Ann Mayer, current Executive Director RCTC: (Press Enterprise, Feb. 15, 2009)**

*"We have to put stops where they will serve the most people".*

**Marion Ashley, Riverside County Supervisor: (Letter, Oct. 14, 2009)**

*"Over the course of more than a decade, the Riverside County Transportation Commission has considered and repeatedly rejected the request of Highgrove residents for Metrolink service."*

**Bob Buster, Riverside County Supervisor: (Statement Oct. 11, 2006)**

*"Highgrove is at the fulcrum, the pivot point of transportation between the 2 counties. You can not ignore the geographic reality that both the freeway and major rail lines and there is available land that will soon be snapped up for other uses. This is a key sight for the future of the Inland Empire"*

**Bob Buster, Riverside County Supervisor: (Letter July 17, 2006)**

*"Highgrove is the right place for a regional, intermodal station, at the junction of the main lines and the 215 freeway. Highgrove still has ample land and the community and Grand Terrace want the station"*

**Mary Crayton, RCTC Commissioner from Canyon Lake: (RCTC meeting Feb. 11, 2009)**

Stated that she *"was not satisfied why Highgrove has not been considered and that they never went to Highgrove to look at the property"*. She stated: *"they should consider the property in Highgrove"*.

**Roger Berg, RCTC Commissioner from Beaumont: (RCTC meeting Feb. 11, 2009)**

*"The Highgrove station may have some merit, more parking is needed and gridlock will only get worse"*.

**James Potts, RCTC Commissioner from San Jacinto: (RCTC meeting Feb. 11, 2009)**

*"It is the right project for the right time and it would open up other areas where seniors could go instead of just driving locally"*.

**Robin Low, RCTC Commissioner from Hemet: (RCTC meeting Feb. 11, 2009)**

*"Recognized the amount of work that has been done on this project and said they need to revisit this idea"*.

**Jeff Stone, Riverside County Supervisor: (RCTC meeting Feb. 11, 2009)**

*Was sympathetic to the concerns of those living near the track and said that the I-215 is reaching capacity and that people need to get out of their cars, onto the tracks and to their destinations.*

**Bill Emmerson, California State Assembly- Dist. 63: (Letter Aug. 14, 2006)**

*"I am very supportive of bringing a Metrolink Station to Highgrove because I agree that it is an appropriate location to help solve traffic congestion for this fast growing area".*

**Mark Hanson, UCR Professor (emeritus): (Letter Feb. 22, 2009)**

*"For us the "no brainer" aspect of the sitting decision comes down to which station could provide the greatest service to commuters of the region when the Metrolink trains come on line. That has to be Highgrove where one station could serve in three directions: San Bernardino, Riverside and the PVL".*

**University Neighborhood Association: (Letter Oct. 21, 2005)**

*"Our meeting was standing room only and by a unanimous show of hands, we voted to support a train stop in Highgrove".*

*(Four years later)*

**University Neighborhood Association: (Letter Nov. 17, 2009)**

*"Our community continues to support this concept because that location seems to offer greater overall flexibility. In addition to servicing Metrolink traffic from the PVL, the Highgrove station establishes services to existing Riverside and San Bernardino traffic, and opens opportunities to increase the number of potential riders through the expanded capacity and the flexibility to serve them".*

**Riverside Land Conservancy: (Letter Oct. 18, 2005)**

*"At this time we see no objection to development of this parcel for such a Metrolink Station, but want you to be aware early on, that the development and any crossing of the Springbrook Arroyo should provide reasonable protection for the natural habitat and an undercrossing for the Regional Trail as well as habitat usage".*

**City of Loma Linda: (Letter Jan. 24, 2002)**

*"This is to advise that the City Council at the regular meeting of Jan 22, unanimously supported your efforts and the Riverside County Service Area 126 Advisory Board's recommendation to the Riverside County Transportation Commission to site a Metrolink station stop in Highgrove".*

**San Bernardino Sun Newspaper: (Article Dec. 31, 2006)**

*"San Bernardino County Supervisor Dennis Hasnsberger believes there is enough demand for a Metrolink station in the Highgrove area. "It's a very worthwhile objective", Hansberger said. "Unfortunately, the people in Riverside County who have jurisdiction have not shown a lot of interest. But we are willing to try to get that discussion going".*

**City of Grand Terrace Resolution: (Passed unanimously Dec. 13, 2001)**

*"NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Grand Terrace, does hereby recommend that the Riverside County Transportation Commission grant a Metrolink Station stop at Highgrove when planning for future track upgrading for Metrolink service on the San Jacinto Industrial Spur".*

*(Eight years later)*

**City of Grand Terrace: (Letter Dec. 29, 2009)**

*"The City of Grand Terrace continues to believe that a Metrolink stop in Highgrove would benefit the city and its residents".*

**Tony Petta, First Mayor of Grand Terrace 1978: (Letter June 23, 2006)**

*"I encourage you and your staff to seriously consider building a Metrolink Station in Highgrove".*

**Tony Petta, Retired Grand Terrace Mayor: (Public comments Dec. 11, 2009)**

*"It's absolutely favorable to our community"*

**Hugh J. Grant: Former Chairman San Bernardino L. A. F. C. O., Former S. A. N. B. A. G. and Omnitrans Boards: (Letter June 21, 2006)**

*"I have become aware of the important need to situate a Metrolink stop in our neighboring community of Highgrove, in Riverside County. Due to the fact that the nearest stops at this time are in San Bernardino and Riverside, servicing the transportation needs for the large population in between, with valid predictions of sizable increases in the near future, seem to me to be self-evident".*

**Southern California Association of Governments (S. C. A. G.): (Aug. 30, 2007)**

*"In the latest State of the Region Report, Southern California received an "F" for transportation mobility. The region has been the most congested in the country for the past two decades".*

**JoAnn Johnson Manager Grand Terrace Senior Center: (Letter Feb. 23, 2009)**

*"I strongly support a Metrolink Station in Highgrove and I know that many others in Grand Terrace do also".*

**William A. Shopoff, The Shopoff Group: (letter Feb. 23, 2009)**

*"Since Highgrove is a natural railroad junction point where two railroad lines meet between Riverside and San Bernardino, a commuter train stop in Highgrove would benefit the entire region. This location is only ½ mile east of the congested I-215 Freeway that has exits at Center Street. It is also only about one mile northeast of the new \$381 million dollar 60/91/215 interchange that was just completed, and about 3 miles south of the I-215/I-10 interchange. Both major interchanges are between Riverside and San Bernardino and the Highgrove location is also between Riverside and San Bernardino".*

**Anthony Mize, Builder: (Letter Feb. 24, 2009)**

*"It is our opinion that the junction point of the Metrolink train traffic between the City of Riverside and the City of San Bernardino and the Perris Valley Line is a very logical location for a new station. In this day of "NIMBY" on just about everything, it would seem to us that if a community wants to work together to revitalize itself by embracing something like this then RCTC should give it careful, thoughtful consideration".*

**Kirk Wallace, Builder: (Letter Oct. 21, 2009)**

*"We feel this station would be very beneficial to the community not only because of the established residents but with the future development that will impact the area of Highgrove".*

**Bobbie Kay Forbes, Terra Loma Real Estate: (Letter Feb. 25, 2009)**

*"As a local Realtor I believe the area would benefit having a Metrolink Station in Highgrove. There are many people in our community that use the Metrolink a few times a week to get to I.A for work. When I am showing property to people from out of the area they will ask about the location of Metrolink stations. And as more people in the area are financially stressed by the economy and the price of commuting they will be more encouraged to use Metrolink if it is closer to home".*

**Byron Matteson 14 year Mayor of Grand Terrace: (Letter June 23, 2006)**

*"I think the commuter trains will gain even more popularity in the near future as our area continues to experience rapid growth and our freeway systems become more and more congested. Proper planning is essential in being able to handle these future transportation needs and I hope the new Highgrove Station will be approved soon, to help alleviate some of these ongoing traffic problems".*

**Highgrove CSA 126 Resolution: (Nov. 27, 2001)**

*"Highgrove community adopted a 15 point resolution outlining the benefits of a Metrolink station stop in Highgrove".*

**Highgrove Project Area Committee: (Petition Jan. 8, 2002)**

*"The Project Area Committee (P. A. C.), for the redevelopment of the Highgrove area, hereby submits this recommendation that a Metrolink Station stop be implemented at Highgrove when the tracks are upgraded for commuter service on the San Jacinto branch".*

**Robert and Nancy Rice, Retired Highgrove residents: (Letter Feb. 20, 2009)**

*"We are in our Seventies, and don't like to drive very far. With a station near home, we could go, go, go, and not have to worry about traffic".*

**George Saunders, commuter from Grand Terrace to Orange County for 7 years: (Letter Feb. 20, 2009).**

*"With the ever expanding usage of the train it has become increasingly difficult to get to, and to find parking at Downtown Riverside station. An additional stop on the route between Riverside and San Bernardino would be helpful".*

**William H. Addington, Civil Engineer since 1975-Retired: (Public comments Dec. 11, 2009)**

*"It is really important to Grand Terrace, Loma Linda and Highgrove to have a station. The opportunity is there now and if passed by, it won't be available. The site is well located and the problems could be mitigated with good engineering. This is the time to act!"*

..

We also have additional letters of support from:

Terry and Lori Carlstrom, G. T.	2-23-2009
James Lasby, Highland	2-20-2009
Ron and Cynthia Cruz, Highgrove	2-26-2009
Melanie Zimmermann, Highgrove	2-23-2009
Barbara McCoy, Highgrove	2-23-1009
Ardie Barnett, Highgrove	2-26-2009
Ron and Geri Barnett, G. T.	

The above information does not include residents who have signed the circulated petition for a Highgrove station nor does it include names of those who signed the on-line petition on the web site: [www.highgrovehappenings.net](http://www.highgrovehappenings.net)

Our requests consist of 3 items:

1. Build a Metrolink station stop next to the BNSF main line at Highgrove.
2. Build the Highgrove station first.
3. Name the station "Highgrove".

County of Riverside



SUPERVISOR MARION ASHLEY  
FIFTH DISTRICT

October 14, 2009

The Honorable Bob Magee,  
Chairman Riverside County Transportation Commission  
4080 Lemon St., 3<sup>rd</sup> Floor  
Riverside, CA 92520

Dear Chairman Magee:

I am enclosing recent correspondence which I have received from a number of residents in the Highgrove community regarding RCTC's future Metrolink plans.

Over the course of more than a decade, the Riverside County Transportation Commission has considered and repeatedly rejected the request of Highgrove residents for Metrolink service... Most recently, the Commission spent considerable amounts of time and money to identify potential hurdles to constructing a station in the area.

My goal is to ensure that the residents of Highgrove's receive a fair hearing and careful consideration of their desire for infrastructure investment in their community and the provision of public transit service.

I am requesting that the Perris Valley Line Ad Hoc Committee schedule a meeting within the next few months to review the history of the Commission's actions regarding Highgrove from the day it was first mentioned. During the past few years we have seen new members join RCTC and some of the decisions predate my tenure as a County Supervisor.

As we embark on the investment of the Perris Valley Line, I want to ensure that we are making prudent investments with Measure A and federal dollars. While I believe that the Commission has made wise decisions up to this point, we need to continue to challenge ourselves to accomplish more and improve.

With that thinking in mind, I hope that we can revisit Highgrove's issues once again. If we can't provide a station and direct rail service to the community, I want our Commissioners to clearly understand the reasons which will only make our project better. On the other hand, if there is way to provide additional transit (either bus or rail) service to Highgrove, this could be an important opportunity to consider it.

Most importantly, I want to come away from this effort with a cooperative relationship with the Highgrove community. I would hope that Mr. Barnett could attend the ad hoc meeting with a few of his neighbors so they can interact with our committee members and staff, express their interests and concerns, and then accurately report on the matter with the rest of the community.

Thank you for your consideration of this request.

Very truly yours,

Marion Ashley  
Riverside County Supervisor, 5<sup>th</sup> District

Cc: Bob Buster, Vice-Chair, Riverside County Transportation Commission:  
Barney Barnett, Chairman, Highgrove Community Council

R. A. Barnett, Chairman  
Highgrove Area Redevelopment  
474 Prospect Avenue  
Highgrove, CA 92507

Re: Metrolink Station in Highgrove

Dear Mr. Barnett:

Thank you for the opportunity to review your proposed Metrolink station stop in Highgrove. The Transit Coalition (TTC) is an organization that works to improve public transportation and mobility in conjunction with land use planning in Southern California.

We have noted that it is within the coalition's interest and mission that a station stop be placed in the Highgrove area given the local support.

We have posted a conceptual rendering of the Highgrove Metrolink station with a link to your video presentation to the Riverside County Transportation Commission on our "A Better Inland Empire" Project Web Site:

[http://www.thetransitcoalition.us/a\\_better\\_inland\\_empire/images/pdf/PVL-Rail-highgrove.pdf](http://www.thetransitcoalition.us/a_better_inland_empire/images/pdf/PVL-Rail-highgrove.pdf)  
[http://www.thetransitcoalition.us/a\\_better\\_inland\\_empire/proj\\_coachellatrainssta.html](http://www.thetransitcoalition.us/a_better_inland_empire/proj_coachellatrainssta.html)

As an organization that works to improve public transportation and mobility in conjunction with land use planning, we appreciate your advocacy for better public transportation in Highgrove and thank you for your support. Please feel free to use our maps as part of your work. Please keep us updated of the status of your campaign.

Sincerely,

Nicholas Ventrone,  
Community Engagement Director  
The Transit Coalition  
[www.transitcoalition.org](http://www.transitcoalition.org)

RESOLUTION NO. 2001- 28

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
GRAND TERRACE, CALIFORNIA, RECOMMENDING  
THAT THE RIVERSIDE COUNTY TRANSPORTATION  
COMMISSION GRANT A METROLINK STATION STOP AT  
HIGHGROVE

WHEREAS, Highgrove needs a Metrolink Station Stop; and

WHEREAS, Highgrove is already a railroad junction point connected to the BNSF Main line; and

WHEREAS, a railroad signal bridge is already functional to allow trains to enter or depart from the San Jacinto Industrial Spur onto the BNSF railroad that already has Metrolink service; and

WHEREAS, the track and right of way are already owned by the Riverside County Transportation Commission between San Jacinto and Highgrove; and

WHEREAS, the distance of the- existing track between Marlborough Ave. and Highgrove is only one and one half miles of straight track; and

WHEREAS, track upgrading would be more, economical to go from Marlborough Ave. to Highgrove rather than from Marlborough onto the SP/UP Railroad and then to Riverside and

WHEREAS, the Riverside County Transportation Commission would have to purchase the SP/UP track instead of using track they already own; and

WHEREAS, the SP/UP track is also in need of upgrading and has many more curves than going straight to Highgrove; and

WHEREAS, Metrolink trains coming into Highgrove could proceed eastward to San Bernardino without going into Riverside and

WHEREAS, the San Bernardino Metrolink Station currently has commuter service into the greater Los Angeles area; and

WHEREAS, westward trains could also proceed from Highgrove into Riverside and points beyond; and

WHEREAS, the San Bernardino and Riverside Metrolink parking lots are near capacity and

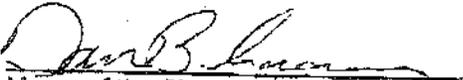
WHEREAS, Highgrove is approximately half way between San Bernardino and Riverside; and

WHEREAS, vacant land adjacent to the track is already owned by the Riverside County Transportation Commission and could be used for parking at Highgrove; and

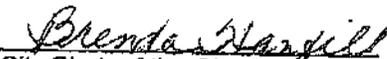
WHEREAS, a Metrolink stop in Highgrove would also be the closest access for commuters from Grand Terrace, Loma Linda and the 1520 new homes to be constructed in Pigeon pass plus other proposed residential development;

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Grand Terrace, does hereby recommend that the Riverside County Transportation Commission grant a Metrolink Station stop at Highgrove when planning for future track upgrading for Metrolink service on the San Jacinto Industrial Spur.

PASSED, APPROVED AND ADOPTED this 13<sup>th</sup> day of December, 2001.

  
Mayor of the City of Grand Terrace

ATTEST:

  
City Clerk of the City of Grand Terrace

I BRENDA STANFILL, City Clerk of the City of Grand Terrace, do hereby certify that Resolution No. 2001-28 was introduced and adopted at a regular meeting of the City Council of the City of Grand Terrace held on the 13<sup>th</sup> day of December, 2001, by the following vote:

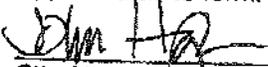
AYES: Councilmember's, Hilkey, Larkin and Ferre: Mayor Pro Tem Garcia and Mayer Buchanan

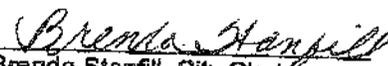
NOES: None

ABSENT: None

ABSTAIN: None

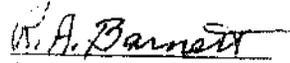
Approved as to form:

  
City Attorney

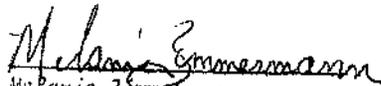
  
Brenda Stanfill, City Clerk

## PETITION

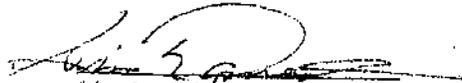
- > The Project Area Committee (P.A.C.) for the redevelopment of the Highgrove area, hereby submits this recommendation that a Metrolink station stop be implemented at Highgrove when the tracks are upgraded for commuter service on the San Jacinto branch.
- > The PAC believes the Metrolink stop in Highgrove is necessary to ensure adequate transportation to accommodate future growth within our redevelopment boundaries that presently is turning our former citrus groves into residential and industrial properties.

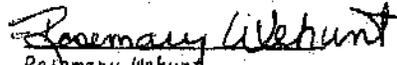
  
R.A. Barnett

  
Adam Ornelas

  
Melanie Zimmermann

  
Beatrice Etchison

  
Jim Danielson

  
Rosemary Wehunt

  
Denis Kidd

JAN 8 2002



# City Of Loma Linda

25541 Barton Road, Loma Linda, California 92354-3160 • (909) 799-2800 • FAX (909) 799-2890  
Sister City — Manipal, Karnataka, India

January 24, 2002

R. A. Barnett, Chairman  
Highgrove Area Redevelopment  
474 Prospect Avenue  
Highgrove, CA 92507

Dear Mr. Barnett:

Subject: Metrolink Station Stop In Highgrove

This is to advise that the City Council, at the regular meeting of January 22, unanimously supported your efforts and the Riverside County Service Area 126 Advisory Board's recommendation to the Riverside County Transportation Commission to site a Metrolink station stop in Highgrove.

Councilman Christman serves as president of the SANBAG Board and noted that Board's interest in a station stop in Highgrove.

Please keep us apprised of the status of the project.

Sincerely,

*Pamela Byrnes-O'Comb*

Pamela Byrnes-O'Comb  
City Clerk

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0063  
(916) 319-2063  
FAX (916) 319-2163

DISTRICT OFFICE  
10001 FORT HILL BLVD., SUITE 325  
HANFORD, CALIFORNIA, CA 91730  
(509) 466-9096  
FAX (509) 466-9892

Assembly  
California Legislature



**BILL EMMERSON**  
ASSEMBLYMEMBER, SIXTY-THIRD DISTRICT

STANDING COMMITTEES  
LOCAL GOVERNMENT, VICE CHAIR  
APPROPRIATIONS  
WATER, PARKS AND WILDLIFE

August 14, 2006

R.A. "Barney" Barnett  
474 Prospect Ave.  
Highgrove, CA 92507

Dear Mr. Barnett:

I want to thank you for providing me with information on the Highgrove Metrolink Station. I am very supportive of bringing a Metrolink Station to Highgrove because I agree that it is an appropriate location to help solve traffic congestion for this fast growing area.

I appreciate all of your efforts in this matter. Please contact me at my District or Capitol office to advise me on how I may assist you to ensure that this Metrolink Station is built.

Sincerely,

A handwritten signature in cursive script that reads "Bill Emerson".

BILL EMMERSON  
Assemblyman, 63<sup>rd</sup> District

BE/tt

## **Ardie Barnett**

**From:** Buster, Bob [BBUSTER@rcbos.org]  
**Sent:** Monday, July 17, 2006 3:13 PM  
**To:** Robert Phillips  
**Subject:** RE: METROLINK

Mr. Phillips:

The second part of my proposal, which I will spell out in another op-ed soon, is to provide Perris-Riverside commuter service for the next five to ten years by Bus Rapid Transit or BRT. These are the high-tech, high-speed, attractive coaches that are jammed with commuters now on Wilshire and Ventura boulevards in L.A. and San Fernando Valley. Separate lanes next to the median on the 215 Freeway here are already planned to be constructed, which BRT can use. BRT is completely flexible as to routes and schedules and operates at less than half the cost of Metrolink trains. BRT improvements on a Perris Line cost only \$10 million. BRT obviously has minimal noise or safety problems for existing communities. If BRT takes University Ave. or Martin Luther King off the freeway to go to the Downtown Metrolink Station, it will serve UCR much better.

Train service on the Perris Line should not be started until grade separations are in place in the highest priority Riverside and all grade crossing in the University and Hunter Park areas. Indeed, this line should be completely rethought as a San Bernardino-Riverside-Perris (with side service to Hemet-San Jacinto)-Temecula mass transit corridor. BRT can serve it best first. Train service would commence only when, hopefully, two-way ridership justifies it and grade separations and other noise reduction and safety improvements are in place. Rather than luring future residents to live in the mid-county and attempt 100 minute to 130 minute commutes each way to Orange County and L.A., we should be reinforcing our own inland area transportation to provide closer local trips to work.

That would also cancel any need for stations in the already cramped University and Hunter Park areas, where impacts on existing neighborhoods will be severe. Highgrove is the right place for a regional, intermodal station, at the junction of the main rail lines and 215 Freeway. Highgrove still has ample land and the community and Grand Terrace want the station.

I've been meeting with every City of Riverside Councilmember, the Chambers of Commerce, UC Riverside reps. from the Chancellor's Office, and our State Assemblymen and Senators about my proposal. I've still got a few left to talk to, but, so far, everyone is very favorable. Getting Mayor Loveridge and Supervisors Tavaglione and Ashley "on board" is important. I think it's possible to build enough support to turn Mr. Haley around and then go and lobby our Congressional reps. (Calvert mainly) to make some sense of how ample federal transportation dollars are spent here.

Your writing the Mayor, both Supervisors, and Cong. Calvert to tell them what you told me will help a great deal.

Bob Buster, Supv., 1<sup>st</sup> District

## **Supervisor Bob Buster's comments 10-11-2006**

"A defacto decision has been made here apparently that has not been discussed by the commission and we are the policy body".

"Highgrove is at the fulcrum, the pivot point of transportation between the 2 counties. You can not ignore the geographic reality that both the freeway and major rail lines and there is available land that will soon be snapped up for other uses".

"This is a key sight for the future of the Inland Empire"

## **Supervisor Marion Ashley's comments 10-11-2006**

"Logically there should be a Metrolink stop in the Highgrove area for a lot of reasons but it is not just that simple. That doesn't mean that the residents can't continue to pursue this until we come up with some solution that will please as many people as possible but we need the cooperation of San Bernardino County in order to do this.  
Direct staff to arrange a tour of the Perris Valley Line and look at the Highgrove sight"

## **Eric Haley's comments 10-11-2006**

"Recognize that it (a Highgrove station) would trigger an \$85 million dollar obligation to build the Colton crossing".

"There are complicated legal issues, complicated timing issues very complicated cost negotiations that have never been seriously addressed by our San Bernardino neighbors"

THIS MESSAGE IS BEING SENT ON BEHALF OF ERIC HALEY.

A hard copy of this letter will be included with your agenda packet.

Dear Commissioners:

During our September retreat in La Quinta, staff was directed to set up a tour of the proposed Perris Valley Line project. The tour would give Commissioners an opportunity to see the proposed line on a first-hand basis and to also visit the locations of proposed stations.

The best way to travel the rail line is through a Hy-Rail vehicle, which is an SUV that is equipped with steel wheels that allows it to travel on the actual rail line. By traveling in this type of vehicle, you will be able to travel the line much like a Metrolink car would.

Hy-Rail vehicles are owned by the railroads and Metrolink and obtain access to one takes time to reserve. After a few weeks of working with the railroad, staff has been able to secure the availability of two Hy-Rail vehicles for Tuesday, November 28. The tour will begin with breakfast and a brief presentation at RCTC's offices at 8:15 a.m. We will then drive to the Highgrove area for the Hy-Rail part of the tour.

Space is limited so please call Jennifer Harmon to reserve a place on the tour as quickly as possible. We are also aware that this last week of November is an especially busy one with Committee meetings scheduled for the 27<sup>th</sup> and our special workshop on the 30<sup>th</sup>. For that reason, we will also schedule another Hy-Rail tour in the future, but thought it would be important to offer this one as soon as the vehicles were made available

Thank you for your interest in the Perris Valley Line project. Please contact me if you have any questions regarding the tour.

Sincerely,

Eric Haley Executive Director

# **RIVERSIDE COUNTY TRANSPORTATION COMMISSION**

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

## **WORKSHOP AGENDA\***

*\* Actions may be taken on any item listed on the agenda*

**9:00 a.m.**

**Friday, September 15, 2006**

### **MEETING ROOM**

**Embassy Suites Hotel La Quinta  
50-777 Santa Rosa Plaza, La Quinta**

*In compliance with the Americans with Disabilities Act and Government Code Section 54954.2, if you need special assistance to participate in a Commission meeting, please contact the Clerk of the Board at (951) 787-7141. Notification of at least 48 hours prior to meeting time will assist staff in assuring that reasonable arrangements can be made to provide accessibility at the meeting.*

**9:00 – 9:15 a.m.**

### **WELCOME AND WORKSHOP OVERVIEW**

*Marion Ashley, Chair*

*Eric Haley, Executive Director*

**9:15 – 9:45 a.m.**

### **BOTTOM LINE REPORT ON GOODS MOVEMENT**

*Stephanie Wiggins, Regional Programs Director*

This item is for the Commission to:

- 1) Receive and file the presentation of the RCTC Goods Movement Bottom Line Report;
- 2) Approve the Southern California National Gateway Memorandum of Understanding (MOU) No. 07-67-041-00; and
- 3) Authorize the Chair, pursuant to legal counsel review, to execute the MOU on behalf of the Commission.

**9:45 – 10:30 a.m.**

### **GRADE CROSSING FUNDING STRATEGY**

*Stephanie Wiggins, Regional Programs Director*

**10:30 – 10:45 a.m.**

### **BREAK**

**10:45 – 11:15 a.m.**

### **PERRIS VALLEY LINE PROJECT UPDATE**

*Stephanie Wiggins, Regional Programs Director*

*John Standiford, Public Affairs Director*

## Sun, The (San Bernardino, CA)

December 31, 2006

Section: News

### Wanted: New **Metrolink station**

*Stephen Wall, Staff Writer*

R.A. "Barney" Barnett thinks he has a solution to clear up some of the traffic mess on local freeways. The 68-year-old is leading an effort to build a **Metrolink station** just south of Grand Terrace.

Barnett is pushing transportation officials in San Bernardino and Riverside counties to make the project a priority.

The biggest obstacle, he says, is finding someone to buy about 35 acres of vacant land to build the **station**.

More than 2,000 homes are slated to be built starting next spring in Highgrove, an unincorporated Riverside County area bordering Grand Terrace that Barnett has called home since 1947.

"All this development is going to bring a lot of traffic to Highgrove," said Barnett, who publishes the Highgrove Happenings monthly newspaper with his wife, Ardie. "If we don't do something, the whole area is going to be jammed."

But Riverside County transportation authorities question if there would be enough riders to warrant a **station**.

"We're doing a thorough analysis to determine if it's feasible," said John Standiford, spokesman for the Riverside County Transportation Commission. "If only a few people are going to ride it, it's not worth the investment."

The commission on Jan. 10 is scheduled to hear a report on the feasibility of a **station**.

In addition, San Bernardino Associated Governments' Commuter Rail Committee is expected to discuss the project on Jan. 18.

Barnett said there are now 48 **Metrolink** trains a week that pass through Highgrove between Riverside and San Bernardino on the Inland Empire-Orange County line.

The proposed stop is seven miles from the **Metrolink station** in San Bernardino and 3.5 miles from the Riverside **station**, he said.

Standiford said he doesn't know if the land proposed by Barnett is for sale. The pie-shaped parcel, which is owned by a land trust, is bordered on two sides by different sets of railroad tracks.

Barnett said the site is large enough for shops and restaurants to serve rail commuters getting on and off trains. Bus riders would have close access to the **station** from a route that goes through Highgrove between Riverside and Loma Linda, he said.

Barnett has received support from elected officials in Grand Terrace and Loma Linda. Both cities have passed resolutions in favor of the **station**.

"If it does anything to alleviate traffic on the freeways, I think that's a good thing," said Grand Terrace Mayor Maryetta Ferre.

San Bernardino County Supervisor Dennis Hansberger believes there is enough demand for a **Metrolink station** in the Highgrove area.

"It's a very worthwhile objective," Hansberger said. "Unfortunately, the people in Riverside County who have jurisdiction have not shown a lot of interest. But we're willing to try to get that discussion going."

Riverside Land Conservancy



SERVING SOUTHERN CALIFORNIA

October 18, 2005

BOARD OF DIRECTORS

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V. President-Frank Heyming  
Secretary-Jack Eason  
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Assistant  
Caitlin  
Caitlin  
Caitlin

The Riverside Land Conservancy is dedicated to the preservation of open space by seeking to identify, protect, and manage habitats of rare and endangered species, natural lands, and other sensitive sites throughout the Inland Southern California Region.

Riverside Land Conservancy  
4075 Mission Inn Ave  
Riverside, CA 92501  
(951) 788-4670  
Fax (951) 788-4670  
info@rlc.org  
www.riversideconservancy.org

Non-Profit Organization  
Section 501 (c) (3)

Eric Haley, General Manager  
Riverside County Transportation Commission  
P.O. Box 12008  
Riverside, CA 92502

Dear Mr. Haley,

The Riverside Land Conservancy (RLC) is aware that there is interest and discussions on potential development of a Highgrove/MetroLink station on a 35 acre triangular parcel of open land just north of Citrus Street, within the Riverside City limits, adjacent to the community of Highgrove. This parcel is bisected by the Springbrook Wash Arroyo; any development for this purpose would almost certainly require crossings of the arroyo with a rail spur, pedestrian crossing from a parking area, and/or new street access.

We are writing to make you aware of extensive planning and coordination efforts the RLC has been doing with the City of Riverside, Riverside County, the Department of Fish and Game, and others in preserving the Springbrook Arroyo for long term Open Space Habitat and Regional Trail uses.

At this time, we see no objection to development of this parcel for such a MetroLink Station, but want you to be aware early on, that the development and any crossings of the Springbrook Arroyo should provide reasonable protection of the natural habitat and an under-crossing for the Regional Trail as well as for habitat usage.

Thank you for your consideration.

Sincerely,

*Robert A. Nelson*

Robert A. Nelson  
Springbrook Wash Trail  
Subcommittee Chairman

*Jane Block*

Jane Block, President  
Riverside Land Conservancy

cc: Ken Gutierrez, City of Riverside Planning Director

November 9, 2006

Highgrove Metro Link Station

Riverside County Transportation Commission  
4080 Lemon St.  
Riverside, CA 92502  
Attn: Chairman Marion Ashley

San Bernardino Associated  
Governments 1170W 3rd St.  
San Bernardino, CA  
Attn: Chairman Dennis Hansburger

Dear Gentlemen:

I WOULD LIKE TO HAVE REPRESENTATION

I attended my first Riverside County Transportation Commission meeting on November 9, 2006 and I was so impressed with how really large the board was. It shows how large of a county Riverside is. And how many people live here, with just one person to represent all the cities they really have a big responsibility.

As I was waiting for my time to address the Riverside County Transportation Commission on the subject of supporting a Metro Link Station in Highgrove I was able to observe them in action. Very interesting, but I have some concerns that "with some of the commissioners, they were not listening to our voice. My biggest concern was with Mr. Eric Hayley. I have never met this man or even heard him speak but he made me think, why is he so against this? Is he mad at someone, or something? It seemed like he wants to shut this idea down without even trying to view the possibilities.

I know I sound like a broken record, but this Metro Link Station is just too big of a good idea just to toss out. We all know it's going to cost a lot of money and why worry about who owns the land at this point. It really needs to be looked into seriously and without bias. Riverside and San Bernardino are growing too much to fast and just putting this on the back burner and let this pass by will not help the public transportation issues.

The outcome of this issue was that the Riverside County Transportation Commission will meet with the San Bernardino Associated Governments. To represent the people from Riverside County on this matter is to be Eric Hayley, after hearing him speak, seeing his actions I'm afraid that he is not informed enough to present this issue unbiased and will not speak seriously about it.

So I am asking that you please invite Mr. Barney Barnett of Highgrove, to speak about the Highgrove Metro Link Station to the San Bernardino Associated Government when they meet with the Riverside County Transportation Commission and to all future meetings. By doing this Mr. Barney Barnett can answer questions and keep other supportive groups informed.

Sincerely,



Melanie R. Zimmermann

cc: RCTC Executive Director, Eric Haley  
SANBAG Executive Director, Tony Grasso  
SANBAG Grand Terrace Representative, Bea Cortes  
SANBAG Loma Linda Representative, Robert Christman  
SANBAG Colton Representative, Deirdre Bennett

MRS. MELANIE  
ZIMMERMANN 411  
MICHIGAN AVE.  
HIGHGROVE, CA 92507

**University  
Neighborhood  
Association**

**Wendy Eads, Co-Chair  
P.O. Box 55543  
Riverside, Ca. 92517**

**March 15th, 2006**

**Memo To: Riverside County Transportation Commission,  
Riverside County Supervisors, Riverside City Council,  
City Manager and Planning Director, all other interested parties**

**From: Wendy Eads, UNA Co-Chair** *Wendy Eads*

**Re: Location of proposed new Metro Link Station in Ward One  
of Riverside, for Perris Valley Line Project**

This is to again inform you that the membership of the University Neighborhood Association, acting upon the greatly researched recommendation of its standing advisory committee on trains, has by an overwhelming majority vote decided to officially oppose the placement of either of the two proposed new Metro Link stations in our residential University Heights/University Hills neighborhood, at either proposed location, on the corner of Spruce Street and Watkins Drive, or on Watkins Drive at Valentia Hill. In addition, we wish to inform you that we instead support placing the location of a new Metro Link Station in Highgrove (if one should be ever be built anywhere nearby our neighborhood), to serve UCR, and the surrounding area comprising both wards one and two, and the city's sphere of influence in nearby locations. Barney Barnett has identified a prime site on a roughly 35 acre parcel that is already appropriately zoned, and is developable land without the multitude of insurmountable obstacles that exist in our neighborhood. UCR can run its Highlander Hauler the roughly two miles to and from the site daily, as it currently does to the downtown Metro Link station, and "claim" the station as its own. Call it the UCR-North Riverside Station. Barney Barnett, a member of UNA train Committee, has been appointed our official representative on this issue of potential new station location, as he is an expert on it, and has full awareness and understanding of our overwhelming concerns and opposition to placement of a station anywhere in our neighborhood. He is our spokesman to all official parties on the subject of the proposed new Metro Link Station location in Highgrove, which we support. Please give his plan and his suggestions your full attention and all due consideration. This letter does not in any way imply any support by our membership of the Metro Link Perris Valley Line Extension Project.

Barney has already spoken to most of you, but you may reach him by phone at (951) 683-4494, by FAX at (951) 683-7258, and by email at [highgrovenews@adelphia.net](mailto:highgrovenews@adelphia.net)

**UNA**  
**University Neighborhood Association**

October 21, 2005

John Standiford.  
Riverside County Transportation Commission  
4060 Lemon St. 3<sup>rd</sup> Floor Riverside CA 92502-2208

RE: Perris Valley Line

Dear Mr. Standiford:

I am writing to update you on the results of a discussion about Metrolink at our October 13<sup>th</sup> meeting. As you know, there is a great deal of interest about the locations of the Metrolink train stops planned for our area.

While there is great community support for high quality public mass transit, there is also a growing resistance to having a stop at UCR on Watkins Dr.

We believe a better location for a second stop would be in Highgrove where there is more room for parking and would provide a significantly smaller impact to existing residential areas.

Our meeting was standing room only and by a unanimous show of hands, we voted to support a train stop in Highgrove. We remain committed to the Perris Valley Line setting the standard for a workable transportation solution and to enhancing our community's assets. I offer this feedback for your consideration.

Sincerely,



Gurumantra Khalsa  
Co Chair UNA

June 23, 2006  
Supervisor Marion Ashley  
Chairman  
Riverside County Transportation Commission  
4080 Lemon St.  
Riverside, Ca. 92502

Dear Supervisor Ashley,

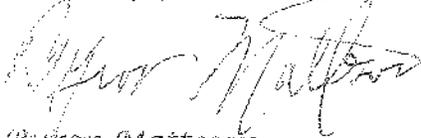
Renewed interest in a Highgrove Metrolink station has again come to our attention here in Grand Terrace. It has been several years since our Grand Terrace City Council first endorsed the location in Highgrove for a station stop and the new week-end trains are a very welcome addition.

A Metrolink stop in Highgrove would prevent us from having to drive to San Bernardino or Riverside to board the commuter trains and the idea of being able to ride to San Bernardino for additional destinations between San Bernardino and Los Angeles or to Riverside, Orange County, or the beach, from nearby Highgrove, is a benefit that will be appreciated by many of the residents of our city. It would also help alleviate some of the anticipated traffic problems through Grand Terrace associated with the new homes to be built in the Spring Mountain Ranch Project.

I have been very active in the City of Grand Terrace and first served as Mayor Pro-Tem in 1980 and 1981. In 1982 I was elected Mayor of Grand Terrace and served consecutive terms as Mayor for the next 14 years until 1996.

I think the commuter trains will gain even more popularity in the near future as our area continues to experience rapid growth and our freeway systems become more and more congested. Proper planning is essential in being able to handle these future transportation needs and I hope the new Highgrove Station will be approved soon, to help alleviate some of these ongoing traffic problems.

Sincerely yours,



Byron Matteson  
12175 Michigan Ave.  
Grand Terrace, Ca.  
92313  
(909) 783 1353

June 23, 2006  
Mr. Eric Haley  
RCTC  
4080 Lemon St.  
Riverside, Ca.  
92502

Ref: Highgrove Metrolink Station

Dear Mr. Haley,

*As the first Mayor in the City of Grand Terrace back in 1978 I have seen a lot of changes and I have watched our city grow and continue to be a desirable residential community. With all of the growth that has happened since then, we too are feeling the impact of more vehicle traffic on our busy streets.*

*The idea of having Metrolink service nearby will be a great asset to the residents of Grand Terrace. There is an ideal location nearby in Highgrove that would accommodate riders from Grand Terrace, the current Highgrove residents, and the future ones coming in the new housing developments.*

*We were also happy to hear that there will be additional week end trains added next month but commuter trains that pass by this location each day without stopping is not in the best interest of the residents of the entire area who want this service.*

*I encourage you and your staff to seriously consider building a Metrolink Station in Highgrove.*

*Thank you very much,*

*Tony Petta*

Tony Petta  
11875 Eton  
Grand Terrace, Ca.  
92313  
(909) 783 0658



22795 Barton Road  
Grand Terrace  
California  
92313-5295

Civic Center  
(909)824-6621  
Fax (909) 783-7629  
Fax (909) 783-2600

Maryetta Ferré  
Mayor

Lee Ann Garcia  
Mayor Pro Tempore

Council Members  
Bea Cortes  
Jim T. Miller  
Dan Buchanan

Thomas J. Schwab  
City Manager

March 15, 2007

Tony Grasso, Executive Director  
SANBAG  
472 N. Arrowhead  
San Bernardino, CA 92401

Dear Mr. Grasso:

Re: SCAG's request to study the proposed Metrolink Station in Highgrove before SANBAG makes their decision.

Dear Mr. Grasso:

Grand Terrace is very interested in the proposed Highgrove Metrolink Station. It is my understanding that SCAG has requested SANBAG to wait on making a decision regarding the Highgrove Metrolink Station until they have had time to do a regional study on the issue. It would be our hope that SANBAG would grant SCAG's request.

Thank you for your consideration.

Sincerely,

Maryetta Ferré  
Mayor, Grand Terrace

xc: Barney Barnett

June 21, 2006

Eric Haley  
Executive Director  
Riverside County Transportation Commission  
4080 Lemon Street  
Riverside, CA 92502-2208

Dear Eric:

You may or may not remember me from the distant past, so I will re-introduce myself. I am Hugh J. Grant, a resident of Grand Terrace, California. I served on the City Council of our Community, beginning as a Charter member, for fourteen years, from 1978 to 1992, with four years tucked in there as Mayor, from 1980 to 1984. I finally decided to retire from the Council at the completion of my final term, due to the location of my new employment position. I represented Grand Terrace on the SanBag and Omnitrans Boards for many years, as well as San Bernardino County LAFCO as the Chairman.

I have become aware of the important need to situate a Metrolink stop in our neighboring community of Highgrove, in Riverside County. Due to the fact that the nearest stops at this time are in San Bernardino and Riverside, servicing the transportation needs for the large population in between, with valid predictions of sizable increases in the near future, seem to me to be self-evident.

I therefore respectfully request that you and the Riverside County Transportation Commission seriously consider a viable solution to the transportation needs of the people of Highgrove, Grand Terrace, Loma Linda, and the surrounding areas, a Metrolink Station stop in Highgrove, California.

Sincerely,

Hugh J. Grant

22560 Eton Drive  
Grand Terrace, CA 92313-5133  
909 783-1067  
hughjgrant@sbcglobal.net

/ Cc: R.A. "Barney" Barnett

---

**From:** Steve Berry <SBERRY@cityofgrandterrace.org>  
**To:** <swiggins@rcte.org>  
**Cc:** <ardiebame@aol.com>  
**Sent:** Thursday, May 15, 2003 1:25 PM  
**Attach:** Steve Berry.vcf  
**Subject:** San Jacinto Branchline Corridor Study

Thank you for providing the information concerning the proposed alternatives for the San Jacinto Branchline.

The City of Grand Terrace would like to see a Metrolink station built closer to Highgrove that will service our 12,500 residents, Loma Linda's 40,000 residents and the expected new growth in Highgrove.

Although we are in a different county---it is important that we take a 360 degree look when it comes to transportation issues.

Steve Berry  
Assistant City Manager  
City of Grand Terrace  
909-430-2226  
909-783-7629 FAX

5/20/03

Mr. R.A. "Barney" Arnett  
474 Prospect Ave.  
Highgrove, CA 92507

May 28, 2001

Dear Mr. Arnett,

We spoke by phone a few weeks ago, and you suggested that I write a letter to you regarding my thoughts on the proposed Metrolink Park and Ride stop in Highgrove which I was delighted to read about in your column in the Highgrove Happenings Newsletter for May.

I work in North Hollywood. My commute is as follows: I drive from my home in Grand Terrace to the Metrolink Station in Riverside (sometimes to San Bernardino). I ride to Los Angeles and then transfer to the Metro Red Line to the North Hollywood terminus where I then transfer to a bus to complete my journey. The time spent commuting is usually 2 - 2.5 hours.

A Metrolink Station in Highgrove would certainly ease my commute. I have a few suggestions regarding it:

1. It should be a courtesy service extension of the Riverside and San Bernardino lines. That is, much like the "feeder" service to Glendale and Burbank from Los Angeles, it should not be a separate fee from the ticket / pass purchased to ride those lines.
2. Metrolink should consider working with the San Bernardino and Riverside County Transportation Authorities to market the addition as new service between the two cities. As such, I would suggest adding a station stop in the Colton shopping area too.
3. Service needs to be as frequent as possible; not just tied to the Inland Empire - Orange County Line Schedule. A train that can shuttle in - between would be ideal, perhaps running once an hour..

Done properly, this would not only be great for those of us living in the Highgrove area, but for others who live and work in the greater Riverside - San Bernardino "central" corridor.

Thank You,



Franklin Carpenter Jr.  
22725 Raven Way  
Grand Terrace, CA  
(818) 509 - 5423 Days  
(909) 873 - 1916 Eves

12723 Mt. Vernon Ave.  
Grand Terrace, CA 92313-6109  
909-783-0244

November 4, 2006

Riverside County Transportation Dept.  
4080 Lemon Street  
Riverside, CA 925??

Dear Sirs:

It is my understanding that the issue of a Metro Link Station in Highgrove is on the Agenda for the Board of Supervisors meeting on November 8<sup>th</sup> at 10 o'clock. I am not able to attend that meeting, but I do want to go on record as supporting this issue.

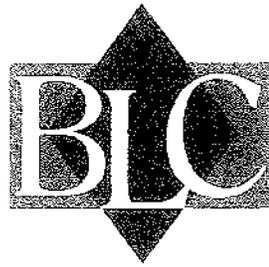
I am with the Senior Center in Grand Terrace. Speaking for myself and for some others, I want you to know how much a Metro Link Station in Highgrove or Grand Terrace would help greatly. For seniors who are not comfortable driving out of town as well as for commuters, I personally think a Station in our area would be a definite plus.

Please consider very carefully.

Most Sincerely,

JoAnn Johnson

*Dear Mr. Barnett  
I actually did very much want  
the station.  
Copies sent in support*



## BIXBY LAND COMPANY

December 12, 2005

Mr. Barney Barnett  
Publisher, Highgrove Happenings  
474 Propect Avenue  
Highgrove, CA 92507

Re: Highgrove Area Transportation Plan Proposal

Dear Barney,

This letter is in support of your efforts to assist in the creation of a Metrolink station to serve the Highgrove area. A Metrolink station would benefit our property by providing a nearby alternative to automotive transportation and may ease traffic on the 215 freeway.

Bixby Land Company would also be supportive of the East-West road connecting Spring Street to the proposed Metrolink station location you pictured in the December 2005 issue of *Highgrove Happenings*. This route could also ease traffic along Center Street.

From our discussions, we agreed that if a North-South road were determined to be necessary and feasible to connect the Hunter Park tech area through to Highgrove, that we would not object to an alignment along the California Street right-of-way, currently a dirt road. However we would not support an alignment through the middle of the 65 acres of land we are in the process of developing.

Thank you for your efforts to improve the Highgrove area. It takes involved citizens to ensure the best results are achieved for all the owners and residents of Highgrove.

Sincerely,

A handwritten signature in black ink that reads "Mark L. Bixby". The signature is written in a cursive, flowing style.

Mark L. Bixby

C: Terry Dickens

**From:** Carol Williams [carolinekisch@hotmail.com]

**Sent:** Friday, March 30, 2007 6:14 PM

**To:** highgrovenews@adelphia.net

To Sanbag, c/o Barney Barnett

I would like to write in support of two new metro stations being placed in Highgrove as opposed to any metro station being placed on Watkins Drive in Riverside.

The site in Highgrove has plenty of room for parking, etc. and future expansion. The proposed site on Watkins Drive does not have enough room to house a station, not to mention, room for expansion. In addition, Watkins Drive now turns into a virtual parking lot during morning and evening rush hours as commuters use it as a short cut from the 60 freeway to the 215/91 freeways in the morning and vice versa in the evening.

Even to discuss the addition of metro traffic (which would certainly peak at the same rush hours) to an already over-congested residential street indicates that decisions are being made without regard to the real world conditions and consequences.

Sincerely,  
Carol Williams Kisch

---

**From:** CLIFFORD BERGER [nebr32@sbcglobal.net]

**Sent:** Saturday, March 31, 2007 9:22 AM

**To:** highgrovenews@adelphia.net

**Subject:** Metro link station in Highgrove

SANBAG  
c/o Barney Barnett

To Whom It May Concern:

I am in favor of the Metro Station being located in Highgrove where there is adequate space for the station and parking and any expansion at a later date. Metro stations on Watkins Drive in Riverside would be located near two elementary and one middle school, and several child care facilities. These trains would add particulates to the air and this would be harmful to the children and to senior citizens living in the area. If a transit village is constructed in this area, homes would be taken for the space required to build such a facility.

Sincerely,

Clifford and Margaret Berger

Riverside City Council Member

March 21, 2006

Dear Dom Betro,

Please set aside the 35 acres shown on the accompanying map for a future Metrolink Station and Transportation Center. This location is in the Hunter Business Park area between the BNSF railroad main line that runs between Riverside and San Bernardino, and the Perris Valley Line that runs between Highgrove and San Jacinto.

This important location is ideal because the west side of the property is bordered by railroad tracks that currently have 8 commuter trains that go past this location without stopping because there is no station, and the east side of the property that is bordered by railroad tracks already owned by the Riverside County Transportation Commission for the Perris Valley Line.

If the City of Riverside is planning for the year 2025, it is important to realize now that this city owned property should be reserved for future transportation uses instead of allowing more large buildings to be built. A Metrolink station, park and ride and bus service and a new road is needed to accommodate the future growth of the area where grading is currently underway for 2,100 new homes. In addition, other developers are planning new construction of businesses and homes where citrus groves used to flourish. There are resolutions of support from Highgrove, Grand Terrace and Loma Linda for a Metrolink station in Highgrove. Also, the members of the University Neighborhood Association in Canyon Crest agree that they do not want a station stop at UCR or Spruce and Watkins in their community but prefer a station in Highgrove.

The boundaries of the Hunter Park location mentioned above are: Villa St. on the north, Citrus St. on the south, the Perris Valley Line Railroad on the east and the BNSF Railroad on the west.

Please include this area as a Metrolink Station and Transportation Center in the 2025 General Plan.

Thank you,



R. A. "Barney" Barnett  
474 Prospect Ave.  
Highgrove, Ca.  
92507  
(951) 683 4994  
(951) 683 7258 Fax  
highgrovenews@adelphia.net

## Additional Support for Highgrove Metrolink Station

Prepared Feb. 10, 2012

Here are some additional requests for a Highgrove Metrolink Station to add to the: **“8 years of Comments”** and **“Supporting Docs”** that are displayed on the website:

[www.highgrovehappenings.net](http://www.highgrovehappenings.net)

Received via e-mail:

<u>Name</u>	<u>Date</u>
Dan Lindholm	1-11-12
Bobbie Benson	1-12-12
Bill Holland	1-12-12
Betty Crossno	1-13-12
Kevin and Karen Collier	1-13-12
Tammy Matteson	1-13-12
Greg April	1-14-12
Lloyd Spiker	1-14-12
Marilyn Denney	1-17-12
Kelly Keough	1-18-12
Jim McKee	1-18-12
Terry Reagan	1-21-12
Riverside Press: letter to editor	1-23-12
<b>Letter of support from City of Loma Linda</b>	<b>1-26-12</b>
Dale Crossno	1-28-12
Virginia Washburn	2-2-12
Dave Mathers	2-2-12
Marie Thomas	2-2-12
Patricia Kinion	2-2-12
Ken and Karen Hughes	2-2-12
JoAnn Johnson	2-3-12
Steve Dawson	2-3-12
Gary Laesser	2-7-12

**The City of Loma Linda has supported the Highgrove Metrolink Station for 10 years. Their first letter of support was dated Jan. 24, 2002.**

It is unfortunate that the Highgrove location continues to be downplayed for such a long period of time. For over 10 years, surrounding cities, civic organizations and local residents have requested a Metrolink station at Highgrove. But city resolutions, letters, and the public comments made at the RCTC meetings continue to be ignored.

RCTC now owns the property at Highgrove and according to Ann Mayer, Executive Director of the Riverside County Transportation Commission, RCTC bought the 17.22 acres of vacant land to enable the Perris Valley Line railroad track to connect to the BNSF main line track.

The excess land that RCTC does not need would be an ideal location for the SCAG **Regional Transportation Plan** for commuters between San Bernardino County and Riverside County.

On Jan.18, 2012 I spoke at the SCAG **Regional Transportation Plan** meeting in San Bernardino under public comments and submitted written documentation that contained 29 items that included a colored map, city resolutions and letters of support from elected officials and local residents. Some of these items date back to 2001. This information was given to Justine Block who is SCAG's Deputy Legal Council in Los Angeles.

Copies of the above e-mail have been sent to SCAG, prior to the Feb. 14, 2012 deadline for public input for their Regional Transportation Plan. The above list is also being sent to RCTC and SANBAG representatives.

Please look at the new map and the related information on: [www.highgrovehappenings.net](http://www.highgrovehappenings.net) that shows the Highgrove Metrolink Station north of the proposed curved track. RCTC's property at Highgrove should be use for the SCAG Regional Transportation Plan due to the ideal location, existing commuter trains, and growth potential due to hundreds of acres of nearby lots ready for homes. This location is way too important to continue to be ignored!



R. A. "Barney" Barnett

Chmn.: Highgrove Municipal Advisory Council

Editor: Highgrove Happenings Newspaper

474 Prospect Ave.

Highgrove, Ca.

92507

(951) 683 4994

[highgrovenews@roadrunner.com](mailto:highgrovenews@roadrunner.com)



# City Of Loma Linda

25541 Barton Road, Loma Linda, California 92354-3160 • (909) 799-2800 • FAX (909) 799-2890  
Sister City — Manipal, Karnataka, India

January 24, 2002

R. A. Barnett, Chairman  
Highgrove Area Redevelopment  
474 Prospect Avenue  
Highgrove, CA 92507

Dear Mr. Barnett:

Subject: Metrolink Station Stop In Highgrove

This is to advise that the City Council, at the regular meeting of January 22, unanimously supported your efforts and the Riverside County Service Area 126 Advisory Board's recommendation to the Riverside County Transportation Commission to site a Metrolink station stop in Highgrove.

Councilman Christman serves as president of the SANBAG Board and noted that Board's interest in a station stop in Highgrove.

Please keep us apprised of the status of the project.

Sincerely,

Pamela Byrnes-O'Camb  
City Clerk



# City of Loma Linda

25541 Barton Road, Loma Linda, California 92354-8160 • (909) 799-2800 • FAX (909) 799-2890

Sister Cities: Manipal, Karnataka, India - Libertador San Martín, Argentina • [www.lomalinda-ca.gov](http://www.lomalinda-ca.gov)

January 26, 2012

R. A. Barnett, Chairman  
Municipal Advisory Council  
474 Prospect Avenue  
Highgrove, CA 92507

Subject: Metrolink Station Stop In Highgrove

Dear Mr. Barnett:

Thank you for providing the City Council with an update on not only the Spring Mountain Ranch Housing Project, but also the potential for a Metrolink station stop in Highgrove.

The Loma Linda City Council reaffirms its previous support of your efforts and the Municipal Advisory Council's recommendation to the Riverside County Transportation Commission to site a Metrolink station stop in Highgrove.

Please keep us apprised of the status of the project.

Sincerely,

Rhodes Rigsby, Mayor

## **Ardie/Barney Barnett**

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**From:** RooferDan@aol.com  
**Sent:** Wednesday, January 11, 2012 10:46 PM  
**To:** highgrovenews@roadrunner.com  
**Subject:** We want a Highgrove Metrolink station

## **Ardie/Barney Barnett**

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**From:** TrnBrat1@aol.com  
**Sent:** Thursday, January 12, 2012 6:21 PM  
**To:** highgrovenews@roadrunner.com  
**Subject:** RR Stop

With the traffic jams all over the freeways it would be a perfect place to get off and park and get on the train and leave the driving to the hoghead. Also you'll be more rested at the other end since your not a jumble of nerves from the drive. Also coming from Palm Springs or San Diego area it would be a break to just take a train the rest of the way and know your not going to be stuck in traffic for several hrs. Bobbie Benson

## **Ardie/Barney Barnett**

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**From:** Bill Holland [billybyu@gmail.com]  
**Sent:** Thursday, January 12, 2012 9:51 AM  
**To:** Ardie/Barney Barnett  
**Subject:** Fwd: Metrolink station

Begin forwarded message:

**From:** Bill Holland <billybyu@gmail.com>  
**Date:** January 12, 2012 9:47:49 AM PST  
**To:** "Amatya@scag.ca.gov" <Amatya@scag.ca.gov>  
**Subject:** Metrolink station

We need a Metrolink station here in Highgrove....More and more people .... New schools & churches...Highgrove is growing, Freeways are congested.....  
Thankyou for your attention to this matter....

**Ardie/Barney Barnett**

---

**From:** Betty Crossno [boop01@pacbell.net]  
**Sent:** Friday, January 13, 2012 11:14 AM  
**To:** Amatya@scag.ca.gov  
**Cc:** Barney Barnett  
**Subject:** METROLINK STATION IN HYGROVE

WE NEED A METROLINK SAION IN HYGROVE. MOST CONVIENT AS I LIVE IN GRAND TERACE AMD IS BEST FOR MY NEEDS AS I HAVE TO DEPEND ON PUBLIC TRANSPORAION.

**Ardie/Barney Barnett**

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**From:** Kevin and Karen [colliernitro@gmail.com]  
**Sent:** Friday, January 13, 2012 8:21 AM  
**To:** Amatya@scag.ca.gov  
**Cc:** Ardie/Barney Barnett  
**Subject:** Highgrove Metrolink Station

WE WANT A HIGHGROVE METROLINK STATION!

As guardians of taxpayer transportation funds, SCAG must consider the BEST POSSIBLE usage of those funds for the community they serve. As clearly explained numerous times by Mr. Barnett and other members of this and the surrounding communities, a Metrolink Station in Highgrove, where there is ALREADY existing railroad tracks, existing Metrolink trains, existing acreage suitable for construction of the station and parking accommodations, and hundreds of up and coming home sites (Spring Mountain Ranch), it is imperative that the members of this agency decide WISELY to construct the METROLINK STATION IN HIGHGROVE.

Thank you,  
Karen and Kevin Collier  
235 Goldfinch Lane  
Highgrove, Ca. 92507

**Ardie/Barney Barnett**

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**From:** WONDERFULTAMMY@aol.com  
**Sent:** Friday, January 13, 2012 9:04 AM  
**To:** Amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** "We want a Highgrove Metrolink station"

Highgrove is a perfect location because it already has the existing railroad tracks, existing Metrolink trains 7 days a week, plenty of room for parking, and hundreds of acres of former orange groves have been converted into pads for future homes.

---

Tammy Matteson

951-203-7467

**Ardie/Barney Barnett**

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**From:** Greg Apprill [highgrovepony@yahoo.com]  
**Sent:** Saturday, January 14, 2012 9:34 PM  
**To:** lieb@scag.ca.gov; amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com; highgrovepony@yahoo.com  
**Subject:** Highgrove, CA - "We want a Metrolink station"

1/13/2012

**Mr. Jacob Lieb**  
**SCAG**  
**818 W. 7th Street, 12th Floor**  
**Los Angeles, CA 90017-3435**

Dear Mr. Lieb,

**"WE WANT A METROLINK STATION" in Highgrove, CA.**

**Our community would support and embrace a station. This is the type of economic development and land usage we are looking for.**

Thank you,  
*Greg Apprill*  
*President*  
*Highgrove Pony Baseball League*  
909-322-7290 cell  
[highgrovepony@yahoo.com](mailto:highgrovepony@yahoo.com)  
[highgroveponyleague.com](http://highgroveponyleague.com)

**From:** Lloyd Spiker [mailto:lloyd.spiker@gmail.com]  
**Sent:** Friday, January 13, 2012 2:25 AM  
**To:** [Amatya@scag.ca.gov](mailto:Amatya@scag.ca.gov)  
**Cc:** [highgrovenews@roadrunner.com](mailto:highgrovenews@roadrunner.com)  
**Subject:** Highgrove Metrolink Station

We want a Highgrove Metrolink station. As a senior citizen, I feel this would be a vital asset to our community and help boost the economy of Riverside.

thanks  
Lloyd Spiker  
Highgrove

## **Ardie/Barney Barnett**

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**From:** MARILYN MARILYN [marilyndenney@sbcglobal.net]  
**Sent:** Tuesday, January 17, 2012 3:45 PM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** METROLINK STATION WANTED IN HIGHGROVE!

PLEASE! See to it that a Metrolink station is provided in HighGrove, CA

Thank you,!

Marilyn Denney  
Resident of Grand Terrace, CA

## **Ardie/Barney Barnett**

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**From:** kelly keough [g.t.c.2004@sbcglobal.net]  
**Sent:** Wednesday, January 18, 2012 11:08 AM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** Metrolink Station

Just a note to let you know that I am in support of a Highgrove Station

Thanks

Dr. Kelly P. Keough

## **Ardie/Barney Barnett**

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**From:** Jim McKee [jmnatural@netzero.net]  
**Sent:** Wednesday, January 18, 2012 6:51 AM  
**To:** amatya@scag.ca.gov; Barney Barnett  
**Subject:** metro-link station in highgrove, ca.

we want our Federal and State tax money to benefit residents in both counties by building a Metrolink Station in Highgrove

## **Ardie/Barney Barnett**

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**From:** Terry Reagan [realtor.reagan@gmail.com]  
**Sent:** Saturday, January 21, 2012 6:22 PM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** IE Metrolink Station

To All Concerned:

We support having the proposed Metrolink Station built in Highgrove. It just makes sense!

Margaret and Terry Reagan  
Local Residents

## **Ardie/Barney Barnett**

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**From:** Dale Crossno [dcrossno@pacbell.net]  
**Sent:** Saturday, January 28, 2012 3:01 PM  
**To:** Amatya@scag.ca.gov  
**Subject:** Highgrove Metrolink station

To the responsible board or person,

I have followed the many discussions in regards to the Metrolink rail from Riverside to Perris. There is no way I can understand any reason to not have a station in Highgrove. I have seen many resolutions from varies cities and requests from residents asking for this station. If I understand all of this correctly this station will be very convenient for many residents in both Riverside and San Beranardino counties who can use the Metrolink service form the Highgrove station but would essentially have very little use of this service from the Hunter Park proposal. I believe us tax payers funding this project deserve the route that will serve the most people. Thank you for any consideration for us tax payers in your decision regarding this project.

Dale Crossno  
22668 Arliss Dr.  
Grand Terrace, Ca. 92313  
909 825 6963

## **Ardie/Barney Barnett**

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**From:** Virginia Washburn [washburn\_virginia@yahoo.com]  
**Sent:** Thursday, February 02, 2012 8:42 AM  
**To:** highgrovenews@roadrunner.com  
**Subject:** WE SUPPORT METRO LINK STATION AT HIGHGROVE, CA

WE SUPPORT METROLINK STATION AT HIGHGROVE, CALIFORNIA Thank you

## **Ardie/Barney Barnett**

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**From:** Marie Thomas [mgdmarie11@yahoo.com]  
**Sent:** Thursday, February 02, 2012 10:37 AM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** Metrolink Station

We support a Metrolink Station at Highgrove!

We respectfully request a true consideration of this proposal.

Thank You,

David Mathers  
Marie Thomas

## **Ardie/Barney Barnett**

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**From:** Patricia Kinion [patkin32000@yahoo.com]  
**Sent:** Thursday, February 02, 2012 9:08 AM  
**To:** highgrovenews@roadrunner.com  
**Subject:** metrolink at Highgrove

We support a metrolink station at Highgrove.

## **Ardie/Barney Barnett**

---

**From:** Ken Hughes [kenhughes997@yahoo.com]  
**Sent:** Thursday, February 02, 2012 12:35 AM  
**To:** amatya@scag.ca.gov  
**Cc:** Ardie & Bernie Barnett  
**Subject:** Metrolink Station

*"We support a Metrolink Station at Highgrove"*

Ken & Karen Hughes, 232 Cliffhill Place,  
Riverside, Ca., 92501

## **Ardie/Barney Barnett**

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**From:** JoAnn Johnson [kg6nsdjoann@yahoo.com]  
**Sent:** Friday, February 03, 2012 12:41 PM  
**To:** amatya@scag.ca.gov  
**Cc:** Highgrove Happenings  
**Subject:** Metrolink and Highgrove

I have long been an advocate for a Metro Link Station at Highgrove.  
I believe it would be a distinct advantage to a large area, including Grand Terrace.  
Please consider seriously.  
JoAnn Johnson  
Grand Terrace

## **Ardie/Barney Barnett**

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**From:** Stephen Dawson [stdawson@charter.net]  
**Sent:** Friday, February 03, 2012 2:17 PM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** Metrolink Highgrove

It is imperative that Highgrove have a Metrolink station easily accessible to the citizens of Highgrove. The proposed Marlborough station does not service the Highgrove area and is very difficult for the Highgrove residents to access. Please assist the residents of Highgrove to achieve the long sought Metrolink station in Highgrove.  
Thank you for assistance.  
Stephen T. Dawson  
5020 Sepulveda Avenue  
San Bernardino, CA 92404

## **Ardie/Barney Barnett**

---

**From:** Gary Laesser [garylaesser@att.net]  
**Sent:** Tuesday, February 07, 2012 11:11 AM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** Metro Link Station

*Gentlemen,*

*this email is concerning a Metro Link Station in Highgrove, CA. It would be nice to have this station*

*because it would cut traveling for the citizen of Grand Terrace and other local communities to easier San Bernardino or Riverside.*

*The train is already going thru there, why can't it stop.*

*Thank you for your consideration in this matter.*

*Gary & Burga Laesser*

est in knowing how the state's prisons operate, without any official filtering of information. Inmate interviews provide crucial insights into the workings of the criminal justice system. Such scrutiny is essential to providing public accountability for the corrections system and the officials in charge of it.

And taxpayers have a legitimate need to keep close watch on the state's prisons. The Legislature's long history of negligence and irresponsibility let prison ills fester, with dismal public consequences.

Corrections costs accelerated over the past 15 years, adding to state budget woes. California will spend about \$9 billion on corrections this fiscal year — more than the state general fund will contribute to the University of California

should avoid glamorizing criminals. That argument was always flimsy, mindlessly equating news reports with public relations.

The media restrictions are more likely an effort to control negative publicity. Corrections officials instituted the regulations in 1996, after reports of excessive violence and abuses at Pelican Bay State Prison. The reporting grew out of a 1995 federal court ruling that ordered sweeping reforms at the maximum security facility.

Prison policy should have a higher goal than avoiding unflattering news reports. Blocking media coverage deprives the public of a clear understanding of prison issues — which is the worst possible approach for a system in crisis. Public safety should not mean protecting the public from an honest picture of the corrections system.

## JOIN THE DISCUSSION

**W**e encourage readers to address public issues in letters of up to 200 words and op-eds of up to 600 words. We favor submissions offered exclusively to The Press-Enterprise. We require the writer's full name, street address and telephone number for verification.

We do not publish any individual's work more than once every 30 days. We do not publish poetry, withhold names on submissions or print letters cribbed from other sources.

All letters are subject to editing and may be republished in any format. For more detailed guidelines on submitting letters, visit PE.com.

MAIL: Opinion, Box 792, Riverside 92502

FAX: 951-368-9023

E-MAIL: letters@PE.com (no attachments)

## Votes add up to 'same old'

Dennis Mackey rightly condemns the California Legislature's outrageous salaries, perks and per diems, and its cuts in aid to the old, disabled and poor ("Vote all of them out," Your Views, Jan. 13).

It's easy to see that this state's lawmakers are incompetent. In the past few years, I've read countless letters and editorials calling for their removal by the voters.

But people complain about government, then vote in the same politicians and complain some more. Are the lawmakers the only ones who are incompetent?

PAUL HEARD  
Moreno Valley

## Direct democracy works

In his letter, Keith Richards writes, "Our elected officials don't represent us" ("Make voting mandatory," Your Views, Jan. 15).

In fact, they go to the highest bidder. The framers of the Constitution could not foresee the appearance of huge transnational corporations that are concerned only with profit and do not care about the countries in which they conduct business. What was supposed to be a democratic republic has devolved into a commercial republic. Corporate money buys elections and politicians.

We need to continue the direct democratic procedures that came into being in the last century: initiative, referendum and recall. This could be done through the Internet, backed up by a paper vote. Then you'll see a 90 percent turnout.

ART KOERTZ  
Riverside

## Left steers us onto rocks

Kudos to Fred Zerkle for his new word ("Behold an 'ineptocracy,'" Your Views, Jan. 12), which perfectly describes the far-left secular movement that has infected our country.

The Obama administration is the standard bearer for this movement, which shows nothing but disdain for achievement, success, personal accountability, family values and national security.

The wealthy left, including President Barack Obama, George Soros, the Hollywood elite and many others, are destroying the system that allowed them to garner such wealth.

It doesn't figure. One would think these people would be big supporters of capitalism, free enterprise and democracy. Instead, they are doing their best to turn this once-great nation into a cesspool of entitlements, government control, high taxes and redistribution of wealth.

How much of their wealth are they willing to redistribute?

CHUCK R. BOLTON  
San Jacinto

## OK Highgrove rail station

Hasan Ikhrata, executive director of the Southern California Association of Governments, describes SCAG's 2012-2035 plan for infrastructure investments in transportation that will cost \$500 billion over the next 23 years ("Transportation upgrades can fuel growth engine," Perspective, Jan. 8).

But I'm reminded of the request by Grand Terrace more than 10 years ago for a Metrolink station in Highgrove that would benefit Grand Terrace, Highgrove and surrounding communities on both sides of the Riverside/San Bernardino county line.

Ikhrata writes that investing in transportation infrastructure is one of the fuels needed to rebuild our economy. Very little investment is needed for the Highgrove location because commuter trains have been operating past this location for 10 years. If movement of people is part of SCAG's plan as mentioned, what happened to the Metrolink station in Highgrove?

We have a ready customer base for the Highgrove station.

PHIL TURNER  
Grand Terrace

# GOP'S CLASS-WARFARE RHETORIC GIVES OBAMA A LUCKY LIFT

RIVERSIDE PRESS 1-23-12

Points made at SCAG public hearing in San Bernardino on Jan. 18, 2012 by R. A. “Barney” Barnett:

1. **Location efficiency:** The Highgrove Metrolink Station will be an ideal and efficient location for SCAG’s Regional Transportation Plan for commuters between Riverside and San Bernardino counties and beyond.
2. **Land use:** The vacant 17.22 acre property at Highgrove is already owned by the Riverside County Transportation Commission.
3. **New Station Location:** The request for a station platform has been moved north of the proposed curved track that will connect the Perris Valley Line to the BNSF main line. This location is still on the same property owned by RCTC and will not interfere with their plan to run future trains between Riverside and Perris.
4. **Vacant 1,555 acres:** Highgrove has 1,555 acres of vacant buildable land for future homes and businesses including the Spring Mountain Ranch project.
5. **\$250 Million:** One mile east of the Highgrove Metrolink station location is the Spring Mountain Ranch housing project where \$250 Million dollars have already been spent on infrastructure for 2,500 new homes.
6. **Existing residents:** Even before any new homes are built in the Spring Mountain Ranch area there are already 30,777 residents within a 2 mile radius of the Highgrove location that could have been using the existing Metrolink trains. (Riverside EDA figures)
7. **Existing trains:** On July 15, 2006 Metrolink trains through Highgrove went from 5 days a week to 7 days a week. Each year 3,224 commuter trains pass through Highgrove without stopping. All that is needed is to have parking on RCTC’s property next to these existing trains and a station platform to buy tickets. The construction of the Colton Flyover will allow even more future commuter trains through Highgrove but RCTC has no plan to stop any of the existing or future trains at Highgrove!
8. **Location:** The Highgrove location is ½ mile from the Center St. exit of the I-215 freeway and ¼ mile south of the Riverside/San Bernardino county line.
9. **Website:** Please look at our website: [highgrovehappenings.net](http://highgrovehappenings.net)  
There is a map and 10 years of written support for a Metrolink Station at Highgrove but this location has been opposed by RCTC for 10 years.

R. A. “Barney” Barnett

████████████████████  
Highgrove, Ca.

██████████  
(951) 683 4994

[highgrovenews@roadrunner.com](mailto:highgrovenews@roadrunner.com)

# HILLS FOR EVERYONE

Southern California comes  
together at the Puente - Chino Hills



Los Angeles County  
Orange County  
Riverside County  
San Bernardino County

February 10, 2012

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street 12<sup>th</sup> floor  
Los Angeles, CA 90017  
RTP@scag.ca.gov

Re: Comments on the Draft RTP/SCS and Draft PEIR

Dear Ms. Lin,

Thank you for the opportunity to comment on the Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (PEIR). Hills For Everyone (HFE) is a 34 year old non-profit organization that established Chino Hills State Park and is still working to conserve the remaining natural lands in the Puente-Chino Hills Wildlife Corridor at the juncture of Los Angeles, Orange, San Bernardino and Riverside Counties. We have extensive experience in land use, land preservation, fire history and wildlife corridors and therefore offer our comments to strengthen the RTP/SCS and Draft PEIR.

### **Adaptation (pg. 31 of the Draft 2012 RTP/SCS)**

HFE agrees Southern California will be faced with extremes in precipitation and temperature, increased storm frequency, and intensity and sea-level rise. However, we feel it is critical to include the impact of fire, especially as more people and roads come to the region. Much of California is facing significant and extended fire seasons, which have tremendous impacts on both the natural environment and the developments nearby. In essence, we have planned our entire infrastructure system (e.g., flood plains, water networks, transportation methods) on the climate being a certain way and now that climate baseline is changing.

Since 1986 the number of major forest fires in California has quadrupled due to more days with summer-like and generally hotter temperatures.<sup>1</sup> This increase in fires has numerous implications, including but not limited to: increased firefighting costs, increased danger to residents near the wildland urban interface, and a transition of habitat types to more flammable vegetation due to increased fire frequency.<sup>2</sup>

<sup>1</sup> California Energy Commission. "Public Interest Energy Research Climate Change Program." Retrieved 2 Feb 2012 from the California Energy Commission website: <http://www.energy.ca.gov/2009publications/CEC-500-2009-092/CEC-500-2009-092.PDF>

<sup>2</sup> Department of Justice. "Global Warming Impacts in California." Retrieved 2 Feb 2012 from the California Attorney General's website: <http://www.ag.ca.gov/globalwarming/impact.php>

### **Recommendation #1**

We recommend that as a part of the SCS in the Adaptation section of the document, SCAG provide examples of how it and local jurisdictions plan to adapt to these new risks, especially in regard to wildland fires, through better land use choices. For example as it relates to fires, fire officials, planners, developers, transportation agencies, and others must shift the focus from primarily a reactionary fire plan (i.e., fighting fires when they occur) to a preventative fire plan (e.g., creating buffers between communities and natural lands). What other steps will SCAG be taking to adapt to climate change and to ensure public health, economic livelihoods, the financial sector, the insurance industry, individual comfort, natural lands and recreation areas will be protected?

### **Safety and Security First (pg. 37 of the Draft 2012 RTP/SCS)**

We applaud your efforts to ensure Southern California's residents are both safe and secure on the region's transportation system. We were also pleased to see one of your two main goals for safety and security is to "prevent, protect, respond to, and recover from major human-caused or natural events in order to minimize the threat and impact to lives, property, the transportation network and the regional economy" (p. 37). HFE has just completed a near 100 year analysis of fires in the four-county area surrounding Chino Hills State Park. See Attachment 1, which documents the fire frequency of the Chino Hills. What we've found is that proximity of roads to natural lands directly increases the likelihood for fires to ignite and burn both habitat and homes.

For example, as it relates to the 91 Freeway at the juncture of Riverside and Orange Counties, we have provided to you an analysis of the fire perimeters and points of origin for fires that burned in and near Chino Hills State Park. Along this freeway alone, there are 48 separate fires that ignited/burned. From 1914 – 1963 (49 years), 1963 being when the freeway opened, we have records of six fires. Since 1963 – 2012 (49 years), after the freeway opened, there were nearly seven times as many fires recorded (41). The average fire size for recorded fires was 6,263 acres. It is clear to us that the safety and security of residents along this one transportation corridor are being significantly impacted because of 91 Freeway, not to mention disruption of mobility due to road closures because of fires and evacuations.

### **Recommendation #2**

With additional roadway and other projects planned in and around the Puente-Chino Hills Wildlife Corridor on the 57, 91 and 71 Freeways, we ask that SCAG analyze potential fire prevention measures along freeways that bisect natural lands. For example, one fire prevention measure would be the creation of hardscape along the roadway edges so that dry brush cannot ignite when transportation-related fires begin. Reducing the fire frequency and duration not only protects habitat, but also allows continued and uninterrupted operation of the major transportation corridors and, importantly, protects life and property of local residents.

### **Biological Resources and Open Space (pg. 79 of the Draft 2012 RTP/SCS)**

We reiterate the importance of acknowledging the impact of wildland fire with a transportation-generated point of origin on our natural lands. Though wildlife fatalities, habitat fragmentation, and other habitat impacts are important—if the habitat can no longer regenerate in its natural and native state due to excessive fire frequency the long term preservation of the land has been lost.

### **Recommendation #3**

As previously mentioned, we recommend incorporating fire prevention strategies along natural areas bisected by major transportation corridors. For example, the 91, 57, 71 Freeways all

bisect natural lands and not only inhibit natural migration and movement of large animal species, they become areas prone to fire ignition and therefore habitat destruction.

### **Growth in the SCAG Region (2035) (Exhibits 4.1, 4.2 and 4.3)**

We appreciate that SCAG has included a projected population, employment, and housing growth maps as exhibits, but are dismayed that the maps are illegible. In order to appropriately comment on this map it must be readable.

From what we can decipher, the area of the Puente-Chino Hills Wildlife Corridor, known as the Missing Middle, is shown as adding 2000 – 3500 people per square mile. This area is designated as a Significant Ecological Area (SEA) in the Los Angeles County General Plan, thereby acknowledging its significant natural resource values. The owner, Aera Energy, has attempted to achieve entitlements on this property twice without success because of the SEA designation.

Ironically, this particular development proposal's population, employment, and housing growth areas contradict the goals of SB 375 and its requirement for reduced vehicle miles traveled (VMT) since the location of the development is nowhere near transit; does not include a major employment center but instead focuses on large single family residential units; encourages dependency on the automobile and will, when combined, increase VMTs, not reduce them.

In addition, related to Exhibit 4.2, there are no employment centers approved or proposed on the Aera Energy property in Los Angeles County. As noted in your Integrated Growth Forecast (p. 111) the "RTP/SCS depends heavily on accurate and credible forecast for future growth in population, housing and employment." It is therefore misleading to show growth when residential units are the only documented development feature. And likewise it is inaccurate to show such a large population growth in an area protected under the County's own SEA program.

### **Advanced Mitigation Policy**

While we understand the RTP is directly related to County Transportation Commissions (CTCs) we would respectfully request that conservation organizations, like HFE, and other related agencies, conservancies, and joint power authority's (e.g., the Santa Monica Mountains Conservancy, Mountains Recreation and Conservation Authority, and the Wildlife Corridor Conservation Authority) be included in determining priority conservation areas and plan development. CTCs, with all due respect, do not tend to focus on nor do they specialize in conservation of natural lands.

As the Orange County Transportation Authority will confirm, it relied upon many sources for establishing its priority conservation areas under the Environmental Mitigation Program of Renewed Measure M. To that end, HFE would like to offer its assistance with potential conservation areas in the four-county region. In addition, we believe there are similar conservation non-profit organizations and entities throughout the SCAG region that could provide useful, beneficial, and relevant information about their on-the-ground priorities.

### **Recommendation #5**

We recommend that SCAG incorporate public workshops and outreach to effectively gather information from conservation organizations and other related agencies on conservation priorities. This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (pg. 128 of the Draft 2012 RTP/SCS).

Additionally, we also believe there are conservation opportunities above and beyond the Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) areas to acquire, protect, and preserve land in perpetuity.

#### **Recommendation #6**

We recommend that SCAG expand the possible mitigation sites to include any undeveloped natural lands in its inventory as this would be a more inclusive list than just focusing on NCCP/HCP lands, which by their very nature are limited to particular areas of each county (where established) and related to specific residential developments, not transportation projects (the Orange County Transportation Authority's NCCP/HCP is the exception).

#### **Mitigation Measures: Biological and Open Space (Section 3.3 of the PEIR)**

In addition, we have comments that we hope strengthen the mitigation measures proposed in the draft PEIR.

First, as it relates to MM-BIO/OS2 (replanting disturbed areas with native vegetation), we agree avoidance should be the first approach and use of native high quality vegetation should be installed. However, in working with the Orange County Transportation Authority, we believe there is an opportunity to ensure a better functioning ecosystem pre- and post-construction activity. Specifically, the Measure M2 Ordinance states its program will establish an "accounting process for mitigation obligations and credits that will document *net environmental benefit* from regional, programmatic mitigation in exchange for *net benefit in the delivery of transportation improvements* through streamlined and timely approvals and permitting" [emphasis added].<sup>3</sup> With SCAG's potential adoption and promising opportunity for early implementation of the advanced mitigation program, inclusion of net environmental benefit language would improve program and the delivery of freeway projects at a minimum in terms of construction, timing, and budget.

#### **Recommendation #7**

Therefore, we recommend ensuring that, after the impacts and restoration, the affected natural habitat realizes a *net* environmental benefit.

Second, as it relates to MM-BIO/OS36 (assessment of habitat linkages) we agree habitat linkages should be preserved and improved, but also believe utilizing existing data when evaluating habitat linkages will aid in the evaluation process. It is critical that the integrity and functionality of the wildlife corridor(s) be preserved *before* construction begins and if alternative linkages are needed those be established and studied prior to construction commencement.

#### **Recommendation #8**

Therefore, we recommend utilizing existing data and research conducted by agencies (e.g., US Geological Survey, California Department of Parks and Recreation) and qualified biologists on assessment of habitat linkages and their function and/or risk of habitat fragmentation, encroachment, and urban edge effects. In addition, during construction the wildlife corridor should maintain its functionality and again, if the linkage is compromised the mitigation measures for alternative linkages should come *before* the construction activities begin.

Third, MM-BIO/OS38 (analysis of wildlife corridors, impacts avoided or minimized) provides a good place to start in analyzing wildlife movement corridors, but can be expanded to include

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<sup>3</sup> Orange County Local Transportation Authority. "Ordinance No. 3." 24 July 2006. Section II Item A.5.iii, page B-5.

determining locations where wildlife are crossing roadways that do not yet have established culverts, undercrossings, etc.

**Recommendation #6**

We recommend using roadkill data and surveys to determine where additional linkages and/or culverts/undercrossings are needed, but not yet installed. This pre-construction, pre-design activity can yield important information during the project planning phase so that connectivity can be improved during project implementation.

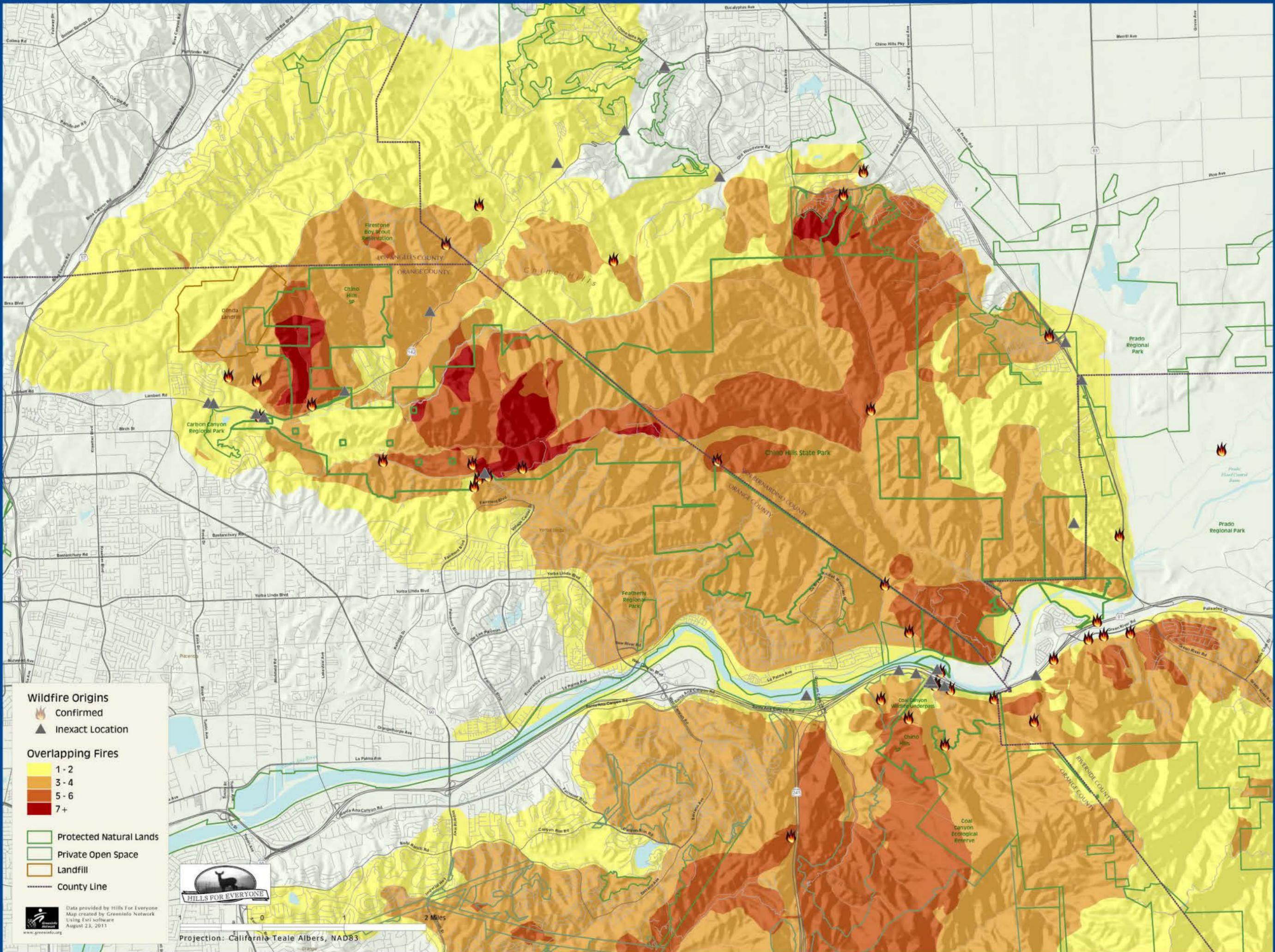
Thank you for the opportunity to provide feedback on the Draft 2012 RTP/SCS and the PEIR. We look forward to working with you in the future on the SCS and the conservation policy.  
Regards,

*Claire Schlotterbeck*

Claire Schlotterbeck  
Executive Director

Attachment

# Wildfire Origins and Overlapping Fires near Chino Hills State Park





## Hills For Everyone Fire Research Project Fire Statistics for the 91 Freeway (Perimeters)

### Fire Location

Of the 37 separate fire perimeters that burned along the 91 freeway

- 13 fire burned along the freeway
- 18 fires within a ¼ mile of the freeway
- 6 fires within a ½ mile of the freeway

### Fires before/after Freeway Opened (1963)

- 6 fires burned before the freeway opened (48 years of fire data, 1914-1963)
- 29 fires burned after the freeway opened (48 years of fire data, 1963-2011)

### Adjacency to Chino Hills State Park

Of the 37 separate fires perimeters that burned along the 91 freeway

- 16 burned in Chino Hills State Park
- 2 burned adjacent to Chino Hills State Park (shared a border)
- 19 burned outside Chino Hills State Park (close enough to cause concern)

### Fire Size

Of the 37 separate fire perimeters that burned along the 91 freeway

- Largest Fire – 41,285.2 acres (Green River Fire – November 1948)
- Smallest Fire – 0.1 acres (Coal Canyon – July 2003)
- Average Fire Size – 6,263 acres

### Fire Date

Of the 37 separate fire perimeters that burned along the 91 freeway, July was the predominant month when fires burned.

MONTH	No Data	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
# of Fires			2	1	1		1	8	4	2	4	4	

### Weather Conditions

Known weather conditions for all the fires (since 1979)

WEATHER CONDITIONS	Temperature (Daytime Highest)	Temperature (Daytime Lowest)	Temperature (Daytime Average)	Wind Gusts (Highest)	Wind Gusts (Average)	Most Common Wind Direction
Stats	102°F	70°F	86°F	29 MPH	20 MPH	SW

### Corresponding Data

Of the 37 separate fires that burned along the 91 freeway

- 22 had no known point of origin
- 15 had a point of origin



## Hills For Everyone Fire Research Project Fire Statistics for the 91 Freeway (Points of Origin)

### Fire Location

Of the 18 separate fire points of origin that ignited along the 91 freeway

- 3 fire ignited at the Coal Canyon exit
- 15 fires ignited along the 91 freeway

### Fires ignited before/after Freeway Opened (1963)

- 0 fires ignited before the freeway opened (48 years of fire data, 1914-1963)
- 18 fires ignited burned after the freeway opened (48 years of fire data, 1963-2011)

### Fire ignition causes

Of the 18 separate fires points of origin that burned along the 91 freeway

- 0 were natural
- 18 were human-caused

CAUSE	Unknown	Vehicle Fire/Crash	Arson	Downed Powerlines	Caltrans Machinery	Incendiary Device	Prescribed Burn Reignited
# of Fires	8	4	2	1	1	1	1

### Corresponding Data

Of the 18 separate fires that burned along the 91 freeway

- 11 have no matching fire perimeter
- 7 have a matching fire perimeter



**Hills For Everyone Fire Research Project  
Fire Statistics for the 91 Freeway (Points of Origin and Perimeters)**

**Number of Fires**

There was recorded data for 37 perimeters and 18 points of origin. In some cases the data set was complete and included both a perimeter and a point of origin. In other cases, we had only one or the other (a perimeter and no point of origin, or a point of origin with no perimeter). To provide an accurate count of actual fires we only included a single record of any given fire. Therefore there are 48 separate fires that ignited/burned along the 91 freeway.

**Fires ignited before/after Freeway Opened (1963)**

Of the 48 separate fire perimeters and/or points of origin

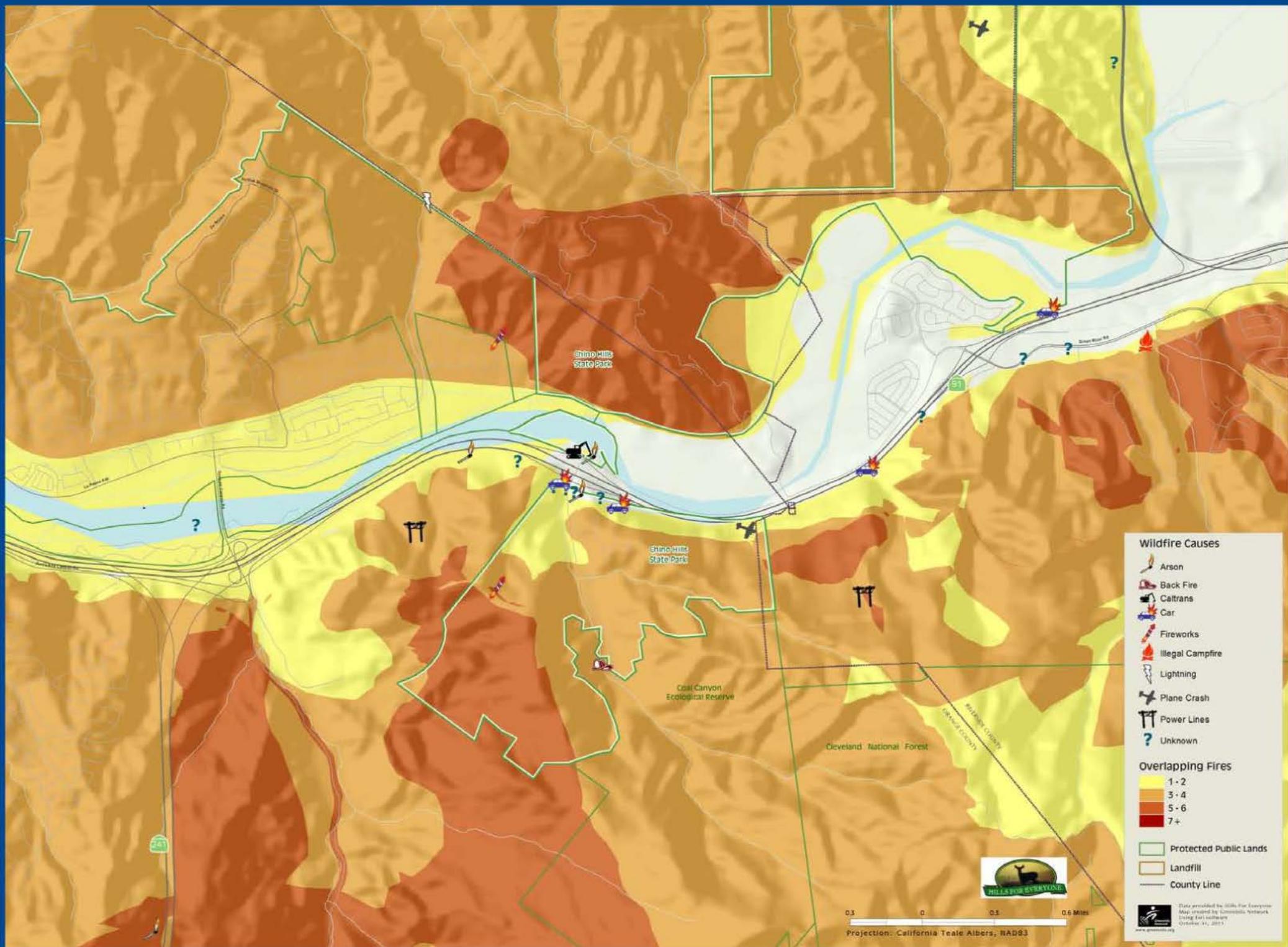
- 1 unknown date
- 6 fires ignited or burned before the freeway opened (48 years of fire data, 1914-1963)
- 41 fires ignited or burned after the freeway opened (48 years of fire data, 1963-2011)

**Fire Date**

Of the 48 separate fire perimeters and points of origin that burned along the 91 freeway, July was the predominant month when fires were ignited or burned.

MONTH	No Data	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
# of Fires	10		2	2	2	5	1	11	4	2	5	4	

# 91 Freeway - Wildfire Causes and Perimeters (1914 - 2011)



**Wildfire Causes**

- Arson
- Back Fire
- Caltrans
- Car
- Fireworks
- Illegal Campfire
- Lightning
- Plane Crash
- Power Lines
- Unknown

**Overlapping Fires**

- 1 - 2
- 3 - 4
- 5 - 6
- 7 +

Protected Public Lands

Landfill

County Line

HOLD ON FOR EVERYONE

Data provided by Wildfire For Everyone  
Map created by Linnemann, November  
Using Esri software  
October 04, 2011

0.3 0 0.3 0.6 Miles  
Projection: California Teale Albers, NAD83



Tuesday, Feb. 14, 2012

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

Dear Hasan:

On behalf of the American Lung Association in California and Human Impact Partners, we would like thank you and your staff for your leadership to improve the health and equity benefits of the Sustainable Community Strategy/Regional Transportation Plan. We appreciate the hard work and broad community and stakeholder outreach that you and your staff have undertaken and congratulate you on developing a plan that meets the 2020 and exceeds the 2050 greenhouse gas reduction targets as well as reduces air pollution and vehicles miles traveled.

A broad-based coalition of health, transportation, academic, environmental, environmental justice and housing advocates participated in the development of recommendations for health and equity performance measures that should be incorporated in the development of RTP/SCS plans. While we are pleased that SCAG has incorporated some of those metrics, there are many others that we continue to urge you to include in future SCS/RTPs.

To aid SCAG in measuring and monitoring these health and equity targets and determinants, we have attached the original Health and Equity Metrics for Sustainable Communities Strategies and a commentary table specifically addressing the performance measures that SCAG has included in the 2012 RTP/SCS.

We look forward to working with you to support a truly health protective, equitable and sustainable plan for Southern California, and urge you to consider these additional measures to best achieve this goal.

Signed,

A handwritten signature in black ink that reads "Bonnie Holmes-Gen".

Bonnie Holmes Gen  
Executive Director for Air Quality and Public Health  
American Lung Association in California

A handwritten signature in black ink that reads "Kim Gilhuly".

Kim Gilhuly  
Project Director  
Human Impact Partners

## Health and Equity commentary on SCAG 2012 RTP/SCS performance measures and Environmental Justice performance measures

**A broad-based coalition of health, transportation, academic, environmental, environmental justice and housing advocates spearheaded by Human Impact Partners participated in the development of recommendations for health and equity metrics that should be incorporated in the development of RTP/SCS plans. The chart below provides a commentary of how SCAG’s performance measures compare to the Health and Equity Metrics:**

SCAG RTP/SCS 2012 Performance Measure	Health and Equity commentary
Asthma incidence and exacerbation	We were glad to see this included but believe the data point could be strengthened by using NOx as an exposure measurement to better tie this outcome to vehicle emissions and monitor over time. SCAG is currently measuring exposure to NOx and has an accepted methodology to enable this analysis and quantification.
Analysis of percent of environmental justice households living within 500 feet from high-volume roadways.	We request analysis of the percent of environmental justice households and potential health outcomes within 1,000 feet to better reflect research demonstrating health impacts within that area, particularly in environmental justice communities. Protocols for addressing impacts are also needed. We also would request a measure of how many households are below market rate (BMR) vs. market rate (MR), as with the analysis in the EJ appendix.
Premature deaths due to PM 2.5	Thank you for including this performance measure.
SCAG 2012 RTP/SCS Environmental Justice Performance Measure	Health and Equity commentary
Jobs-housing imbalance	SCAG was responsive to stakeholders in measuring a jobs-housing imbalance, but the measurement could be improved by using methodology that UC-Davis and the Sacramento Council of Governments has developed. There is a relatively simple methodology to do a jobs-housing fit by creating a 4-to-5-mile buffer zone around major job centers, and comparing wages provided by those jobs to cost of housing within the buffer zone to see if there is a good fit. UC-Davis is developing this tool to be able to project the jobs-housing fit into the future, which would enable SCAG to show how the Plan will impact this performance measure.
Gentrification & displacement	We applaud this measure and request ongoing monitoring and development of mitigation measures. SCAG’s analysis indicates that with ongoing concentration of new housing in High Quality Transit Areas (HQTA), gentrification and displacement will happen. While this can be discerned from the analysis of what has happened with the indicators historically, they do not project change with these indicators. It would strengthen this EJ analysis to see how many market-rate vs. below-market rate units are planned for each TAZ, and the EJ Toolbox could be strengthened by suggesting displacement

	mitigation measures.
Access to employment and services (45-minute auto access)	Kudos for measuring this, but we would like to see measurements for walking and biking access and recommend using a 30-minute walking or biking travel time. An alternative method would be to map ½ mile access to employment and services for walking and cycling. The cut-off choice of 45- minute auto access time does not show, from a health lens, how people could be more likely to use active transport methods to access jobs and services.
Access to parks	Similar comments to access to employment and services, above. It is not clear for either measure what “average” access is.
RTP project investment share	This analysis does not detail what kinds of investments are targeted for each quintile, i.e., will there be more rail investment in higher or lower income quintiles, for example. This analysis was a step in the right direction but more detail would help determine if the type of investment is targeted for the mode usage of each income level and/or ability/disability.
Air pollution and noise exposure	The analysis showed clearly that risks are higher for EJ populations, and that more current and future housing near freeways and busy roadways is targeted for lower-income residents and minorities. We were pleased to see that a mitigation measure in SCAG’s toolbox is to do a corridor-level analysis for proposed projects in areas where roadway air quality impacts are concentrated among EJ communities. We request more indicators that measure actual health outcomes. Respiratory risk was not well-defined. Also, mapping in smaller geographies would be useful as the maps were unable to show much at the regional level.  With regard to noise, we see that highway noise reductions will not benefit EJ communities as much as non-EJ communities. We appreciate the noise mitigations suggested in the Toolbox.
Share of household and employment growth in High Quality Transit Areas (HQTAs)	Would like to see household growth, job growth, and population growth. Would also like to see how many large (3-4 bdr) units, how much senior housing, and below market rate (BMR) units projected for HQTAs.

**SCAG stated that the following recommended metrics would be targeted for a future RTP/SCS if data became available. We would encourage SCAG to continue researching ways to measure and report out these indicators earlier than in the next RTP/SCS.**

SCAG 2012 RTP/SCS Performance Measure	Health and Equity commentary
Percent of households with walk access to neighborhood services	SCAG states further research is needed. SANDAG has pioneered mapping strategies for this, and SCAG has laid the groundwork for this analysis in the Environmental Justice appendix.
Percent of existing and new BMR rental housing units in TOD areas	SCAG states further research needed, yet has measured a similar indicator above as “Share of growth in High Quality Transit Areas”.
Percent of jobs within 15	SCAG states that this is pending available data, but it is unclear why

minute walk of transit	this is not included since they are measuring growth of jobs and households in high quality transit areas. Also we are interested in proportion of jobs and households within ¼ mile of <i>local public transit</i> (bus and rail) and within ½ mile of <i>regional public transit</i> .
Percent of population within ½ mile of high frequency transit stop	SCAG states that this is pending available data, but we note that SCAG has assigned this task to their GIS team, which is a great sign. It is unclear what data is needed beyond what SCAG has access to since they have measured the share of household and employment growth in high quality transit areas.
Percent of residents within ½ mile walk to parks and open space (pending available data) (new research measure)	SCAG states this is pending available data but did perform a distance to parks analysis in the EJ appendix, so it appears this data is available.
Percent of households living with >65 decibels of noise	SCAG states that further research is needed, but this data is collected for the EJ appendix and appears to be available.

**We encourage SCAG to incorporate these additional performance measures, which were not included.**

SCAG 2012 RTP/SCS Performance Measure	Health and Equity commentary
Daily amount (in minutes) of work and non-work trip related physical activity	Methodology exists to predict this as the MTC has done.
Chronic disease resulting from changes in physical activity due to transportation project expenditures	Methodology exists to predict this via the California Department of Public Health.
SCAG 2012 RTP/SCS Environmental Justice Performance Measure	Health and Equity commentary
Injuries and fatalities from motor vehicle collisions, including from trucks, for pedestrians, bicyclists, as well as motor vehicle operators	While this is measured for performance measures, there is no EJ analysis.
<i>Premature mortality</i> from PM2.5 emissions from mobile sources, for EJ communities	SCAG looks at air quality and some EJ respiratory health issues, but the health effects of changes in air quality due to transportation expenditures would be clearer if premature mortality were measured and reported specifically in environmental justice communities. SCAG measures particulate matter, and so could do the calculation to attribute premature mortality to mobile sources of PM2.5.
Physical activity gained from active transport for EJ communities.	SCAG considers accessibility to parks, employment and services, which all tie into why someone would walk/bike/take public transit to get to these services. We request that the health benefits from transportation decisions be made explicit by measuring them.

# SB375 Health & Equity Metrics

## SB375: Sustainable Communities Strategies for Regional Transportation Planning

With the goal of reducing greenhouse gas emissions, SB375 requires that California's Metropolitan Planning Organizations (MPOs) prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP). The SCS process is an opportunity to improve the health of all communities in the state, truly ensuring our sustainability.

## Performance Metrics and Planning

MPOs use a variety of performance measures to assess different scenarios for land use and transportation changes. As we have seen in the past, if those metrics don't include health and equity measures, it is unlikely that the final selected plan will lead to healthy and equitable outcomes. For example, if MPOs use the indicator "Automobile Level of Service (LOS) on Roadways," their decisions will focus on making driving easier, which might not be the best for health given the many ways driving can harm health. If instead they use "Premature Death due to Traffic-Related Pollution," then their plans are more likely to decrease traffic-related pollution by promoting alternate forms of transportation. Our goal is to provide MPOs a set of metrics that will promote health and equity as well as sustainability.

## Developing the Health and Equity Performance Metrics

To develop a list of health and equity metrics, Human Impact Partners, an Oakland-based non-profit that strives to transform the policies and places people need to live healthy lives, received funding from the Resources Legacy Fund and worked in collaboration with:

- American Lung Association in California
- Bay Area Regional Health Inequities Initiative
- Climate Plan
- Fehr & Peers
- Healthy Places Coalition
- Move LA
- Nelson & Nygaard
- PolicyLink
- Public Health Institute
- Prevention Institute
- Public Advocates
- Public Health Departments in Shasta, Marin, San Mateo, & Los Angeles
- Public Health Law & Policy
- Public Law Center
- Public Policy Institute of California
- Raimi & Associates
- Reconnecting America
- Safe Routes to Schools
- TransForm

Starting with metrics proposed by many organizations and agencies, we developed a final list of 13 metrics. For each proposed metric, we also provide a review of its links to health and a description of how it can be measured.

## SB375 & Health

As California continues to grow over the coming years, we will need to accommodate **millions of new households and jobs**.

Currently, the **cars and trucks** we drive account for almost **40% of our greenhouse gas emissions**. How will **further growth** impact our **climate**?

Transportation and land use decisions impact our health by changing air quality, noise levels, physical activity rates, pedestrian and bicycle injury rates, and access to the goods and services we need to live healthy lives.

Children born today are expected to have a shorter life span than their parents due to obesity and respiratory illnesses. How will **further growth** impact our **health**?

# The Health and Equity Metrics

## SAFETY

1. Map annual number of pedestrian and bicycle collisions (and severity of injury/fatality): per capita, per geographic area, by daytime population.
2. Total number of vehicle, bike and pedestrian collisions per capita, broken down by injury type: fatalities and injuries.

## ACCESS TO GOODS, JOBS & SERVICES

3. Proportion of households that can walk or bike (10 minutes) to meet at least 50% of their daily needs. Public daily needs defined as: schools, parks, healthcare institutions and transit. Private daily needs defined as: restaurants, grocery stores, food markets and childcare.
4. Proportion of households and proportion of jobs within 1/4 mile of local public transit (including both bus and rail) or 1/2 mile of a regional public transit, that has less than 15 minute frequencies.
5. Proportion of daily trips less than 3 miles and less than 1 mile by mode (walking/biking/transit (bus and rail)/driving).

## GENERAL TRANSPORTATION

6. Daily amount (in minutes) of work-trip and non-work trip related physical activity.
7. Work and non-work trip mode share (including biking, walking, transit (bus and train), carpooling and SOV)- Both at peak times and all day.

## FUTURE GROWTH

8.
  - a) Share of housing growth in transit priority areas, targeting measures of how many large (3-4) bedroom units, senior housing, low-income units will be built;
  - b) Proportion of projected population growth located in transit priority areas;
  - c) Proportion of projected jobs in transit priority transit areas.

## ECONOMIC

9.
  - a) Percent of household income consumed by housing and transportation combined;
  - b) Percent of income going towards housing costs;
  - c) Percent of income going towards transportation costs.

## ENVIRONMENTAL POLLUTION

10. For all daily trips, per capita miles traveled by mode (walking, biking, transit, vehicle).
11. Working with a local public health department, university or air quality management district: Estimate pre-mature mortality attributed to traffic related ambient PM 2.5, and estimate asthma incidence and asthma exacerbations attributed to traffic related NO2.
12. Proposed housing near busy roadways will require:
  - a) Assessment by local air district or public health department of the need for environmental/health impact analysis when housing is proposed near (within 1,000 feet) busy roadways (over 100,000 Average Annual Daily Traffic (AADT) or other significant pollution sources (e.g., rail yards, port terminals, refineries, power plants, etc); and
  - b) Best practice mitigation requirements by local governments when the above assessment determines that environmental quality is below standard for such proposed housing, and if such housing is determined to be safe by local air districts and public health departments with identified mitigation.

For MPO representing highly urban regions, we suggest an alternate metric due to the ongoing concern about the lack of developable land, the need for housing, and equity concerns about placing low-income residents near polluting emissions of cars and trucks.

Alternate Metric 12: Working with a local public health department, university and/or air quality management district:

- a) Estimate the number of sensitive sites (homes, schools daycares, parks, etc.) within 1,000 feet of freeways and other major pollution sources, based on standards such as Bay Area Air Quality Management District's.
- b) Estimate proportion of affordable housing units vs. market rate units within above identified areas.

## EQUITY

13. Measure and stratify all indicators by race/ethnicity; income; geography (neighborhood, Census block or tract level, or Community of Concern); age; disability.

## Ways You Can Advocate for Health and Equity

Through letters to and meetings with MPO staff and Board, through testimony at public meetings, and in letters to local press, **you can advocate that health and equity be considered** when your MPO is:

- ✓ Developing performance metrics to assess proposed growth scenarios.
- ✓ Proposing scenarios about future transportation and land use.
- ✓ Conducting its Environmental Impact Review (EIR), which technically requires an analysis of health impacts, but often doesn't. You can do this when the agency announces that it is starting the EIR at the Notice of Preparation stage, when it is Scoping the EIR, and/or as comments on the Draft EIR.



February 14, 2012

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

RE: Comments on Draft 2012-2035 Regional Transportation Plan – Sustainable Communities Strategy & the Draft Program Environmental Impact Report

Dear Mrs. Lin:

The Imperial County Air Pollution Control District (Air District) has finalized the review of the Draft 2012-2035 Regional Transportation Plan (RTP) – Sustainable Communities Strategy and its Draft Program Environmental Impact Report (Draft PEIR) and is here by providing its comments.

RTP

**Section: Executive Summary**

- The list of transportation investment projects found in page 5 and 6, calls for many beneficial projects within the SCAG region which would ultimately reduce VMT, traffic congestion and vehicle emissions. On top of the priority list and one of the most expensive projects is the passenger high speed rail system which is schedule to provide services to most of the SCAG region with the exception of Imperial County. As indicated in Table 1.7 found on page 28 of the RTP, the Imperial County is currently classified non-attainment for 2008 8-hour Ozone standard, as well as non-attainment for the PM10 and PM2.5 standards which is why it is very important and crucial that projects such as the high speed rail system are built and tied into the Imperial County to alleviate the same issues other SCAG regions are having and expect to have in future years. As it stands, the Air District will not benefit from the emission reductions a high speed rail system can provide. For this reason, the Air District would like to request a cost-feasibility analysis and/or a detailed explanation which demonstrates why tying a high speeds rail system to the Imperial County is not beneficial.
- The current financial plan found on page 7 calls for an estimated \$110.3 billion revenue source from a proposed mileage-based user fee beginning in 2025. If this revenue source is ultimately approved and implemented, Imperial County residents will be at an

enormous disadvantage and end up paying more into this funding source due to the county's geographical location and lack of transportation resources available in the area (currently high-speed rail not proposed). Even though the Imperial County's population has continued to grow at a fast rate during the last couple of years (page 17), it still continues to heavily rely on goods and services that are mainly provided in metropolitan areas such as San Diego, Riverside and L.A. Counties. As mentioned in the first comment, the Air District is in desperate need of transportation improvements that will not only allow easier, faster and safer services to other SCAG regions but that it will also reduce air emissions in the Imperial County region.

## **Section: 02 – Transportation Investments**

- The Air Quality section on page 79 provides several measures that are necessary to address air emissions necessary to achieve RTP goals. One of the measures is to have “ARB measures that set new on-road and off-road engine standards and accelerate turnover of higher emitting engines from the in-use fleet” among others. It is important for SCAG to continue working with the California Air Resources Board (CARB) and to discuss these types of measures in a consistent basis to ensure new engine standards and the turnover of higher emitting engines will be feasible for both the private and public sector in the upcoming years. In 2008, CARB adopted the Truck and Bus regulation which requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Heavier trucks must be retrofitted with PM filters beginning January 1, 2012, and older trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. Ultimately, the Air District would like to know if the emission reductions found on Table 3.2: Criteria Pollutant Emission By County – Existing Conditions (2012) VS Plan (2035) have been approved by CARB and will be included in their emissions inventory.

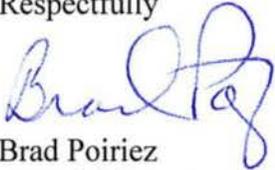
### DPEIR

- On Page 3.2-12, it is stated that the entire portion of the Imperial County is maintenance for 8 hour ozone. This statement is incorrect, the Imperial County is in attainment of the 1997 8-hour ozone standard however it is in non-attainment of the 2008 8-hour ozone standard.

As stated on the DEIR, it is important to note that future projects within the Imperial County geographical area will be required to comply with local rules and regulations to minimize construction and operational emissions. The Imperial County *CEQA Air Quality Handbook* provides guidelines which assist in identifying when an air quality analysis is necessary, the type of analysis that should be performed, the level of significance of the impacts predicted by the analysis, and the mitigation measures needed to eliminate or reduce the overall air quality impacts. The CEQA Handbook also provides emission thresholds for both project construction and operations which assist in determining whether the project may have a significant air quality impact.

In conclusion, the Air District looks forward to working with SCAG and other regions to ensure the current and proposed transportation plans for our region not only improves mobility, the economy and provides sustainability but that it also commits to reducing emissions from transportation sources as well as construction sources ultimately improving air quality in the entire region.

Respectfully



Brad Poiriez  
Imperial County, APCO

CC: Mark Baza, Executive Director, ICTC  
APCD Board of Directors

KOHL RANCH COMPANY, LLC  
KOHL RANCH II, LLC  
11990 San Vicente Boulevard, Suite 200  
Los Angeles, California 90049

February 14, 2012

Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: Comments on Draft 2012-2035 Draft RTP/SCS

Dear Ms. Lin:

Thank you for the opportunity to comment on SCAG's Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy ("Draft RTP/SCS" or "SCS"). We understand that this is an enormous undertaking and appreciate SCAG's efforts in this process. We look forward to playing a constructive role in the further development of the SCS.

As explained below, we are concerned that the draft RTP/SCS as proposed would result in an inappropriate use of the regional growth forecast planning effort to encroach on local land use authority and jurisdiction. We therefore request that SCAG (1) extend the comment period and make transportation analysis zone (TAZ) data available for public review and comment; (2) correct the TAZ data and maps to accurately reflect current local planning decisions including entitled projects; and (3) revise the SCS so that consistency determinations are made not at the small-scale level of a TAZ, but at the jurisdictional level to allow reasonable flexibility and appropriate land use decision making authority at the local level.

**1. The SCS does not appear to account for projects already in process**

Kohl Ranch owns over 2,200 acres of land in Southern California. However, we are concerned that the SCS process has not fully accounted for projects that are already in process. Regent has several projects in the area that are fully entitled and approved for build-out, as well as proposed projects with pending applications that represent a substantial investment of resources to design, plan and communicate with the community and responsible agencies. While the SCS itself states that it was created with input from local jurisdictions (see, for example, Draft RTP/SCS p. 111), we are concerned that the growth projections contained in the SCS and Land Use Pattern Maps do not in fact reflect the land use decisions that have been made by local jurisdictions. More specifically, while the Draft RTP/SCS indicates that it has shifted projected densities from less developed areas to the urbanized core, nowhere does the SCS clearly state that those shifts in density take into account development projects that are either already approved or that are reasonably foreseeable projects which local jurisdictions have already spent considerable resources processing.

## **2. Underlying TAZ data must be released to allow meaningful public comment**

Moreover, the SCS's treatment of approved projects is impossible to determine from the information that SCAG has made available to the public. The 2035 Land Use Pattern Maps, which are intended to depict projected density and land use, are at such a large scale, with such slight color gradations, that they cannot be interpreted in any meaningful way. The SCS itself does not seem to contemplate that these maps will be important to future transportation and land use decisions. Instead, the SCS focuses on the projected density contained in the data that underlies the maps -- data that SCAG has not released to the public. The SCS states that the land use projections contained in the SCS are based on the distribution of growth forecast data to transportation analysis zones. (RTP/SCS, p. 122.) According to the SCS, the TAZ data contains forecasted housing, population, and employment data, which the SCS used to create "Community Types" and more refined "Development Types" that contain average use designations, densities, and building intensities. The SCS states that a Development Type, including an average residential density, has been assigned to each TAZ for purposes of creating the SCS. (Draft RTP/SCS, p. 123.) However, it cannot be determined whether this assignment was made in a manner that takes existing conditions (including approved and reasonably foreseeable projects) as a baseline for these projections, nor can it be determined how the forecasting was done or how it was distributed across the TAZ.

Despite the critical role of the TAZ data in developing the SCS, we are not aware that SCAG has made this data available for public review and comment in any meaningful way. We were able to obtain partial data, showing housing densities only, from other agencies involved in the SCS process. These data do not contain employment or population forecasts, and do not contain any Community Type or Development Type designations which, according to the SCS, have been assigned to each TAZ. It is not possible for the public to provide meaningful comment on the SCS without access to the underlying data on which density and land use projections are based. In the absence of the underlying data and modeling supporting the proposed plan, we are substantially impaired in our ability to provide meaningful public comment on the technical and legal adequacy of the plan. In particular, we cannot assess whether the underlying data adequately reflects all developments as approved. Under the federal (5 U.S.C. § 500 *et. seq.*) and California Administrative Procedures Acts (Gov. Code §§11340 *et seq.*, including § 11346.2(b)(6)), the opportunity for public comment must include disclosure of the data and technical studies in time to provide meaningful public comment. *See, e.g. Solite Corp. v. EPA*, 952 F.2d 473, 484 (D.C.Cir.1991) (*per curiam*).

While we are not confident that the data is either accurate or complete, we have reviewed what data we were able to obtain. Based on our review we conclude that the forecasted housing densities do need to be corrected, as the numbers clearly do not reflect either existing entitlements or pending, reasonably foreseeable projects.

## **3. Implications of consistency with underlying TAZ data**

The importance of the TAZ data is not limited to understanding how the SCS was created. In addition to being the basis for creation of the SCS land use projections, according to the SCS, the TAZ data is to be relied on in future determinations as to whether a project is consistent with the SCS. The SCS states:

"SCAG suggests that utilizing community types at the TAZ level of geography (which an average size of 160 square acres) offers local jurisdictions adequate information and flexibility to make appropriate consistency findings for projects to be eligible to receive CEQA streamlining benefits." (Draft RTP/SCS p. 122.)

"One way of determining consistency [with the SCS] is if a proposed residential/mixed use or TPP [Transit Priority Project] conforms with the Development Type designated for a TAZ." (Draft RTP/SCS, page 148.)

Despite these explicit statements that the existing TAZ data will be critically important to future decisions affecting projects, SCAG has not provided the public the opportunity to review and comment on the TAZ data in any meaningful way.

Significantly, a project's consistency with the SCS -- which is to be determined at the TAZ level according to the SCS -- affects not only the availability of CEQA streamlining incentives, but can have adverse consequences for the availability of federal funds for transit improvements that would serve the project. Transit improvement projects relying on federal funding must be consistent with an approved RTP, and with the adoption of SB 375, that includes consistency with the Sustainable Communities Strategy portion of the RTP as well. (40 CFR 93.102; 42 U.S.C. 7506.) Thus, if the Draft RTP/SCS has shifted density away from approved or pending projects, those projects stand to lose critical transit improvements. The loss of transit improvements could impair project feasibility, or create new unmitigated impacts if traffic mitigations become unfunded, which could result in an unlawful taking of private vested property rights for those projects that have already been approved by local jurisdictions. In many cases, approved projects also involve executed development agreements, which means that violation of contractual rights could also result, causing difficult situations for developers and local jurisdictions.

We are concerned that a project's inconsistency with the growth projections contained in the SCS may have broader implications as well. Local jurisdictions will be under considerable pressure to conform their general plans to the density, intensity, and land uses contained in the SCS, or risk losing transportation funding throughout their jurisdictions. While all the implications of a project's inconsistency with the SCS have yet to be determined, we are concerned that by shifting density away from locally approved and pending projects, the SCS is creating land use policy in violation of SB 375's mandate that the SCS must not supersede the land use authority of cities and counties. (Gov't Code 65080(b)(2)(J).)

#### **4. RTP/SCS consistency should be determined at the jurisdictional level.**

The TAZ maps are a modeling tool for engaging in a regional planning and evaluation process. The feasibility of achieving the precise results in any particular TAZ area has not been evaluated or confirmed by any city council or board of supervisors, and as explained above it appears that the TAZ data and maps for 2035 do deviate from general plans and vested entitlements that have been approved by these elected officials. While we understand elected bodies or senior administrative staffs of local jurisdictions may have approved local input for the overall population and household numbers within their respective jurisdictions, we believe they have not approved the TAZ data or maps. Accordingly, requiring consistency determinations

concerning use designations, density, and building intensity at the small scale of each TAZ would be inappropriate and overly-prescriptive.

Again, SB 375 specifically precludes SCAG from interfering with local land use decisions.<sup>1</sup> SB 375 requires that an SCS “identify the *general* location of uses, residential densities, and building intensities *within the region...*” Calif. Government Code § 65080(b)(2)(B)(i) (emphasis added). Thus there is no legislative mandate that SCAG identify the location of land uses, densities and building intensities within the region more precisely down to a TAZ level. Instead, SCAG should appropriately identify these characteristics at a level consistent with the need for reasonable flexibility and local control. At the lowest, the level of comparison should be at a jurisdictional level – particularly given that there are nearly 200 jurisdictions within the SCAG region. Accordingly, we urge SCAG to identify such characteristics at no finer a scale than at the lesser of (i) the jurisdiction, and (ii) the sub-region (i.e., where unincorporated county land is divided into sub-regions).

Despite SB 375's mandate that the SCS not regulate land use, the draft RTP/SCS "shifts" households "from the periphery into the urbanized core" stating that much of this shift "will occur naturally in the marketplace," and that this "shift" was done "per consultation with the local jurisdictions." (Draft RTP/SCS p. 128.) However, this shift does not "occur naturally," nor through a "consultation" process between agency staff that excludes the public. Instead, such a shift can only occur, if at all, as part of a separate and lengthy discretionary development application process involving requests to local land use jurisdictions to amend their general plans, specific plans, areas plans, and zoning. In short, there is no "shift" to high-density housing in some local jurisdictions, and away from housing density already approved by other jurisdictions, unless and until the local land use jurisdictions adopt the requested discretionary approvals.

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<sup>1</sup> SB 375 provides in pertinent part:

- "Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land . . . "
- "Nothing in this section shall be interpreted as superseding the exercise of the land use authorities of cities and counties within the region."
- "Nothing in this section shall be interpreted to authorize the abrogation of any vested right whether created by statute or by common law."
- "Nothing in this section shall require a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan . . . ." (Gov't Code section 65080(b)(2)(J))

**4. Conclusion**

The draft RTP/SCS represents a substantial and important regional planning effort. We believe the current draft needs to be corrected to reflect current local land use planning decisions, and to ensure that the regional growth projection process is not implemented in a manner that infringes on either vested property rights or the land use authority of local jurisdictions. We appreciate SCAG's consideration of the comments provided in this letter and look forward to your responses. If you should have any questions, please do not hesitate to contact me.

Sincerely,

KOHL RANCH COMPANY, LLC,  
a California limited liability company

By: KF Master Investments, L.P.,  
a California limited partnership  
Its: Member

By: KFO Capital Management, LLC,  
a California limited liability company  
Its: General Partner

By: Stephanie S. Cohen  
Stephanie S. Cohen  
Its: Secretary

KOHL RANCH II, LLC,  
A California limited liability company

By: KF Master Investments, L.P.,  
a California limited partnership  
Its: Member

By: KFO Capital Management, LLC,  
a California limited liability company  
Its: General Partner

By: Stephanie S. Cohen  
Stephanie S. Cohen  
Its: Secretary

cc: Supervisor Jeff Stone, Riverside County Supervisor District 3

## **RTP Document Text**

- p.31/41 Environmental Justice Appendix
- p.42/52 The full list of RTP projects is provided in the Project List technical appendix.
- p.58/68 Aviation technical appendix
- p.70/80 Goods Movement Technical Appendix
- p.127/137 Subregional Framework and Guidelines (see Appendix 20
- p.140/150 Appendix: Transportation Conformity.
- p.153/163 Additional information regarding air quality and energy is included in Chapter 1 and Appendix: The Role of Vehicle Technology in Meeting Long-Term Air Quality and Energy Challenges.
- p.153/163 (See Appendix: The Role of Vehicle Technology in Meeting Long-Term Air Quality and Energy Challenges, for more information)
- p.154/164 Reference: 2012 RTP/SCS Chapter 4: Sustainable Communities Strategy, p. 117; 2012 RTP/SCS Appendix: SCS Background Documentation; 2012 RTP/SCS Appendix: Growth Forecast
- p.156/166 2012 RTP/SCS Appendix: Transportation Conformity Analysis; 2012 RTP/SCS Appendix: Performance Measures
- p.157/167 2012 RTP/SCS Appendix: Growth Forecast
- p.167/177 Additional speed maps are provided in the Highways and Arterials technical appendix.
- p.176/186 Appendix 19
- p.192/202 (see Transportation Conformity appendix for details).

## **2012-2035 Draft RTP/SCS Downloads**

- Draft 2012-2035 RTP/SCS (Complete Report)
- Executive Summary
- Chapter 1: Vision
- Chapter 2: Transportation Investments
- Chapter 3: Financial Plan
- Chapter 4: Sustainable Communities Strategy
- Chapter 5: Measuring Up
- Chapter 6: Public Participation
- Chapter 7: Strategic Plan

## **Supplemental Reports**

- Active Transportation
- Aviation and Airport Ground Access
- Congestion Management
- Economic and Job Creation Analysis of 2012 RTP/SCS
- Environmental Justice
- Goods Movement
- Growth Forecast
- Highways and Arterials
- Intelligent Transportation Systems
- Passenger Rail
- Performance Measures
  - NHTS Model Documentation Report
- Project List
- Public Participation and Consultation

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Transportation Demand Management  
Transportation Finance  
Transportation Safety  
Transportation Security  
Vehicle Technology



February 14, 2012

President Pam O'Connor and Members  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear President O'Connor and Regional Council Members:

We thank the Southern California Association of Governments (SCAG) and its staff for the hard work on the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Latino Health Access is particularly pleased to see that important health and equity indicators were included in the strategy positively impacting the health of our community.

The high levels of air pollution and health problems experienced in the Southern California region require strong action to transform transportation and land use planning. The Los Angeles region continues to be rated as the most polluted area for ozone in the country by the American Lung Association and the public health toll remains high.

We trust and rely on the research by the American Lung Association in California. The agency quantified the respiratory health benefits of smart growth strategies in the Southern California region. Their analysis showed that the **six-county Southern California region could avoid over \$16 billion in cumulative health and societal costs** through smart growth strategies that reduce the growth in the region's vehicle trips by 20 percent by 2035. While large, these benefits may represent a small fraction of the greater benefits that accrue with more physically active transportation options, as envisioned and quantified by the California Department of Public Health's I-THIM modeling project. Understanding the potential benefits of given planning scenarios will help to identify plans that provide the greatest reductions in harmful emissions and chronic illnesses.

As an agency we see firsthand the effects that obesity and diabetes has on the lives on our clients and recognized the need for greater focus on a shift to active transportation modes like walking, cycling and transit that reduce pollution emissions and gets people out of their cars and into a more physically active lifestyle.

We join the American Lung Association in offering the following comments and recommendations to ensure that the Sustainable Communities Strategy and future

transportation investments place sufficient emphasis on promoting active transportation modes and transit oriented development, measuring and improving health progress, and ensuring that health and equity are imbedded in the decision making process for this plan and future planning efforts.

### **Key Health Recommendations for SCAG SCS**

- **Increase active transportation investments to more than \$12 billion a year.** While we appreciate the increase in active transportation funding included in the draft SCS, we believe more funding is needed. A recent study by the Los Angeles County of Public Health estimated that up to \$40 billion could be needed to build out all of the current bicycle and pedestrian projects in Los Angeles County alone. SCAG, in coordination with health departments and organizations, should conduct a Comprehensive Needs Assessment for the Southern California region to determine the infrastructure needs to develop a network of bicycle and pedestrian pathways and transit connections. Analysis is also needed of how SCAG's bicycle and pedestrian per capita investment compares with other regions.
- **Improve Assessment of health benefits through new modeling approaches.** Utilize the new California Department of Public Health I-THIM screening tool to analyze the potential chronic disease reductions that can be achieved in the SCAG region based on increased transportation-related physical activity such as walking and biking. This model was used in the San Francisco Bay Area region to determine reductions in heart and respiratory disease, breast cancer and other health effects linked to active transportation scenarios. We urge SCAG to incorporate this tool in regional planning and decision making for transportation investments.
- **Include the attached list of 13 health and equity metrics in the SCS and monitor over time, including expanded public health targets.** In addition to monitoring premature mortality, SCAG should also assess reductions in asthma incidence and exacerbations due to traffic related pollution (NOX) and other targets through collaboration with local health departments, the South Coast Air Quality Management District, academic researchers and community based organizations. Improvements to the targets should be monitored and reported to the public every two years. *Additional comments on the targets already included by SCAG in the SCS will be sent in a separate comment letter.*
- **Focus investments on completing transit systems** and building out transit infrastructure, rather than highway expansion, including the following:
  - Doubling Metrolink ridership by 2020 and double it again by 2035
  - Expanding Bus Rapid Transit and regional bus service
  - Enhancing TOD planning and 1<sup>st</sup>-mile-last-mile investments near Metrolink stations
  - Doubling the bicycle network to 24,000 miles and improving pedestrian environment
- **Front load active transportation funding.** SCAG should commit to a higher amount of transportation funding for bike and pedestrian infrastructure, especially in the early years of the 25-year RTP process. SCAG should work with local transportation agencies

to prioritize bicycle and pedestrian projects and ensure the majority of funds are spent prior to 2020.

- **Increase investments in zero emission freight transportation** in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards. Ensure that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies and infrastructure. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially those living along the freight corridor.
- **Evaluate the number and type of new developments** that could be located in close proximity to freeways and high traffic roadways in the SCAG region under the new RTP. Work with air district, health departments and universities to develop and implement best practice policies for developments located near heavy traffic areas to reduce exposures to air pollution.

As health and medical organizations and professionals, we recognize that strong government policies to control harmful emissions and that dramatically increase options for active transportation are critical to improving public health and quality of life in Southern California. We stand ready to assist you in implementing a truly health protective, equitable and sustainable plan for Orange County and all of Southern California.

Signed,

*Dolores Gonzalez-Hayes*

Dolores Gonzalez-Hayes

Director of Policy

Latino Health Access

February 8, 2012

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Hasan Ikhmeta  
Southern California Association of Governments (SCAG)  
818 West 7<sup>th</sup> St, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**RE: Draft Regional Transportation Plan comment letter**

Dear Mr Ikhmeta:

Thank you for the opportunity to comment on the 2012 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We have specific concerns regarding statements and recommendations made in the document regarding how transportation improvements can increase economic competitiveness in the SCAG region.

LAANE is an advocacy organization dedicated to building a new economy for all. Combining dynamic research, innovative public policy and the organizing of broad alliances, LAANE promotes a new economic approach based on good jobs, thriving communities and a healthy environment.

We strongly believe that infrastructure investment is crucial to our region's economic recovery and to increase mobility options for workers. However, at the same time families should earn middle-class wages, with health and pension benefits, as it also essential to stimulating our economy. Solid infrastructure investment and good jobs go hand-in-hand in being able to maximize public investment.

We find it very troubling that an agency, such as SCAG, would recommend or suggest that lowering workers' wages would make the region more economically competitive, as stated in the Economic and Job Creation Analysis Appendix. Public investment that is tied to increasing worker standards; workforce training programs and targeting communities disproportionately affected by poverty and unemployment will make us more economically competitive. SCAG should look towards models already existing, for example in Los Angeles County, to guarantee efficiency in infrastructure projects and put people back to work.

**Draft Analysis Comments**

1. On page 8, the draft Economic and Job Creation analysis states:

*"The RTP can boost employment in two ways--providing jobs for persons in highway and rail construction, operation, and maintenance, and boosting the economic competitiveness of the SCAG region by making it a more attractive place to do business."*

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Madeline Janis, Esq.

SCAG could take this recommendation one step forward by identifying strategies which ensure the creation of good-middle class job creation and project delivery. One such tool are Project Labor Agreements (PLAs), in which public agencies can use to attract a highly-skilled workforce to complete construction projects on-time and on-budget. PLAs, used in both the public and private sector, are pre-bid, collective-bargaining agreements between a developer (or agency) and the construction trade unions to set out wages, standards and benefits for workers on a construction project. In exchange, both parties agree to refrain from strikes or lock-outs. Because they are traditionally used on large-scale, multi-year projects, they provide excellent opportunities to develop jobs programs for communities.

LAANE has pushed for a more comprehensive approach by advocating for Construction Careers Policies, which combine a PLA and a targeted hire program, which requires contractors to set aside a percentage of construction jobs to individuals who live in communities most affected by high unemployment and poverty, and with barriers to employment.

PLA are an increasingly popular project delivery tool in the SCAG region. Construction Careers policies have been approved at the following agencies:

- City of Los Angeles Community Redevelopment Agency (CRA-LA)
- City of Los Angeles Department of Public Works
- Port of Los Angeles

Recently, Construction Careers Policies have been applied to transportation-related construction projects. In March 2011, the Exposition Line Construction Authority passed such a policy for Phase II of the light rail project. In January 2012, the Los Angeles County Metropolitan Transportation Authority (Metro) Board of Directors unanimously approved an agency-wide policy that includes a PLA and targeted hire program for projects greater than \$2.5 million, which includes many projects funded by Measure R. Metro is the first transit agency in the country to approve such a policy. This approach can serve as a valuable tool for transit agencies throughout the SCAG region that are dealing with the twin problems of congestion and unemployment. In February 2011, the Federal Transit Administration (FTA) approved the use of targeted hire on projects receiving federal dollars. The FTA approval sets a national precedent for targeting disadvantaged workers on transit projects.

## 2. “How Transportation Improves Economic Competitiveness” Section (P. 8)

This section of the draft analysis “outlines five paths through which transportation improvements can increase regional economic competitiveness.” We find it troubling that SCAG suggests that, under number 3, “Reduced Congestion Reduces Employees’ Asking (or Reservation) Wage.” It states, “Metropolitan areas, all else equal, lure more migrants into the region due the amenity value of lower traffic congestion. This increases the supply of available labor, *driving wages down.*”

These statements suggest that congestion reduction alone would encourage people to move into the SCAG region, as opposed to other more essential factors such as major industries that are rooted in the local economy—goods movement, tourism,



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construction, entertainment, etc. We should be looking to strengthen industries that are vital to our economy, not creating low-road career options for residents.

It is also highly problematic to have as a policy objective to *lower wages* when the SCAG region has high levels of poverty, unemployment, sluggish growth, and high levels of income inequality. SCAG has provided an analysis that essentially implies that lowering wages are a benefit to the region, and that the agency can help achieve that through the 2012 RTP congestion reduction interventions, projects and policies.

For example, the SCAG Region:<sup>1</sup>

- Ranked last in average wage per job at about \$44,379 among the nine largest metropolitan areas
- Has the highest poverty rate among the nine largest metropolitan regions in the nation
- In 2006, had the highest housing cost burden among the nine largest metropolitan regions in the nation, with 53 percent of owner households paying 30 percent or more of their incomes on housing

The seven counties that are part of the SCAG region are grappling with significant challenges that have been further exacerbated by the recession. When workers spend less on transportation costs, a benefit of reduced congestion, they are able to spend their earnings in other ways, stimulating the regional economy. Given that housing prices in the SCAG region, especially in Los Angeles County, are very high, congestion reduction alone will not address affordability and supply, and how current income earnings play a role in where workers choose to live.

We suggest the following recommendations be considered in revising the RTP:

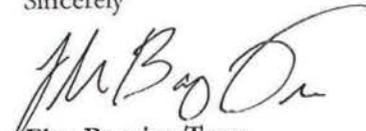
- Delete language in the 2012 RTP/SCS or appendices that suggest that lower wage rates in the SCAG region are a benefit of the congestion reduction strategies included in the plan;
- Include tools, such as project labor agreements with targeted hire, that allow government agencies to ensure that investment in transportation infrastructure also creates middle-class careers, especially in construction;
- Include an analysis on what the economic benefits of congestion reduction in improving the quality of life of workers in the SCAG region, which includes how the diversion of earnings from transportation costs to other vital services and industries can help stimulate our economy.

We hope that the agency takes these recommendations seriously and develops a blueprint for the region that improves the quality of life of working families through effective infrastructure investment and the creation of good middle-class career opportunities. If you have any questions or would like to discuss please feel free to call us at 213-977-9400.

<sup>1</sup> Southern California Association of Governments (SCAG). State of the Region 2007. [http://scag.ca.gov/publications/pdf/2007/SOTR07/SOTR07\\_FullReport\\_lores.pdf](http://scag.ca.gov/publications/pdf/2007/SOTR07/SOTR07_FullReport_lores.pdf)



Sincerely



Flor Barajas-Tena

Deputy Director

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November 3, 2011

Attn: Honorable Pam O'Connor, President of SCAG and Regional Council members  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**RE: Active Transportation in SCAG's 2012 Regional Transportation Plan (RTP)**

Dear Honorable O'Connor, Regional Council members and Policy Committee members:

On behalf of the Southern California Safe Routes to School Network and the Los Angeles County Bicycle Coalition and the many other organizations and individuals who have signed this letter, we would like to thank SCAG staff, Regional Council and Policy Committee members for all their hard work to date, we recognize the multitude of efforts that go into developing a long range plan of this magnitude.

As SCAG prepares to release the draft 2012 RTP in December 2011, which is a 25 year plan allocating \$450 Billion in transportation funds throughout six counties in Southern California, and the region's first Sustainable Communities Strategy (SCS) as outlined under SB 375, we would like to share our rationale, observations and comments to the SCAG Board and policy committees on how the draft plan can better address public health and active transportation.

It is critical that the 2012 RTP set tangible and measurable goals to improve the safety of all community members, especially our most vulnerable road users, those walking and bicycling. We are concerned that the SCAG staff report to the Regional Council and Policy Committees, dated October 20th, failed to provide measurable goals in regards to Safety and Active Transportation. We encourage SCAG to be specific as to how the 2012 RTP/SCS will improve the safety of people walking and bicycling and how SCAG and the six County Transportation Commissions (SCAG Region CTC's: [Imperial County Transportation Commission](#) , [Los Angeles Metro](#), [Orange County Transportation Authority](#), [Ventura County Transportation Commission](#), [Riverside County Transportation Commission](#), [San Bernardino County Association of Governments](#)) can work to address and achieve policies listed such as: "making transit more bike friendly" and how to "encourage implementation of a Completes Streets policy across the region," ([as stated on page 11 of 10/20 staff report](#)).

Creating a more multi-modal transportation network in the SCAG region requires the RTP to be specific about how investments in active transportation will be funded, planned, prioritized, measured and developed in collaboration with partners and interested stakeholders. With those key principles in mind, we respectfully submit the following recommendations for your consideration:

**1. Fund: Increase Funding Levels for Bicycle and Pedestrian Infrastructure:** Currently close to 21 percent of all trips in the SCAG Region are done via walking and bicycling (2009 National Household Travel Survey) and 25 percent of all SCAG roadway injuries and fatalities are pedestrian and bicyclists (2008 SWITRS). The Region's last RTP, adopted in 2008,

allocated only 0.46 percent of its total funding for these modes. We respectfully request that the 2012 RTP includes strategies to significantly increase the proportion of funds allocated to active transportation so that over time, such funding reflects the proportion of trips made by walking and biking. We recommend the following:

- Preliminary estimates show a funding need in the range of \$22B to \$36B throughout the life of the 2012 RTP to fund the build-out of high priority pedestrian and bicycle investments as identified by local jurisdictions. Given the mode split, safety and collision trends, public health concerns and many other co-benefits we recommend that 5-8 percent of the 2012 RTP fund active transportation projects. (For a \$450B plan, 5 percent equals \$22B and 8 percent equals \$36B.)
- All future SCAG Regional Transportation funding strategies (i.e. congestion pricing, cordon pricing, VMT fees) should allocate 10 percent of all revenue towards walking and biking improvements and investments to help meet the unmet funding gap for active transportation.
- Recommend the formation of a Active Transportation Funding Committee to assist in next six months while the RTP continues its development and scheduled adoption in May 2012. We recognize going from 0.46% to 5%-8% is a significant jump in investments, however we maintain that there is a tremendous unfunded need to make our streets safer and usable for all users. Many from around the region would be interested in assisting with identifying strategies for the unmet active transportation funding needs, as we would be happy to play a leadership role in this Committee.

**2. Plan and Economics: Integrate Bicycle and Pedestrian Improvements into all Transportation System Preservation Projects:** Road maintenance and the first and last mile connections to transit are crucial for creating a connected and sustainable transportation system. System preservation is inherently important to people walking, biking, and connecting to transit; there needs to be enhancements for complete streets - ensuring that when maintenance opportunities arise or are scheduled, that the region is leveraging its limited resources to enhance our multi-modal transportation network. Currently the potential benefits to of the Transportation System Preservation category fail to address how these investments will improve the safety and access of people walking and biking - it only outlines benefits to drivers. Therefore we recommend:

- Embed a Complete Streets Policy within the Transportation System Preservation category that requires any investments into system preservation on surface streets include improvements for pedestrians and bicyclists, and those accessing transit.
  - Funding for Transportation System Preservation of highways needs to include bicycle and pedestrian safety improvements at on/off ramps to ensure greater safety of people using those modes on surface streets that connect with ramps and help knit communities, that have been adversely impacted by freeway on and off ramps, back together.
- Adopt a Complete Streets checklist that requires County Transportation Commissions to demonstrate how each project is addressing all modes. This checklist should be included in the 2012 RTP to be implemented in 2014. This will assist in prioritizing projects that are critical in achieving regional goals.

**3. Plan: Do Bicycle and Pedestrian Planning:** Improving the walking and biking environments in our region cannot be done without adequate planning at the local level. Unfortunately, many SCAG cities do not have bicycle or pedestrian master plans; in Los

Angeles County, for example, only approximately 11 of 88 cities have bicycle master plans and four cities have pedestrian plans. Additionally, current station area plans fail to take into account the first and last mile of transit trips, which are usually done on foot or by bicycle. This lack of planning is a significant impediment to improving infrastructure for people who rely on bicycling and walking to connect to transit, work, school, and their daily needs. As such we recommend:

- Expand the Compass Blueprint program to support SCAG cities in the development of bicycle, pedestrian, Safe Routes to Schools, Safe Routes to Transit, and ADA Transition plans.
  - It is estimated that it would require approximately \$200,000 per city to develop these plans (95 cities at \$200,000). Identify and secure funding sources in order to set aside at least \$19M in the 2012 RTP to support these planning efforts.
  - Establish a goal of 50 percent of SCAG cities having completed at least one plan by 2016 in order to prepare for the 2016 RTP.

**4. Prioritize: Safety and Equity:** Bicyclists and pedestrians account for 25% of all roadway fatalities and injuries in the SCAG Region (2008 SWITRS), yet these modes are currently receiving less than 0.46% of all available funding (2008 SCAG RTP). Studies also show that a disproportionate amount of those injuries and fatalities occur in low-income communities (Traffic Injury Prevention 09/11). It is critical that we are doing all we can to ensure safety for all community members, regardless of where they live or how they travel. Earlier this month, the [Los Angeles Times wrote a compelling article](#) on 3 young girls walking to school who were severely injured when a car struck them, it is imperative that our transportation plans are doing all they can to make sure these tragedies, and the high number in which they occur in the SCAG region, end. For these reasons, we recommend that the RTP take the following steps to increase safety and equity:

- Analyze bicycle and pedestrian collision data to understand where high rates of collisions in the six-county region are happening and if collision rates are increasing or decreasing each year. SCAG staff should present a yearly report to the SCAG Board to help inform the public and Board on the state of walking and bicycling safety, and Safe Routes to School programs in the region. Many of the counties (San Bernardino, Riverside, Los Angeles) in the SCAG region are working to support local efforts and investments - these projects are increasing safety and improving the mode split, and addressing community concerns.
  - The RTP should set a goal of working towards zero deaths and should prioritize improving the safety of all transportation modes.
  - Utilize [Transportation Injury Mapping System \(TIMS\)](#) in the 2012 RTP. TIMS is a suite of Web-based tools created by researchers at the UC Berkeley Safe Transportation Research and Education Center (SafeTREC). The system is free and open to the public. Users can select collisions based on numerous criteria, as well as map each collision. The two most comprehensive TIMS tools are based on the California Statewide Integrated Traffic Records System (SWITRS) database of serious and fatal collisions. Currently, TIMS has SWITRS data from 2000-2008. Newer data will be added as it becomes available.
- Allocate greater resources to cities with little or no bicycle/pedestrian infrastructure and/or plans, high rates of collisions (using TIMS data), and significant populations of low-income residents. Identify these communities in the 2012 RTP in order to allocate resources for technical assistance and prioritize planning and infrastructure resources.
- Expand the “Toolbox Tuesdays” program to include bicycle safety design, pedestrian safety design, ADA design, and training on how to use the TIMS program for staff from

the 190 SCAG cities, to expand understanding of where collisions are happening, how to improve the safety for people walking and bicycling, and enhance local jurisdiction HSIP, SRTS, and other grant opportunity applications.

**5. Measure: Conduct Pedestrian & Bicycle Usage Counts:** We must increase documentation of bicycle and pedestrian usage and demand by regularly assessing numbers of people walking and biking. Without such figures, it is difficult to forecast usage or measure the positive benefits of investments in these modes.

- Create and fund a regional bicycle and pedestrian count program at SCAG establishing yearly usage counts at key locations in cities throughout the SCAG region. Use the data collected to establish trends, set goals, evaluate fund requests for facility improvements, prioritize improvements, and show the impacts of recent improvements. Set aside funds in SCAG's 2012/2013 OWP to create and maintain this program in future years. (See [link: Nashville Metropolitan Planning Organization's program, Technical Memorandum on Regional Pedestrian and Bicycle Count Procedures](#))
- The RTP should set a target for increasing the amount of all trips made by bicycle and the amount of walking to transit trips (measuring the 1st/last mile).

**6. Collaborate: Review Local Input, Provide Opportunities for Stakeholders to Engage and Incorporate Feedback:** There are growing voices all over the six county SCAG region in support of safe walkable and bikeable neighborhoods for users of all ages and abilities. Safe Routes to School programs and investments is an example of a broad-spectrum program that while focusing on improvements to ensure the safety of our youth, ultimately benefits the whole neighborhood. Many of these individuals, community members, professionals - and more, have concerns about the fundamental change needed in our region. SCAG conducted valuable and well run workshops this summer, and we commend those efforts, however we are concerned there has not been a report compiled and presented on the feedback received in those workshops. We understand SCAG staff is working on this. We urge these finding to be shared in a timely manner with the Board, so that they may understand their constituents. We ask that the staff to report on what was heard and how these comments are addressed in the draft 2012 RTP.

- We recognize there is a significant increased level of investments and policies outlined in this document, this is built on the demand, interest and support for active transportation happening all over the SCAG region. With increased opportunities for stakeholders to weigh in on the Region's Transportation plan, we believe this will strengthen the RTP and its ability to be successfully implemented over the coming years.

We recognize SCAG is not the implementer for transportation improvement projects, but SCAG does have the ability to do better planning, monitoring, collaboration, and evaluating to provide support and insight to counties, cities and communities on how to address our transportation opportunities and challenges and move towards safer and more usable streets for the region - regardless of choice of travel mode - all the while maximizing our limited resources in which to do so.

Thank you for considering our comments and concerns.

Sincerely,

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Sunyoung Yang  
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West San Gabriel Valley Bicycle Coalition

Rachel Morris  
VCCool Executive Director / Ventura Bicycle Union

Tracy McMillan, Ph.D., MPH  
President, PPH Partners

Lars Clutterham  
Chair, Downey Chamber of Commerce Green Committee, and Chair, City of Downey Green Task Force

Individuals:

Nathalie Winiarski, City of Los Angeles  
Rye Baerg, City of Arcadia  
Arye Gross, City of Glendale  
Colin Bogart, City of Los Angeles  
Ryan Lehman, City of Los Angeles - Living Streets



February 14, 2012

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

RE: Comments on the Drafts of the 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR)

Dear Mr. Ikhtrata:

For the past three years, business and industry representatives from throughout Southern California have participated in the Southern California Association of Government's extensive process used to develop the region's Draft 2012 Regional Transportation Plan (RTP), which includes an inaugural Sustainable Communities Strategy (SCS). Our interest in this process has been particularly keen given both the significant economic challenges currently facing our region's economy and the fact that the inaugural SCS could – if not considered from many viewpoints – have unforeseen negative consequences.

In light of our ongoing participation and understanding, we appreciate the tremendous effort that SCAG's staff and leaders have put into the process that led to the Draft 2012 RTP/SCS & PEIR. The development of this RTP/SCS followed an inclusive approach with SCAG holding hundreds of meetings with SCAG's public and private stakeholders. We also appreciate the extensive economic analysis that SCAG has performed on the Draft RTP/SCS in order to provide all stakeholders and SCAG's Regional Councilmembers with an understanding of the financial impacts of the plan.

As representatives of Southern California's broader business community, we recognize the crucial roles that transportation and infrastructure have in maintaining our region's economy and quality of life. Accordingly, through this letter, we join together to provide SCAG with general comments regarding remaining significant concerns about the contents of both (i) the Draft 2012 RTP/SCS, and (ii) the Draft Program Environmental Impact Report (PEIR).

From the beginning, representatives of businesses and industries have agreed upon the qualities of a good RTP/SCS. Those qualities can be summarized as follows. The RTP/SCS should:

- Foster economic growth and job creation in a balanced and accountable manner and in recognition of foreseeable regional population growth;
- Utilize all revenue sources very efficiently, and utilize new revenue sources only if they are economically sound and equitable;
- Honor the prerogatives that local governments – as the level of government with the greatest understanding of and sensitivity to community interests and context – should continue to enjoy concerning land use and community development;
- Comply with the California Environmental Quality Act (CEQA) and federal environmental laws and regulations (e.g., federal Clean Air Act conformity); and
- Allow for expeditious review and approval of projects that are consistent with a sound and reasonably accommodating RTP/SCS.

Despite our overall appreciation for the work put in by SCAG's staff, there are important aspects of the Draft 2012 RTP/SCS and Draft PEIR which, we believe, require much more consideration and correction or clarification before SCAG approves the 2012 RTP/SCS and the Final PEIR. Corrections – or at least substantial clarifications – are needed in order to bring the Final 2012 RTP/SCS and PEIR back into line with the principles set forth above.

Stated here in the most general terms, SCAG's staff and ultimately its Regional Council should address the following concerns and correct the final 2012 RTP/SCS and the accompanying PEIR.

- 1) The Draft PEIR is unduly prescriptive and imposes mitigation requirements that are not suitable for mandatory consideration at the individual project level. Simply put, many of the prescribed mitigation measures address matters at too small a scale for a regional transportation and land use strategy. The Draft PEIR lists more than 500 discrete mitigation measures that cover a broad range of topics; and it asserts that SCAG has preliminarily found that all such mitigation measures are feasible and “can and should” apply to all future projects in the region. Many of these mitigation measures were drawn from “model policies” that were drafted in 2009 and were intended for consideration only at a jurisdictional planning level – not an individual project level. Many of the mitigation measures listed are not reasonably considerable – let alone feasible – generally at a project level throughout Southern California.
- 2) Many of the mitigation measures set forth in the Draft PEIR have no relationship to the RTP/SCS or its impacts. For example, the Draft PEIR invokes mitigation measures ranging from low-flow toilets to green roofs. Such mitigation measures have nothing to do with the regional dispersion of future development and redevelopment or its indirect effects on emissions from vehicular use (which is the proper focus of the RTP/SCS).
- 3) The Draft PEIR attempts to etch in stone the project-level consideration and potential incorporation of mitigation measures that conflict with, or inevitably will conflict with, highly-evolved and dynamic subject-matter regulations. For example, the Draft PEIR would prescribe mitigation requirements concerning matters ranging from storm water management to energy efficiency standards to fire protection to landscaping to water supply analyses – all matters that are highly regulated and subject to dynamic standards that either are now or are bound to be at odds with the PEIR.

In light of the above-stated problems with the Draft PEIR, we believe that it needs to be substantially rewritten to clarify what we understand was intended by SCAG's staff and leaders – that the PEIR should not subtract from or interfere with local governments' reasonable prerogatives under CEQA. As the Draft PEIR now stands, the environmental analysis and suggested mitigation requirements would likely lead to more CEQA litigation rather than to CEQA streamlining as California Senate Bill 375 (2008) promised.

Turning to the substance of the RTP/SCS as a policy matter, we have the following additional general comments:

- 4) The RTP/SCS is undergirded by analysis which shows the dispersion of populations and employment shown and categorized at the level of sub-jurisdictional “transportation analysis zones” (TAZs). The TAZ level of detail is, we believe, too small and precise a level at which to prescribe the spatial dispersion of development and redevelopment, particularly in light of the regional nature of the RTP/SCS. Page 148 of the SCS should therefore be clarified to indicate that questions of consistency with the RTP/SCS should be substantively measured and determined at a jurisdictional or sub-regional level, not at a TAZ level.
- 5) The RTP/SCS should aim to reflect and accommodate both the short-term future of the SCAG region and its long-term future. For example, the RTP should better anticipate the need for and reasonable likelihood of a gradual transition in the region’s overall vehicle fleet (e.g., gradually towards alternative fuels) and the ongoing need for enhancements to vehicular mobility even as more mass transit comes to fruition.
- 6) More detail, clarity and explanation are needed concerning the new revenue sources that are outlined within the plan document. New revenues account for \$219.5 billion out of the total \$524.7 billion needed for the transportation plan, yet there is very little detail explaining these significant new fees and impositions (see page 95 & 96 of the Draft RTP/SCS).  
To fully and fairly evaluate these proposals, the business community and all stakeholders need the benefit of additional detail and explanation. In particular, we need clarity and assurance regarding the following:
  - a. The new revenue concepts assumed within the RTP/SCS must be fair, equitable and economically sound, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.
  - b. The new revenue sources within the RTP must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it is proposing.
- 7) New revenues from fees on businesses operating in the SCAG region – and particularly the “Freight Fee/National Freight Program” listed on page 96 of the Draft RTP – need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region’s competitiveness will be compromised.
- 8) In the RTP, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system. It would be helpful for SCAG to state clearly in the RTP that, to date, stakeholders have not reached consensus on technologies, timing, funding, or emissions impacts of the various options that SCAG examined in the RTP. For example, SCAG discusses long-term steps towards a “Zero Emissions Container Movement System” (ZECMS). If SCAG chooses to pursue such a fundamental shift in new technology, it would need to work with all goods movement stakeholders to clearly establish whether and, if so, when and where within the transportation infrastructure a ZECMS option could be demonstrated and evaluated without negatively effecting the velocity and throughput of the system.
- 9) With the recent elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is challenged, given the costs related to aging or inadequate infrastructure capacity and high development costs for higher density projects. The elimination of redevelopment agencies also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. In fact, since the passage of SB 375, the State of California has stripped local governments of funds that were previously available for

transit, transportation and redevelopment. This follows many years in which the state diverted revenues from gasoline, sales, income and other taxes needed for local government programs. Local governments cannot help to fulfill the 2012 RTP/SCS without increased, not decreased, state support. SCAG should emphasize the need for the state to restore support for planning, transit, transportation and redevelopment or other necessary funding to pre-SB 375 levels in order to speed the attainment of mandated goals.

While we find many very positive aspects in the plan, especially related to principles and direction, these significant issues need to be addressed. The short list of general concerns set forth above is not meant to be exhaustive. Many of the organizations that subscribe to the above-stated comments will be commenting more robustly in separate writings. We join here, however, to express our unity in finding the Draft 2012 RTP/SCS and PEIR to be in need of significant clarification and correction. We are also jointly committed to completing this process and, over the remaining weeks, working closely with SCAG to develop and adopt a smart, flexible, accountable, and economically sound RTP/SCS.

Respectfully,



Jim Clarke  
Executive Director  
Apartment Association of Greater Los Angeles (AAGLA)



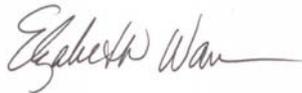
Andrew R. Henderson  
Vice President and General Counsel  
Building Industry Association of Southern California, Inc.



Heidi L. Gallegos  
Executive Director  
Eastvale Chamber of Commerce



Hilary Norton  
Executive Director  
FAST – Fixing Angelenos Stuck in Traffic



Elizabeth Warren  
Executive Director  
FuturePorts



John Kelsall  
President & CEO  
Greater Lakewood Chamber of Commerce



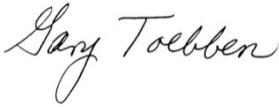
Gene Hale  
Chairman  
Greater Los Angeles African American Chamber



Paul C. Granillo  
President & CEO  
Inland Empire Economic Partnership



Joeann Valle  
Executive Director  
Harbor City/Harbor Gateway Chamber of Commerce



Gary Toebben  
President & CEO  
Los Angeles Area Chamber of  
Commerce



David Fleming  
Founding Chairman  
Los Angeles County Business  
Federation



Hugo W. Merida  
Chairman of the Board  
Los Angeles Metropolitan Hispanic  
Chamber of Commerce



Kate Klimow  
Vice President of Government Affairs  
Orange County Business Council



T.L. Garrett  
Vice President  
Pacific Merchant Shipping  
Association



Sandy Cajas  
President & CEO  
Regional Hispanic Chamber of  
Commerce



Rich Lambros  
Managing Director  
Southern California Leadership  
Council



Ron L. Wood  
President & CEO  
The Valley Economic Alliance



Stuart Waldman  
President  
Valley Industry & Commerce  
Association (VICA)



Patty Senecal  
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Michael W. Lewis  
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Michael W. Lewis  
Senior Vice-President  
Construction Industry Coalition on  
Water Quality (CICWQ)



Alexander Pugh  
Senior Project Manager - Policy &  
Project Management  
Southern California Edison



Bill Allen  
President & CEO  
Los Angeles County Economic  
Development Corporation



John Guerra  
Director, Regional Public Affairs  
SoCalGas



Michael Carroll  
Regulatory Flexibility Group



Madame M C Townsend  
President & CEO  
Regional Black Chamber of  
Commerce – San Fernando Valley



Bob Amano  
Executive Director  
Hotel Association of Los Angeles



Randy Gordon  
President/CEO  
Long Beach Area Chamber of  
Commerce



Jay McKeeman  
Vice President, Government  
Relations & Communications  
California Independent Oil  
Marketers Association (CIOMA)



Christina Davis  
President & CEO  
LAX Coastal Chamber



LaDonna DiCamillo  
Senior Manager Government Affairs  
BNSF Railway



Lupe Valdez,  
Director of Public Affairs  
Union Pacific Railroad

*Fred Johring*

Fred Johring  
President  
Harbor Trucking Association



Eric Sauer  
Vice President Policy and Regulatory  
Affairs  
California Trucking Association



# Los Angeles County Department of Regional Planning

*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

February 14, 2012

Hasan Ikhata  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Dear Mr. Ikhata:

We want to commend you and your staff for the years of hard work in preparing the Draft 2012 RTP/SCS for the region. As we are undergoing a General Plan Update for the unincorporated areas of Los Angeles County, it is an exciting time to be coordinating our local land use planning efforts with SCAG's regional efforts to meet our State climate change goals.

The Department of Regional Planning has worked with your staff to provide the County's local input for the growth forecast for the unincorporated areas of Los Angeles County. The County's recommendations have been largely based on policies from the existing General Plan, knowledge of the unincorporated areas, alternative projections prepared by the County's Urban Research section, and proposed policies in the General Plan Update.

We are concerned that the Draft RTP/SCS states that the growth forecast is based on local input. The Overall Land Use Pattern Maps for Los Angeles County (Part A of the SCS Background Documentation appendix of the Sustainable Communities Strategy Chapter) reflect land use patterns that are not part of the County's local input. In particular, the land use pattern for the northwest corner of the unincorporated Antelope Valley reflects significant growth by 2020. A review of the TAZ-level socioeconomic data for that area shows projections of over 10,000 new households by 2020, and over 22,000 new households by 2035. The area is a greenfield designated Non-Urban by the Antelope Valley Area Plan. The area also consists of environmental and hazard constraints. Another concern is the land use pattern in unincorporated Rowland Heights and unincorporated South Diamond Bar along SR-57, particularly the designation of this area as a High Quality Transportation Area by 2035. This area is vacant, designated Open Space or low density, and also consists of hazard and environmental constraints.

It is our understanding that SCAG assumed growth within these areas based on knowledge of pending large-scale projects through the CEQA Intergovernmental Review (IGR) process. The assumption of growth based on pending individual projects is not explicitly described in the Draft RTP/SCS as part of SCAG's growth forecast

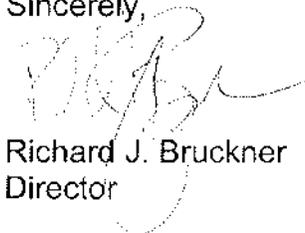
methodology. In addition, assuming growth based on individual and pending projects is of concern given the uncertainty of projects that have not been considered by a decision-making body and the public, and the significant time and complex issues entailed in processing large-scale projects. The projects mentioned above will require legislative acts by the Los Angeles County Board of Supervisors and this action should not be assumed. In addition, assuming a pending project in the growth forecast puts local governments in a difficult position and causes confusion when the project is actually considered for public hearing. Furthermore, as large-scale projects are often built in phases, assuming full build-out for an individual project within the horizon of the RTP may not always be appropriate—in particular, assuming over 10,000 new households by 2020 and over 22,000 new households by 2035 in one particular TAZ. These projections are not consistent with historical data. The Antelope Valley absorbs less than 200 new units per year. Even if 100% of the growth were in this one area, these projections would far exceed historic patterns.

Given the outlined concerns, we recommend the following amendments to the Draft 2012 RTP/SCS:

- Amend the Overall Land Use Pattern maps and adjust the associated TAZ-level socioeconomic data to redistribute the growth assumed to occur due to pending large-scale IGR projects to areas where the County encourages growth in the General Plan Update, such as Transit Oriented Districts; and
- As an alternative to using pending large-scale IGR projects to inform growth distributions in the Draft RTP/SCS, add a separate section to the Draft RTP/SCS that acknowledges pending large-scale IGR projects throughout the SCAG region and their potential to impact future growth forecasts upon approval and adoption by the local jurisdiction.

Consistency between the General Plan Update and Draft RTP/SCS is an important part of advancing the goals of the RTP/SCS at the local level. We acknowledge that several large projects are in the entitlement process, and at the time projects are approved it would be appropriate to amend the RTP/SCS. We look forward to continuing to work with you to realize our shared vision to create a socially, economically, and environmentally sustainable region.

Sincerely,



Richard J. Bruckner  
Director

RJB:cc

C: Board of Supervisors Planning Deputies



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

Arthur T. Leahy  
Chief Executive Officer  
213.922.6888 Tel  
213.922.7447 Fax  
metro.net

February 14, 2012

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

Dear Mr. Ikhata:

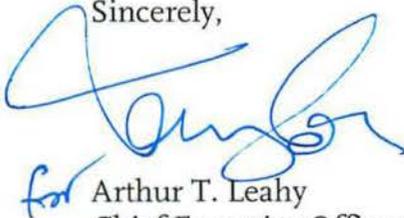
Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) Draft 2012 Regional Transportation Plan (RTP/SCS).

We would also like to compliment SCAG on the immense stakeholder outreach process that was undertaken to develop the RTP/SCS in conjunction with the Sustainable Communities Strategy (SCS), in order to develop this draft RTP/SCS. We find the document to be well-written in identifying many of the key challenges our region faces.

Attached for your consideration are our comments on the Draft 2012 RTP/SCS.

Again, SCAG has made an exceptional document from a challenging set of requirements, and we commend you.

Sincerely,



for Arthur T. Leahy  
Chief Executive Officer

Attachments

## Comments on Draft 2012 Regional Transportation Plan

- We commend SCAG for the significant and unprecedented outreach to MTA, sub-regional agencies, and the public in the development of the Draft 2012 RTP/SCS. We also acknowledge the extensive and dedicated effort on the part of SCAG to craft a Southern California approach to the new SCS requirements of SB 375. We are pleased that the Draft 2012 RTP/SCS has been able to meet both the air quality conformity requirements of the federal Clean Air Act, and green house gas emission (GHGe) reduction requirements necessary to comply with SB 375.
- We appreciate the working relationship between SCAG and MTA staff necessary to integrate our 2009 Long Range Transportation Plan (LRTP) projects, programs, and financial assumptions into the Draft 2012 RTP. It appears that the Draft 2012 RTP includes all projects and programs funded by MTA in the 2009 LRTP. We note that SCAG has identified a number of projects and programs that are beyond funding levels of the LRTP. We assume that these projects and programs will be funded through new or innovative funding programs that SCAG has identified in the Draft 2012 RTP as “reasonably available” funding sources over the life of the RTP. Examples of projects beyond the funded LRTP include:
  - East-West Freight Corridor between the I-710 and the I-15.
  - Phase I of the California High Speed Rail Authority (CHSRA), pending an agreement between CHSRA, Metrolink and LOSSAN to identify funds to bring local systems up to high speed (110+ MPH) where possible.
  - A regional Express/HOT Lane Network that expands our Fast Lanes pilot project to include the I-405 and SR-91.
  - Various modal programs, including bus and rail expansion, TDM, TSM, bicycle, pedestrian, and operations and maintenance.
- MTA has proposed and is advocating a program known as America Fast Forward (formerly known as the 30/10 Initiative) to look at federal loan and bonding mechanisms which could accelerate the completion of 12 transit projects in 10 years instead of 30 years. We believe that such a program is beneficial to Southern California counties that have a tradition of self-help local sales tax mechanisms, and that those self-help traditions should be rewarded through new federal bonding or loan assistance programs. Clearly this program would assist the region in the earlier attainment of federal and state air quality conformity and GHGe reduction requirements. We would recommend that a section be included in the Draft 2012 RTP regarding America Fast Forward, and that this section include SCAG policies and actions to partner with MTA and other county transportation commissions to support and advocate for federal enactment of this program.

### Additional Technical Comments on SCAG Draft 2012 RTP/SCS

- We note that page 50, paragraph 3 states that “our region has virtually no bus lanes, especially compared to other major metropolitan areas.” We would suggest that this reference be revised to acknowledge that MTA has opened the highly successful Orange Line busway, has federal approval of a Very Small Start Grant to implement bus lanes on Wilshire Boulevard, and that the MTA Board has recently directed staff to conduct a countywide transit study to identify a minimum of five additional bus lane candidate projects. Additionally, we have been operating dedicated bus services for some time on the El Monte Busway and on the Harbor Transitway.
- The Transit Policies on page 50 and the SCS chapter make reference to High Quality Transit Opportunity Areas (HQTAs). We would encourage SCAG to identify in the Draft 2012 RTP the specific areas that will be designated as HQTAs and the benefit of this designation.
- On page 66, in the paragraph on “Logistics activities – including warehouse and distribution facilities”, we would suggest adding that warehouses and distribution centers also perform value-added services to prepare goods for retail sale, such as packaging and adding of accessories. These services also create jobs for the SCAG region.
- On page 67, in the section “Components of the Regional Goods Movement System”, we would encourage SCAG to add rail intermodal facilities (ICTF, Hobart, etc.) as a separate bullet point for two reasons. First, they play a significant role in the goods movement system, while also generating traffic and environmental impacts. Second, they are mentioned as a component of the rail improvement strategy (ICTF and SCIG are specifically mentioned).
- On page 71, it should clarify in the text that even though the specific alignment has yet to be determined, the east-west freight corridor would generally parallel the UP Los Angeles subdivision/SR-60 between the I-710 and I-605, San Jose Creek/SR-60 between the I-605 and SR-57, and the SR-60 east of the SR-57.
- On page 71, the text states the benefits of an east-west corridor, but SCAG may also want to state why this corridor was selected over the 210, 91, and 10 using information contained in the Comprehensive Goods Movement Study.
- On page 71, SCAG may want to highlight that the east-west freight corridor is envisioned to be a clean freight corridor similar to that which would be built on the I-710.

- On page 72, we suggest that the bottleneck relief strategy report should be included in the technical appendix and footnoted in the “Bottleneck Relief Strategy” section.
- On page 72, SCAG may want to add another paragraph on smaller-scale, near-term goods movement improvements, such as truck climbing lanes on the I-5 and arterial improvements throughout the region.
- On page 74, under Key Rail Projects in the Draft 2012 RTP, we encourage SCAG to highlight the ACE San Gabriel Trench, as it is the largest and most significant ACE grade separation project (\$498 million).
- We concur that the Orangeline High-Speed Transit corridor improvement from Union Station to Palmdale is in the Strategic (unfunded) portion of the Draft 2012 RTP/SCS.
- On page 207 of the main RTP/SCS document, in the last paragraph, that refers to America Fast Forward, please add “and 14 highway projects” in the third sentence after the phrase “to build 12 key mass transit projects”.

#### Passenger and High Speed Rail Comments Starting on Page 51

- We suggest that SCAG add a definition of the acronym “LOSSAN”.
- To clarify which draft CA HSR Business Plan is being referred to, SCAG may want to add the 2012 date.
- SCAG may want to indicate that the CA HSR is estimated to reach our region with the Initial Operating Segment (IOS) in 2021, and the Bay to Basin phase in 2026. Furthermore, it should be clarified in other locations in the document, that the IOS will connect to southern California’s network in 2021.
- Since the actual speeds for the system will vary by location, SCAG may want to remove the reference to the definition of 110 MPH for the CA HSR system.
- On page 51, subsection “Implementation of Phase 1 of the California High-Speed Train (HST) Project”, SCAG may want to define which “Authority” is being discussed.
- We request that SCAG clarify that Prop. 1A will allocate \$9.95 billion in funding for the project (the current Draft reads almost \$1 billion less: “\$9 billion”).
- We suggest that SCAG state that the \$950 million in funding needs to be allocated by the State. Furthermore, a Memorandum of Understanding is anticipated between the CAHSRA and southern California agencies to identify funds for the region for advance investment in high speed rail corridors and connections.

- On page 52, we suggest that SCAG provide a definition or description of “grade closures”.
- We suggest a source of where the LOSSAN strategies are from, to provide clarity.
- Starting at the bottom of page 52, in the section “Improvements to the Existing Metrolink System”, we note that positive train control is not a “strategy”, it is mandated by Federal law. SCAG may want to add that Metrolink will incorporate this developing technology two to three years ahead of the rest of the nation’s passenger railroads.
- The term “speed capacity improvements” needs to be clarified: either it is a “speed improvement” or a “capacity improvement”.
- The second paragraph on page 53 suggests that Metrolink will be connected in 2035 when the HST reaches the Central Valley. We suggest rewording the paragraph to be in accordance with Metrolink’s operational area and the California High Speed Rail Authority’s Business Plan.
- Furthermore, the final sentence in this paragraph implies that it is known what would be needed for travel times of one hour. This is under study regarding the feasibility for Metrolink operations. We ask that SCAG state that there may be significant costs and impacts of such an option.

**Addendum to Comments on the Draft 2012 RTP/SCS  
Comments on the Technical Appendices**

- It appears that all strategic projects from the Supplement #1 Strategic Plan to the 2009 LRTP were added, but the original strategic projects from the 2009 LRTP were not added. Please add the 2009 Strategic Projects on pages 31 and 37.
- In the Transportation Safety Appendix, we suggest using the term “people [or persons] with disabilities” for describing members of the public for whom the Americans with Disabilities Act applies.
- The Sustainable Communities Strategies (SCS) Background Technical Appendix should include the methodology for calculating GHG emission reductions associated with the RTP/SCS alternatives, including assumptions and discussion of off-modeling analysis.
- The SCS Background Technical Appendix should provide some discussion of the relative benefit of various transportation and land-use strategies toward reducing regional greenhouse gas emissions. For example, how much of the reduction is attributable to the VMT fee, TDM measures, TSM measures, etc. Moving forward, this information would be useful for cities and other agencies seeking to reduce GHGs in local Climate Action Plans and transportation planning efforts.
- In the Aviation and Ground Access Technical Appendix: on page 126, on Table 4-8, under the Exposition Light Rail Phase II, the description currently reads that it will “connect” to the Exposition Light Rail Phase I, and it should be corrected to say that it will “extend the Exposition Light Rail Phase I”; and, the same Table 4-8 should include the Slauson Light Rail: Crenshaw Corridor to Metro Blue Line Slauson Station (RTP # 1120003) because it provides additional access to LAX.
- On page 7 of the Executive Summary, and on pages 95 and 100 of the Draft 2012 RTP/SCS, we request that SCAG replace the word “tunnel” and replace it with “transportation improvement options”.
- In the Project List Appendix please make the following changes:
  - On page 27, delete the description for the 13<sup>th</sup> entry and replace it with, “Route 710: Study to evaluate transportation improvement options and prepare alternatives analyses, engineering and environmental studies” (EA #187901 and PPNO# 2215).

- On page 162, delete the description for the fifth entry and replace it with, “Route 710: Study to evaluate transportation improvement options and prepare alternatives analyses, engineering and environmental studies” (EA #187901 and PPNO# 2215).
- On page 163, in the first entry, delete the description and replace it with, “Develop transportation improvement options”.
- On page 430, the fifth entry, delete the alternatives to the SR-710 tunnel option and replace it with, “SR-710 transportation improvement options”.
- On page 432, the sixth entry, delete the description and replace it with, “SR-710 transportation improvement options”.
- In the Highways and Arterial Appendix, on page 3, the first entry under Toll Lanes heading, delete the description and replace it with “Develop transportation improvement options”.
- Regarding the Passenger Rail Appendix:
  - On Page 1, reference is made to Amtrak service. It should be stated that all Amtrak service other than the Pacific Surfliner are intercity and long distance routes that connect Los Angeles County and adjoining counties with destinations throughout California and the United States. Also, the Antelope Valley Line is part of the LOSSAN Corridor between Burbank Junction and Los Angeles Union Station.
  - The Passenger Rail document should eliminate reference to Maglev and the SCAG HSRT as this creates confusion and appears to indicate that the technology and the proposed corridor are still under consideration. As written, it appears as if the Maglev technology and the California High Speed Rail program are in competition with each other. It is unclear why this is heavily covered in this document when the conclusion is that the project is no longer planned.
  - The vision for rail service in the Southern California region should provide a stronger emphasis on intermodal linkages at the three regional airports that will be physically or temporally linked to the California High Speed Rail. These airports include Palmdale, Bob Hope and Ontario. Each of these airports already has passenger rail accessibility, but this will be strengthened as a result of current planning and system development efforts.
  - The document should amplify on the role of regional rail integration and service/operating improvements in meeting regional greenhouse gas reduction and vehicle miles traveled/vehicle trip reduction goals. Further, the document should identify the passenger rail station areas

as candidate locations for land use intensification that address the regional jobs/housing imbalances.

- The discussion of the statewide HST system and what it means for southern California is fragmented. There should be a clearer definition of the technology, routes, and what it means for regional connectivity.
- The document should make clearer the desired effect of the Early Infrastructure Investment initiative both to develop the way for High Speed Rail and to incrementally upgrade existing infrastructure to support higher speed, more efficient and safer passenger rail service linking the region to the High Speed Rail system. This could include reference to the use of shared corridors and shared corridor/shared track scenarios that will help improve existing passenger service and enhance service integration across the region.
- The discussion of the Pacific Surfliner should refer to the recent efforts to develop the business plan for the corridor and the addressing of short term improvements. Also, the discussion should include the efforts to create synergy in the corridor and the efforts to move towards local governance. The discussion should include the advantages of this.
- The discussion of Metrolink should include capital studies in Los Angeles County that are underway. Specifically it should include:
  - Antelope Valley Line Study - this is a comprehensive study of the Antelope Valley Line (AVL) for capital improvements and enhancements to the overall safety. The study will address capacity and travel time issues as well as grade crossing upgrades and grade separations. The proposed improvements will be modeled and from that a prioritization and funding strategy will be developed for implementation of the improvements.
  - CP Raymer to CP Bernson Double Track - this is Preliminary Engineering and Environmental work (PE/NEPA) to double track this segment of the Ventura Line. This project will complete the double tracking of the LOSSAN Corridor from Chatsworth to Orange County. Metro received an ARRA grant for this work and is partnering with Metrolink to complete it. Metro is pursuing funding for construction.
  - Van Nuys Station - The Van Nuys station on the LOSSAN Corridor is used by Amtrak and Metrolink. This is a single platform station that is an operational bottleneck in the system.

Metro received an ARRA grant to perform PE/NEPA work for a second platform at this station.

- Strategic Studies - Metro is moving forward with strategic studies of the other Metrolink lines in Los Angeles County. Metro will be working with the other member agencies on shared lines to develop overall strategic priorities.
- On Page 15, regarding the discussion of decision points after construction of the Initial Construction Segment (ICS); there will not be a decision to continue the project. That will be an ongoing discussion prior to that. Prior to the completion of that segment there will be discussion regarding proceeding north or south. The document should not discuss decision points for the system. This will be an ongoing process for the CHSRA and will be based on business models and funding opportunities. Also, on this page the various stages should use the term "extend" rather than "build".
- Note that the CHSRA has decided to move forward with a Palmdale station and not move forward with the I-5/Grapevine alternative. This should be mentioned and the discussion should include what this means for the Palmdale area.
- Page 17 refers to the "Authority's draft 2011 Business Plan". This may be the California High Speed Rail Authority but it is noted within the Metrolink discussion and can confuse the reader. We suggest stating the specific Authority involved.



# Los Angeles World Airports

January 20, 2012

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

**LAX**

**LA/Ontario**

**Van Nuys**

**City of Los Angeles**

Antonio R. Villaraigosa  
Mayor

**Board of Airport  
Commissioners**

Michael A. Lawson  
President

Valeria C. Velasco  
Vice President

Joseph A. Aredas  
Robert D. Beyer  
Boyd Hight  
Ann M. Hollister  
Fernando M. Torres-Gil

Gina Marie Lindsey  
Executive Director

Re: Comments on the Draft 2012 Regional Transportation Plan.

Dear Mr. Ikhata:

Los Angeles World Airports (LAWA) appreciates the opportunity to comment on the Draft 2012 Regional Transportation Plan (RTP), and is committed to working with all levels of government to address the future transportation needs of Southern California. As the operator of two of the region's commercial airports, Los Angeles International (LAX) and Ontario International (ONT), and operator of Van Nuys General Aviation Airport (VNY), LAWA plays an important role in meeting the region's demands for air travel and goods movement.

LAWA, as a proprietary department of the City of Los Angeles, is responsible for operating its airports in a safe, efficient, and fiscally responsible manner on behalf of our passengers and the citizens of each market service area. Furthermore, we must operate within the constraints placed upon our resources by federal law and regulation, along with our contractual obligations to our tenants and partner agencies. It is in this context that LAWA provides the following comments to the Aviation and Airport Ground Access portion of the RTP:

## 1. Use of Airport Funds

LAWA's first priority is to maintain safe and efficient airports. Our revenues and expenditures are used to support that effort and fulfill our commitment to supporting the national airspace system. All airports have a tremendous demand for capital improvements.

As such, most airports depend on financial support from the FAA via grant funds for eligible construction and noise mitigation projects. In return for federal grant monies, the FAA includes grant assurances that limit use of airport revenue solely for aviation-related uses on airport property. Using airport funds for non-airport functions violates federal law and jeopardizes the airport's ability to receive federal grants.



PC DOC 294681

Nevertheless, LAWA seeks to partner with SCAG to find solutions to support ground access improvements to airports, other primary transportation facilities, and "secondary" airports in the region.

## 2. Use of Airport Express Buses

The RTP includes an "Action Step" which would plan and promote a regional system of airport express buses, modeled in part on the FlyAway<sup>®</sup> service currently operating at LAX. LAWA agrees that express buses are a promising solution to certain ground access problems. However, it has been LAWA's experience that express buses are most effective at airports with high passenger demand and in cities with concentrated populations of passengers and employees. Even then, high fares or significant subsidies have been required to maintain an effective level of service.

LAWA has spent a great deal of resources carefully studying the feasibility of establishing new FlyAway<sup>®</sup> routes to serve LAX. However, even for LAX, with its extensive market area and passenger base, it has been a challenge to find station locations that are both viable and successful. LAWA invites SCAG to continue examining ways to bring similar projects to other airports, but cautions that these services, by themselves, may not be effective in increasing passenger demand at "secondary" airports.

## 3. Aviation Activity Constraints

LAWA agrees that the aviation activity constraints in the region, and potential dispersion of that activity at other airports, should be re-examined in subsequent regional plans.

## 4. Additional Technical Clarifications

LAWA also wants to offer the following technical clarifications and comments to the RTP:

- SCAG has reported a number of vehicle trips to LAX under existing conditions as well as under a future forecast for 2035, citing the LAX Master Plan EIR/EIS as a justification for those trip numbers. However, the numbers reported do not correspond to data that LAWA has previously reported or used in any environmental analysis. LAWA requests clarification of those data points.
- LAWA recommends the following changes to Tables 4-6 and 4-7 in the Aviation and Airport Ground Access sections of the RTP:
  - In Table 4-6, the following projects should be included in the list of projects completed since the project notice of preparation in 2008 (footnote 1): Douglas St., La Cienega Blvd., Lincoln Blvd. (all), Nash St.,

Sepulveda Blvd. (both), the I-105 westbound off-ramp at Sepulveda Blvd., and the I-405 at SR-90.

- Two other projects on Table 4-6, Arbor Vitae St., and the I-405 from I-10 to SR-101, are under construction as of January 2012.
- In Table 4-7, Project LAX-19, which includes Lincoln Blvd. improvements, has already been completed.
- LAWA recommends that SCAG include in the RTP a portion of the project referred to as LAX-10, widening Aviation Blvd. from Century Blvd. to Manhattan Beach Blvd. to 3 lanes in each direction.

#### 5. 2011 Air Passenger Survey

Lastly, the 2006 LAX Air Passenger Survey was used to create several data points within this section of the RTP. LAWA is hoping to unveil the results of its 2011 Air Passenger Survey in February of this year. SCAG should consider updating its Appendix with this new data as it finalizes the RTP. LAWA will post the results of this survey on our website (<http://www.lawa.org>) once the report is completed.

Thank you for the opportunity to review the 2012 Draft RTP. We hope that these comments will be helpful in developing a successful plan for the region. If you have any questions regarding these comments, please contact Diego Alvarez, Regional Transportation Coordinator, at 424-646-5179 or [dalvarez@lawa.org](mailto:dalvarez@lawa.org).

Sincerely,



Michael D. Feldman  
Deputy Executive Director

MDF:DA:yl

# MARCH JOINT POWERS AUTHORITY



February 14, 2012

Margaret Lin  
SCAG  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**SUBJECT: COMMENTS ON THE DRAFT RTP/SCS**

Dear Ms. Lin:

The March Joint Powers Authority (JPA) is pleased to submit comments on the 2012-2035 Draft RTP/SCS. We recognize that SCAG has put a significant amount of time and energy into the creation of this document. March JPA has the following comments after reviewing the Draft document:

- 1) Chapter 4 – Sustainable Communities Strategy: Exhibit 4.18, Land Use Pattern Riverside County (2035) identifies a “High Quality Transit Opportunity Area” located along Alessandro Boulevard in proximity to Interstate 215, within the City of Riverside, City of Moreno Valley, unincorporated Riverside County and March Joint Powers Authority. The concentration of high density residential and/or high intensity commercial uses along portions of the Alessandro corridor would conflict with the airport Accident Potential Zones as defined in the 2005 March Air Reserve Base Air Installation Compatibility Use Zone (AICUZ) study, and further conflict with the recommended airport compatibility provisions identified in the draft Joint Land Use Study currently undergoing environmental review by the Riverside County Airport Land Use Commission. While transit is encouraged by these plans, the proposed increase in densities/intensities in this area of high noise and airport safety concerns necessitates detailed analysis, best performed by the Riverside County Airport Land Use Commission and March Air Reserve Base.

Again, we thank you for the opportunity to provide comments. Should you have any questions please contact me at (951) 656-7000.

Sincerely,

Dan Fairbanks, AICP  
Planning Director

cc: Ed Cooper, Executive Director, Riverside County Airport Land Use Commission  
Pamela Hann, March Air Reserve Base Civil Engineer  
Steve Hayes, Interim Planning Director, City of Riverside  
John Terrell, Planning Official, City of Moreno Valley

attach: 2005 March Air Reserve Base Air Installation Compatibility Use Zone Study  
2010 draft March Air Reserve Base/Inland Port Joint Land Use Study

February 13, 2012

The Honorable Pam O'Connor  
President  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**COALITION PARTNERS**

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Riverside County  
Transportation Commission

San Bernardino Associated  
Governments

Southern California  
Association of Governments

Ventura County  
Transportation Commission

**Subject: SCAG 2012 Regional Transportation Plan**

Dear President O'Connor:

Mobility 21, Southern California's transportation advocacy coalition, respectfully submits these comments as part of the ongoing efforts of Southern California Association of Governments (SCAG) to produce a comprehensive 2012 Regional Transportation Plan (RTP). Mobility 21, being comprised of both business and government entities is uniquely positioned to provide insight into the RTP process. We recognize SCAG staff's diligence in crafting an RTP that will meet the requirements of the federal process and of the newly-required SB375 legislation. Mobility 21 also appreciates the open process and intensive outreach SCAG has undertaken during the development of the 2012 RTP. Nevertheless, we share these ideas regarding the RTP as currently laid out and thoughts on reforming the RTP process for future success.

First and foremost, our goal is to assist SCAG with ensuring the final adopted RTP is both comprehensive and defensible, provides flexibility to the county transportation agencies responsible for delivering projects under the program, and supports a strong private sector economic engine. We have five recommendations to provide to SCAG at this time:

**Protect Locally-Approved Sales Tax Measures**

The program of projects submitted to SCAG by the county transportation commissions consist in part of projects promised to voters as part of locally-approved sales tax measures. Mobility 21 reminds SCAG that these projects individually and together constitute a contract with the taxpayers that must be respected and implemented as voters approved. Local taxpayers have prioritized the distribution of funds in their respective sales tax measures to a complete, multi-modal program of projects to meet local needs. Changes cannot and should not be made without taxpayer approval. The RTP should strengthen and enhance the ability of the counties to deliver these projects, while at the same time supporting their efforts to deliver non-sales tax projects that will provide greater mobility, congestion relief, and air quality benefits. The RTP needs to bolster the efforts of local transportation agencies, and the business community that supports them, to protect this essential covenant with voters and taxpayers. Failure to do so will make approval of future funding measures nearly impossible.

### **Thorough Economic Analysis**

As yet, the impact of the elimination of redevelopment agencies is unknown in terms of the delivery of transportation projects. Some business groups have also expressed concern over the feasibility of several of the proposed financial options and mitigations included in the RTP. Mobility 21 strongly urges SCAG to incorporate a thorough economic analysis into the development and approval of the RTP so that all elements of the final approved plan support the economic growth of this region.

### **Locally Sensitive Context**

This RTP is the first of its kind. SCAG has done a yeoman's job of working to produce Sustainable Community Strategies, housing analysis and transportation projections in the RTP. However, Mobility 21 remains concerned that intensifying development in the urban core may impact future housing availability, choices and affordability. Recommendations regarding land-use should take into account the region's disparate communities, geographies, market forces, and take a flexible approach to protect the diversity of the region.

### **Protect Region's Economic Competitiveness**

A large share of our regional economy is dependent upon the flow of goods from our ports, through the counties and to the rest of our nation. Infrastructure improvements related to goods movement are vital for Southern California to remain economically competitive. As other options become available both nationally and globally for cargo movement, Mobility 21 is concerned that components of the RTP could put the region at a disadvantage, such as implementing new technologies before they are feasible or imposing fees on businesses operating in the SCAG region. New revenue sources should be developed and implemented at the federal level, not the local and regional level.

### **Reform the Process**

Mobility 21 recognizes that federal and state transportation planning processes are imperfect and that SCAG must work within the proscriptive requirements of existing laws and regulations. We therefore propose to identify systemic weaknesses in the process and work to reform the flaws in the RTP process that consume substantial resources, but add little or no value. Our intent is to help reduce the time and cost expended on the process and to remove regulatory hurdles that inhibit the development and delivery of effective, efficient, and timely transportation projects and services. Specifically, Mobility 21 encourages changes in state legislation that would enable MPO's to use low and no-cost alternatives to reach out to the public in lieu of resource-heavy public meetings. Additionally, since 83% of the funding for projects in the RTP comes from non-federal sources, Mobility 21 believes that empowering the federal government to veto a locally-approved financially constrained RTP unnecessarily jeopardizes federal funding needed to complete projects. Mobility 21 therefore will seek modifications to federal legislation that would enable MPO's with over 75% local funding to self-certify that an RTP is financially constrained.

Again, Mobility 21 applauds SCAG for the open and transparent process used to develop the 2012 RTP. We look forward to working with SCAG staff in the final stages of RTP implementation to ensure the strongest possible document is delivered to the Regional Council in April. If you have any questions or would like to follow up on any of our comments, please contact me at [mprimer@mobility21.com](mailto:mprimer@mobility21.com) or 949-288-6884.

Sincerely,



Marnie O'Brien Primmer  
Mobility 21 Executive Director

CC: SCAG Regional Council  
Mobility 21 Board of Directors

*Bonnie Holmes-Gen*  
**American Lung Association  
of California**

*Neil Richman*  
**BREATHE California of  
Los Angeles County**

*James Provenzano*  
**Clean Air Now**

*Jonathan Parfrey*  
**Climate Resolve**

*Luis Cabrales*  
**Coalition for Clean Air**

*Lars Clutterham*  
**downeygreen**

*Jocelyn Vivar Ramirez*  
**East Yard Communities for  
Environmental Justice**

*Jane Block*  
**Endangered Habitats  
League**

*Cesar Covarrubias*  
**Kennedy Commission**

*Victor Griego*  
**Latino Business  
Association Member**

*Alexis Lantz*  
**Los Angeles County  
Bicycle Coalition**

*Denny Zane*  
**Move LA**

*Patty Ochoa*  
**Physicians for Social  
Responsibility**

*Jessica Meaney*  
**Safe Routes to School  
National Partnership**

*Darrell Clarke*  
**Sierra Club**

*Paul Zimmerman*  
**Southern California Assn. of  
Non-Profit Housing**

*Rev. Earl W. Koteen*  
**Unitarian Universalist  
Legislative Ministry  
California**

*John Longville*  
**Former Mayor of Rialto &  
former SCAG President**

February 14, 2012

Pam O'Connor, President  
Regional Council  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear President O'Connor,

We congratulate the leadership and staff of the Southern California Association of Governments and its Regional Council members on the agency's first-ever Sustainable Communities Strategy and Regional Transportation Plan that meets the 2020 and exceeds the 2035 greenhouse gas reduction targets, achieves Clean Air Act conformity, and reduces vehicle miles traveled and traffic congestion—despite projected population growth of about four million residents by 2035.

We applaud SCAG staff for their leadership and for their collaboration with local governments, county transportation commissions and a wide range of non-governmental organizations. This effort was particularly challenging given it is the first time anyone in the region has put together an SCS. In the spirit of creating a stronger RTP/SCS this year and in future years we offer these recommendations.

### **Key changes to strengthen the RTP/SCS**

Although the draft RTP/SCS meets the SB375 targets, changes in four key areas would make the plan even stronger in terms of moving the region closer to sustainability.

1. Ensure adequate, achievable funding to carry out the RTP/SCS
2. Expand funding for transit, Metrolink, bus rapid transit, bicycling, pedestrian travel.
3. Make a tighter link between transit and land use throughout the region.
4. Take greater measures to reduce GHG and other emissions from freight.
5. Improve public health monitoring and benefits, especially in environmental justice communities.

### **1. Ensure adequate funding to carry out the RTP/SCS.**

We applaud SCAG's goal of bringing all roads to a "state of good repair," and understand the policy decision to look for new revenue sources rather than to eliminate transportation projects in order to address the RTP's projected \$200 billion shortfall. We understand that it may be more politically palatable for the Regional Council at this time to project reliance upon expanded federal sources, such as indexed gas tax or a transition to an equivalent VMT fee, but that does not make it more achievable.

**a. *Emphasis should be on more achievable revenue sources such as local voter approved fees or taxes rather than more speculative federal sources***

The recent history of voter response to county-based transportation funding measures in the SCAG region suggests a more promising local direction. The experience with Measure R in LA County and the recent extension of sales tax measures in other SCAG counties demonstrates to us that regional voters are not as tax-averse as some believe, especially when voting on measures to fund well defined local transportation investment, if they have confidence in the agencies and are clear about investment priorities. Voters in Los Angeles County approved sales tax measures by 54% in 1980, 50.4% in 1990, and 67.8% in 2008. This suggests an increased willingness, not reluctance, to support transportation investments by LA County voters. In San Bernardino, Riverside and Orange sales tax extensions were easily approved: Riverside voters approved Measure A in 2002 with 69% of the vote; San Bernardino County approved Measure I in 2004 with 80% of the vote; and Orange County approved a sales tax extension in 2006 with almost 70% of the vote. In each case the original sales taxes had been originally approved with narrow majorities.

The point is that, with the exception of Ventura County, voters throughout the SCAG region have consistently voted to approve new or extended sales tax measures for transportation improvements by substantial and increasing majorities in excess of 2/3. If a county or the region needs more funds for transportation investments, local voters seem a more promising opportunity of first resort than a contentious State Legislature or the Congress.

We urge SCAG to work to challenge its member transportation commissions to go to voters in the near future for local and regional funding solutions instead of “punting” this problem of a regional funding shortfall to the federal government. In other words, let’s make the funding of regional planning more achievable, and thus more real.

**b. *Recommendation: Develop regional revenue sources to fund regional projects.***

There are a number of transportation systems that are vital to the welfare of the Southern California region as a whole, rather than specific counties. This includes the 450-plus-mile regional commuter rail system operated by Metrolink and the regional goods movement system. Region-wide investments in each of these systems could yield enormous economic, environmental, and equity benefits. We urge SCAG and its Regional Council to consider taking a truly regional approach to an investment strategy for each of these regional systems by including in the RTP projected additional revenue from a region wide revenue source.

We recommend a broad-based uniform regional tax or fee increase, such as a 1/8 – 1/4 cent increase in sales tax or equivalent parcel tax, that can raise between \$15- \$30 billion over the 25 year life of the plan to invest specifically in regional transportation needs such as meeting the needs of our goods movement infrastructure, modernizing and electrifying the regional commuter rail system, providing expanded BRT and bus service as well as first-mile-last-mile bike-pedestrian infrastructure that would connect to that regional commuter system.

We would pledge to work with you to build support for such a funding measure.

**c. Recommendation: Develop strategies to provide adequate funding to modernize freight transportation projects.**

The goods movement industry is a vital component to the Southern California economy but is also a major reason for our poor air quality and various health impacts affecting the region. Developing and investing in both the zero and near-zero emission goods movement technology and the operational efficacy of the goods movement infrastructure would significantly benefit the region and the many communities of concern that are directly affected by emissions and congestion from transportation and rail activity. Estimates of the regional investment needed could be up to \$25 billion over the life of the plan.

Ensuring that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies as well as the infrastructure needed for operational efficacy should be a central component of the regional strategy.

For these reasons, we recommend that SCAG include the following strategies:

- Develop a clear assessment of funding options available, including various models of public-private partnerships that could make zero-emission and near-zero emission freight technology options possible and ensure an efficient goods movement system in the region.
- Recommend pursuing legislation seeking a \$30 per twenty-foot container fee for moving either into or out of the ports. This strategy could generate as much as \$441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports and more in subsequent years as cargo activity grows at our ports. Such a program could generate over \$10 billion over the life of the plan.<sup>1</sup> Previous legislative efforts have created a broad coalition to support this measure. Such legislation has been approved twice by both houses of the state legislature only to be vetoed by the previous governor.
- As previously stated, we recommend a broad-based uniform regional tax or fee increase, such as a 1/8 – 1/4 cent increase in sales tax or equivalent parcel tax that could raise between \$15-\$30 billion over the 25 year life of the plan to invest specifically in regional transportation needs such as goods movement infrastructure needs, as well as modernizing and electrifying the regional commuter rail system and related infrastructure.
- Prioritize spending on projects that deliver maximum health benefits for residents of the region.
- Include public health as an overarching priority and goal in the \$2.1 billion annual freight program included in the Environment and Public Works Committee.

**d. Support national efforts to create a strategic plan for the freight system.**

- Encourage SCAG to include language that clarifies the current federal funding restraints and alter the RTP to reflect that these revenues are assumed but not assured and are contingent upon passage of the MAP-21 program on page 95 and 100. As a revenue source the inclusion of this funding is still in doubt as the current iteration of the House American Energy and Infrastructure Jobs Act does not include a national freight program or any dedicated freight funding. The establishment of this program is contingent upon a freight program making its way into the final federal transportation reauthorization and that legislation passing through both Chambers.

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<sup>1</sup> Haveman, Jon, and Thornber, Christopher, Container Fees and Commercial Benefits of Improved Waterborne Goods Movement Infrastructure in California. Beacon Economics, August 2007.  
[http://www.coalitionforcleanair.org/images/stories/Haveman\\_Report\\_Final\\_Aug2007.pdf](http://www.coalitionforcleanair.org/images/stories/Haveman_Report_Final_Aug2007.pdf)

- Actively support the passage of a federal freight program that would deliver these revenues and clearly establish improving public health on the freight network and adjacent communities as an overarching priority and goal of the federal freight program.
- Support the inclusion of Senator Lautenberg's Freight Act of 2011 in the final federal transportation reauthorization with the competitive grant program and the goals and objectives as written.

**e. *Champion increased Compass Blueprint funding to help local governments update their general plans to implement the SCS.***

While the RTP/SCS shows a significant shift in household growth toward HQTAs, this will in most cases require changes in General Plans and community plans — and ensuring that this will happen is likely to require incentives and other resources. SCAG's Compass Blueprint program was successful in helping many communities move in the direction of smart growth and urban infill years before SB 375. With additional funding, the Compass Blueprint Demonstration Project Program could fund the SCS implementation and ensure that growth happens in an equitable way with minimal displacement, in addition to updating plans. SCAG should also work with the other MPOs to advocate for a statewide "infill first" package of incentives to promote development near transit. SCAG should also consider working with the CTCs to find sources of funding for land use planning in HQTAs.

**2. *Expand proposed funding for transit, Metrolink, bus rapid transit, bicycling, and pedestrian travel into the RTP constrained plan.***

We need increased investment for bus and rail transit, bicycle and pedestrian systems. This is especially true in the Inland Empire where over-dependence on a spreading highway infrastructure and dispersed land use pattern has made residents in these counties very vulnerable to just the kind of economic calamity witnessed in the 2008 – 2012 Great Recession.

In addition, residents of agricultural areas, especially in the eastern Coachella Valley, the North Shore of the Salton Sea and similar communities, remain disproportionately underserved by transit, which makes it very difficult for residents without a car to access health care, groceries, or good jobs. Improvements to bus headways, especially in these areas, could create new HQTAs.

Building transit infrastructure is one of the best ways to create good, "green" jobs that enhance the health and wealth of the region and its residents. Construction work can provide a career path to middle-income jobs through apprenticeship programs that provide young workers with formal training. Agencies that adopt project labor agreements and requirements ensuring that jobs will go to local workers — and/or those who live in areas with high unemployment — help make the local economy more robust because workers' earnings will be spent at local businesses, creating additional jobs and local tax revenues.

**a. *Move enhanced Metrolink investments into the Constrained Plan.***

The Metrolink commuter rail system is a regional gem that could become a major source of VMT reduction, congestion relief and economic development. It links many communities in every county in the region.

We recommend moving into the Final Plan (the Constrained Plan) the upgrading of the Metrolink commuter rail system region-wide to make a planned transition to an all-electric system capable of providing zero-emission high-speed service (up to 110 mph) and enabling expanded express service in select corridors with double tracking, grade separations and other modifications needed. Such an upgrade may cost the region as much as \$8 to \$10 billion, but would be well worth the investment in terms of congestion relief, emission reductions and economic opportunity created. This RTP Constrained Plan enhancement could be funded by new resources, such as the regional sales tax proposed above.

Specifically, we want to highlight opportunities for enhanced investments on several key lines that we believe will create exceptional regional connectivity.

- **The Antelope Valley Line**, which is the focus of current planning efforts to dramatically reduce the time it takes to travel over 76 miles from Lancaster to Union Station by more than fifty percent - from nearly two-hours to about one-hour.
- **The San Bernardino Line's** success with limited express service from downtown San Bernardino to Union Station indicate express service on a regular basis is possible, especially if a direct link into Ontario Airport is created.
- **The Ventura County Line and the Orange County Line** present the possibility of a continuous, high speed, electric express system from Ventura to Union Station to Orange County to San Diego.
- **LA Union Station Run-Through Tracks** project would significantly enhance regional trip potential of all Metrolink corridors serving Union Station by improving efficiency and throughput capacity.
- We recommend additional corridor infrastructure enhancements and improvements in Appendix A.

Each of these Metrolink corridors and projects, if funded and enhanced, will create opportunities for new BRT and enhanced bus service, as well as smart growth infill with first-mile-last-mile bicycle and pedestrian infrastructure in multiple communities and will create enhanced access to the jobs corridors throughout the region.

**b. *Expand Bus Rapid Transit and provide more frequent bus service on high-performing routes linked to Metrolink to give more people alternatives to driving alone.***

Well over 80 percent of transit ridership in the region now uses bus service. While our rail transit system is expanding dramatically, we should expect that heavy reliance on bus service is likely to continue as far out as 2035.

However, while there is a lot of growth projected for the Inland Empire, much of it will not be near existing or planned bus or rail service. For example, in Riverside County, about 40% of residents live near bus lines with some service (15-30 minute headways) but presently only 10 percent of the population is served by high-quality transit (with 15-minute headways). By expanding the Bus Rapid Transit (BRT) system in the Inland Empire, especially where proposed lines would connect with the potentially enhanced Metrolink lines and by bringing up service on select higher

performing lines to 15- minute headways we could increase high-quality transit at a much lower cost.

Our recommendations in Appendix A are limited to improvements to investment in Bus Rapid Transit infrastructure (BRT) and enhanced bus service with connections to the Metrolink Regional Rail network or regional airports. Each of these Metrolink corridors and projects, if enhanced, will create opportunities for new smart growth infill and TOD investment in multiple communities. These corridors could be served as well as by first-mile-last-mile bicycle and pedestrian infrastructure opportunities, and will help create enhanced access to jobs throughout the region.

See Appendix A below.

**c. *Increase funding for active transportation to at least \$12 billion for bicycling and pedestrian improvements.***

SCAG has received an outpouring of support for increased investment in bicycle and pedestrian infrastructure and projects at workshops and hearings across the region, as well from members of SCAG's Regional Council. As was often repeated at the hearings, according to the 2009 National Household Travel Survey of California, 14 percent of all trips in the region are pedestrian while 6 percent are on bikes, and 25 percent of all roadway injuries and fatalities affect pedestrians and bicyclists, yet only 1 percent of the regional investment is identified as going to non-motorized modes. A poll of Southern California voters sponsored by Move LA, NRDC and the American Lung Association late last year found that voters would make bicycle and pedestrian investments a much higher priority.

While we applaud the SCAG staff for recommending that funding for active transportation be increased from \$1.8 billion to \$6 billion, we believe funding should be at least \$12 billion. We believe investments should prioritize first-mile/last-mile connections to transit stations, which will help support the increased investment in the transit system. Investments should also be prioritized for areas of disproportionate high injury and fatality rates and in areas with lower car ownership rates.

Safe Routes to School strategies and investments to improve the safety of students as they walk and bike to school should also be promoted because statewide cuts in school transportation budgets make getting to and from school more difficult for K-12 kids — especially in rural areas where there are no sidewalks or safe bike routes.

We recommend SCAG work with the CTCs to identify funding sources that are flexible and that could be used to prioritize accelerated transit, bike, pedestrian and other traffic-reducing projects. It is our judgment that one appropriate source of funding for this program could be the regional sales (or parcel) tax we have suggested earlier.

**d. *Encourage CTCs and local jurisdictions to adopt “complete streets” policies.***

We believe that SCAG should encourage CTCs and local jurisdictions each to adopt a complete streets policy so that bike and pedestrian improvements can be made routinely and more economically when streets are improved or built. For example, counties in the SCAG region, especially outside of LA County, often include funding for arterial capacity enhancements for streets which largely run between and through community centers. These stretches of boulevards

seem very good opportunities for implementation of “Complete Streets” programs. We recommend that SCAG identify such opportunities and call them out for special programming efforts.

**e. *Work with CTCs to develop a methodology for quantifying the unmet need for bicycle and pedestrian investments to improve safety and increase active transportation.***

SCAG should work with the CTCs to develop a methodology for quantifying the unmet needs, particularly safety needs, for cyclists and walkers. Because concerns about safety may discourage people from walking and biking entirely, surveys may be required, especially in rural areas, to accurately assess the needs of residents. We recommend that SCAG work with the CTCs to develop active transportation budgets and to identify existing and potential local and regional funding sources. One idea, for example, would be to create guidance that would be used to allocate funding in each CTC’s Call for Projects.

**f. *Work with CTCs to ensure full participation of all counties in the funding and implementation of regionally significant transit and goods movements systems that achieve regional objectives like cleaner air, reduced greenhouse gases, expanded access to high quality transit, and mode shift away from driving alone.***

SCAG should encourage county transportation commissions to place a higher priority on investment in transit services and active transportation projects and seek to ensure a fair share investment in these projects among counties either by identifying new revenues locally, shifting funds out of other programmed projects, or participating in the creation of regional revenue sources, and encouraging infill development strategies that keep our momentum toward a higher regional sustainability strong.

**3. Create a tighter link between transit and land use throughout the region.**

The draft SCS takes into account changes underway in the regional real estate market including the shift in new housing development away from the construction of single family homes on large lots and toward the development of multifamily housing -- apartments, townhomes and condominiums -- in more urban environments with easier access to jobs, service and transit systems. The fact that half of all new homes and new jobs will be located near transit under the plan will be a boon to the region’s efficiency, economy and sustainability.

The demographic and real estate trends, more transit opportunities and healthier, active lifestyles, portend a new, and better, version of the American Dream in Southern California. By focusing development in transit areas and downtowns, the draft SCS plan would consume 408 square miles less “greenfield” land than in the 2035 Baseline, which assumes current land use trends.

**a. *SCAG should identify to local jurisdictions adjustments in land use policy that would ensure each county is contributing its fair share to meeting regional goals of cleaner air, reduced greenhouse gas emissions, expanded access to high quality transit, and mode shift away from driving alone.***

Although the region as a whole will achieve reductions in vehicle miles traveled sufficient to meet the targets for reducing greenhouse gas emissions, the reductions are not evenly distributed across the region. These outcomes are the result of both past decisions and future actions

reflected in this draft SCS and RTP. The maps in the RTP/SCS suggest that in some areas, especially Riverside County, significant growth is projected in areas with little or no transit investment.

**b. *Limit High Quality Transit Areas, especially along freeways in low-density areas, to within a 1/2 mile of the stop with frequent services, as opposed to including the entire corridor.***

It is unclear how SCAG defines high-quality transit areas. Under SB 375, a HQTAs is a place that has bus service with headways of 15 minutes or less during commute hours. Several freeway corridors are designated as HQTAs presumably because they have express bus service. But, there is not currently frequent bus service along the I-10 east of I-215, I-15 north of I-10, I-15 south of the 61, and the 33 (Ventura County) which are all designated as HQTAs. Only the area within ½ mile of the stop should be regarded as an HQTAs.

**c. *Include a snapshot of the current jobs-housing fit and develop a methodology for projecting the jobs-housing fit as a result of transportation investments and land use changes for the 2016 RTP/SCS.***

The current mismatch between the location of jobs and housing is at the root of our transportation problems. SCAG should set a baseline for a jobs-housing fit by taking a “snap shot” of 4-to-5-mile buffer zones around major job centers, and then comparing the wages provided by those jobs to cost of housing within the buffer zone to see if there is a good fit. UC-Davis and the Sacramento Council of Governments have developed a relatively simple methodology to do a jobs-housing fit, and are now developing a tool to project the jobs-housing fit into the future. Continuing to monitor the jobs/housing fit over successive RTP/SCSs will be an important tool for transportation planning in rural, urban and suburban areas.

**d. *Strengthen Conservation Planning Policy***

We commend SCAG for including an advanced mitigation strategy for land conservation. This strategy is an important step forward. We recommend the following changes to strengthen the Conservation Planning Policy section:

- change “critical habitat” to important natural lands because of its limitation to the federal designation and its relationship to endangered and threatened species;
- create an inclusive process for agencies, conservancies, and non-profits to help map and prioritize priority conservation lands;
- include all unprotected undeveloped lands in the inventory of potential mitigation location sites instead of limiting opportunities to just Natural Communities Conservation Plan and Habitat Conservation Plan areas;
- expand the conservation activities to include existing and/or future programs instead of simply already-established programs; and
- Advocate for the advanced mitigation policy to result in the environment ending up better than it started as opposed to no gain (a net environmental benefit) from the standpoint of natural resource lands after construction activities.

#### 4. **Take greater measures to reduce greenhouse gases and other emissions from freight.**

We are deeply concerned that the projected increase in freight volumes and traffic will undermine the gains of the RTP in other areas. In particular, CO<sub>2</sub> emissions from trucks would increase at least 30% by 2023 and at least 60% by 2035. Even more dramatically, CO<sub>2</sub> emissions from rail would increase at least 50% by 2023 and at least 123% by 2035. To mitigate goods movement related emissions, we recommend that SCAG take the necessary steps to:

- a. **Ensure the ports augment the Clean Air Action Plan by creating GHG reduction plans.**
- b. **Devise a set of strategies that account for the differences among local freight service and that of port origin/destination.** Similarly, the sector of medium duty trucks may be targeted for technology improvements, given that it is the sector's 2nd largest emitter of NO<sub>x</sub>.
- c. **SCAG should identify and promote a sequence of projects** that maximizes on-dock rail and that reduces constraints on the expansion of on-dock capacity in advance of projects that expand off-dock capacity. Without appropriate sequencing, efficiencies could be lost.
- d. **Clean up existing freight corridors, not just the proposed new projects.**  
While we welcome zero emission technology by the year 2035, more short term gains should be implemented. SCAG should further analyze what can be done until a majority of truck traffic is zero or near zero emissions and consider using currently available technology while working to demonstrate future technology applications (such as maglev technology).

#### 5. **Improve public health monitoring and benefits, especially in environmental justice communities.**

We applaud SCAG for adopting a number of performance "outcomes" — in particular, those measuring public health and affordability — that will be monitored during RTP/SCS plan implementation. We believe that these additional performance metrics should be reported to the Regional Council as a way to help encourage implementation of the RTP/SCS. While we understand that SCAG has no authority over local land use or county transportation planning and funding, we do believe that it's critical that SCAG find ways to incentivize RTP/SCS implementation.

- a. **Evaluate the impact by geography of RTP/SCS investments on environmental justice communities by increasing monitoring over successive RTP/SCSs.**

The disparate impacts of transportation investments and land use planning — especially noise and pollution — on lower-income communities is lost in the county-wide or region-wide averaging that SCAG uses. It would also be informative if SCAG monitored a number of geographic areas where environmental justice populations are overrepresented. The Metropolitan Transportation Commission in the Bay Area, for example, does "snapshot" analyses of 44 geographic communities to focus on key transportation-related indicators such as transit service frequency, walkability, access to essential destinations by a 30-minute transit trip, housing and transportation affordability, bike and pedestrian collisions, diesel PM<sub>2.5</sub> emissions, etc. For example, the EJ appendix reports that air quality will be worse for 23-29% of the population with no indication of where they live, making it difficult to design and evaluate the effectiveness of mitigation measures.

SCAG is planning to track characteristics in 125 transit stations. We recommend instead that SCAG analyze 125 places where environmental justice populations are overrepresented. The analysis could be used to monitor progress over successive RTP/SCSs, and goals could be set and strategies identified to reduce disparate impacts. Where there are disparities, SCAG should propose mitigations and work with the CTCs to improve conditions.

Because the EJ analysis also suggests that low-income people are being displaced from station areas, we also recommend that rail and possibly BRT stations be monitored for the impacts of gentrification — by checking income levels, housing costs, transit usage and car ownership, etc. SCAG could also develop a toolbox of policies, implementation measures and funding sources that could be used to help low-income people continue to live near stations.

**b. *Improve the discussion around performance outcomes and alternatives analyses.***

One of the best ways that SCAG can do this is to help make the outcomes of land use planning and transportation investment choices clearer to Regional Council members and the general public — through reporting on performance outcomes. While the Alternatives 1, 2, 3 & 4 presented at the summer workshops illustrated the impacts of particular policy choices, the Alternatives A, B, C & D were different in ways that were hard to understand. We recommend that in the next RTP/SCS, SCAG should give stakeholders more time and more information to evaluate the different scenarios. We also recommend that SCAG set targets for performance measures and outcomes, and to evaluate the scenarios against these targets early and continuously in the planning process.

**c. *Develop new tools for measuring health & equity impacts in future RTP/SCSs.***

We also believe that SCAG should develop new tools for measuring health and equity impacts in future RTP/SCSs. In particular:

- SCAG should enhance efforts to measure the daily amounts of walking and biking related to work and non-work trips.
- SCAG should also measure chronic disease rate changes based on transportation decisions and resulting physical activity (based on the work of Neil Maizlish of the California Department of Public Health's work with the MTC in the Bay Area and ongoing work with MPOs across the state).
- SCAG will monitor premature mortality due to PM2.5, which is important since the region contributes 53 percent of premature deaths in the state of California due to PM2.5. We recommend SCAG report improvements every two years, and develop a more precise goal in collaboration with the LA County Department of Public Health and the American Lung Association in California.
- SCAG should monitor asthma incidence and exacerbations due to NOx (an emission that is being measured) in collaboration with the California Department of Public Health, the South Coast Air Quality Management District, academic institutions, and others who are focusing on communities most impacted by air pollution, as well as communities located near high volume roadways.

We want to express our appreciation to the SCAG Regional Council and staff for all your efforts in putting together this ambitious plan to make Southern California a better place to live for present and future generations.

Sincerely,

Bonnie Holmes-Gen  
**American Lung Association of California**

Neil Richman  
**BREATHE California of Los Angeles County**

James Provenzano  
**Clean Air Now**  
Jonathan Parfrey  
**Climate Resolve**

Luis Cabrales  
**Coalition for Clean Air**

Lars Clutterham  
**downeygreen**

Jocelyn Vivar Ramirez  
**East Yard Communities for Environmental Justice**

Jane Block  
**Endangered Habitats League**

Cesar Covarrubias  
**Kennedy Commission**

Victor Griego  
**Latino Business Association Member**

Alexis Lantz  
**Los Angeles County Bicycle Coalition**

Denny Zane  
**Move LA**

Patty Ochoa  
**Physicians for Social Responsibility**

Jessica Meaney  
**Safe Routes to School National Partnership**

Darrell Clarke  
**Sierra Club**

Paul Zimmerman  
**Southern California Association of Non-Profit Housing**

Rev. Earl W. Koteen  
**Unitarian Universalist Legislative Ministry California**

John Longville  
**Former Mayor of Rialto & former SCAG President**

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## APPENDIX A

### Metrolink, bus rapid transit and bus corridors proposed to be enhanced and considered for inclusion in the RTP Constrained Plan.

#### 1. METROLINK

Specifically, we want to highlight opportunities for enhanced investments on several existing lines that will create exceptional regional connectivity:

- **The Antelope Valley Line**, which is the focus of current planning efforts to dramatically reduce the time it takes to travel over 76 miles from Lancaster to Union Station by more than fifty percent - from nearly two-hours to about one-hour. Projects to improve its speed and efficiency and avoid unnecessary delays in service, including eliminating unnecessary curves, providing grade separations and double tracking where needed, will make this goal possible.
- **The San Bernardino Line** has already shown great success with limited express service from downtown San Bernardino to Union Station in Los Angeles. Investments to provide double-tracking for some segments of the line, grade separations could enable this line to provide express service on a much more regular basis. A direct link into Ontario Airport would create an exceptional economic development opportunity. Imagine the enhanced investment interest there would be for any community east of LA if it had high-speed express access to Ontario Airport and to Downtown LA via Union Station.
- **The Ventura County Line** also offers the opportunity for high speed express access from Ventura through the North San Fernando Valley with links to the Orange Line at Chatsworth, Northridge and Van Nuys, potentially connecting directly to Burbank Airport, Glendale, on to Union Station.
- **Orange County Line** continues from Union Station to Norwalk, Fullerton, Anaheim, Irvine and beyond to San Diego County. Together with the Ventura County Line it presents the possibility of a continuous, high speed, electric express system serving 25 stations from Ventura to Union Station to Orange County to San Diego, connecting to 4 other Metrolink lines and the entirety of the LA Metro Rail system at Union Station.
- **LA Union Station Run-Through Tracks** project that would significantly enhance regional trip potential of all Metrolink corridors serving Union Station by improving efficiency and throughput capacity, enabling more frequent regional service within LA County.

In addition to the existing corridor infrastructure enhancements and improvements we recommend:

- **Extension of 91 Line** from Riverside to Palm Springs/Coachella Valley, connecting the resort communities in Palm Desert to LA and Inland Empire.
- **Extension of San Bernardino Line** to Redlands and San Bernardino Airport.
- **Harbor Subdivision Service** from Union Station to South Bay Region via LAX, utilizing existing Railroad Right-of-ways to provide Commuter Rail service to an underserved transit region.
- **Additional infill stations** along Metrolink Corridors to support activity centers such as Universities and Major Employment Centers such as Perris Valley Line - UC Riverside Station; San Bernardino Line – Ontario Airport Station branch; San Bernardino Line – LAC/USC Medical Center; Riverside Line - Cal Poly Pomona Station.

## 2. ORANGE COUNTY

### Proposed BRT Enhancements in Orange County

Proposed BRT	Link to Metrolink, Activity Center or Airport	Peak Headway	Off-Peak Headway
Westminster Avenue -17 <sup>th</sup> Street (Long Beach – Santa Ana)	Metrolink / CSULB/VA	10	15
Harbor Boulevard (Fullerton – Newport Beach)	Metrolink /Disneyland	8	15
Bristol Street/State College Boulevard (Brea – Irvine)	Metrolink / John Wayne Airport	8	15

Source: Orange County Transit Authority

### Proposed Bus Enhancements/BRT Conversions beyond current funding in Orange County

Lines	Project Type	Communities/Corridors	Link to Metrolink	Peak Headway	Off-Peak Headway
29	Convert to BRT	Beach Boulevard (Huntington Beach – La Habra)	X	10	15
38	Convert to BRT	La Palma Avenue (Buena Park - Anaheim)	X	10	15
50	Convert to BRT	Katella Avenue (Long Beach – Orange)	X	10	15
53	Convert to BRT	Main Street (Orange – Irvine)	X	8	12
54	Convert to BRT	Chapman Avenue (Los Alamitos – Orange)	X	10	15
70	Convert to BRT	Edinger Avenue (Huntington Beach – Tustin)	X	10	15
	Local Bus	GoLocal Bus Shuttles beyond current funding projections	X	15	30
	Local Bus	Station Link to Metrolink Stations beyond funding projections	X	15	30

Source: Orange County Transit Authority - LRTP

## 3. SAN BERNARDINO COUNTY

### Proposed BRT Enhancements in San Bernardino County

Proposed BRT	Link to Metrolink or Airport	Peak Headway	Off-Peak Headway
E Street sbX Redlands Extension	Metrolink	5	10
Foothill East sbX	Metrolink /San Bdo Int AP	5	10
Foothill West sbX - Foothill	Metrolink	10	15
Euclid sbX	Metrolink	10	15
San Bernardino Avenue sbX		10	10
Holt/Fourth sbX	Metrolink / Ontario AP	10	15
Grand/Edison sbX		10	20
Sierra sbX	Metrolink	10	20
Riverside sbX	Metrolink	10	10
Haven sbX	Metrolink / Ontario AP	10	15

Source: San Bernardino County LRTP

**Proposed Bus System Enhancements  
Best Bets in San Bernardino County**

Lines	Type	Communities	Peak Headway	Off-Peak Headway
1	Local Bus	Colton-Del Rosa	10	15
4	Local Bus	Baseline-Highland-San Bernardino	20	20
8	Local Bus	San Bernardino-Mentone-Yucaipa	15	30
10	Local Bus	Fontana-Baseline-San Bernardino	15	30
15	Local Bus	Fontana-Rialto-SB-Highlands-Redlands	10	15
19	Local Bus	Redlands-Colton-Fontana	20	20
65	Local Bus	Montclair-Chino Hills	15	30
80	Local Bus	Montclair-Ontario-Chaffey	15	30

Source: San Bernardino County L RTP

**4. RIVERSIDE COUNTY**

**Proposed BRT/Bus System Enhancements in Riverside County**

Lines	Project Type	Communities/Corridor	Link to Metrolink	Current Headway	Enhanced Headway
19	Local Bus, Convert to BRT	Perris Boulevard Corridor	X	60	20
20	Local Bus Convert to BRT	Allessandro Corridor	X	60	15
24	Local Bus	Temecula – Pechanga Corridor		70	20
206	Commuter Express Bus (Convert to BRT)	Corona-Temecula I-15 Corridor	X	4 trips each direction (RH Only)	20
208	Commuter Express Bus (Convert to BRT)	Riverside-Perris-Temecula via SR-60/I-215 Corridor	X	4 trips each direction (RH Only)	30
210	Commuter Express Bus	Riverside-Banning via SR-60 Corridor	X	4 trips each direction (RH Only)	30
212	Commuter Express Bus	Riverside-Perris-Hemet via SR-60 Corridor	X	4 trips each direction (RH Only)	30

Source: Riverside Transit Agency



February 14, 2012

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

Re: Comments on the Draft 2012 Regional Transportation Plan/Sustainable  
Communities Strategy, and Program Environmental Impact Report

Dear Mr. Ikhata:

NAIOP, the Commercial Real Estate Development Association, is the leading organization of developers, owners, and related professionals in office, industrial and mixed use real estate. The over 900 members of the NAIOP SoCal Chapter serve Los Angeles and Orange Counties, and is the premier commercial real estate organization in Southern California. We have been actively involved in the development of the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), along with the review of the just released Program Environmental Impact Report (PEIR).

NAIOP SoCal fully understands the enormity of the undertaking to create the RTP, particularly with the newly required SCS being added to the effort. We commend SCAG for its efforts to make the RTP/SCS as much of a bottoms-up process as possible. We particularly thank SCAG for incorporating the Orange County LRTP and SCS developed by the Orange County Transportation Authority (OCTA) and the Orange County Council of Governments (OCCOG) respectively. NAIOP believes that is a model for all SCAG subregions to embrace in any future RTP/SCS. We fully support what OCTA and the OCCOG have submitted, and also incorporate by reference as though fully set forth herein their comments on the RTP/SCS and PEIR. That same broad participatory process and effort should also have been made in the drafting of the PEIR, but was not. Hopefully that can be changed in the future so as to avoid many of the issues that have arisen.

Our major concerns surround the PEIR. The 642 page complex document with approximately 550 supposed mitigation measures was released the afternoon of Friday December 30, 2011, right before the New Year's holiday weekend. Thus, no one really could look at it until January 3, 2012, losing 3 days of the brief 45-day review period. A tremendous effort, and cost, has been undertaken to try to meet the February 14 end of comment period. It is very obvious the comment period for the PEIR is not sufficient to allow for a thorough, thoughtful analysis of the very belatedly released PEIR. Unfortunately, SCAG has repeatedly

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**NAIOP SoCAL EXECUTIVE STAFF**

Cynthia G. Fusco, Executive Director

Vickie Talley, Director of Legislative Affairs

indicated they would not extend the comment period. NAIOP does request that the comment period be extended.

To compound the problem, the PEIR is going to be rushed to approval. NAIOP has worked closely with many organizations throughout Southern California, and it is very apparent SCAG will be receiving numerous comments. Yet, the schedule is to hold a joint Policy Committee hearing on March 21 to gain their recommendation that the RTP/SCS and PEIR be approved, which is 5 days before the response to comments will be released on March 26. Then, the Regional Council is supposed to approve all the documents on April 4. SCAG has, again unfortunately, ruled out any delay in this schedule as well as specifically saying they will not make any changes to the PEIR that would require a recirculation. This incredibly rushed schedule with predetermined lines in the sand as to the length of the comment period and timing of the actual approval does not provide the time for the appropriate review of these complex documents, any real analysis of the comments that will be supplied, and specifically eliminates any valid modification to the RTP/SCS or PEIR. It leads one to question whether there has been a legally questionable predetermined outcome.

Turning to the substance of the documents. There is a blanket statement that all the mitigation measures are feasible and effective. Yet, there is no discussion or analysis to support such a statement. Furthermore, SCAG goes on to claim that local jurisdictions and project sponsors "can and should" perform the mitigation measures. While SCAG has claimed the mitigation measures are supposed to be a "tool-box" to choose from, the actual verbiage of the documents does not so indicate. The statement of the feasibility, efficiency, and "can and should" language should be deleted. Furthermore, SCAG should at a minimum clearly state that the PEIR sets forth a menu of options for the local jurisdictions and project sponsors to choose from, and that it is up to the local jurisdictions and project sponsors to determine what is feasible and efficient. This could effectively be done by separating all the mitigation measures that are applicable to SCAG, and put all the "tool-box" suggestions into a separate document indicating the above so SCAG's stated intention is clear to all.

Next, there are nearly 200 "mitigation measures" that are incomplete references to Federal, State, and Local law, and various regulatory measures. These are matters that project sponsors are already legally required to perform. Once all of the legal requirements are performed, then the CEQA process analyzes if there are any environmental impacts that need to be mitigated. Thus, the legal requirements are actually in the baseline, and are not used as mitigation measures. By trying to reword the legal requirements and call them mitigation measures can cause great confusion and legal concerns. Since the legal requirements are already in the project, do these so-called "mitigation measures" in the PEIR refer to something different, something new, something additional? All references to legal and regulatory requirements should be deleted. If SCAG feels there is some need to remind local jurisdictions and project sponsors to comply with the law, this can easily be done with one statement in the RTP, not the PEIR, indicating they should comply with all applicable laws and regulations.

NAIOP appreciates SCAG's interest in being a forum for discussion of issues that may be impacting the Southern California area. Forum discussions can lead to ideas that can be fully analyzed by the appropriate agencies. But, SCAG does not need to try to be the one to implement or oversee such ideas. There are many governmental agencies and regulatory bodies that already have the authority to cover a variety of issues, and SCAG should not intervene in matters already under the purview of other governmental agencies. SCAG, as all MPOs, is a federally created organization whose focus is on transportation efforts. Congress wanted MPOs to ensure that federal transportation funds were utilized through a cooperative and comprehensive planning process. The core function of MPOs is to evaluate the transportation issues in a region, and develop realistic options. Involving the public, MPOs are to

develop long range transportation plans and transportation improvement programs that promote a multi-modal transportation system. The RTP should solely be focused on that objective, and the SCS is only to fit the requirements of SB 375. Yet, the documents go in to things such as paleontology, wastewater, utilities, and many other areas that are beyond SCAG's scope. There are numerous areas in the PEIR where SCAG claims it will "ensure" certain outcomes. This is not SCAG's role, and the entire issue of not intervening in other agencies domains is needs to be addressed in any final RTP/SCS and PEIR.

The funding for the RTP is also of great concern. Federal law does require that the plans be fiscally constrained such that any funding is available or reasonably expected to become available. Yet, the draft RTP claims to be an approximate \$524 billion program, but has a shortfall of \$219 billion in revenues; nearly half. There is a reference to about \$127 billion of the shortfall being reliant on major State and/or Federal actions, which seem awfully speculative. NAIOP has a major concern over the numerous references in the documents to pushing local jurisdictions to adopt new fees or taxes. The commercial/industrial development industry is already heavily burdened with fees from many, many regulatory agencies and jurisdictions. We often hear that some new fee is not that big, or is for a great cause. Yet, the net effect is a mountain of "little fees". Sort of a death by a thousand fees. To make up billions and billions of revenue shortfall would necessitate extensive new fees and taxes. This would clearly be a huge hinderance, if not paralyze, any type of economic recovery in the regions. NAIOP did not see any type of analysis in the documents that would lead one to believe such fee and tax increases are reasonably possible, especially in light of Proposition 22, nor an analysis of the economic impacts. Such analyses are needed before any of the documents are finalized.

The RTP/SCS and PEIR are incredibly complex documents that are very important and far-reaching. NAIOP SoCal has made on effort to evaluate the very voluminous materials. Yet, in the compressed timeline, it has been impossible to touch on every area of concern. The above highlights some of the major issues. We will continue to evaluate the material and follow the efforts to revise the RTP/SCS and PEIR so that the final product is credible and truly benefits all of Southern California. NAIOP SoCal looks forward to SCAG's responses to the above comments and the request to extend the comment period. We request to be included in any conversations regarding the necessary revisions to the RTP/SCS and PEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "James V. Camp". The signature is fluid and cursive, with a large initial "J" and "C".

James V. Camp  
Director  
Chair, Legislative Affairs Committee

February 14, 2012

Pam O'Connor, President  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**RE: Comments on the 2035 RTP/SCS and Project Environmental Impact Report**

Dear President O'Connor:

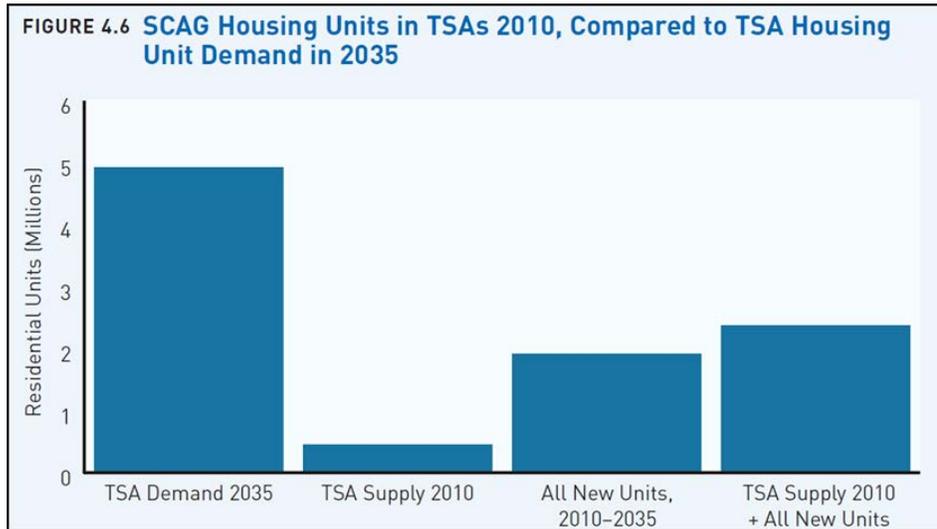
On behalf of Endangered Habitats League (“EHL”) and the Natural Resources Defense Council (“NRDC”) we thank you for the opportunity to comment on the Southern California Association of Governments’ (“SCAG”) regional transportation plan and its attendant environmental impact report.

Your staff has worked tirelessly to engage 197 separate local jurisdictions in the creation of the first ever Sustainable Communities Strategy in the SCAG region under SB 375, and should be commended for their hard work. The plan achieves some important early accomplishments, including:

- Responding to the growing market demand for walkable communities, the plan will house 68% of new development in multi-family housing, as opposed to 39% in the last 25 years.<sup>1</sup> The chart below from the Urban Land Institute’s recently published report *The New California Dream* confirms the strong demand for multi-family and small lot single family housing, as well as a projected surplus of large-lot single family homes;



- By planning for new homes near transit, and bringing new transit to existing communities, the plan achieves the equivalent of locating 94% of all new development near transit. This is also sound planning, as the ULI study referenced above also finds that even if all new development now to 2035 was built near transit, the region will still fall short of its 2035 demand for this type of housing;



- Through an emphasis on walkable communities, the plan reduces open space consumption by 400 square miles, and;
- The plan achieves its 2020 and 2035 state assigned SB 375 GHG reduction targets.

In the spirit of collaboration, we offer the following comments with the aim of improving the plan:

### **I. Commit to the Creation of a Sustainable Transportation Network**

While SCAG has received much praise for the land use assumptions in its Sustainable Communities Strategy, it is unclear whether the transportation system has been adjusted to support this land use pattern. While we recognize that SCAG must use input from its six County Transportation Commissions (CTCs) as the starting point for SB 375 scenario planning, we had hoped that the evaluation process would not end there. The problem, in our view, with the limited approach SCAG has adopted is the inconsistency between the varied land use projected across several scenarios and a transportation system that has been kept relatively constant. Such an approach ignores the evidence that land use patterns and transportation systems are frequently mutually reinforcing. The walkable compact development patterns SCAG calls for are less likely to materialize without adjustments to its transportation network, particularly in the Inland Empire. Similarly, compact land use patterns need to be serviced with real transportation choices if they are to be viable. We seek a commitment from SCAG, through its next SCS process in

four years, to evaluate scenarios which consider what environmental achievements may be possible with a transportation system that is more varied across those scenarios.

In particular, we find the emphasis on arterial widenings to be of concern. SCAG's EIR claims that it will spend \$22 billion on "local arterial improvements". A review of the SCAG project list indicates that by improve, the clear intent is to widen, or as some engineers describe it, to "rationalize" the system. Throughout the RTP project list, the verb widen is one of the most commonly found. And yet, the empirical literature on induced demand and induced growth makes clear that widening roads does not solve traffic congestion, and, as a recent poll demonstrates, the voters agree<sup>ii, iii</sup>. The futility of attempting to remedy congestion through arterial widening alone is perhaps best elucidated in Riverside County, where, despite an investment of more than six billion in arterial improvements, the County's residents can expect no marked improvement in hours of delay. Instead, the County projects an increase in hours of delay. While some of these arterial widenings may be represented in sales tax measures, County Transportation Commissions have significant latitude with respect to the phasing and prioritization of investments in their regions.

Before continuing to our specific recommendations, we would like to note the absence of certain data which would have been valuable in further scenario analysis. The transit and active transport appendices of the plan contain a wealth of data, categorized by county, concerning the current availability of transit and active transportation elements. What is lacking, however, are projections of how the current plan improves (or does not, as the case may be) access to transit and active transportation facilities for the residents of the various SCAG counties by 2035. We have submitted a request for the data to SCAG staff. We note that SCAG staff has been both helpful and responsive, but, as we were informed by staff, the data could not be made available in time for analysis in this comment letter.

Our recommendations for improving the transportation network are as follows:

1. Accelerate funding for Metrolink to provide badly needed regional commuting options

The Metrolink commuter rail system, which links numerous communities in all SCAG area counties, is already a critical component of SCAG's transportation system, and, with improvements, could become a major source of VMT reduction, congestion relief and economic development. The Draft Plan includes a Strategic Plan section with projects deemed important by the region, but for which funding does not currently exist. We strongly recommend moving the upgrading of the Metrolink commuter rail system into the Constrained Plan. The upgrade project would provide double tracking, grade separations and other modifications where needed to enable expanded express service, while making a planned transition to an all-electric system capable of providing zero-

emission high-speed service (up to 110 mph) in select corridors. Such an upgrade could provide significant returns in the form of congestion relief, emission reductions, and economic opportunity created, as well as create enhanced opportunities for transit-oriented development.

2. Explore bus and bus rapid transit expansions to provide high quality, cost-effective transit to a majority of residents

Eighty percent of transit ridership in the region takes the form of bus travel. Considering the long lead times involved with capital expansion projects, expanded bus service may present the most immediate and cost-effective strategy to provide alternatives to driving for millions of SCAG residents. And yet in Riverside County, projected to house another 1.1 million residents over the life of the RTP (second only to Los Angeles County in growth projections), only 10% of the population is currently served by high quality bus service (less than 15 minute headways). Currently 40% of residents have access to 15-30 minute headway service. SCAG should identify potential service frequency upgrades which could provide a significantly higher proportion of the population access to high quality transit service.

SCAG should identify strategic investments to increase ridership in light of the new revenues which may be available through the AB 32 cap and trade revenue. In fact, we would like to urge SCAG's Regional Council to adopt a policy commitment that any new revenues received through the cap and trade program be prioritized for efficient transit operations. The public transportation literature indicates that for every 1 percent increase in transit service frequency, ridership increases up to 0.5 percent and a similar increase in vehicle miles or vehicle hours of service can increase ridership up to a range of 0.6 to 1% (Evans, 2004)<sup>iv</sup>. The highest-performing lines could be candidates for upgrade to Bus Rapid Transit, which could, in turn, serve to anchor development along now low-density transportation corridors. SCAG and its CTCs should examine the highest-performing lines, and potentially recommend them for upgrade to fixed guideway systems in this RTP.

3. Commit funds for bicycling and walking commensurate to the share of trips these modes accommodate

SCAG has increased bicycle and pedestrian funding from \$1.8 billion to \$6 billion in this plan. While this is more than a 200% increase, for which staff should be commended, it still accounts for just over 1% of the plan's total funds. This is hardly commensurate with the 20% of total trips taken on foot or by bike. The recent poll of SCAG region voters conducted by NRDC, Move LA and ALAC found that, by strong

contrast, voters believe 14% of RTP funds should go to making walking and biking safer. SCAG should continue to examine the balance of funds which constitute the \$524 billion regional transportation plan, and investigate whether there are ways to free up additional funding for these most sustainable forms of transportation.

For example, SCAG proposes to spend \$22 billion widening arterials in the six county region. If some of these funds were instead directed to ensuring that these roads are “complete streets” – safe for walking and bicycling, the region would be taking real steps towards encouraging sustainable transportation. SCAG should encourage CTCs and local jurisdictions to adopt complete streets policies so that bicycle and pedestrian improvements can be made routinely and more economically when streets are improved or built. Widening arterials will neither encourage other modes nor solve traffic congestion. We believe committing \$6 billion to bicycle infrastructure and \$6 billion to pedestrian safety improvements is actually a very reasonable request, and would still represent just 2.3% of total plan revenues for these modes.

4. Commit to collaborating with County Transportation Commissions to Prioritize Projects which help to reduce VMT and GHG Emissions

While SCAG does not make final decisions about transportation projects – its CTCs do—SCAG does play an important role analyzing the social and environmental impacts of alternative investment decisions. In its upcoming TIP process, as well as the next SCS/RTP, we recommend that SCAG adopt a process similar to the Bay Area Metropolitan Transportation Commission’s to evaluate whether individual projects help to achieve regional goals<sup>v</sup>. In partnership with its County Transportation Commissions, SCAG should engage in a project performance analysis to determine whether its proposed investments help the region achieve its intended outcomes of improved air quality and health, location efficiency, improved mobility for its residents and reduced household transportation costs. Such an analysis assists decision makers in determining which projects are consistent with SCS goals.

The recently conducted poll of Southern California voters found that voters think building new roads and widening existing roads are by far the *least* effective strategies to reduce congestion and improve air quality. Instead, voters would rather see the region focus on smarter land use and prioritize investments in transit, bicycle, and pedestrian infrastructure. It is well known that SCAG is facing a significant funding shortfall for this RTP and makes some fairly ambitious assumptions about the availability of new

revenues. Perhaps a project performance assessment process could help to encourage SCAG's CTCs to adjust project priorities to contribute to overall SCS goals<sup>1</sup>.

## **II. The RTP Must Include More Detail on Making Clean Freight Movement a Reality in the SCAG Region**

As the RTP highlights, the movement of freight creates significant economic productivity in the SCAG region, but these financial benefits come at immense costs to the health and welfare of residents throughout the region, including the primarily low income communities of color nearest our freight hubs. Accordingly, any work to expand the freight movement system must concurrently push the cleanest technologies. In addition, resources must be allocated to cleaning up the already unacceptable high levels of pollution from the existing infrastructure. There is consensus amongst all regulatory air quality agencies that in order for the SCAG region to meet federal and state clean air standards on time, it must shift the freight movement system from a diesel-dominated industry to a near zero or zero emissions systems. To turn the rhetoric of moving to a cleaner freight system into a reality the RTP must be modified to include more detail.

In order to achieve the long-term, speculative projects of electric freight corridors on the I-710 and I-60, we need short-term projects. The notion was eloquently put in the 2006 Clean Air Action Plan ("CAAP"), adopted unanimously by both Boards of Harbor Commissioners for the Ports of Los Angeles and Long Beach, in which the commitment was made to the develop and implement a zero emissions container movement system. In pertinent part it reads:

This component of the program is focused on finding the next generation of transport solutions for goods movement. The ultimate goal is a 21st century electric powered system that will move cargo from our docks to the destinations within 200 miles that today are moved by truck. It may (sic) take 20 years to complete such a system, but it will always be 20 years away unless in the next five years we build and test a demonstration prototype and perfect a detailed plan for widespread construction.<sup>vi</sup>

This prototype project will serve as the path towards actual achievement of the projects along the I-710 and I-60.

Other forward looking projects should also be included in the RTP. A catenary system along the Terminal Island Freeway serving to connect the Port of Long Beach to the Union Pacific Intermodal Container Transfer Facility ("ICTF") merits inclusion. In the same vein, the RTP should also include a catenary system along Alameda Street. These projects must be

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<sup>1</sup> Given the recent *Association of Irrigated Residents vs. Environmental Protection Agency* case, the region needs to adopt enforceable Transportation Control Measures (TCMs). The measures identified in this section and others are prime candidates for inclusion in a list of TCMs.

pushed forward in the near-term (e.g. next two years). Finally, the catenary system should be incorporated as an enforceable measure in the State Implementation Plan. This type of strategy provides an ideal Transportation Control Measure. *See* 42 U.S.C. § 7408(f)(v), (vi); *see also* 42 U.S.C. § 7511A(e)(4). We would be delighted to collaborate with staff in determining how these projects should be included in both the constrained plan and the State Implementation Plan as enforceable measures to push progress towards a true zero emissions system.

### **III. Ensure Projects Meet a Robust Definition of SCS Consistency in order to Qualify for SB 375 California Environmental Quality Act Streamlining**

SCAG's EIR sets too low a bar for compliance with the SCS in order to achieve SB375's contemplated CEQA. Specifically, the EIR states that:

“In other words, the SCS was not developed with the intent that each project to be located within any given TAZ must exactly equal the density and relative use designations that are indicated by the SCS Development Type in order for the project to be found consistent with the SCS's use designation, density, building intensity and applicable policies. Instead, any given project, having satisfied all of the statutory requirements of either a residential/mixed-use project or TPP as described above, may be deemed by the lead agency to be consistent with the SCS **so long as the project does not prevent achieving the estimated average use designations, densities and building intensities indicated by the Development Type within the TAZ, assuming that the TAZ will be built-out under reasonable local planning and zoning assumptions.**”

We are particularly concerned that the standard established by this EIR--specifically the meager requirement that a project merely not prevent the achievement of a designated density for a certain development type--leaves it open to easy manipulation. It would seem to be quite easy for an individual project, of substantially lower density than that which is envisioned in the SCS, to justify its consistency with the SCS simply on the grounds that higher density projects are imagined in the future.

We strongly recommend that SCAG adopt a more stringent standard for consistency with the SCS in order to achieve the SB 375 CEQA benefits. At a minimum, we suggest the following language as an alternate standard:

so long as the project *promotes* achieving the estimated average use designations, densities and building intensities indicated by the Development Type within the TAZ, assuming that the TAZ will be built-out under reasonable local planning and zoning assumptions.

#### **IV. Commit to increased Compass Blueprint funding to ensure Local Governments have adequate resources to implement the Sustainable Communities Strategy**

Working in close partnership with its local jurisdictions, SCAG has identified a future growth pattern which manages to save 400 square miles of open space from development. This is a highly impressive accomplishment, and it will take the sustained partnership of SCAG's local governments to follow through on the promise of this plan. To recognize their critical role as essential partners in implementation, SCAG should commit—in this plan—to an increased funding level for the Compass Blueprint program. SCAG may want to consider future revenues from the AB 32 cap and trade program as a potential funding source for this investment. Funds should be prioritized to local governments who plan and zone for growth consistent with the SCS.

#### **V. Conformity**

We have reviewed SCAG's conformity demonstration for the 2012 RTP, and have identified the conformity finding for PM 2.5 in the 2014 milestone year as potentially problematic. According to the report, the PM 2.5 budget for that year is 35 tons, while estimated emissions are calculated at 34.5 tons a difference of just one half ton. (Transportation Conformity Report at p. 20.) This means that the integrity of the conformity finding will be fatally compromised by even small errors in future estimates of emissions.

There is an even chance that this half-ton difference is illusory. According to ARB's June 20, 2011 revisions to the PM 2.5 transportation conformity budget, included with this letter, the 35 ton 2014 PM 2.5 budget is rounded *up* to the nearest ton.<sup>vii</sup> (See Table C-3 at p. C-10.) Because estimated emissions for that year are 34.5 tons, *there is a 50% chance that the rounding error exceeds the difference between the 2014 budget and estimated emissions.* Use of a "rounding up to the nearest ton" method of establishing the emissions budgets, when the difference between emissions and the budget is half a ton, means that the conformity finding is random; there is a 50% chance that emissions *exceed* the budget. This is logically indefensible and manifestly arbitrary and capricious.

We believe that the aforementioned improvements to the regional transportation system work toward amelioration of this problem. We also urge staff to commit to modeling alternative transit scenarios in the next SCS/RTP process in order to fully ascertain the potential environmental benefits.

#### **VI. Conclusion**

SCAG staff has taken significant strides with this SCS to set the region on a more direct path to sustainability. In particular, the land use pattern shows a substantial deviation from years

past in its attempt to provide opportunities for Southern California residents to live in walkable communities with affordable, convenient transportation options. We feel more work is necessary to adjust the priorities in the transportation system to ensure it is worthy of the ambitious changes to the land use pattern SCAG envisions. We have been honored to work so closely with your excellent staff through the process of creating this plan, and we look forward to the critical implementation phase in the years to come.



Amanda Eaken  
Deputy Director, Sustainable Communities  
Natural Resources Defense Council



Adrian Martinez  
Staff Attorney  
Natural Resources Defense Council



Michael Fitts  
Staff Attorney  
Endangered Habitats League

## Citations

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<sup>i</sup> [http://www.uli.org/sitecore/content/ULI2Home/News/PressReleases/Archives/2011/2011PressReleases/~/\\_media/ResearchAndPublications/Report/ULI%20Voices%20Nelson%20The%20New%20California%20Dream.ashx](http://www.uli.org/sitecore/content/ULI2Home/News/PressReleases/Archives/2011/2011PressReleases/~/_media/ResearchAndPublications/Report/ULI%20Voices%20Nelson%20The%20New%20California%20Dream.ashx)

<sup>ii</sup> <http://latimesblogs.latimes.com/lanow/2011/11/poll-says-most-voters-in-la-region-favor-more-public-transit.html>

<sup>iii</sup> Giles Duranton & Matthew Turner, *The Fundamental Law of Road Congestion: Evidence from U.S. Cities* 42 (2009) Available at : <http://repec.economics.utoronto.ca/files/tecipa-370.pdf>

<sup>iv</sup> John E. Evans (2004), "Transit Scheduling and Frequency," *Traveler Response to Transportation System Changes*, TRCP Report 95, Chapter 9, TRB ([www.trb.org](http://www.trb.org)); At [http://gulliver.trb.org/publications/tcrp/tcrp\\_rpt\\_95c9.pdf](http://gulliver.trb.org/publications/tcrp/tcrp_rpt_95c9.pdf).

<sup>v</sup> [http://apps.mtc.ca.gov/meeting\\_packet\\_documents/agenda\\_1660/03\\_SCS-RTP\\_Project\\_Performance\\_Assessment\\_Revised\\_Approach.pdf](http://apps.mtc.ca.gov/meeting_packet_documents/agenda_1660/03_SCS-RTP_Project_Performance_Assessment_Revised_Approach.pdf)

<sup>vi</sup> San Pedro Bay Ports, 2006 Clean Air Action Plan, 141 (November 2006) available at <http://www.polb.com/civica/filebank/blobdload.asp?BlobID=3451>.

<sup>vii</sup> Proposed 8-Hour Ozone State Implementation Plan Revisions and Technical Revisions to the PM2.5 State Implementation Plan Transportation Conformity Budgets for the South Coast and San Joaquin Valley Air Basins [http://www.arb.ca.gov/planning/sip/2007sip/2011\\_ozone\\_sip\\_staff\\_report\\_with\\_appendices.pdf](http://www.arb.ca.gov/planning/sip/2007sip/2011_ozone_sip_staff_report_with_appendices.pdf)



February 14, 2012

Pam O'Connor, President  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**RE: Comments on the 2012-2035 RTP/SCS—Need for Amendments to Freight Element**

Dear President O'Connor:

On behalf of the Natural Resources Defense Council and the Coalition for Clean Air, we write regarding the need for a near-term clean freight project in the Regional Transportation Plan (“RTP”). Specifically, we are concerned that there is not an emphasis in the RTP on near term projects that will help the region achieve its technology goals of creating a zero or near zero emission freight movement system. Accordingly, we respectfully ask that the RTP be amended to include short term projects in the constrained plan that will help advance cleaner technologies in the short-term.

In the 2006 Clean Air Action Plan (“CAAP”), adopted unanimously by both Boards of Harbor Commissioners for the Ports of Los Angeles and Long Beach, the ports committed to develop and implement a zero emissions container movement system. In pertinent part, the Port boards declared that —

This component of the program is focused on finding the next generation of transport solutions for goods movement. The ultimate goal is a 21st century electric powered system that will move cargo from our docks to the destinations within 200 miles that today are moved by truck. It may take 20 years to complete such a system but it will always be 20 years away unless in the next five years we build and test a demonstration prototype and perfect a detailed plan for widespread construction.<sup>1</sup>

Here we are six years later, and we are no closer to actual implementation of a zero emissions system. While there are a lot of discussions about these technologies, there is an imperative need for SCAG to be leaders on this issue. In that vein, SCAG needs to provide more support for this concept in the near-term.

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<sup>1</sup> San Pedro Bay Ports, 2006 Clean Air Action Plan, 141 (November 2006) *available at* <http://www.polb.com/civica/filebank/blobdload.asp?BlobID=3451>.

The RTP should be amended to include a project or projects that will help spur technology. A catenary system along the Terminal Island Freeway serving to connect the Port of Long Beach to the Union Pacific Intermodal Container Transfer Facility (“ICTF”) merits inclusion in the constrained portions in the plan. In the same vein, the RTP could also include other similar projects, including a catenary system along Alameda Street in the harbor area. At least one of these projects must be pushed forward in the near-term (e.g. next two years). The cost of such a system is estimated to be between 5 and 6 million dollars per mile on the high end. Furthermore, dollars should be allocated to procure trucks that can use this system. Accordingly, we recommend an initial allocation of 35 million for the entire project with the creation of a plan to increase the percentage of trucks that use this facility. Funding for this project could come from some combination of the ports, agencies responsible for clean air locally and statewide, and private industry. The key is to develop and implement the catenary system in the short term to help progress in actually achieving zero emissions goals. Finally, the catenary system should be incorporated as an enforceable measure in the State Implementation Plan. This type of strategy provides an ideal Transportation Control Measure. *See* 42 U.S.C. § 7408(f)(v), (vi); *see also* 42 U.S.C. § 7511A(e)(4). We would be delighted to collaborate with staff in determining how these projects should be included in both the constrained plan and the State Implementation Plan as an enforceable measure to push progress towards a true zero emissions system.

Please do not hesitate to contact us if you have questions about this recommendation.

Sincerely,



Adriano L. Martinez  
Staff Attorney  
Natural Resources Defense Council

Luis Cabrales  
Deputy Director of Campaigns  
Coalition for Clean Air



**LOS ANGELES  
NEIGHBORHOOD  
COUNCILS**  
 Arroyo Seco  
 Cypress Park  
 Eagle Rock  
 El Sereno  
 Glassell Park  
 Highland Park  
 Lincoln Heights  
 Sunland-Tujunga

**CITIES**  
 City of Glendale  
 City of Los Angeles  
 City of La Cañada Flintridge  
 City of South Pasadena

**OPPOSITION GROUPS ( PARTIAL LIST )**

Caltrans Tenants of the 710 Corridor  
 Natural Resources Defense Council  
 East Yard Communities for Environmental Justice  
 Glassell Park Improvement Association, Land Use Committee  
 Far North Glendale Homeowners Association  
 Crescenta Valley Town Council  
 La Cañada Flintridge Unified School District  
 LA RED, El Sereno

**Green Scissors 2011 Report Groups**

Friends of the Earth  
 Taxpayers for Common Sense  
 Heartland Institute  
 Public Citizen

**INJUNCTION PLAINTIFFS**

City of South Pasadena  
 Sierra Club  
 National Trust for Historic Preservation  
 California Preservation Foundation  
 Los Angeles Conservancy  
 Pasadena Heritage  
 South Pasadena Preservation Foundation  
 South Pasadena Unified School District

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**January 30, 2012**

**Southern California Association of Governments  
 Attention: Margaret Lin  
 Southern California Association of Governments  
 818 West 7th Street, 12th Floor  
 Los Angeles, CA 90017**

**Sent via email to: [lin@scag.ca.gov](mailto:lin@scag.ca.gov)**

**Subject: Comments on SCAG DRAFT 2012 RTP**

**Who We Are**

The No 710 Action Committee is a grassroots organization with members from the northeast area of Los Angeles and surrounding communities, including Alhambra, Eagle Rock, El Sereno, Highland Park, Glassell Park, Glendale, La Crescenta, La Canada, Los Angeles, Pasadena, and South Pasadena. Our group is comprised of residents as well as business and health professionals from diverse backgrounds and communities who are committed to improving transportation modes across and within the County. Our members include community organizers and activists, engineers, elected officials, scientists, economists, physicians and other health care professionals. Cities, neighborhood councils and groups that have taken official positions against the SR-710 extension represent over 500,000 people.

Through decades of involvement in 710-related issues, we have exhaustively researched multiple aspects of our region's transportation issues including pollution and health concerns, contemporary advances in freight movement, mass transit, traffic calming strategies and more. We support projects that are environmentally responsible and financially prudent, projects that will have benefit for the entire region. Since the proposed SR-710 Extension Toll Tunnels would not improve our regional mobility and air quality, but would actually worsen them, we recommend alternative solutions.

### **Objections to the RTP**

We urge SCAG policymakers to **remove from the RTP all line items associated with expanding and extending the 710 freeway**, and remove from the RTP all items associated with expanding and increasing *existing* infrastructure and technology for goods movement in the region.

In addition, the No 710 Action Committee notes that SCAG must move the proposed SR-710 Extension Toll Tunnels from the Constrained Plan to the Strategic Unfunded Plan in the 2012 RTP because there are no committed, available, or reasonably available funds as required by federal law to include them in the Constrained Plan.

We oppose SCAG RTP items associated with proposed SR-710 Toll Tunnels because **they will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks in our communities and throughout the region**. We oppose related plan items which have the goals of increasing conventional roadway and rail yard capacity for the same reasons. The Programmatic Draft Environmental Report for the Plan is inadequate, as is stated in an addendum to this letter. These approaches are outdated, inefficient, and harmful to the region. **Better, zero-emission proposals for goods movement are available now – we should not wait another 20 years.**

### **Air Quality and Congestion**

Goods movement proposals in the Draft Plan are inconsistent with regional, state, and federal air quality and congestion targets stated in the plan. The plan states that to attain federal ozone standards, the region will need broad deployment of zero and near-zero emission transportation technologies in the 2023 to 2035 timeframe (p.74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor air quality (p. 68), yet allocates billions of dollars to expanding existing systems, with no requirement that new technology be implemented.

The plan says that “truck-only freight corridors are effective as they add capacity in congested corridors, improve truck operations and safety..and provide a platform for the introduction and adoption of zero-emission technologies.” However, the plan does not require zero-emission technology (which truck operators will be reluctant to invest in because of the added expense), assumes and accommodates more trucks on the road en route to proposed freight corridors, and allocates billions to construction of these corridors instead of electrified rail freight movement projects which would eliminate many trucks from inner-city traffic altogether.

### **Health Impacts and Environmental Justice**

The plan acknowledges environmental justice legislation at the federal and state level in detail and pledges SCAG's compliance with the spirit of these laws. It proposes to address freight movement and rail emissions-related impacts, but it avoids mention of significant and sustained community opposition to the BNSF SCIG, which is on the Project List. The No 710 Action Committee opposes the SCIG in solidarity with the Coalition for a Safe Environment and other community groups that have repeatedly presented their comments and concerns related to environmental justice. These communities experience far higher than average freight truck traffic and host undesirable intermodal freight facilities. The resulting higher than average health, quality of life, life expectancy and safety problems are well documented. However, the existence of their concerns and specific objections to the SCIG are completely ignored and not mentioned in this Draft Plan or its appendix on Environmental Justice. The No 710 Action Committee repeats that SCIG and related Draft Plan components are part of an overall framework which favors conventional goods movement activities that cause significant pollution and negative impacts in neighboring communities and throughout the region.

### **Jobs**

Job creation and retention goals in this Draft Plan represent “mission creep” and tilt towards requiring more trucks, more freeways, more traditional rail infrastructure, and more conventional port transfer and loading. We oppose this direction because it is part of a conceptual framework that includes the proposed SR-710 Toll Tunnels and the associated negative impacts mentioned above: pollution, truck traffic, congestion, accidents, health and environmental risks. The Port Working Group, a community coalition, has noted that the SCIG plan claims to add 400 permanent jobs, but existing businesses at the proposed site provide more than 1,200 permanent jobs, resulting in an overall reduction. Further, many of the construction jobs are not permanent, and not guaranteed to be awarded locally.

The No 710 Action Committee urges regional mobilization focusing on multi-modal transit and goods movement projects using electrified rail and zero emission technology. These will also create jobs, but the approach is forward-looking in terms of job and skills training and future infrastructure needs. In addition, more efficient, lower-cost goods movement technology will allow the Southern California region to attract jobs and new investment, competing effectively with other international and eastern seaboard ports' expansion and modernization.

### **Zero Emission Technology**

The plan refers to zero emission electrified rail technology as a long-term goal in sections of the report covering goods movement, congestion, air quality, transportation investments, and truck transport. It proposes a long-term, bureaucratic study. It does not acknowledge that specific patents, plans and technologies are currently being proposed and discussed by several parties. The Draft Plan indirectly and incorrectly implies that such technology cannot be implemented on an accelerated timetable. This is a matter of political will and private investment, not feasibility. The No 710 Action Committee objects to the Plan's time-delay in funding and implementing zero emission strategies, because the near-term alternatives proposed in the Draft Plan include extension and expansion of freeways (such as the 710) and traditional rail yards and goods movement infrastructure which will result in added pollution, truck traffic, congestion, accidents, health and environmental risks in the region.

### **Funding**

We question the revenue projections in the Draft RTP. The profitability of regional toll ways hasn't been demonstrated, and the exact uses of the proposed SR-710 Toll Tunnels haven't been determined (car only, truck only, both?) yet the SCAG RTP assumes a combined \$22.3 billion in revenues for the tunnels and other toll ways.

On the expense side, funding should be reallocated. The billions of dollars for freeway expansion, near-term dedicated truck lanes, the East-West Corridor, and conventional rail yard / truck loading should be spent on accelerated implementation of zero emission electrified rail freight movement and other multi-modal and active transportation projects.

The plan gives lip service to a modernized, zero emission freight movement system from ports to electrified rail, but allocates no funding for this important step that will dramatically reduce truck traffic and congestion, improve air quality and health/environmental impacts, and position this region as an efficient, low-cost, high-tech goods movement magnet.

The plan also admits that increased population, and a growing aging population, will need alternative forms of transportation as roads become more crowded in the region. More funding should be directed proportionally to active transportation: walking, biking, transit, and multi-modal planning. The No 710 Action Committee proposes that the SCAG RTP allocate a share of funding proportional to the anticipated users of and established needs for active transportation to foster

livable, sustainable neighborhoods throughout the region and meet AB32 and SB375 greenhouse gas emission goals.

**Vision**

Mobility, economy, and sustainability can all be advanced with the priorities and funding we propose. We urge SCAG to remove the SR-710 Tunnel from its Draft Plan, reject goods movement proposals that extend the last century's polluting and inefficient practices, and invest instead in forward-looking plans that will enhance the region's quality of life and economic prospects.

Claire Bogaard, Pasadena

Claire Bogaard

Susan Bolan, La Crescenta

A Z Bolan

Sam Burgess, Pasadena

Sam Burgess

Janet Ervin, Alhambra

Janet Ervin

Trisha Gossett, Highland Park

Trisha Gossett

Bill Graham, Burbank

Bill Graham

Don Jones, Eagle Rock

Don Jones

Elise Kalfayan, Glendale

Elise Kalfayan

Clarice Knapp, South Pasadena

Clarice Knapp

Harry Knapp, South Pasadena

Harry Knapp

Joanne Nuckols, South Pasadena

Joanne Nuckols

Carol Teutsch, Los Angeles

Carol Teutsch

Don Smith, Long Beach

Don Smith

Jan Soo Hoo, La Canada Flintridge

Jan Soo Hoo

Odom Stamps, South Pasadena

Odom Stamps

Sherry Stubbs, Glendale

Sherry Stubbs

Tom Williams, El Sereno

Tom Williams

## **Postscript and Addendum:**

### **PEIR**

Additional comments regarding the Draft Programmatic Environmental Impact Report (D-PEIR) shall be submitted separately and provide more detailed citations and comments which will demonstrate that the RTP as Project Description, Alternatives, and Mitigation sections of the PEIR, and the PEIR itself, are grossly inadequate and incomplete with regard to issues summarized below:

### **Summary Issues for 2035 RTP and RTP-Draft PEIR**

#### **1. Inadequate/Incomplete Project Description/Assessment for a Transportation Plan**

Both the RTP and the PEIR are incomplete and totally inadequate as only selective forecasted 2035 traffic flows are provided in the main chapters and appendices which do not allow the public to fully review and evaluate the assessment of impacts. This is especially important for the evaluation of Freight Movements within corridors between the San Pedro Ports and the High Desert Corridor and Colton/Inland Empire Logistics Areas. Specifically more than 15 values for 2035 freight flows are missing from the I-710, I-5, and I-210 segments in Figure 2.7 and Goods Movements Appendix. Similarly no freight movement values are provide for connectors to the High Desert Corridor via I-15, SR-14, SR-138, and I-15.

Without these values the Projects listed for 2035 (e.g., SR-710 North Extension, East-West Freight Way (SR-60), SR-14, SR-138, etc.) cannot be properly confirmed, impacts assessed, and tolls-revenue generation evaluated.

Truck traffic is a major congestion factor on all RTP freeways in central LA County and must be modeled and results provided for independent assessment.

The High Desert Corridor truck destination/origins are not provided as little or no employment or housing or other land use parameters are not provided for such a large project.

#### **2. SR-710 North Extension Project**

The SCAG 2035 RTP assumes a route of the SR-710 along the old surface freeway route from the I-10 to the I-210, although Caltrans and MTA and the Technical Advisory Committee for the Project have already delineated a 150 sq mi study area which could easily change the entire basis for traffic modeling of freight movements through the central Los Angeles County road system. Such changes would have significant effect on modeled freight traffic levels.

Similarly the SR-710 TAC are conducting traffic modeling which specifically is different from results show in the RTP and have commented that the SCAG-RTP Traffic Model does not appropriately model the SR-710 conditions for 2035 and before.

#### **3. Inadequate and Incomplete Port and Rail Facilities Descriptions and Alternatives**

The 2035 RTP remains totally focused on road truck movement of freight between the San Pedro Ports and the High Desert Corridor and Inland Empire Logistics Areas. Alternatives are being submitted to both Ports of Long Beach and Los Angeles for a major increase of direct Ship<->Rail – on-dock/in-port transfer facilities with rapid turnarounds of ships and unit trains between the Ports and Logistics Areas which will promote a rapid increase in the Alameda Corridor, Alameda Corridor East, and the new Alameda Corridor North to the High Desert Corridor Logistics Area. Estimated 10+ unit trains/hr (3 lines x 24 x 10 = 720 unit trains/day) would travel from Ports to the two Logistics Areas.

The RTP and PEIR have an unstated assumption that transfer facilities near the Ports are required to transfer freight from sea containers or 40 ft to US rail/truck containers of 53 ft. However, ships are already being refitted for the longer US containers for both West Coast Ports and for Panama shipping. Such project changes would largely eliminate any transfers in the Port region or the Logistics Areas.

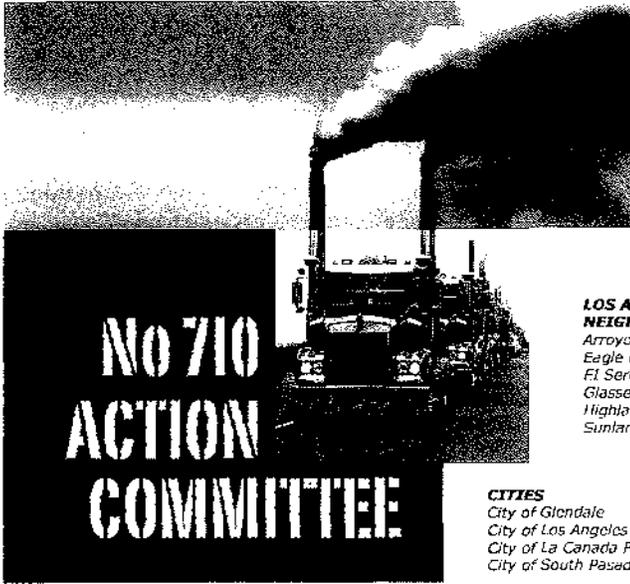
Other issues will address in comments directly for the PEIR. As they stand now, both the 2035 RTP and PEIR are inadequate, incomplete, in error, and unsupported by information accessible to the Public and perhaps between Caltrans/MTA and SCAG regarding the SR-710 and its role in the RTP from Los Angeles County.

**4. PEIR Jobs/Employment  
Time and Totals  
High Desert Corridor and Logistics Employees**

**5. Social Economics – Tolls/ETC. Revenue Generation and Costs  
Constrained v. No Funding**

**CC:**

California Transportation Commission members  
Glendale Mayor and City Council members  
Glendale Transportation and Parking Commissioners  
La Canada Flintridge Mayor and City Council members  
Los Angeles Mayor and City Council members  
Pasadena Mayor and City Council members  
South Pasadena Mayor and City Council members  
South Pasadena Transportation Manager  
MTA Board members  
State Assembly Representatives - northeast LA, Glendale, Pasadena, and La Canada Flintridge  
State Senators – northeast LA, Glendale, Pasadena, and La Canada Flintridge  
Members of Congress – 29th, 31st – 39th, 46th Districts  
Crescenta Valley Weekly  
Glendale News-Press  
La Canada Valley Sun  
LA Streetsblog  
LA Weekly  
Long Beach Press-Telegram  
Los Angeles Times  
Pasadena Sun  
Pasadena Star-News  
Pasadena Weekly  
South Pasadena Review



**OPPOSITION GROUPS (PARTIAL LIST)**  
 Caltrans Tenants of the 710 Corridor  
 Natural Resources Defense Council  
 East Yard Communities for Environmental Justice  
 Glassell Park Improvement Association  
 Far North Glendale Homeowners Association  
 Crescenta Valley Town Council  
 La Canada Unified School District  
 LA RED, El Sereno

**GREEN SCISSORS 2011 REPORT GROUPS**  
 Friends of the Earth  
 Taxpayers for Common Sense  
 The Heartland Institute  
 Public Citizen

**INJUNCTION PLAINTIFFS**  
 City of South Pasadena  
 Sierra Club  
 National Trust for Historic Preservation  
 California Preservation Foundation  
 Los Angeles Conservancy  
 Pasadena Heritage  
 South Pasadena Preservation Foundation  
 South Pasadena Unified School District  
 City of South Pasadena

**LOS ANGELES NEIGHBORHOOD COUNCILS**  
 Arroyo Seco  
 Eagle Rock  
 El Sereno  
 Glassell Park  
 Highland Park  
 Sunland - Tujunga

**CITIES**  
 City of Glendale  
 City of Los Angeles  
 City of La Canada Flintridge  
 City of South Pasadena

Post Office Box 51124

Pasadena, CA 91115

Telephone 626 799.0044

no710extension@aol.com

February 13, 2012

Mr. Jacob Lieb  
 Ms. Margaret Lin  
 Southern California Association of Governments  
 818 West Seventh Street, 12<sup>th</sup> Floor  
 Los Angeles, California 90017-3435

RE: Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR)

Dear Mr. Lieb and Ms. Lin:

The No 710 Action Committee welcomes the opportunity to provide information that we believe is missing from the Draft PEIR and to identify in some cases where the information can be found.

**Air Quality and Health Consequences**

SCAG RTP modeling is seriously out of date. Most of the SCAG region is classified as a non-attainment area for some criteria pollutants and an extreme non-attainment area for Ozone. SCAQMD, as the regional air regulator, has 36 air quality sensors across Southern California (Map 3.2-1) but they don't monitor pollution next to busy freeways. While the sensors may give a big picture view in accordance with federal law, "without the (freeway) monitors, there's a "glaring hole" in air pollution planning that ignores the health of more than a million people who live within 1000 feet of freeways in the AQMD's region, according to Adrian Martinez, an attorney for the Natural Resources Defense Council."1 Baseline data compiled from freeway monitors would allow us to stop the current modeling impulse to "average" pollution throughout the region, to look at health risks more accurately in nearby populations, and not claim unfounded benefits from basically shifting the pollution elsewhere without eliminating it. Current traffic

modeling appears to be out of date and inadequate, as witnessed by the delay of release of the preliminary DEIR on the lower I-710 due to inaccurate truck numbers. Without considering induced demand, the true costs of building, and maintenance and operations of highways the model doesn't build adequate and accurate evidence for decision making. It leaves open to unsupported speculation that more freeways or tunnels will lessen congestion and improve air quality. There is no uncongested freeway in LA and car and truck volumes are projected to increase as the inborn population increases. The volume of traffic and their attendant pollutants will inevitable increase and move us towards a progressively unhealthy place to live.

On the **Executive Summary- page 3** the statement is made that “based on the analysis contained in this Draft PEIR, the following were found to result in a **less-than-significant impact or no impact**: Air Quality (Change in Risk Levels Adjacent to the Freeway and Increased Population).” The RTP conclusion is invalidated by the statement on page **ES-2** regarding **Significant and Unavoidable Impacts**: Air Quality (Criteria Pollutants Emissions and Construction Emissions) and more specifically throughout the 3.2 Air Quality Section that cites many studies and their results:

**pg. 3.2-23** A review of air pollution studies by the California Air Resources Board (CARB) indicates that residing close to freeways or busy roadways may result in adverse health effects beyond those typically found in urban areas. Several studies found an association between adverse non-cancer health effects (e.g., asthma) and living or attending school near heavily traveled urban roadways; however, these studies also found that the roadway and truck traffic densities were key factors affecting the strength of association with adverse health impacts. For urban roadways, the association of traffic-related emissions with adverse health impacts was generally strongest between 300 and 1,000 **feet**. (Dr. Rob McConnell and colleagues at USC published data showing concerning health effects at 500 to 1500 **METERS** from a freeway).

CARB reports that Diesel Particulate Matter (DPM) represents about 70 percent of the potential cancer risk from vehicle travel on a typical urban freeway. As shown in **Table 3.2-4**, exhaust from heavy-duty trucks is **anticipated to decrease** in all areas of the region as compared to today; thus DPM associated with freeways will also decrease as compared to today.

Since the ARB identified diesel emissions as toxic air contaminants that are carcinogenic (TACs) in August, 1998 and 14 years (3 RTPs) have passed, it would seem unlikely that the above conjecture will come true any time soon, especially with America's oil dependency.

- *Mobile Sources Contribute to Serious Health Impacts.*  
Mobile sources such as trucks, locomotives and automobiles create the vast majority of air pollution in the South Coast Air Basin. One type of pollutant, fine particulates, is estimated to cause **6,200 premature deaths** in the Basin *every year*. The **average reduction in life span** for such persons is estimated by the

California Air Resources Board and the U.S. Environmental Protection Agency to be **14 years**. (California Air Resources Board, 2008 (mean estimate) 2

- *Health Risks Near Transportation Facilities.*  
The AQMD *Multiple Air Toxics Exposure Study* (MATES III) shows that diesel particulate matter is the overwhelming contributor to regional cancer risks from air pollution which average 1,200 in a million. This is hundreds of times higher than risk levels allowed for stationary sources under AQMD rules (between 1 and 25 in a million). The highest risks from air pollution are found near highways and other transportation facilities such as the I-710, because of heavy reliance on diesel-powered mobile sources. Persons in highly polluted portions of the basin, and persons near transportation facilities anywhere, also suffer greater risks of reduced lung function and many other serious health effects. (SCAG Mates III analysis, 2008) 3

The above is of particular concern to the No 710 Action Committee because of the overwhelming emphasis on goods movement and single occupancy vehicles in the RTP. The lower I-710 is listed on the projects list and proposes 4 truck lanes from the Ports of LA-Long Beach to the rail yards and 10 general lanes from the Ports to SR-60. While the upper I-710 is listed as a study (EIR/EIS) at a cost of \$87,454 million, (2-27) the projects do not stand alone without consideration of the impact of the other, basically a conduit for port truck traffic into residential areas.

The I-710 North project is also described as an 8 lane toll facility in a tunnel (2-13). While new schools cannot be built within 500 feet of a major highway or freeway, the reverse is not regulated. A freeway or tunnel can be built within that distance, which would result in at least 37 schools that are within 1000 feet of the extension and the 210 from South Pasadena and Pasadena to Sylmar being subjected to toxins from an additional 30,000 vehicles and 2,500 more trucks daily. 4

Tunnels concentrate pollution up to 1000 times. An Australian school district will not allow their school busses to traverse a 2 mile tunnel that is considerably shorter than that planned for the I-710 extension. 5

### **Health Risk Assessments (HRA) and Health Impact Assessments (HIA)**

The RTP must consider formal Health Risk Assessment and Health Impact Assessments for all of the I-710 corridor communities and Hot Spot analysis for sensitive receptor community sites such as schools, daycare centers, hospitals, convalescent centers, senior centers, parks and recreation centers, athletic fields and residential areas. Health professionals must be included in the analyses.

No 710 Action Committee is **attaching** for your reference:

- Scoping comments,
- 13 page Bibliography of Health/Pollution Impacts links,

- Chart of Selected Health and Economic Impacts of Freight in Global Trade Impacts: Addressing the Health, Social and Environmental Consequences...
- National Transportation Objectives and Targets
- Coalition for Clean Air - Top 10 facts Californians should know about air pollution and health
- Coalition for Clean Air - Pollutants and Health Effects
- Coalition for Clean Air - Transportation Facts

### **Port of Los Angeles, Port of Long Beach**

The Ports of Long Beach and Los Angeles are the single largest source of air pollution in the South Coast Air Basin.

The AQMD stated in its February 17, 2009 letter regarding I-710 Project Alternatives that “In sum, **this region needs every possible emission reduction from goods movement and other mobile sources.** This must include zero-emission technologies wherever possible.” The agency continued by mentioning electrified rail, maglev, the Alameda Corridor Electrification, electric trucks, fixed-guideway systems, and zero emission technologies that have been available for decades with photos of electrified freight transport systems in England, France, Russia, Italy, etc. In concluding, the agency stated “**we wish to caution against any unnecessary “phasing” of the evaluation of zero-emission alternatives which could result in other portions of the I-710 project (i.e. lane expansion) proceeding to project level analysis, possible approval and construction, prior to full evaluation and potential decision regarding the zero-emission alternative.**” 6

The 12/6/2010 “Development of a California Geospatial Intermodal Freight Transport Model with Cargo Flow Analysis” commissioned by CARB and CEPA states in its conclusion section “First, the Case Study quantifies port-related intermodal goods movement through the state of California and beyond. Second, the idealized use of least-CO2 routing constraints illustrates how emissions savings can be achieved through modal shifts. **In terms of savings in emissions, it is estimated that a total of 60% reduction in CO2 emissions is achievable by a modal switch from road to rail.**” 7

We need no more long-term goals or bureaucratic studies as stated in the plan. The technology is available now, the studies have been done, commercial projects and lower polluting alternatives have been suggested in the I-710 DEIR, the benefits are region wide.

### **Goods movement versus people movement, by way of forms of mass transit.**

For Los Angeles to become truly a world-class city more mass transit by way of light rail, busses, subways or streetcar connections must be planned and implemented. Los Angeles has been the laboratory for Detroit for the last 100 years and has only been catching up with other major U.S. cities for the last 20 years.

The Move L.A. “ survey completed by Fairbank, Maslin, Maullin, Metz and Associates, shows that voters in the six county region served by the Southern California Association of Governments (SCAG) overwhelmingly support expanding and investing in transit over investing in highways. Even when voters backed highway spending, there was more support for a “Fix It First” approach than funneling more money into mammoth road expansion projects. Voters prioritized expanding public transportation as the most effective means of reducing traffic congestion and air pollution, said Denny Zane, executive director of Move L.A.”<sup>8</sup>

The I-710 North EIR Scoping letters ran overwhelmingly against expansion of the freeway/tunnel. Preferences are for mass transit projects that would relieve congestion, clear the air, make commutes more agreeable and efficient and put more people into one vehicle rather than single occupancy vehicles.

The RTP is “front loaded” with highway projects and “back loaded” with transit. To meet our State mandates, it would make sense to move the transit projects up in the timeline and build them sooner than later.

### **Health in all public policies**

Health and health equity issues do not appear prominently enough in your overall planning. Please reference [www.sgc.ca.gov/workgroups/hiap.html](http://www.sgc.ca.gov/workgroups/hiap.html). Community engagement is not demanding you build more and they are the ultimate stakeholders and the ones who bear the costs and health burdens.

### **Funding an Undefined Project**

We are distressed to see the enormous dollars that might go to a new infrastructure project such as the I-710 north tunnels (11.8 billion, 2007 SCAG figure). **No project** is actually defined yet. The EIR/EIS process is just underway and is considering multiple routes, not just one. In fact, the Technical Advisory Committee has only had 2 meetings and is dealing first with a purpose and need evaluation. Our scarce transportation dollars could be much better used in transit projects to make a healthier and sustainable region. This should not be in the **constrained** list of projects but rather removed to the **strategic** list. The cost estimates are way below the building costs and there are many specialized issues in concentrating pollution in tunnels. The toll revenues may not come to pass, as many municipalities have found. It is not revenue you can reliably build into the current plan. Due to no foreseeable funding in sight to complete an undefined project, **the RTP must reflect reality and move the potential project from the constrained to the strategic unfunded list.**

We need to move to congestion pricing, reduced parking availability, higher parking costs and other incentive taxes to move us away from choosing individual mobility options.

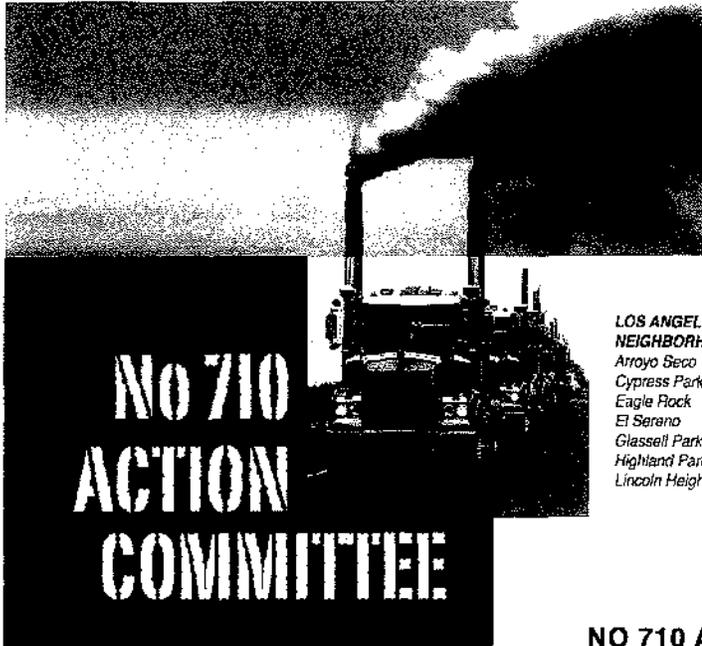
Thank you for your attention to our issues. The public is very interested in transportation as it affects our daily lives. We look forward to seeing the revised plan.

Sincerely,

Clarice Knapp CLARICE KNAPP, SOUTH PASADENA  
Carol B Teutsch CAROL B. TEUTSCH, LOS ANGELES  
SUSAN BOLAN LA CRESCENTA  
Harry A. Knapp HARRY A. KNAPP, SOUTH PASADENA  
W.D. Sherman, MD WILLIAM D. SHERMAN MD, So. PASADENA  
SHERRILL STABBBS LA CRESCENTA  
Wayna Kato WAYNNA KATO, SOUTH PASADENA

- 1. "Dirty freeway air puts Southern California health at risk, say activists" Melissa Pamer, LA Dailynews.com, 1/16/12
2. SCAQMD letter dated February 17, 2009 to the I-710 Technical Advisory Committee re: I-710 Project EIR Alternatives
3. SCAQMD letter dated February 17, 2009
4. I-710 Missing Link Truck Study, Traffic Analysis for the Arroyo Verdugo Subregion With and Without the I-710 Gap Closure, Preliminary Draft Final Report, submitted to SCAG
5. Tunnels Concentrate Air Pollution By Up to 1,000 times, *ScienceDaily*, materials provided by Queensland University of Technology, (Aug. 30, 2009) <http://x-journals.com/2009/tunnels-concentrate-air-pollution-by-up-to-1000-times/>
6. SCAQMD letter dated February 17, 2009
7. Development of a California Geospatial Intermodal Freight Transport Model with Cargo Flow Analysis, Prepared for the California Air Resources Board and the California Environmental Protection Agency, 12/6/2010
8. "Survey: Southern California Voters Want More Transit, Balk at More Highways" 02 Nov 2011, [la.streetsblog.org/2011-switchboard.nrdc.org/blogs./survey\\_shows\\_socal\\_voters\\_want.html](http://la.streetsblog.org/2011-switchboard.nrdc.org/blogs./survey_shows_socal_voters_want.html)

Attachment: No 710 Action Committee scoping comments, et.al.



**OPPOSITION GROUPS (PARTIAL LIST)**  
Natural Resources Defense Council  
Glassell Park Improvement Association, Land Use Committee  
Far North Glendale Homeowners Association  
Town Council of Crescenta Valley  
Glendale Homeowners Coordinating Council  
LA RED, El Sereno  
**Green Scissors 2010 Report Groups**  
Friends of the Earth  
Taxpayers for Common Sense  
Environment America  
Public Citizen

**INJUNCTION PLAINTIFFS**  
City of South Pasadena  
Sierra Club  
National Trust for Historic Preservation  
California Preservation Foundation  
Los Angeles Conservancy  
Pasadena Heritage  
South Pasadena Preservation Foundation  
South Pasadena Unified School District

**LOS ANGELES  
NEIGHBORHOOD COUNCILS**  
Arroyo Seco  
Cypress Park  
Eagle Rock  
El Sereno  
Glassell Park  
Highland Park  
Lincoln Heights

**CITIES**  
City of Glendale  
City of Los Angeles  
City of La Canada Flintridge  
City of South Pasadena

Post Office Box 51124,  
Pasadena,  
California 91115  
626 799.0044

## **NO 710 ACTION COMMITTEE:**

### **SCOPING COMMENTS ON HEALTH AND AIR POLLUTION 710 TUNNELS PROJECT**

Ron Kosinski  
Deputy Director  
Division of Environmental Planning  
Caltrans District 7  
100 S. Main street, MS 16A  
Los Angeles, CA 90012

Dear Mr. Kosinski,

RE: SR-710 Environmental Impact Report/ Scoping Request.

**We are requesting a "hot spot analysis" for the following types of locations related to all the corridors under consideration for the proposed 710 tunnels project:**

- Schools
- Daycare center
- Hospitals
- Convalescent centers
- Senior centers
- Parks and recreation centers and athletic fields
- Residential areas

**These listed locations should be designated as "sensitive receptor community sites."**

**The Hot Spot analysis and modeling analysis should include harmful products e.g.:**

Particulate matter PM to include all sized particles including ultrafine particles (<100nm) and nano particles (<50 nm), carbon black (organic carbon and elemental carbon), and degradation of road products and tires and brake linings and diesel catalyst decay products (including but not limited to metal particulate emissions, strontium, and a variety of organic compounds)

- Nitrogen oxides (NO<sub>x</sub>) and nitrogen dioxide (NO<sub>2</sub>)
- Ozone
- Carbon monoxide (CO)

**We are also requesting "Health Impact Assessments and Health Risk Assessments" at the above named sites.**

In addition to the specified sensitive receptor community sites, the hot spot analysis should also include analyses of the **tunnels themselves** with investigation of concentrations of all the above pollutants at peak traffic hours with congestion modeling, within the tunnels, at the portals and at ventilation shafts. Information about the ventilation shaft air cleaning should be provided consistent with the highest level of available technology and its cost. The modeling should include port truck traffic and be based on the current percentage of fossil fuel dependent vehicles. Time in tunnel at congestion speeds should be modeled for individuals who use the tunnel for regular commuting. Models should be created to look at what might happen at community sites if the traffic chooses to use the surface streets instead of the toll tunnel, which has been seen at various sites around the world.

The hot spot analysis should seek **peak** values for all measurements so as not to underestimate the effect on human health. The impact of various temperatures and day and night changes and local wind patterns should be included in model analyses.

Discussion:

Air pollution in our region is significantly influenced by fossil fuel emissions from transportation. Human health is significantly impacted by the air pollutants produced by fossil fuel combustion regionally and locally. Key pollutants that are recognized as having adverse health effects include particulate matter (PM) of various sizes with increasing concerns about ultrafine particles and carbon black, ozone (O<sub>3</sub>), Nitrous Oxide (NO<sub>x</sub>), and Nitrogen Dioxide (NO<sub>2</sub>) as well as acid and organic vapors.

Health studies of air traffic pollution have shown an association with increased cancer risk, increased cardiovascular events and death, and lung inflammation with worsening of asthma and lung function.

Children are particularly sensitive to regional and local air pollution, leading to permanently decreased lung function and increased incidence of or worsening of asthma.

Children in more polluted communities are almost 5 times as likely to have clinically abnormally lung function compared to those in less polluted communities. As alarming as this is, the greatest effect of pollution-related deficits may occur later in life, since reduced lung function is a strong risk factor for complications and death during adulthood.(NEJM Sept 9, 2004 vol 351: 1057-67 Gauderman)

Inability to get enough exercise because of poor air quality and asthma attacks can impair quality of life, and increase the risk of obesity and associated health problems. Later, societal health care costs could be significantly adversely impacted.

Proximity to a freeway or busy roadway increases many health risks. Wind can be a factor how far the pollution is distributed, up to 1.5 miles in some scientific literature.

Diesel emissions, predominantly from trucks, are major contributors to air pollution. Proximity to truck diesel traffic increases health risks. Diesel particulate emissions are labeled as cancer causing toxic air contaminants. The particles may penetrate deeply into lung and vascular tissues and stay there for a long time. Diesel particulate is responsible for 70% of total cancer risk from all toxic air pollution according to AQMD. Diesel gaseous compounds are also hazardous.

We are very concerned about the project proposal and the health impacts of increased truck and other highway traffic in our neighborhoods. We want livable, healthy neighborhoods, not more freeways.

No 710 ACTION COMMITTEE MEMBERS SUPPORTING THIS REQUEST:

NAME	ADDRESS	DATE	EMAIL
Carol Teutsch	LA, CA		
CLARICE KWARP	SO. PASADENA		
Wayna Kato	S. Pas		
William D. Sherman	SP, CA	4/2/11	
Richard D. Schneider	SP	4/1/11	
SAM BURGESS	SOUTH PASADENA	4/2/11	
Harold A. Kwart	SoPas	4/2/11	
JANICE Scott	LA PASADENA	4/2/11	
SUSAN BOLAN	LA CRESCENTA CA	4/2/11	
SHERILL STUBBS	LA CRESCENTA	4/2/11	
TRISHA Bessett	HIGHLAND PARK		
Elise Kalfayan	Glendale CA	4/2/11	
MARY ANN PARADA	SOUTH PASADENA, CA	4/2/11	

No 710 ACTION COMMITTEE MEMBERS SUPPORTING THIS REQUEST:

NAME	ADDRESS	DATE	EMAIL
Don Lovel	[Redacted] Pa.		[Redacted]
Odom Stamps	[Redacted]	4/2/11	[Redacted]
[Signature]	[Redacted] So. Cal. PAS	4/2/11	[Redacted]
JANET ERVIN	[Redacted] S. PAS	4/3/11	[Redacted]
Jim Miller	[Redacted] So. PASADENA	4/2/11	[Redacted]
Claire Bergman	[Redacted] Pasadena	4/2/11	[Redacted]
TRISHA Gossett	[Redacted] LA	4/2	[Redacted]
Daron Hilley	[Redacted] So. Cal	4/11/11	[Redacted]

Attachments:

Appendix A: Bibliography of Health/Pollution Impacts links

Appendix B: Outline of Health Concerns for 710 Tunnels Scoping

Appendix C:

<http://departments.oxy.edu/uepi/Global%20Trade%20Executive%20Summary.pdf>

Page 4, Chart on Selected Health and Economic Impacts of Freight in

Global Trade Impacts: Addressing the Health, Social and Environmental Consequences.....

[http://t4america.org/docs/blueprint\\_summary.pdf](http://t4america.org/docs/blueprint_summary.pdf)

Page 7, National Transportation Objectives and Targets

<http://coalitionforcleanair.org/air-pollution-pollutant.html>

<http://coalitionforcleanair.org/air-pollution-10facts.html>

<http://coalitionforcleanair.org/our-programs-transportation-facts.html>

## **APPENDIX A**

Attached please find an extensive bibliography of health effects from traffic pollution that the community has collected. We have sorted them into a number of different categories for ease of use with their active links. The EIR should actively study All these health concerns and weigh them against the various transportation benefits. The externalities of health impacts of certain projects may significantly diminish any transportation benefits, making certain alternatives unacceptable. Community health and cohesiveness is of critical importance to those in the path of the proposed tunnel. We are demanding a balanced look at the issues, that will stand up to scientific scrutiny and evolving health and transportation policies. Mitigation of health effects can be difficult, prohibitively expensive, or inadequate so we want honest and full disclosure. We are asking for SMART GROWTH and MOBILITY MANAGEMENT. We know the old solutions are not safe and sustainable.

# Health and Pollution Impact

## Official statements from various organizations

[http://acta.org/projects/tech\\_studies/Health\\_Risk\\_Assessment.pdf](http://acta.org/projects/tech_studies/Health_Risk_Assessment.pdf)

HRA prepared for the Heim Br./SR-47 project

<http://www.aqmd.gov/ceqa/igr/2009/February/feb09.html>

February 2009 Comment Letters Draft Environmental Impact Reports

The following letters were written (date sent in parentheses) by the AQMD commenting on the air quality analysis. PDF files require the use of a reader.

<http://www.aqmd.gov/ceqa/igr/2009/February/EISEIRI-710.pdf>

"Protocol for the Air Quality and Health Risk Assessments (AQ/HRA) for the I-710 Corridor Environmental Impact Report"

Environmental Impact Statement (EIR/EIS) South Coast Air Quality Management District FEBRUARY 22, 2009

[http://www.greenenvironmentnews.com/feed\\_images/2b08292e-7379-4373-9ba8-0f2324b4f956.pdf](http://www.greenenvironmentnews.com/feed_images/2b08292e-7379-4373-9ba8-0f2324b4f956.pdf)

Hearing on "Air Pollution Challenges for California's Inland Empire" United States Senate Committee on Environment and Public Works

Senator Barbara Boxer, Chairman Wednesday, October 10, 2007: San Bernardino CA

"Air Pollution and Health" - testimony by: W. James Gauderman, Ph.D. Keck School of Medicine

<http://www.ictf-jpa.org/publiccomment/Letters/NaturalResourcesDefenseCouncil-022609.pdf>

Re: Notice of Preparation / Initial Study - ICTF Project

Natural Resources Defense Council American Lung Association In California Coalition For A Safe Environment Coalition For Clean Air Communities For Clean Ports East Yard Communities For Environmental Justice Harbor Watts Edc Long Beach Alliance For Children With Asthma San Pedro And Peninsula Homeowner's Coalition February 25, 2009

Re: 1-710 Project EIR Alternatives

Barry R. Wallerstein D.Env. South Coast, Air Quality Management District, February 17, 2009, Pgs 9-14

<http://hydra.usc.edu/scehsc/web/Resources/Reports%20and%20Publications/THE%20Impact%20Project%20Report%20-%20June%202009%20FINAL.pdf>

THE Impact Project Trade, Health, Environment Making the Case for Change

THE Impact Project June 2009

## Air Pollutants from traffic

<http://www.arb.ca.gov/research/health/healthup/march07.pdf>

Health Effects Associated With Traffic-Related Air Pollution

Air Resources Board California Environmental Protection Agency, March 22, 2007

<http://eprints.qut.edu.au/27536/>

On-road ultrafine particle concentration in the M5 East road tunnel, Sydney, Australia

Knibbs, Luke D., deDear, Richard, Mengersen, Kerrie, & Morawska, Lidia (2009) On-road ultrafine particle concentration in the M5 East road tunnel, Sydney, Australia. *Atmospheric Environment*, 43(22-23), pp. 3510-3519.

<http://pubs.acs.org/doi/abs/10.1021/es062590s?prevSearch=freeway%2Bpollution&searchHistoryKey=>

Particle Concentration and Characteristics near a Major Freeway with Heavy-Duty Diesel Traffic

Leonidas Ntziachristos, Zhi Ning, Michael D. Geller, and Constantinos Sioutas\*

Department of Civil and Environmental Engineering, University of Southern California, Los Angeles, California 90089

*Environ. Sci. Technol.*, 2007, 41 (7), pp 2223-2230 DOI: 10.1021/es062590s Publication Date (Web): February 23, 2007

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<http://cfpub.epa.gov/ncer/abstracts/index.cfm/fuseaction/display.abstractDetail/abstract/8977/report/0>

Near Roadways Exposure to Urban Air Pollutants Study (NEXUS)

investigators: Batterman, Stuart A. , Dion, F , Lewis, T , Mukherjee, Bhramar , Robins, Thomas, Institution: University of Michigan - Ann Arbor, EPA Project Officer: Stacey Katz/Gail Robarge,, Project Period: September 1, 2008 through August 31, 2011

[http://www.chaseireland.org/Documents/WHO\\_PM\\_factsheet.pdf](http://www.chaseireland.org/Documents/WHO_PM_factsheet.pdf)

Particulate matter air pollution: how it harms health

World Health Organization Fact sheet EURO/04/05 Berlin, Copenhagen, Rome, 14 April 2005

<http://pubs.acs.org/doi/pdf/10.1021/es00046a019>

<http://www.mendeley.com/research/sources-fine-organic-aerosol-3-road-dust-tire-debris-organometallic-brake-lining-dust-roads-sources-sinks/>

Sources of fine organic aerosol. 3. Road dust, tire debris, and organometallic brake lining dust: roads as sources and sinks

Wolfgang F. Rogge, Lynn M. Hildemann, Monica A. Mazurek, Glen R. Cass, Bernd R. T. Simoneit, *Environ. Sci. Technol.*, 1993, 27 (9), pp 1892-1904, DOI: 10.1021/es00046a019, Publication Date: September 1993

<http://pubs.acs.org/doi/abs/10.1021/es070198o>

Metal Emissions from Brake Linings and Tires: Case Studies of Stockholm, Sweden 1995/1998 and 2005

David S. T. Hjortenkrans,\* Bo G. Bergbäck, and Agneta V. Häggerud, School of Pure and Applied Natural Sciences, University of Kalmar, Sweden, *Environ. Sci. Technol.*, 2007, 41 (15), pp 5224-5230, DOI: 10.1021/es070198o, Publication Date (Web): June 22, 2007, Copyright © 2007 American Chemical Society

[http://pubs.acs.org/doi/full/10.1021/es0618797?prevSearch=freeway%2Bpollution&searchHistoryKey=](http://pubs.acs.org/doi/full/10.1021/es0618797?prevSearch=freeway%2Bpollution&searchHistoryKey=In-Cabin)

In-Cabin Commuter Exposure to Ultrafine Particles on Los Angeles Freeways

Yifang Zhu, Arantzazu Eiguren-Fernandez, William C. Hinds, and Antonio H. Miguel\*, Department of Environmental Engineering, Texas A&M University-Kingsville *Environ. Sci. Technol.*, 2007, 41 (7), pp 2138-2145 DOI: 10.1021/es0618797 Publication Date (Web): February 27, 2007 Copyright © 2007 American Chemical Society

<http://articles.latimes.com/2010/jan/08/nation/la-na-epa-smog-rules8-2010jan08>

EPA proposes nation's strictest smog limits ever

It wants to toughen the ozone limit adopted in 2008 by cracking down further on vehicles, power plants, factories and landfills. Much of the U.S. could then be in violation of federal regulations.

January 08, 2010 | By Jim Tankersley and Margot Roosevelt

<http://eprints.qut.edu.au/27536/>

On-road ultrafine particle concentration in the M5 East road tunnel, Sydney, Australia

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Sheng-Chieh Chen<sup>a</sup>, Chuen-Jinn Tsai<sup>a</sup>, Charles C.-K. Chou<sup>b</sup>, Gwo-Dong Roam<sup>c</sup>, Sen-Sung Cheng<sup>d</sup> and Ya-Nan Wang<sup>d</sup>  
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Ambient Air Pollution and the Progression of Atherosclerosis in Adults

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A Cohort Study of Traffic-Related Air Pollution and Mortality in Toronto, Ontario, Canada

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Study finds traffic pollution can speed hardening of arteries

February 14, 2010 | By Margot Roosevelt, LA Times

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New USC study links air pollution to progression of atherosclerosis

By Meghan Lewit *HSC Weekly* 2010-02-26

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Pollution-cholesterol link to heart disease seen

The combination activates genes that can cause clogged arteries, UCLA researchers say.

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We Gotta Clean Up: Freight Transportation's Hidden Cost to Health and the Planet

EDF March 1, 2010 | Posted by Transportation Team *This post was co-authored by Camille Kustin*

[http://www.arb.ca.gov/planning/gmerp/plan/appendix\\_a.pdf](http://www.arb.ca.gov/planning/gmerp/plan/appendix_a.pdf)

Appendix A - Quantification of the Health Impacts and Economic Valuation of Air Pollution from Ports and Goods Movement in California (PDF) 111 pages

State of California California Environmental Protection Agency Air Resources Board arb Emission Reduction Plan for Ports and Goods Movement in California [http://www.arb.ca.gov/planning/gmerp/plan/final\\_plan.pdf](http://www.arb.ca.gov/planning/gmerp/plan/final_plan.pdf)  
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Controlling Asthma in Los Angeles County: A Call to Action

Approved and adopted by the Asthma Coalition of Los Angeles County on 4/10/06

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Traffic-Related Pollution Near Schools Linked to Development of Asthma in Pupils, Study Suggests

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Ozone and Traffic Pollution Increase Asthma-Related Hospitalizations in Children

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## Long Term health effects

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Black Lung Lofts

Many children being raised in L.A.'s hip, new freeway-adjacent housing are damaged for life, By Patrick Range McDonald, LA Weekly, published: March 06, 2010

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Environmental Exposure To Particulates May Damage DNA In As Few As Three Days

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## Misc Health Effects Due to Diesel Exhaust

<http://www.sciencedaily.com/releases/2008/03/080311075339.htm>

Diesel Exhaust Inhalation Stresses Your Brain

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*ScienceDaily*, materials provided by BioMed Central/Particle and Fibre Toxicology, (Mar. 13, 2008)

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Diesel Exhaust Associated With Lethargy in Offspring

Breathing diesel exhaust during pregnancy is associated with sluggishness in offspring.

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Why Diesel Particulates Cause Cardiovascular Disease

*ScienceDaily*, materials provided by Umeå University, (June 9, 2008)

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Diesel exhaust causes arteries to lose their flexibility

Researchers found that exposure to engine pollution resulted in arterial stiffness in a group of healthy volunteers. Arterial stiffness plays an important role in hypertension and is an independent predictor of mortality."

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Diesel Exhaust May Increase Risk In Patients With Heart Disease

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Diesel-Fueled Trucks Drive Up Air Pollution Exposure For Commuters

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<http://www.medscape.com/viewarticle/473165>

Emerging Infectious Diseases

Coccidioidomycosis Among Workers at an Archeological Site, Northeastern Utah

Lyle R. Petersen; Stacie L. Marshall; Christine Barton-Dickson; Rana A. Hajjeh; Mark D. Lindsley; David W. Warnock; Anil A. Panackal; Joseph B. Shaffer; Maryam B. Haddad; Frederick S. Fisher; David T. Dennis; Juliette Morgan Posted: 04/22/2004; Emerging Infectious Diseases. 2004;10(4) © 2004 Centers for Disease Control and Prevention (CDC)

<http://arizonapublicrecordsearch.org/353/valley-fever-2/>

Valley Fever

There is no doubt that construction companies contribute significantly to Valley Fever. According to the MayoClinic By ADMIN, Arizona Public Record Search, on December 27, 2010

<http://www.thefreelibrary.com/PROJECT+STIRS+FEARS+OF+VALLEY+FEVER%3b+RESIDENTS+SAY+CONSTRUCTION+MAY..-a083807257>

Project Stirs Fears Of Valley Fever; Residents Say Construction May Spread Harmful Spores

Byline: Gloria Gonzales Daily News Staff Writer Copyright 1998 Daily News

## **APPENDIX B**

## **OUTLINE of health concerns for 710 Tunnels Scoping**

### Tunnel Safety

Traffic accidents--specific dangers of a tunnel accident with fires

Major hazards: earthquakes, floods, terrorist attacks

What will be the typical time in tunnel with current congestion patterns?

Rescue and safety capability within the tunnel; escape routes; handicap escapes

### Tunnel and Health

Monitor pollutants - tunnels concentrate pollutants:

Specify PM including ultrafine, carbon black, ozone, Nitrogen dioxide, NO<sub>2</sub>, CO<sub>2</sub>

Brake and tire lining emissions; tire rubber, fine organic aerosols

Temperature and seasonal impacts/day and night impacts/ wind impacts on pollutants

What are the health effects in a tunnel with stopped traffic? Noise, pollution, psychological

HIA, HRA should cover the following tests and analyses:

Concentrations in proximity to portals and ventilation shafts

Concentrations at sensitive sites including schools, hospitals, residences

Effect on asthma

Effect on lung disease

Possible effect on diabetes, breast cancer

Neurotoxin effect on brain cancers and cognitive dysfunction

Cardiovascular -mortality, cardiovascular events, vascular inflammation, stroke, BP

Miscellaneous: appendicitis, pneumonia

Children:

lung development, asthma, autism, fetal brain development

Women:

Differential effect on women: lungs, premature births, fetal brain development, increased abortion rates

Continuum of effect-no threshold (important for mitigation)

Diesel specific health data

Duration of exposure with regular commuters

Comparison with smoking risk

Distance from freeway/tunnel/ventilation shafts modeling 500 feet up to 1.5 miles

Other health externalities: missed school, missed work, increased health expenses, increased stress/worry

#### Tunnel Construction

Workers safety

Dust displacement into air; coccidioidomycosis

Disruption of underground water supplies

#### Tunnel finances

Cost estimates don't take into consideration **health externalities**

PPP responsibility to health and communities

Ultimately liability for health impact

#### Tunnel impact on Quality of Life

Alignment with transportation needs and goals to make livable, equitable communities

Alignment with regional climate and air quality goals/guidelines/standards

Alignment with complete roads concepts

Impact on regional air quality

## **APPENDIX C**

# Selected Health, Economic & Community Impacts - Freight Transportation

<b>REGIONAL AIR POLLUTION</b>	Particulate matter	Elevated levels of PM <sub>2.5</sub> in the air	Cardiovascular disease, COPD (e.g., emphysema)
	PM and elemental carbon (EC)	In vehicle exhaust; EC is a marker for diesel	Chronic exposure leads to reduction lung function in children
	Ultrafine particles (UFPs)	In vehicle exhaust; considered very toxic	When lab animals breathe UFPs, some end up in the brain; UFPs can cause artery hardening in lab animals
	Nitrogen dioxide -- precursor to ozone	Diesel emissions contains high levels of NO <sub>x</sub>	Increase in school absences is linked to increases in ozone levels
<b>LIVING NEAR TRAFFIC-RELATED AIR POLLUTION</b>	Living close to highways	Children	Increased asthma; exacerbation of asthma (e.g., wheezing) and use of more asthma medication
	Living or going to school near a busy road	Children	More likely to develop new cases of asthma
	Living near busy roads	Pregnant women	More likely to have premature or low birth weight babies or miscarriages, or develop preeclampsia
	Living near a freeway	Adults	Thickening of the artery walls that can lead to heart disease and stroke
	Living within 50 meters of a busy road with more than 15,000 vehicles/day	Women	More likely to develop mild cognitive decline as they age
	Living near busy roadways	Women	More likely to develop new cases of diabetes
	Living near busy roads	Men and women	More likely to develop stroke and new cases of heart disease
<b>HIGH NOISE LEVELS</b>	Community noise pollution	At risk: those living near busy highways, marine terminals, airports, rail yards, and train tracks, and/or construction of the above	Residents near airports and highways show (for adults) an increase in cardiovascular disease and stroke, sleep difficulties and anxiety; and (for children) problems with school behavior and anxiety
	Elevated levels of noise in workplaces	At risk: dock workers, railroad workers and truck drivers	Long term exposure can cause hearing loss, stress and high blood pressure
<b>LABOR ISSUES; WORKER HEALTH AND SAFETY</b>	Contingent employment - e.g., warehouse workers	Workers often hired by agencies as temporary workers with low-pay and no benefits	Stressful, insecure jobs without benefits
	Misclassification as independent contractors rather than employees	Port truck drivers	Lack of basic worker protections, such as hourly wage, overtime, health insurance, unemployment benefits, right to organize - and OSHA protections
	Diesel exhaust	Dock workers, railroad workers, truck drivers and workers at trucking operations	Increase in lung cancer in all three occupations; increase in COPD (e.g., emphysema) among railroad workers
	Heat	Lack of air conditioning in cabs of trucks and locomotives and inside huge distribution centers	If outdoor temperatures are extremely high and there is no relief or mitigation, workers can suffer from heat stress illnesses
	Injuries/fatalities	Some parts of the freight transportation industry are considered "high hazard"	E.g. The 2009-2010 California OSHA highest hazard industry list included warehousing and truck transportation
<b>COMMUNITY IMPACTS</b>	Industrial blight	Empty containers in lots near homes; views of industrial cranes	Decreases home values and quality of life
	Traffic Congestion	Cars must travel with big-rig trucks; expanding number of heavy duty trucks hauling containers; truck driving schools operating in neighborhoods	Stress from congestion; increased commuting time means longer times on the road breathing air pollution in exhaust from cars and trucks
	Cars traveling in same lanes and on same highways	Expanding number of heavy duty trucks hauling	Injuries and fatalities in car-truck accidents.
	24-hour lighting	Lights shine in windows	Difficulty sleeping at night
	Road repairs	Highways, truck routes, residential streets near rail yards, ports and warehouses	High cost to local and state taxpayers to repair the roads and highways from big-rig truck damage
	Eminent domain	Exerts the right of railroads or governments to appropriate private property (e.g., to build a highway)	Community residents can lose their homes

# National Transportation Objectives & Targets



2010-2030

## Objectives

Improve Economic Competitiveness, Transportation System Efficiency and Workforce Development Opportunities

Improve Transportation System Conditions and Connectivity

Promote Energy Efficiency and Achieve Energy Security

Ensure Environmental Protection, Restore Climate Stability and Resolve Persistent Environmental Justice Issues

Ensure Safety for All Transportation Users and Improve Public Health Outcomes

Provide Equal and Equitable Access to Transportation Options in Urban, Suburban and Rural Communities

## Performance Targets

Reduce per capita vehicle miles traveled by 16%

Triple walking, biking and public transportation usage

Reduce transportation-generated carbon dioxide levels by 40%

Reduce delay per capita by 10%

Increase proportion of freight transportation provided by railroad and intermodal services by 20%

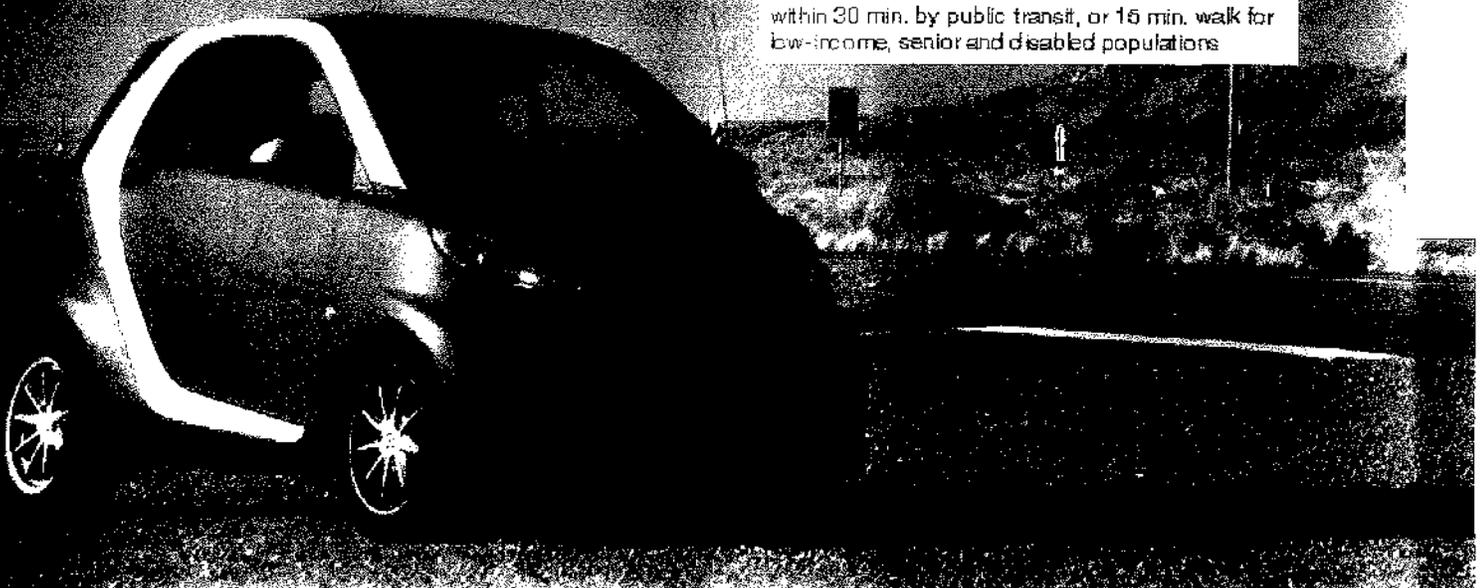
Achieve zero percent population exposure to at-risk levels of air pollution

Improve public safety and lower congestion costs by reducing traffic crashes by 50%

Increase share of major highways, regional transit fleets and facilities, and bicycling/pedestrian infrastructure in good state of condition by 20%

Reduce average household combined housing + transportation costs 25% (use 2000 as base year)

Increase by 50% essential destinations accessible within 30 min. by public transit, or 15 min. walk for low-income, senior and disabled populations





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The Coalition for Clean Air is dedicated to restoring clean, healthful air to California by advocating responsible public policy, providing technical and educational expertise, and promoting broad-based community involvement.

## Top 10 facts Californians should know about air pollution and health

1. Breathing air in polluted metropolitan areas such as Los Angeles or Riverside can reduce your life expectancy by 2 to 3 years.
2. Motor vehicles and other air pollution sources that move, such as ships, trucks, trains, buses and even lawnmowers, account for about 90% of the cancer risk in the greater-Los Angeles region – with stationary sources such as power plants and factories accounting for only about 10%.
3. Diesel exhaust from trucks, ships, trains and buses has been declared to contain over 40 substances listed as hazardous air pollutants by the U.S. EPA.
4. When you drive in bumper-to-bumper traffic, pollutants outside can seep into your car, making the air you breathe inside your car up to 10 times more polluted than typical city air.
5. Every day that a ship sits at dock unloading its cargo, it releases an entire ton of smog-forming and toxic pollutants.
6. If you live, work or go to school near freeways, high-traffic roads, seaports, and rail yards, you are generally at greater risk for cancer and decreased lung function, studies show, because these places contain more concentrated levels of air pollution.
7. For your child, toxic air pollution is an even bigger problem, in part because children breathe much more quickly than adults.
8. Asthma is a leading cause of school absenteeism, according to the California Department of Education.
9. Even if you don't smoke cigarettes at all, your lungs or heart may be similarly damaged simply from exposure to ozone and particulate matter. The American Heart Association recently declared, "[Air pollution's] impact on cardiovascular disease ... represents a serious public health problem."
10. Health impacts from diesel pollution exposure, such as premature death, heart disease, asthma and bronchitis, cost some \$22 billion statewide in 2004, not including impacts such as lost work and school days.



# AIR POLLUTION



Go straight to the latest Action Alerts.



The Coalition for Clean Air is dedicated to restoring clean, healthful air to California by advocating responsible public policy, providing technical and educational expertise, and promoting broad-based community involvement.

## Pollutants & Health Effects

-- Select Topic or Scroll Down --

### Particulate Matter (PM)

Particulate matter or PM consists of soot and dust particles that are smaller than the diameter of a human hair. There are two classifications for particulate matter, PM10 and PM2.5. All particles smaller than 10 microns in diameter are classified as PM10, or coarse size particles. Fine size particles, or PM2.5, are those particles less than or equal to 2.5 microns in diameter. Particles that are smaller 2.5 microns are smaller than 1/8th the diameter of a human hair. Sources of PM include diesel exhaust, soil dust, tire wear, and soot. These particles penetrate deeply into the lungs and are captured by lung tissue. A major contributor to the PM pollution problem is exhaust from diesel vehicles, which produce 79% of the particulate emissions from mobile sources. The most dangerous aspect of PM pollution from diesel vehicles is the hundreds of different chemicals that are adsorbed to the particle. Exposure to PM pollution has been associated with respiratory and cardiac problems, infections, asthma attacks, lung cancer and decreased life expectancy. The World Health Organization has estimated that 500,000 premature deaths each year may be associated with PM pollution. Fine particulate air pollution (<2.5 microns) is thought to be more dangerous because of its ability to penetrate deeper into lung tissue. A recent study found that even a small increase in PM2.5 can result in a significant increase in mortality. In fact, The American Lung Association believes that PM2.5 represents the most serious threat to our health. Segments of the population that are more susceptible to PM pollution include children, athletes, senior citizens, and people with pre-existing respiratory problems.

### Ozone

Ozone forms when hydrocarbons combine with nitrogen oxides and chemically react in sunlight. Hydrocarbons and nitrogen oxides are primarily produced by motor vehicles and various industrial practices. Ozone is a highly reactive oxidizing agent that breaks-down organic materials. Ozone is the primary component of smog, which has plagued Los Angeles for many years. A natural phenomenon called an "inversion layer" traps these gases and prevents them from dissipating into the atmosphere. The result is a serious smog problem in the valleys and basins of Southern California. Smog and the related high ozone levels are not just a California problem; Texas City, Texas recorded the highest one-day ozone level in the country for 1999. As populations grow, ozone and smog are becoming problems for large

cities throughout the country. Symptoms of ozone exposure are coughing, shortness of breath, wheezing, fatigue, throat dryness, chest pain, headache and nausea. Ozone has been shown to cause inflammation of lung tissue and reduced lung capacity. Development of asthma, increased lung cancer mortality rates, and accelerated lung aging have all been linked to ozone exposure. Lung damage from long-term exposure to ozone can be permanent, while short-term exposure appears to be reversible. Ozone reduces the respiratory system's ability to fight infection and remove foreign particles such as particulate matter. Segments of the population that are more susceptible to ozone pollution include children, athletes, senior citizens, and people with pre-existing respiratory problems.

#### Hydrocarbons

Hydrocarbons are a class of reactive organic gases or ROG, which are formed solely of hydrogen and carbon. Hydrocarbons contribute to the formation of ozone and the resulting smog problem. Carcinogenic forms of hydrocarbons are considered hazardous air pollutants, or air toxics. The incomplete burning of any organic matter such as oil, wood, or rubber produces hydrocarbons. Combustion engine exhaust, oil refineries, and oil-fueled power plants are the primary sources of hydrocarbons. Another source of hydrocarbons is evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint. The primary health effect of hydrocarbons results from the formation of ozone and its related health effects. High levels of hydrocarbons in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement.

#### Nitrogen Oxides (NO<sub>x</sub>)

Nitrogen monoxide (NO) and nitrogen dioxide (NO<sub>2</sub>) are the two forms of nitrogen oxide found in the atmosphere. Nitrogen oxides contribute to the formation of ozone, production of particulate matter pollution, and acid deposition. The presence of nitrogen oxides gives smog its brown appearance. Factories, motor vehicles and power plants that burn fossil fuels produce nitrogen oxides. Diesel engines produce a disproportionately large amount of NO<sub>x</sub> when compared to gasoline engines because of their high temperature combustion process. Nitrogen dioxide has been shown to irritate lung tissue, cause bronchitis and pneumonia, and reduce resistance to respiratory infections. The presence of NO<sub>2</sub> in the atmosphere can have synergistic effects with other forms of air pollution. The health effects of ozone are magnified in the presence of nitrogen dioxide. Frequent or long-term exposure to high levels of nitrogen oxides can increase the incidence of acute respiratory illness in children.

#### Carbon Monoxide (CO)

Carbon monoxide is a colorless, odorless gas that is produced by burning organic matter such as oil, natural gas, fuel, wood, and charcoal. Motor vehicles produce 67% of the man-made CO that is released into the atmosphere. Carbon monoxide displaces oxygen in red blood cells, which reduces the amount of oxygen that human cells need for respiration. Exposure to CO can result in fatigue, angina, reduced visual perception, reduced dexterity, and death. The elderly, young children, and people with pre-existing respiratory conditions are particularly sensitive to carbon monoxide pollution. Carbon monoxide is extremely deadly in an enclosed space, such as a garage or bedroom.

#### Sulfur Dioxide (SO<sub>2</sub>)

Sulfur dioxide is a colorless gas produced by motor vehicles, refineries, and power plants that burn fossil fuels. Fossil fuels like coal and oil vary in sulfur concentrations and as a result the amount of sulfur dioxide they produce when burned. A high level of sulfur dioxide in exhaust gas can interfere with emission control mechanisms for other pollutants. Sulfur dioxide reduces respiratory volume, and increases breathing resistance in those exposed, especially asthmatics. Studies have also shown that sulfur dioxide increases nasal airway resistance. Other research has shown that daily mortality rates are consistently associated with sulfur dioxide and ozone levels.

## Air Toxics

Air toxics, which are also known as hazardous air pollutants, are 188 toxic and potentially toxic compounds listed by the Federal Clean Air Act. Air toxics are generally organic chemicals, including some hydrocarbons that are highly evaporative in nature. Sources for air toxics are motor vehicles, chemical plants, paint, and any other operation that uses organic compounds. Benzene, formaldehyde, acetaldehyde, 1,3-butadiene, and acrolein are typical examples of air toxics. Air toxics are pollutants that cause or are suspected of causing cancer in those exposed to them. Cancer is the primary health effect studied due to the low exposure concentrations of these air toxics such as benzene, and formaldehyde. Benzene has been shown to cause aplastic anemia and acute myelogenous leukemia in occupational studies of workers exposed to it. Known health concerns related to aldehydes include cancer, asthma, and respiratory tract irritation. It is also believed that these air toxics have impacts on the reproductive system by causing chromosomal aberrations or mutations. The nature of air toxics still poses many uncertainties about their true health effects. These chemical compounds have many different forms and metabolites as they are broken down, and little is known about how they interact with the body. The health effects of particulate matter from diesel exhaust are thought to be attributable to the many air toxics that are adsorbed to the particles. These small particles penetrate deeply into the lungs, and are the perfect vehicle for delivering air toxics into the body.

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The Coalition for Clean Air is dedicated to restoring clean, healthful air to California by advocating responsible public policy, providing technical and educational expertise, and promoting broad-based community involvement.

## Transportation Facts

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### General

- California population (2003): 36,363,502
- Registered cars and trucks in California: 24 million
- Miles driven every day in California: 825 million
- Miles driven daily by the average driver: 36
- Gallons of fuel burned every day in California: 47 million
- Pounds of pollutants created daily: 5.4 million

### Diesel

- Diesel exhaust is known to cause cancer, asthma, and other respiratory diseases.
- The health risk from diesel exposure is greatest for children and the elderly. The proximity of a child's residence and school to major roads is linked to asthma occurrence.
- Asthma limits children's ability to participate in sports, and is the most common cause of children's absence from school due to hospitalization.
- The State of California decided that there is enough evidence to list the particulate matter in diesel exhaust as a toxic air contaminant.
- Exhaust from heavy-duty diesel engines contains between 100-200 times more small particles than gasoline engine exhaust.
- California's Scientific Review Panel estimates that 16,000 Californians will develop lung cancer over a lifetime of diesel exhaust exposure.
- Only 2 percent of the vehicles on California's roads run on diesel. Yet they account for 31 percent of smog-forming nitrogen oxides, and for 79 percent of particulate matter emissions from on-road vehicles.
- Cleaner alternatives to diesel are available, such as liquefied natural gas, compressed natural gas, or propane. Electric or fuel-cell engines are being enhanced to provide future alternatives.

### School Buses

- Children breathe at a rate twice that of adults, and are thus more susceptible to the

toxicity of airborne diesel particles, vapors and gases.

- Some diesel exhaust causes pollutes the inside of buses when entering the cabin.
- There is a continuing need to replace older, dirtier buses with cleaner, newer buses to reduce children's exposure to vehicle related pollutants.
- The average diesel school bus is 223.5 times more toxic than a new compressed natural gas (CNG) school bus.
- Although a clean school bus powered with compressed natural gas costs about \$30,000 more than a diesel bus, it is cheaper in maintenance.

#### Alternative Fuel Vehicles

- Electric vehicles (EV's) are the only true zero-emissions vehicles on the road.
- The only emissions from electric vehicles are from upstream power plants providing electricity.
- Upstream emissions for gasoline vehicles are more than 14 times higher than for electric vehicles.
- Electric vehicles run on electricity provided by on-board batteries, and can be recharged at any of the many recharging stations around the state.
- As of March 2002, there were more than 4,000 electric vehicles on the road in the U.S., most of them in California.
- Hybrid vehicles offer 2-3 times the energy efficiency of a comparable gasoline-only car, and have ranges of about 600 miles on a tank of gas.
- The most widely available hybrid vehicles are the Honda Insight and the Toyota Prius, which have retail prices of about \$20,000. The Ford Escape Hybrid will be launched late summer 2004, at a retail price of around \$27,000.
- Comprehensive data of vehicles' fuel economy and emissions is provided by the Environmental Protection Agency's "Green Vehicle Guide": <http://www.epa.gov/greenvehicles>.

#### Light Trucks and SUV's

- By federal law, light trucks and SUV's do NOT have to meet the strict emission standards placed on passenger cars.
- Light trucks and SUV's now account to almost half of all auto sales in the United States.
- Many Light Trucks and SUV's run on diesel, which severely increases the danger of lung diseases.
- In average, light trucks and SUV's of the 2004 model year achieve only about 70 percent of the fuel economy of average cars.
- With advanced technology, such as gasoline-electric hybrid motors, auto manufacturers could ensure that SUV's and light trucks meet the same emission standards as cars.

#### Ports

- The Ports of Los Angeles and Long Beach are the largest fixed source of air pollution in the South Coast Air Basin. Communities neighboring these ports suffer from some of the highest cancer risk due to air pollution in our region.
- The number of cargo containers entering these ports is expected to as much as quadruple in the next 20 years.
- A container ship that idles at dock emits about as much diesel pollution as a diesel truck traveling 70,000 miles – the approximate distance of three trips around our earth. These ships can produce more than 1 ton of smog-forming compounds during a 24 hour period at the dock.
- Shoreside power allows ships to turnoff their dirty auxiliary engines – virtually eliminating pollution at the dock.
- This technology has been used by the Navy for decades. The technology has also been proven successful for cruise ships and other harbor craft.
- The first container terminal with dockside power capability opened in 2004 as a result of a settlement between the Port of Los Angeles, NRDC, the Coalition for Clean Air and local community groups. A container ship with dockside power capability has already docked twice and ran on electric power.

#### Shipping

- Los Angeles International Airport is the second largest industrial smog source in the Los Angeles Area.
- Air pollution from airports is exempt from many rules that other industrial polluters must follow.
- Air travel is expected to double within the next two decades. It is the fastest growing mode of travel in the United States.
- One 747 arriving and departing from JFK airport in New York City produces as much smog as a car driven over 5,600 miles, and as much polluting nitrogen oxides as a car driven nearly 26,500 miles.
- Airplanes can save a lot of fuel if they have the ability to move on ground with just one engine running.
- The United States is one of only 3 countries opposing a worldwide standard that would reduce the impact of aircraft emissions in the atmosphere.

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February 14, 2012



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



**Re: Draft 2012 Regional Transportation Plan and Program Environmental Impact Report**

Dear Mr. Ikhata:



The Orange County Transportation Authority, Transportation Corridor Agencies, Orange County Council of Governments, Association of California Cities - Orange County, County of Orange, Orange County Business Council, and undersigned organizations representing local agencies thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG's) Draft 2012 Regional Transportation Plan (RTP) and associated Program Environmental Impact Report (PEIR). We acknowledge SCAG's effort to deliver the draft documents, and your commitments to incorporate the Orange County Sustainable Communities Strategy (OC SCS) and Long-Range Transportation Plan (LRTP) as presented to you.



Each of our agencies has prepared individual comment letters; however, this letter emphasizes some issues of common concern raised through our collaborative review.



- Induced growth discussions incorrectly imply a lack of coordination between land-use and transportation planning agencies and are contrary to the balanced plans provided through the LRTP and OC SCS collaboration process. Please state that land-use plans and transportation projects identified in the OC SCS and LRTP are balanced and, if necessary, clarify under what circumstances "induced growth" may occur.



- The preliminary determination that all of the mitigation measures are feasible is not supported within the draft documents. Moreover, the "can and should" language incorrectly implies that mitigation measures are feasible for the identified agencies. SCAG should provide a clear statement that all mitigation measure recommendations are advisory and replace the "can and should" phrase with "may" when referencing mitigation measures.



- Multiple mitigation measures appear to exceed SCAG's authority and responsibilities for implementation. These mitigation measures should be restated or removed as appropriate.



- New revenue sources and innovative financing strategies used to demonstrate financial constraint can have significant impacts on businesses and the economy that must be clearly understood before advancing. In fact, the RTP

Mr. Hasan Ikhata  
February 14, 2012  
Page 2

vision statement recognizes the linkages between economy and the regional transportation system. Specifically, details on how any new user fees would be further defined, evaluated, and advanced must be evaluated through a full economic analysis prior to final adoption of the RTP. In addition, this analysis should demonstrate, by county, the need for new revenues, how the new revenues are proposed to be invested, and how a county-level return to source mechanism can be ensured.

We encourage SCAG to pay particular attention to these issues and the specific comments submitted by the respective agencies and ensure that they are appropriately addressed in the RTP and PEIR revisions.

Regards,



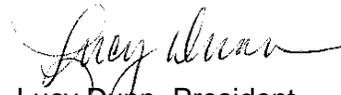
Will Kempton, Chief Executive Officer  
Orange County Transportation Authority



Tom Margro, Chief Executive Officer  
Transportation Corridor Agencies



Tom Mauk, Chief Executive Officer  
County of Orange



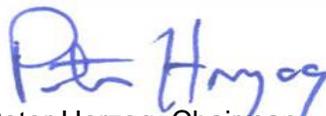
Lucy Dunn, President  
Orange County Business Council



Lisa Bartlett, President  
League of California Cities,  
Orange County



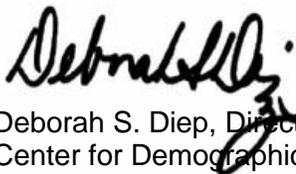
Rich Freschi, President  
Independent Special Districts of  
Orange County



Peter Herzog, Chairman  
Orange County Council of Governments



Lacy Kelly, Chief Executive Officer  
Association of California Cities -  
Orange County



Deborah S. Diep, Director  
Center for Demographic Research

c: OCTA Board of Directors  
OCCOG Board of Directors  
Orange County City Managers Association

February 13, 2012

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

**RE: Draft 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR) - COMMENT**

Dear Mr. Ikhata:

Based in America's sixth largest county, Orange County Business Council represents the largest and most innovative employers who comprise the economic engine of Southern California. We advance Orange County's economic prosperity while protecting a high quality of life.

We appreciate the monumental task of compiling the RTP/SCS and the PEIR and commend SCAG on its concerted effort to engage with the community and local jurisdictions in development of these mandated documents. In particular, SCAG has worked closely with Orange County to ensure that our own SCS met requirements while also addressing the needs of the community. We recognize the difficult position SCAG is in to do the same on a regional basis – meeting federal and state laws while also addressing the needs of very disparate communities in a geographically and socio-economically large and diverse region. However, in the effort to be all things to all groups, both documents suffer.

From the business community's perspective, the documents inadequately address the role of goods movement as part of the comprehensive transportation plan for a healthy and thriving region, as well as constrain opportunities to provide adequate housing options. In addition, the recognition of existing regulatory authority or local control is muted through the seemingly misplaced authority delivered in the mitigation measures. The following highlights some of these areas of concern.

**RTP/SCS**

- There are repeated references throughout the RTP/SCS that transportation projects “induce growth” which incorrectly implies a lack of coordination between land-use and transportation planning agencies and that there was insufficient effort in the planning process to accommodate for anticipated, organic, population growth. The RTP/SCS and the PEIR should differentiate between balanced, planned growth identified by local jurisdictions, and growth that is inconsistent with what is already being planned for at the local level.
- SCAG should identify in the plan the economic contribution of the goods movement sector to the regional and state economy and elevate the importance of the east-west corridor as critical to the future of California's position in the global economy.
- The RTP should explicitly state how any new user fees would be further defined, evaluated (both for economic and feasibility impacts), and advanced. In particular, the analysis should demonstrate the need for new revenues and how the new revenues are proposed to be invested, while also protecting existing transportation plans as identified by local transportation entities.  Voter-approved projects funded by local sales tax measures must be protected.

- With the elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is highly problematic and ignores issues related to aging or inadequate infrastructure capacity and high development costs for higher density projects. It also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. Recommendations regarding land-use should take into account the region’s unique communities, market forces, and take a flexible not proscriptive approach to protect regional diversity.
- Finally, since passage of SB 375, the State of California has de-funded transit, transportation and redevelopment support for local government. This continues years of state diversion of revenues from gasoline, sales, income and other taxes needed for local government programs. Local government cannot achieve these mandated changes without increased, not decreased, state support. SCAG should explicitly state the imperative for state support for planning, transit, transportation and redevelopment or other necessary funding to pre-SB 375 levels in order to achieve mandated goals.

**PEIR**

- With over 500 mitigation measures, half of them being proposed for the first time in a SCAG RTP, the PEIR raises significant concerns for the regulated community. Although SCAG has expressed in community meetings that the PEIR mitigation measures merely offer a “toolbox of possible solutions”, history shows that there are no such things as good intentions when it comes to the tortured CEQA process. The PEIR needs a clear explanation that lead agencies should select those measures that apply to a specific project. The final PEIR should not block the intent of SB 375 to provide CEQA streamlining for certain types of advantageous projects.
- The wording of the mitigation measures utilizing “can and should” incorrectly implies that mitigation measures are feasible for the identified agencies. SCAG should provide a clear statement that all mitigation measure recommendations are advisory and replace the “can and should” phrase with “may” when referencing mitigation measures.
- Multiple mitigation measures appear to exceed SCAG’s authority and responsibilities for implementation and have nothing to do with the RTP/SCS or its impacts. Further, many of these mitigations could create conflict with existing regulations. For example, the requirement for local jurisdictions to implement individual “climate action plans” is contradictory to the regional planning undertaken in the SCS. These mitigation measures that have nothing to do with the regional planning for future development or emissions from vehicular use should be restated or removed as appropriate.
- Perhaps to further clarify the intent, all mitigation measures not directly controlled by SCAG should be moved out of the PEIR document and into an appendix, which can be referenced as the “tool box” resource for consideration by other entities (a local jurisdiction, project sponsor, or other). However, this appendix would need to specifically state that no determination of feasibility on the measures has been made and that they are not intended to supersede any existing law or regulation.

We look forward to our continue partnership with SCAG and other business, housing and transportation entities as we all work to enhance the economic prosperity of the region and ensure a high quality of life. We respectfully ask SCAG to consider and address our comments in the RTP and PEIR revisions.

Sincerely,



Kate Klimow  
 Vice President, Government Affairs



Orange County  
Council of Governments  
Member Agencies

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Anaheim  
Brea  
Buena Park  
Costa Mesa  
Cypress  
Dana Point  
Fountain Valley  
Fullerton  
Garden Grove  
Huntington Beach  
Irvine  
La Habra  
La Palma  
Laguna Beach  
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Stanton  
Tustin  
Villa Park  
Westminster  
Yorba Linda  
County of Orange  
OCTA  
TCA  
OC Sanitation District  
ISDOC  
South Coast AQMD

February 14, 2012

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

Dear Hasan,

On behalf of the Orange County Council of Governments (OCCOG), I would like to commend the Southern California Association of Governments (SCAG) and its staff who worked hard to prepare the draft Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), the Program Environmental Impact Report (PEIR), and associated documents. This effort was monumental and unprecedented in our history and throughout the process collaboration between SCAG and Orange County stakeholders has been exceptional.

The 34 Orange County local jurisdictions and six special districts that comprise OCCOG thank you for the opportunity to comment on the Draft 2012 RTP and associated PEIR.

As you know, Orange County took upon itself the task of developing a subregional SCS. The continued cooperation of SCAG staff and the numerous references throughout the document where the RTP/SCS expressly states that it incorporates the Orange County Sustainable Communities Strategy (OC SCS) into the RTP/SCS document is greatly appreciated.

The OCCOG Technical Advisory Committee (OCCOG TAC), made up of member agency planning staff, created an ad hoc committee dedicated to the review of the Draft RTP/SCS and PEIR. This committee met four times since January 3, 2012, and has collectively spent hundreds of hours since reviewing the draft plan and documents. The OCCOG TAC review and analysis was considered in late January by the OCCOG Board and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2012-2035 RTP and SCS (draft RTP/SCS) and associated Appendices and draft PEIR (draft PEIR). OCCOG requests that this letter and its attachments be included in the public record as our collective comments on the draft RTP/SCS, PEIR and associated documents.

## 1. GROWTH FORECASTS

**Issue: Growth Projections:** The 2012 growth projections identify population, housing and employment data for the six-county SCAG region, from 2008 (existing) to 2020 and 2035. These growth projections represent the best available information from local jurisdictions, the business community, and landowners. However, as time passes, what is feasible for any given project can change. The triggers for change to adopted growth projections can range from factors such as market conditions, new information or data, infrastructure availability, changes in funding availability (such as the dissolution of redevelopment agencies statewide), and changes to jurisdictional boundaries resulting from future annexations and incorporations of previously designated unincorporated territory. SCAG should continue to adopt the 2012 growth projections at a countywide level, consistent with past approvals of the RTP growth forecasts.

A county level of geography accommodates internal adjustments to changing conditions as described above, without compromising the integrity of the overall growth projections. However, approving the growth projections at any lower level of geography, such as at the city level, would be challenged with continual revisions and shifts to the total number of housing, population and employment within a city, among cities, and between cities and counties as a result of the factors described above. Adoption of the data at a level lower than the county would limit jurisdictional control and create inflexibility in a regional planning document. In addition, the level of geography in which RTP/SCS growth forecast is adopted should not be determined by other processes. For example, the Regional Housing Needs Allocation (RHNA) allocations must be consistent with the RTP/SCS; state law does not require that they be identical. The RTP/SCS can be adopted at the county level and the RHNA process may proceed independently until it is completed after the appeals, trades, and transfers are completed. The RHNA allocations that were derived from the growth forecast can still be determined to be consistent with the RTP/SCS, even if changes are made to the city totals during the appeals, trades, and transfers process.

**Growth Projections Recommendation:** SCAG's adoption of the growth forecast numbers should be at the county level, consistent with past RTPs, and not at a smaller level of geography such as city, census tract, or traffic analysis level.

**Issue: Orange County Projections (OCP)-2010 Modified:** On January 26, 2012, the update to the OCP-2010 dataset known as "OCP-2010 Modified" was officially approved by the OCCOG Board of Directors and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 Employment Development Department Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this letter also serves as the formal notice of the update that should be incorporated into the 2012 RTP/SCS, PEIR, and related documents.

**OCP-2010 Modified Recommendation:** All documents, tables, maps, narrative, modeling runs, PEIR Alternatives (including Alternate C/3/Envision 2) referencing

the Orange County growth forecasts should be updated with the Orange County Projections-2010 Modified Growth Projections, as adopted by the OCCOG Board of Directors and consistent with the subregional delegation Memorandum of Understanding (MOU) between OCCOG, OCTA and SCAG.

## 2. DRAFT RTP/SCS

**Issue: 2012 Draft RTP/SCS:** The RTP/SCS identifies strategies to reduce greenhouse gas (GHG) emissions from cars and light duty trucks. Because counties, jurisdictions and agencies have different needs and feasibility of implementation, we believe these strategies should be clearly identified as a menu of options that can be used to achieve the goal of reduced GHG emissions. However, the document can be construed to suggest that each of the strategies listed in the table on pages 150-153 are necessary to successfully implement the SCS, many of which are beyond SCAG's purview or control. It is requested that the language be clear that it is permissive.

### 2012 Draft RTP/SCS Requests:

1. **Revise language on page 149: "The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders may use or consider while preparing specific projects which that help can and should undertake in order to successfully implement the SCS."**
2. **Please provide SCAG analysis supporting the strategies in the Draft RTP/SCS Chapter 4.**
3. **Please describe what municipal obligations are anticipated as a result of adopting these strategies as a list to be accomplished rather than a menu of options.**

**Issue: OC SCS Strategies:** There are strategies in the OC SCS that are not included in the regional SCS. Similarly, there are some strategies in the regional SCS that are not consistent with the strategies in the OC SCS. This creates confusion and clarification is needed.

Under SB 375 and only within the SCAG region, subregional councils of government were allowed to prepare subregional plans that SCAG is then required to incorporate into the regional SCS. In Orange County, the OCCOG and the Orange County Transportation Authority (OCTA) developed a countywide or subregional OC SCS that was to be incorporated in whole into the SCAG SCS. Local agencies in Orange County developed the OC SCS and approved it in June 2011. SCAG has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the regional SCS, but it is unclear what the standing is of the OC SCS. The OC SCS contains a set of strategies that were agreed upon by local governments, agencies and other stakeholders within

Orange County and was accepted by SCAG and should represent the SCS that is applicable to the Orange County region.

**OC SCS Strategies Recommendation:** Please revise the text in the last paragraph on page 106 to state: **“These subregional SCS documents are incorporated into the regional SCS and represent the SCS for each of these subregions.”**

### **3. DRAFT PEIR**

**Issue: Mitigation Monitoring Program Intent:** It is unclear how SCAG intends to implement the Mitigation Monitoring Program with regard to the proposed mitigation measures, as may be implemented by local agencies. Section 1-5 of the PEIR specifically provides that “Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG’s monitoring efforts, including SCAG’s Intergovernmental Review (IGR) process.” It is infeasible for SCAG to require local jurisdictions to report when such mitigation measures are considered for any project. Noting that the SCAG region includes 6 counties, 14 subregional entities and 191 cities, this reporting requirement would surely fall short of expectations. Given this identified infeasibility, please clarify what obligations local agencies may have regarding SCAG’s mitigation monitoring efforts.

#### **Mitigation Monitoring Program Intent Requests/Recommendations:**

- 1. Does SCAG intend to require all jurisdictions that avail themselves of the mitigation measures to report to SCAG when such measures are considered for any project?**
- 2. SCAG’s approval of the PEIR needs to clearly state the intent and applicability of the mitigation measures and the PEIR reflective of our comments below and that mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.**
- 3. Add language to Executive Summary and Introduction: **“Mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.”****

### **4. Feasibility and Applicability**

On pages 1-5 and 1-7, the language should reflect that Lead agencies will determine the feasibility and applicability of measures and that the measures are intended to offer a menu of options available should a lead agency opt to utilize them. The PEIR makes the assertion on page 1-7 of the Project Description under Transportation Project Mitigation and Land Use Planning and Development Project Mitigation sections that the draft PEIR has made a preliminary determination that all of the mitigation measures in it are considered feasible. SCAG has not identified any analysis that supports the feasibility of the mitigation measures that are to be undertaken by entities other than

SCAG and SCAG staff has stated on numerous occasions that the mitigation measures were intended to be a menu of options for consideration by lead agencies.

**Issue: Mitigation Measures Impose Obligations Beyond Scope of SB 375.** Given the combination of the RTP and the SCS processes, as mandated by SB 375, we recognize that SCAG must undertake the difficult task of balancing the goal of having a coordinated regional transportation system with land use strategies that encourage a more compact use of land. However, a key principle of SB 375 is that it is not intended to supersede local agencies' authority to regulate land uses. Specifically, Government Code section 65080(b)(2)(K) provides, in relevant part that “. . . Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. . .”

In light of the limitation expressed at Government Code Section 65080(b)(2)(K), we find language in the PEIR, and specifically the mitigation measures therein, imposing affirmative obligations on local agencies within the SCAG region to be inappropriate and contrary to law. The proposed language as recommended below would remedy the legal conflict with Section 65080(b)(2)(K), yet achieve SCAG's recognition that project-specific environmental review is the appropriate level of review for projects that have their own unique, site-specific circumstances.

The revisions are further consistent with OCCOG's understanding that SCAG intended to provide the mitigation measures as a "toolbox" to local agencies for use within their discretion if and when appropriate for projects within their respective jurisdictions. Indeed, from materials presented by SCAG, including the January 26, 2012 workshop held at the City of Anaheim Council Chambers, SCAG explained that **“This PEIR offers a “toolbox” of mitigation measures** for future project-level environmental analyses. . . It also includes suggested mitigation measures for local agencies to consider for implementation, if appropriate and feasible (phrased as “can and should”). This language is permissive and not mandatory upon local agencies.”

**Mitigation Measures Impose Obligations Beyond Scope of SB 375 Recommendations:**

- 1. Please provide SCAG analysis supporting the feasibility of mitigation measures in the PEIR.**
- 2. Change language on page 1-7 found in 2 places under MITIGATION MEASURES, subheadings Transportation Project Mitigation and Land Use Planning and Development Project Mitigation: “This Draft PEIR has made a preliminary determination that the proposed mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will actually implement them where, in the agencies’ independent discretion, the measures are deemed applicable in light specific circumstances at the project level.”**

3. Change language on page 1-5, first paragraph: **“Mitigation Measures proposed in this PEIR are available as tools for implementing agencies and local lead agencies to use as they deem applicable. The implementing agencies and local lead agencies are responsible for ensuring adherence to the mitigation measures as 2012-2035 RTP/SCS projects are considered for approval over time.”**
4. Please make similar text amendments to other sections, including the Executive Summary, of the PEIR that reference how the mitigation measures are to be used by lead agencies.

5. **“Can and Should”**

As indicated in the PEIR on page 1-6, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rests with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies' regulatory measures (as discussed in Section 14). OCCOG recognizes that SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language "can and should" for mitigation measures addressed to local agencies is inappropriate.

**“Can and Should” Recommendations:** Change language in all mitigation measures identifying entities other than SCAG to read **“can and should consider where applicable and feasible.”** To clarify the intent that the mitigation measures are a menu of options for which feasibility has not been established for any given project, the “can and should” language should be changed in all mitigation measures identifying entities other than SCAG to read **“should consider where applicable and feasible.”**

6. **CEQA Streamlining:**

One of the key components of SB 375 was the inclusion of incentives that provided CEQA streamlining for projects consistent with the objectives of the bill as well as consistent with the SCS. As identified on pages 1-10 through 1-12, for projects to qualify for these incentives, mitigation measures from the applicable environmental document must be incorporated into the project. It is not clear, however, which measures would need to be incorporated into a project for it to qualify, particularly in light of the intent of SCAG for the measures to be a toolbox.

**CEQA Streamlining Recommendations: Please clarify how the “menu of mitigation measures” from this PEIR is expected to be used by a lead agency as well as which ones lead agencies should address in order for a project to qualify the use of the CEQA streamlining provisions of SB375.**

## **7. RTP/SCS Policies**

Please ensure that the discussion of the policies represented by the RTP/SCS in the draft PEIR is consistent with the policies actually in the RTP/SCS. In particular, the bullet list on the page 2-3 is stated to represent the land use strategies of the plan; however, the strategies listed are not specifically identified in the regional SCS. Including different language in the PEIR implies additional policy.

**RTP/SCS Policies Recommendation: Amend the land use strategies identified on page 2-3 of the Project Description, under the section Purpose and Need for Action to reflect the strategies included in the SCS chapter of the RTP.**

## **8. PEIR Mitigation Measures**

By far the most concerning portion of the Draft 2012 RTP/SCS to OCCOG members is the PEIR. Specifically, the proposed mitigation measures included in the PEIR extend to and impact a broad spectrum of technical and policy areas. Many examples of these concerns are included on Attachments 1 and 2 of this letter. In sum, the concerns are that the mitigation measures:

- Appear to go above and beyond the requirements of the Regional Transportation Plan and Senate Bill 375;
- Are measures already required by State and Federal law or are regulated by other agencies such as the South Coast Air Quality Management District, California Department of Housing and Community Development, Fish and Game, and the Regional Water Control Boards;
- Appear to run counter to local control; and
- Are financially infeasible for the agencies responsible for implementation.

### **PEIR Mitigation Measures Recommendations.**

- 1. In order for the mitigation measures to truly be considered a toolbox of options for consideration by various entities in the SCAG region as intended, all mitigation measures in the PEIR intended for entities other than SCAG should be moved into an appendix to the PEIR and renamed “Sustainability Strategies”. These strategies could then be identified for consideration by lead agencies as mitigation for future projects should**

a lead agency choose to do so and deem them applicable and feasible. The PEIR would only retain mitigation measures applicable to SCAG. This action would also require that the Executive Summary, Introduction, and Project Description be updated to reflect the nature of the new appendix of Sustainability Strategies.

2. Remove language within mitigation measures that establishes policies not included in the RTP/SCS or modifies the measure to specify a policy or endorses specific technology which would limit agency authority.
3. In the draft PEIR, please replace text in all mitigation measures that identify policy for either SCAG or other entities with language that reflects either adopted SCAG policies or are policies that are included in the RTP and SCS. Mitigation measures should not be used to establish new policy for the region.

For example:

- MM-TR 17: “SCAG shall (for its employees) and local jurisdictions ~~can and~~ should institute where applicable and feasible teleconferencing, telecommute, and/or flexible work hour programs ~~to reduce unnecessary employee transportation~~.
- MM-TR 23: “Local jurisdictions should consider when applicable and feasible coordinated and controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of a feasible, energy efficient Light Emitting Diode (LED) technology.”
- MM-TR 35: “Local jurisdictions should consider where applicable and feasible the adoption of a comprehensive parking policy that ~~discourages private vehicle use and~~ encourages the use of alternative transportation.”

## 9. SCAG Authority

Several mitigation measures identify actions that SCAG shall undertake to mitigate impacts of the plan. Many appropriately direct SCAG to provide a discussion forum or serve as a central data repository for a broad range of topics that affect the region as a whole. However, many measures inappropriately direct SCAG to establish practices, standards, or policy in areas unrelated to what SCAG has purview over. Further, the measures often appear to be directed at policy implementation that is unrelated to the plan itself, such as implementing AB 32. Such measures will essentially require SCAG to establish policy in areas for which it has no authority. Additionally, it is not clear how SCAG would fund the work efforts because they are not directly related to its mission and, therefore, do not have funding. For example, MM-PS 118 states: “SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches and models and to specify levels of performance for regionally

significant projects to be consistent with regional plans.” Green building practices and energy efficiency measures are already addressed by various state and federal agencies, as well as by other local organizations. Further, SCAG does not have the authority to specify levels of performance for land use or buildings.

**SCAG Authority Recommendation: Remove the following mitigation measures for SCAG which it does not have purview for under the law or directed to do by the Regional Council through policy direction. List may not be exhaustive.**

MM-BIO/OS 44	MM-LU 42	MM-LU 77	MM-PS 68
MM-BIO/OS 45	MM-LU 47	MM-LU 80	MM-PS 71
MM-BIO/OS 46	MM-LU 48	MM-LU 81	MM-PS 95
MM-BIO/OS 48	MM-LU 51	MM-LU 82	MM-PS 121
MM-GHG 3	MM-LU 53	MM-LU 83	MM-TR 17
MM-GHG 8	MM-LU 56	MM-NO 12	MM-TR 23
MM-GHG 11	MM-LU 57	MM-NO 16	MM-TR 28
MM-LU 9	MM-LU 60	MM-POP 1	MM-TR 35
MM-LU 21	MM-LU 61	MM-PS 3	MM-TR 83
MM-LU 22	MM-LU 64	MM-PS 14	MM-TR 85
MM-LU 24	MM-LU 65	MM-PS 25	MM-TR 96
MM-LU 26	MM-LU 69	MM-PS 37	MM-W 34
MM-LU 32	MM-LU 71	MM-PS 39	MM-W 59
MM-LU 34	MM-LU 74	MM-PS 41	MM-W 60
MM-LU 41	MM-LU 75	MM-PS 67	MM-W 65

**10. SCAG Mitigation Measures**

It would be helpful to understand how SCAG will implement the mitigation measures that it is assigned to do. Many of the mitigation measures will expand SCAG’s role into areas that are not currently under its purview and are under the jurisdiction of other entities. Many also constitute significant work efforts.

**SCAG Mitigation Measures Request: Please explain how the actions and programs required by the measures SCAG is assigned to do would be funded to ensure that they are truly feasible for SCAG to undertake.**

**11. Ensuring Outcomes**

SCAG has limited authority in many of the areas included in the measures and will not be able to ensure impacts are mitigated and that the outcomes identified do actually occur. SCAG can assist, offer information, educate, and provide discussion forums for topics outside its area of jurisdiction; however, it is not possible to “ensure” that outcomes are achieved for things that are outside of its purview.

**Ensuring Outcomes Recommendation:** Remove all references within mitigation measures that SCAG will “ensure” or “shall minimize impacts” that result from a mitigation measures.

**Example:**

**MM-CUL17:** ~~“Impacts to cultural resources shall be minimized through cooperation, information sharing, and SCAG’s shall, through cooperation, information sharing and ongoing regional planning efforts such as web-based planning tools for local government including CA lots, and direct technical assistance efforts such as Compass Blueprint’s Toolbox Tuesday series, provide information and assistance to local agencies to help them avoid impacts to cultural resources.~~ Resource agencies, such as the Office of Historic Preservation, shall be consulted during this process.”

## **12. Fees and Taxes**

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus not be approved. They also represent prescriptive means to accomplish the mitigation.

### **Fees and Taxes Recommendations:**

- 1. Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. The following list may not be exhaustive.**

MM-BIO/OS55	MM-PS15	MM-TR30	MM-TR88
MM-LU29	MM-PS63	MM-TR37	MM-TR94
MM-LU53	MM-PS75	MM-TR47	MM-TR96
MM-LU54	MM-PS76	MM-TR52	MM-W6
MM-LU80	MM-PS78	MM-TR60	MM-W32
MM-LU81	MM-PS92	MM-TR69	MM-W52
MM-LU82	MM-PS106	MM-TR74	MM-W58
MM-LU83	MM-PS107	MM-TR75	
MM-POP4	MM-PS113	MM-TR80	
MM-PS12	MM-TR28	MM-TR84	

- 2. Please clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.**

### 13. Guidance Documents

Guidance documents are there as information sources for consideration; however, they do not represent regulation or establish standards that are required to be achieved. For example, MM-AQ19 inappropriately indicates that project sponsors should comply with the CARB Air Quality and Land Use Handbook (June 2005) which is only a guidance document.

**Guidance Documents Recommendation: Remove references that indicate a compliance with guidance documents from mitigation measures.**

### 14. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the CEQA, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and the regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures. It is offered that MM-PS 13 is a good example of the type of appropriate language and reads “Project sponsors can and should ensure that projects are consistent with federal, state, and local plans that preserve open space.”

The water section provides another example. The PEIR includes 68 mitigation measures in the Water Resources section regarding water quality. At least 35 of these are related to storm water runoff best management practices (BMPs) that are currently regulated through Municipal National Pollutant Discharge Elimination System (NPDES) Storm Water Permits issued by Regional Water Quality Control Boards. In the SCAG region, there are five water quality control boards each with its own Municipal NPDES Storm Water Permit. The regulations and requirements contained in these permits vary from each other. By listing specific measures in the PEIR that are not included in a project’s applicable Municipal NPDES Storm Water Permit, the PEIR creates conflicting compliance requirements. To eliminate potential conflict with existing regulations, the

mitigation measures regarding specific BMPs should be removed and replaced with a single requirement that each project must comply with its applicable Municipal NPDES Storm Water Permit.

**Duplicative/Existing Regulations Recommendations:**

1. **Please remove all mitigation measures listed in Attachment 1 which are duplicative of existing regulations administered by or under the jurisdiction of other agencies. The list may not be exhaustive.**
2. **For each impact, please add the following language: “Local jurisdictions, agencies, and project sponsors should comply, as applicable, with existing federal, state, and local laws and regulations.”**

**15. Draconian Mitigation Measures**

Many of the mitigation measures in the Draft PEIR are draconian and need to be removed. One prime example is MM-LU 85. It reads in part “Local jurisdictions can and should reduce heat gain from pavement and other hardscaping including: Reduce street rights-of-way and pavement widths to World War II widths (typically 22 to 34 feet for local streets and 30 to 35 feet for collector streets curb to curb)...” Although reduced street widths may be appropriate in some cases and have been implemented in many jurisdictions, it is inappropriate and counterproductive to require reduced street widths as a mitigation measure in the PEIR. Reduced street widths, for example, generally do not provide space for on-street parking which may result in greater, additional paved areas provided in separate parking lots. A second example is MM-LU15: “Project sponsors can and should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of transportation projects/improvements.” Measures should support the SCAG Energy and Environment Committee which recommended that the programs build upon existing open space land acquisition and open space programs in the region, tailoring programs to each individual county in the region. These include, but are not limited to, OCTA’s Measure M Mitigation Program, and Transportation Corridor Agency’s open space mitigation program, which has protected 2,200 acres in perpetuity to date. Open space conservation should be pursued in a voluntary manner, working with willing private sector landowners and not be overly prescriptive and specific.

**Draconian Mitigation Measures Recommendations: Remove mitigation measures that are very prescriptive, such as reducing street widths to WW II widths or specifying preferred technology.**

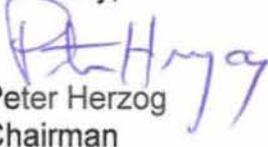
In addition to the above comments, detailed technical comments, language changes, and questions on the RTP/SCS, Appendices, and PEIR documents are included in Attachment 2.

## Conclusion

We recognize the immense efforts it took to prepare these documents. They represent incredibly complex technical work and have important and far-reaching policy impacts for our region. However, because of this importance and complexity, we would like to express concern about the timing of the release of the documents and hope that preparation of future RTP/SCS documents will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The current timeline of document releases, public comment period, and time allowed for the response to comments results in an inability to have credible discussion regarding possible changes because the timeline does not allow for recirculation or full discussion of requested changes. The documents were released over the holiday season and included the release of the draft PEIR document on December 30, 2011. The minimum 45-day public comment period closes on February 14, 2012. Only a few weeks are provided to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS on April 4, 2012.

We appreciate your consideration of all of the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have an RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do not hesitate to contact me or Dave Simpson, OCCOG's Executive Director.

Sincerely,



Peter Herzog  
Chairman

cc: OCCOG Member Agencies  
OCCOG Board of Directors  
OCTA Board of Directors  
Orange County City Managers Association

**Attachment 1: Mitigation Measures Duplicative of Existing Regulation**  
(Listed by type of regulation measures duplicates)

<b>Air Quality/AQMD</b>	<b>CDFG</b>	<b>Federal &amp; state law</b>	<b>Federal law</b>	<b>Resource agencies</b>
MM-AQ1	MM-BIO/OS1	MM-HM3	MM-LU14	MM-TR33
MM-AQ2	MM-BIO/OS3	MM-HM4	MM-LU30	MM-BIO/OS29
MM-AQ3	MM-BIO/OS4	MM-HM5		MM-BIO/OS30
MM-AQ4	MM-BIO/OS8	MM-HM6		MM-BIO/OS31
MM-AQ5	MM-BIO/OS10	MM-HM7	<b><u>NPDES</u></b>	MM-BIO/OS32
MM-AQ6	MM-BIO/OS11	MM-LU28	MM-AQ16	MM-BIO/OS33
MM-AQ7	MM-BIO/OS17	MM-NO18	MM-BIO/OS19	MM-BIO/OS34
MM-AQ8	MM-BIO/OS18	MM-PS13	MM-GEO5	MM-BIO/OS35
MM-AQ9	MM-BIO/OS21	MM-W36	MM-W1	MM-BIO/OS50
MM-AQ10	MM-BIO/OS22	MM-W37	MM-W13	MM-BIO/OS51
MM-AQ11	MM-BIO/OS23	MM-W38	MM-W58	
MM-AQ12	MM-BIO/OS24			
MM-AQ13	MM-BIO/OS25		<b><u>Flood control</u></b>	
MM-AQ14	MM-BIO/OS26		MM-HM8	
MM-AQ17	MM-BIO/OS27			
MM-AQ18	MM-BIO/OS28		<b><u>Local Agencies</u></b>	
	MM-BIO/OS14		MM-AV11	
	MM-BIO/OS7			
<b><u>State law</u></b>				
MM-AV3	MM-HM10	MM-PS4	MM-PS107	MM-W25
MM-AV6	MM-HM11	MM-PS8	MM-PS113	MM-W26
MM-AV12	MM-HM12	MM-PS10	MM-PS119	MM-W27
MM-BIO/OS20	MM-HM13	MM-PS12	MM-PS122	MM-W28
MM-CUL1	MM-HM14	MM-PS14	MM-TR29	MM-W29
MM-CUL2	MM-HM15	MM-PS16	MM-TR49	MM-W30
MM-CUL3	MM-HM16	MM-PS35	MM-TR55	MM-W31
MM-CUL4	MM-LU10	MM-PS36	MM-TR75	MM-W32
MM-CUL5	MM-LU11	MM-PS37	MM-TR89	MM-W39
MM-CUL6	MM-LU17	MM-PS42	MM-W6	MM-W43
MM-CUL7	MM-LU19	MM-PS43	MM-W8	MM-W46
MM-CUL8	MM-LU20	MM-PS48	MM-W9	MM-W47
MM-CUL9	MM-LU38	MM-PS55	MM-W10	MM-W48
MM-CUL10	MM-LU43	MM-PS56	MM-W11	MM-W49
MM-CUL11	MM-LU44	MM-PS57	MM-W12	MM-W50

MM-CUL12	MM-LU48	MM-PS59	MM-W15	MM-W51
MM-CUL13	MM-LU58	MM-PS61	MM-W16	MM-W52
MM-CUL15	MM-NO1	MM-PS67	MM-W17	MM-W54
MM-CUL16	MM-NO4	MM-PS69	MM-W18	MM-W55
MM-GEO1	MM-NO8	MM-PS71	MM-W19	MM-W56
MM-GEO2	MM-NO9	MM-PS73	MM-W20	MM-W61
MM-GEO3	MM-POP2	MM-PS77	MM-W21	MM-W62
MM-GEO4	MM-POP4	MM-PS89	MM-W22	MM-W64
MM-GEO6	MM-PS1	MM-PS92	MM-W23	MM-W66
MM-HM9	MM-PS2	MM-PS97	MM-W24	MM-W68

Attachment 2: Additional Technical Clarifications on documents are also offered as follows:

**2012 RTP/SCS**

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	all	<i>All chapter headings should include the Chapter number on each page for ease of reference.</i>
2	Clarification	1, left column	"The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to <u>comply with SB 375</u> , <del>both</del> improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. As
3	Clarification	4, right column	"This region needs a long-term, sustainable funding plan that <u>ensures the region receives its fair share of funding</u> , supports an efficient and effective transportation system that grows the economy, provides mobility choices, and improves our quality of life."
4	Clarification	page 7- Table 2 and page 95- Table 3.3	<i>Is additional \$0.15 gas tax the sum total of both state and federal taxes or \$0.15 each?</i>
5	Clarification	40, left column	"Strategic investments, <u>put forth by the private sector</u> , that would remove barriers associated with telecommuting are expected..."
6	Correction	page 42- Table 2.2	241 toll road completion year is <u>2030</u>
7	Please define in the text and add to a glossary	50, left column	"scrip"
8	Clarification	54, right column	"Express/HO T Lane Network Despite our concerted effort to reduce traffic congestion through years of infrastructure investment, the region's system demands continue to exceed available capacity <u>during peak periods</u> ."
9	Clarification	70, 78	Greenhouse Gases and Air Quality SCAG seems to rely on CEQA to achieve the "maximum feasible" reductions in emissions from transportation. However, this is not consistent with the intent of SB 375's goal of achieving specific thresholds of 8% by 2020 and 13% by 2035 through a sustainable communities strategy plan.

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
			<p><i>Please provide clarification to this section indicating if the air quality and greenhouse gas CEQA mitigation measures obligate regional agencies and project developers to undertake more strategies, programs and mandates beyond those included in the OC SCS.</i></p>
10	Clarification	78, right column	<p>“Greenhouse Gases On road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total. <u>Emissions from passenger vehicles, which are the subject of SB 375 and this RTP/SCS, constitute % of the transportation sector’s greenhouse gas emissions total.</u>”</p>
11	Clarification	80, left column	<p>Statements are made, such as the following, "the RTP has the ability to affect the distribution of that growth" (in population in the region). These statements could be interpreted to be contrary to SCAG's obligation under the Memorandum of Understanding with OCCOG to respect the strategies and local land use policies in the OC SCS.</p> <p><i>Please clarify how it is in SCAG's ability to affect local change when the OC SCS is consistent with acceptance of local land use plans and planned population and employment distribution?</i></p> <p><i>Recommended text change:</i> “Transportation projects including new and expanded infrastructure are necessary to improve travel time and can enhance quality of life for those traveling throughout the region. However, these projects also have the potential to <u>induce</u> attract more of the regional population growth in certain areas of the region. <u>This means that although</u> <del>Although</del> SCAG does not anticipate that the RTP would affect the total growth in population in the region, the RTP has the ability to affect the distribution of that growth.”</p> <p><del>“In addition to induced population growth,</del> transportation projects in the RTP also have the potential to divide established communities, primarily through acquisition of rights-of-way.”</p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
		82, right column	<p>Text indicates that the RTP and projects in the RTP/SCS as “inducing” growth. It is noted that use of the term “induced growth” has a negative connotation and implies growth above and beyond what would occur naturally. However, it is stated in the RTP that the population, housing, and employment growth totals are fixed and only the distributions may change based on the plan. This means there will not be “new” growth and that the RTP and SCS may simply influence and shift the growth anticipated for the region. This moving of growth is the result of changes in distribution that are due to changes in land use or densities. Because of this, it is requested that references to “induced growth” be reworded to reflect the shifting of growth in the region.</p> <p><i>Recommended text change:</i> “Cumulative impacts from the projected growth <del>induced by the RTP</del> include increased impervious surfaces;...”</p>
12	Clarification	Chapter 3	<p>SCAG’s Financial Plan includes a significant portion of “New Revenue Sources and Innovative Financing Strategies” that are not currently in place or available. While some of the proposed revenues are within the control of SCAG or MPOs and County Transportation Commissions, the majority of the revenues (in terms of dollars) require either state or federal action to implement.</p> <p><i>Please explain what the implications are if these new revenue sources and innovative financing strategies do not become available?</i></p>
13	Clarification	page 95- Table 3.3	<p><del>“Mileage-based user fees would be implemented to replace gas tax and augment estimated at about \$0.05 (2011\$) per mile and indexed to maintain purchasing power starting 2025.”</del></p> <p>Suggested language is from page 31 of Growth Forecast Appendix:  <u>“Current gasoline tax, estimated at about \$0.05 (2011\$) per mile will increase through 2025, then in 2026 it would be replaced with a mileage-based user fee indexed to maintain purchasing power.”</u></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
14	Clarification	105, right column	“While the region was once known worldwide as the “capital of sprawl,” the region today <u>is projecting growth on only a small fraction of the <del>has little</del> raw land available in the region left to accommodate additional growth.</u> ”
15	Clarification	105, right column	“While the region was once known worldwide as the “capital of sprawl,” the region today <u>is projecting growth on only a small fraction of the <del>has little</del> raw land available in the region left to accommodate additional growth.</u> ”
16	Clarification	106	SCAG indicates that the OC SCS has been incorporated into the regional SCS. OCCOG was one of two subregions that undertook the arduous task and obligation of preparing an SCS.  <i>Please add clarifying text that these subregional SCSs, including the OC SCS, represent the Sustainable Communities Strategies applicable to those subregions.</i>
17	Clarification	110, right column	“Municipal water and sewer systems, for example, ensure clean water. At the same time, <u><del>concrete stormwater runoff channels harm water quality and sprawl eats into open space</del> as areas become more urbanized and the percentage of impervious surface is increased, the hydrologic regime is dramatically altered. Drainage conveyances that once were natural and riparian are required to be engineered as hardened flood control channels to provide adequate protection of private property and public infrastructure from the increased frequency, duration, peak flow, and overall volume of stormwater runoff. With this armoring of once natural channels, water quality benefits from biofiltration are lost along with opportunities for infiltration and evapotranspiration, which can lead to hydromodification downstream in sections which are not yet engineered and hardened. Many strategies...</u> ”
18	Clarification	112, 117	The SCS documents the development of four scenarios to explore basic aspects of future growth. These scenarios were used in public outreach and the SCS and the associated Appendix states that “Using the public dialogue and feedback from the analysis of the SCS Scenarios, SCAG developed

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
			<p>the 2012 RTP/SCS Plan alternatives.” (Similar references are also include at RTP/SCS p. 117, and SCS Background Documentation p. 71). The RTP/SCS and Appendix then describes a process that led to the Plan alternatives. Neither the RTP/SCS, Appendix or PEIR expressly state or illustrate the fundamental land use and socioeconomic foundation for the SCS.</p> <p><i>In order to confirm consistency with the OC SCS, it is requested that SCAG include appropriate tables, graphics and maps that provide the detail that confirm this consistency.</i></p>
19	Clarification	113, 122	<p>The regional SCS states that the scenarios/alternatives were developed using the Local Sustainability Planning Tool (LSPT). The LSPT is a sketch planning tool that flattens geographical areas to a 5-acre grid cell. The OC SCS land use data was provided at much greater level of detail in that specific parcel data and detail were provided by each jurisdiction. A cursory review of some LSPT data reveals inconsistencies regarding interpretation of Orange County land uses.</p> <p>It is acknowledged that the regional SCS states, "Land use inputs for OCCOG SCS were unchanged". Yet use of the LSPT and SCAG Development and Community Types presented in the SCS leave open the question as to whether the OC SCS was altered, as noted above.</p> <p><i>Please provide confirmation that the underlying OC SCS land use data was used without significant alteration and LSPT flattening and interpretation in the development of the regional SCS Plan and alternatives.</i></p>
20 17	Add to glossary	127, right column	“Gentrification”
21	Clarification	128, left column	<p>“Thus, this adjustment allowed the land use pattern to conform more closely to local <u>expectations general plans</u>, while reducing the amount of vehicle miles traveled.”</p> <p><i>Whose/What are “local expectations?”</i></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
22	Clarification	149, right column	<p><i>Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options.</i></p> <p><i>“The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders <u>may use or consider while preparing specific projects which would help can and should undertake in order</u> to successfully implement the SCS.”</i></p>
23	Clarification	150-152	<p>The OC SCS was accepted by SCAG and represents the set of strategies and the growth distribution that outlines the best approach for how the requirements of SB 375 would be met within the subregion. Specifically, the OC SCS included 15 specific Sustainability Strategies, reflecting a menu of 222 practices and actions that OC agencies have agreed to pursue (or continue to pursue) to achieve GHG reductions that support SB 375.</p> <p><i>Why doesn't the regional SCS specifically acknowledge these 15 strategies yet include other strategies and performance measures not included in the OC SCS (e.g., Locational Efficiency)?</i></p>
24	Add to glossary	166, right column	“Greenfield”
25	Clarification	194, right column	“In addition to these targeted outreach efforts, all regular and special meetings of the RTP task forces, the Transportation Committee (TC), <u>the CEHD, the EEC,</u> and the SCAG Regional Council are publicly noticed and ...”
26	Clarification	201	<i>Please clarify whether the text stating “Long-term emission reduction for rail, with a goal of zero-emissions rail system” is intended to reflect a zero-emissions freight rail system, or whether this goal also applies to passenger rail.</i>
27	Clarification	202, 203- Table 7.1	<p>Unfunded operational improvements, of which several are listed on page 203, Table 7.1, include transit station improvements in Irvine, Fullerton, and Santa Ana, bus rapid transit (BRT) in Orange County, and high speed rail (HSR) Phase II.</p> <p><i>Please confirm that these are consistent with the OC SCS.</i></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION	COMMENT &
28	Clarification	207	Strategic Finance	
			<i>Please explain what will happen if reasonably foreseeable revenue sources of approximately \$200 million do not become available?</i>	
29	Add to glossary	205	"Active transportation"	

### GROWTH FORECAST APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION	
1	Updated growth forecast numbers	23, Table 13	In December 2011, Orange County provided SCAG with the revised growth forecast dataset, OCP-2010 Modified, per the OC SCS MOU (official OCCOG Board action 1/26/2012).	
			<i>Please incorporate revised Orange County numbers (i.e. OCP-2010 Modified) into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.</i>	

### PERFORMANCE MEASURES APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION	
1	Clarification	1	The document states, "The performance measures are used to evaluate how well the RTP/SCS addresses the adopted goals and performance outcomes."	
			<i>Is there any formal role for the performance measures?</i>	
			ARB will evaluate for SB 375 compliance not based on these measures but based on ARB process.	
			<i>Please include language clarifying that this is a requirement to demonstrate compliance with federal requirements and not for the obligations under SB 375.</i>	

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	Clarification	1, end of first paragraph	Add statement: <u>“Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.”</u>
3	Clarification	1, column 2	The document states, “The Regional Council will formally adopt the goals and outcomes as part of the final 2012 RTP/SCS.”  <i>Does this bring any formal obligation to meet goals? Goals are general, flexible, and aspirational rather than specific, as on p.1.</i>
4	Clarification	13, Table 8	The RTP/SCS claims an extra 2% CO <sub>2</sub> e emissions reduction in 2035 from the NHTS post-processing analysis. While the RTP/SCS meets the ARB SB375 goal without the extra 2%, we would like to note that the extra 2% could be important if the attorney general raises concerns about backsliding. Consequently, the reliability of the extra 2% reduction should be checked. Questions on the NHTS model are below.  It would be useful to know the answers to better judge the quality, although we do note that the report does look like it meets the standards or best practice.
5	Clarification	9	NHTS Model Documentation Report  <i>Are the auto and bus accessibility variables included in the regression models for 30-mile rings?</i>  <i>In “Number of trips” model – is number of cars, included as an independent variable, the actual or predicted value?</i>  <i>The same question applies to other models.</i>
6	Clarification	23, Table 10	NHTS Model Documentation Report  <i>Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample?</i>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	24, Test 3	<p>NHTS Model Documentation Report</p> <p>(Compare Trip-Based and NHTS Model): The final test was to compare the results of the Trip-Based Model and the NHTS Model for the same scenarios.</p> <p><i>Please describe the scenarios tested.</i></p>

#### **TRANSPORTATION FINANCE APPENDIX**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	General	<p><i>What are the implications if revenues other than core revenues do not become available?</i></p> <p><i>Please describe any implications to the ability of the region to meet SB 375 GHG emission reduction targets or the federally required air quality conformity?</i></p>

#### **SCS BACKGROUND DOCUMENTATION APPENDIX**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Please define	53, right column	<p>Housing Options and Mix:</p> <p>Define Larger-lot single family in text</p>
2	Clarification	71-74, 80-83	<p>Alternatives naming: A, B, C</p> <p>Names of Alternatives differ than those listed in the PEIR on pages ES-3 and 1-4.</p> <p><i>Please be consistent with naming protocol for alternatives between two/all documents.</i></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
3	Revise language to clarify	71, right column	<p>“Plan Alternative (B)  ... The alternative maintains city-level forecast control totals for both households and jobs, however, within city boundaries shifts are made to focus a much larger share of future growth in a more compact way around HQTAs, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements.</u> Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family <del>housing</del> housing.”</p>
4	Please define	71, right column	<p>Plan Alternative (B)</p> <p>Define small lot single family in text</p>
5	Revise language to clarify	71, right column	<p>Plan Alternative (C)</p> <p>“As a result very suburban communities may experience no new <u>housing or employment</u> growth, while some urban areas with very good access to regional transit may experience significant increases in <u>housing or employment</u> growth.”</p>
6	Revise language to clarify	72, left column	<p>“While each alternative is distinctive, a number of parameters remained constant across each alternative: the regional RTP/SCS forecast total for <u>population, households and jobs;</u>...”</p> <p>“Detailed forecast: the detailed distribution of <u>population, households, and jobs</u> across the region...”</p>
7	Revise language to clarify	72, Table D1	<p>Alternatives A &amp; B:</p> <p>“Controlled to TAZ-based RTP/SCS Forecast for 2020; Controlled to city-level RTP/SCS Forecast for 2020-2035, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements.</u>”</p> <p>Add statement to table notes: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u></p>
8	Revise language to clarify	74, Table D2	<p>Alternatives A &amp; B:</p> <p>Add statement: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
9	Clarification	75, right column	<p>“Development Types The alternatives are built on, and provides data at, the level of the TAZ, which includes housing units and employment.”</p> <p><i>Please clarify if TAZ is Tier 1, Tier 2, or both.</i></p>
10	Revise language to clarify	79, right column	<p>“Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected <u>unchanged</u> and integrated into the alternatives (with possible revisions for Alternative C only).”</p>
11	Clarification	79	<p>The section includes the following language: “Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected and integrated into the alternatives (with possible revisions for Alternative C only).”</p> <p><i>Please clearly indicate what the “possible revisions” are and what process would be used to coordinate with Orange County should changes to the socioeconomic data contained in the OC SCS be proposed?</i></p>
12	Revise language to clarify	80	<p>Alternative A Add statement: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
13	Revise language to clarify	81	<p>Alternative B</p> <p>It is not clear whether Alternative B is the SCS land use plan. If it is, statements in the appendix lead one to believe the OC SCS foundation has been altered. For example, adjustments made to land uses to locate proximate to High Quality Transportation Areas (HQTA) and intensification of residential and employment development in HQTA that diverge from local General Plans as well as implementation of a vehicle user fee are not part of the OC SCS.</p> <p><i>Is Alternative B the SCS land use plan?</i></p> <p><u>Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.</u></p>
14	Clarification	115, left column	<p>Transit Zoning Code Santa Ana 2011</p> <p><i>Is this a duplicate of the 2010 Santa Ana project?</i></p>

**PEIR**

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
1	Revise language to clarify	ES-2	<p>ES contains matrix of mitigation measures which reference project sponsors, local agency, and project implementation agency without definitions. Add definitions into ES at end of ES.1:</p> <p><u>In general, the terms “local agency,” “project sponsor” and “project implementing agency” are used throughout this PEIR to identify agencies, organizations, companies and individuals that will act as lead agencies or project applicants for different types of individual projects. Individual projects that are anticipated to occur pursuant to the 2012-2035 RTP/SCS consist of planning projects (general plans, specific plans, climate action plans, etc.), development projects (including Transit Priority Projects (TPPs) and other similar projects), and transportation projects.</u></p> <p><u>In general, “local agency” is used to refer to a public agency that would propose a planning project or a public infrastructure project and/or an agency that would be lead agency for individual projects. “Project sponsor” is typically used to refer to an applicant (that could be public or private, an organization or an individual) that proposes a project. “Project implementing agency” is used to refer to an agency responsible for implementing a project. In this document, project-implementing agencies are those that are responsible for carrying out (reviewing, approving, constructing) transportation projects.</u></p>
2	Clarification	ES-3, 1-4, Chapter 4	<p>Alternatives’ Naming: No Project Alternative, Modified 2008 RTP Alternative, Envision 2 Alternative; Alternatives 1, 2, 3</p> <p>Names of Alternatives differ than those listed in the SCS Background Documentation appendix on pages 71-74 and 80-83.</p> <p><i>Please be consistent with naming protocol for alternatives between all documents.</i></p>

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
3	Fix numbering	ES-31	Duplicate naming of GHG11 and GHG12
4	Please define	ES-42	LU63- What are the smart growth principles?
5	Please define	ES-42	LU64- What are the benchmarks for smart growth?
6	Fix numbering	ES-51	PS17 & PS18 are missing
7	Fix numbering	ES-53	Duplicate naming of PS36 & PS37
8	Please define	ES-67	TR 34- what are the identified transportation benchmarks?
9	Please define	ES-83, 3.13-42 MM-W43	Define climate change hydrology
10	Please define	ES-40, 3.8-21 MM-LU42	Define urban growth boundary
11	Please define	ES-57, 3.11-49 MM-PS68 & ES-74, 3.12-43 MM-TR96	Define parking cash out program/ cashouts
12	Clarification	1-5	<i>Besides IGR, what other monitoring efforts is SCAG in charge of? (that would require lead agencies to provide SCAG with documentation of compliance with mitigation measures)</i>
13	Language correction	1-6, paragraph 3	Language correction: "The latter <b>former</b> finding..."
14	Language correction	2-5	Sustainability section should be separated.  Language correction: <b>Sustainability.</b> The 2012-2035 RTP/SCS is subject to specific requirements for environmental performance.  <b><u>New paragraph:</u></b> "Beyond simply meeting these requirements, a ..."
15	Language correction	2-5, Table 2-2	"Align the plan investments and policies with <b>while</b> improving..."
16	Please define	2-14	Define "scrip"

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
17	Narrative	2-21	<p>AB 32 is global warming solutions act. SB 375 was determined to be stand-alone legislation. RTP document is not forum to address global climate change and references distract from RTP goal and purpose. “Global warming” and “global climate change” are not interchangeable phrases. References should be removed or, where appropriate, language should be changed to “global warming”.</p> <p><del>Goods movement is also a major source of GHG emissions that contribute to global climate change.</del></p>
18	Clarification	2-27 paragraph 4	<p>Not in SCAG’s authority, nor funding available. Delete sentence:  <del>SCAG will work with local jurisdictions and community stakeholders to seek resources and provide assistance to address any possible gentrification effects of new development on existing communities and vulnerable populations.</del></p>
19	Clarification	2-27 paragraph 5	<p>“The 2012-2035 RTP/SCS land use development pattern accommodates over 50 percent of new housing and employment growth in HQTAs, while keeping jurisdictional totals consistent with local input.”</p> <p><i>Please confirm that there are no changes to the local land use inputs provided by Orange County.</i></p>

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	2-29	<p>“For purposes of SCAG’s SCS, a Development Type reflects an estimated average density of 22 residential units per acre. However, it is important to note that the designation is a potential ultimate average for the TAZ—and is not an absolute project-specific requirement that must be met in order to determine consistency with the SCS. In other words, the SCS was not developed with the intent that each project to be located within any given TAZ must exactly equal the density and relative use designations that are indicated by the SCS Development Type in order for the project to be found consistent with the SCS’s use designation, density, building intensity and applicable policies. Instead, any given project, having satisfied all of the statutory requirements of either a residential/mixed-use project or TPP, may be deemed by the lead agency to be consistent with the SCS so long as the project does not prevent achieving the estimated average use designations, densities and building intensities indicated by the Development Type within the TAZ, assuming that the TAZ will be built-out under reasonable local planning and zoning assumptions.”</p> <p><i>Does the above PEIR language create a requirement for average TAZ density levels in 2035 and a requirement that each local project not preclude those density levels?</i></p> <p><i>Additionally, please clarify whether in HQTAs, these densities could be exceeded as well as implications of an area that is already fully developed not redeveloping such that it ever achieves the identified densities.</i></p>
21	Please define	3.8-5 paragraph 3,	Define “open space”

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
22	Revise language to clarify	4-39	<p>Envision 2 alternative contains growth projections that would place housing in flight paths, locate housing on sites for which housing is not allowed due to environmental contamination, would significantly impact existing industrial operations necessary to maintain quality jobs in the region, and does not include development projects that are legally allowed due to having existing entitlement for development. Because this alternative does not consider the existing health and safety of future residents nor the existing legal approvals of development in the region, it is not possible to determine if the alternative is actually superior to other alternatives. It is simply another alternative for consideration.</p> <p><i>Please remove references to the Envision 2 (or any other name of this alternative) as being environmentally superior.</i></p> <p><del>ENVIRONMENTALLY SUPERIOR</del> <u>ENVISION 2</u> ALTERNATIVE</p>
23	Revise language to clarify	4-40	<p>“Of the three alternatives, the Envision 2 Alternative would be considered <u>by State CEQA guidelines</u> as the environmentally superior alternative because it does not allow further use of land for single-family development...”</p>



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February 14, 2012

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

Re: Comments on the Draft 2012 Regional Transportation Plan and Program  
Environmental Impact Report

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) draft 2012 Regional Transportation Plan (RTP) and associated Program Environmental Impact Report (PEIR). The 2012 RTP and PEIR are comprehensive documents that reflect the transportation and funding challenges the region will face in the coming years, in addition to the program level impacts and mitigation options. These documents are critical to the region's ability to operate, maintain, and improve the transportation system.

The Orange County Transportation Authority (OCTA) appreciates that SCAG has included the commitments identified in OCTA's 2010 Long-Range Transportation Plan, *Destination 2035*, as well as the demographic forecasts and land-use data submitted through the 2010 Orange County Sustainable Communities Strategy. In addition, OCTA appreciates the hard work and cooperation of SCAG staff throughout the RTP and PEIR development process.

OCTA has coordinated with Orange County's local jurisdictions to identify policy and technical issues related to the draft 2012 RTP and PEIR that are of concern to Orange County. The issues that were identified through this effort, and that are of particular concern to OCTA, are discussed below. Some of these issues were previously transmitted to SCAG in a letter dated October 7, 2011. Since a response to the October letter was never received from SCAG, OCTA strongly urges SCAG to carefully review the issues below and provide specific and detailed responses.

### **Innovative Financing and New Revenue Sources**

The draft RTP suggests that \$127.2 billion of the approximately \$219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a \$0.15 gas tax increase between 2017 and 2024. After that, the draft RTP assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.05 per mile,

beginning in 2025, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee.

OCTA cannot support an increase in fees, including the introduction of a mileage-based user fee, until a comprehensive economic impact study is completed and presented to the OCTA Board of Directors (Board) for discussion. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on the need for a return-to-source criteria that guarantees funds generated within Orange County are reinvested in Orange County. Finally, there should also be a process for recognizing and rewarding areas that keep the transportation system in a state of good repair.

### **California High-Speed Rail**

The draft RTP identifies Phase I of the California High-Speed Rail Authority (CHSRA) Project as a potential solution for improving interregional and intercity ground transportation. As described in the RTP, the project is planned to connect San Francisco with Los Angeles and Anaheim. This also assumes improvements to increase speeds along the Los Angeles-San Diego-San Louis Obispo (LOSSAN) corridor and the Metrolink Antelope Valley Line.

This project description is consistent with the draft CHSRA Business Plan, which OCTA has reviewed and provided comments on (Attachment A). OCTA would like SCAG to take these comments into consideration as the RTP is refined for adoption in April. In summary, these comments focused on the following:

- OCTA supports the phased delivery approach, which includes early investment in the existing LOSSAN and Metrolink infrastructure
- Rather than initially investing in the central segment, OCTA believes it is more prudent to begin implementation at the "bookends" of the system
- Extending the implementation of Phase I by 13 years may jeopardize existing funding due to timely use criteria
- The updated schedule should account for potential contingencies, and the associated potential cost increases should be addressed through contingency planning
- The project's dependency on public funds could place CHSRA in direct competition for funding with existing transit service providers and local transportation agencies

- It is questionable whether the funding plan truly complies with the requirements set out in Proposition 1A, specifically Section 2704.08(c)(2), items A through K
- The operating assumption of "up to nine trains per hour" will likely result in an unnecessary level of service, and the projected operating surplus of \$1 billion per year is too optimistic
- The \$171 billion alternative investment in airports and roadways does not account for the airport and roadway investments that will be required both with and without the high-speed rail project

In addition, OCTA recommends that SCAG provide regular updates to the Transportation Committee and Regional Council regarding the CHSRA business plan, financial status, implementation progress, and any changes in assumptions by the CHSRA; particularly with respect to the status of the memorandum of understanding that better defines CHSRA's commitments to near-term speed improvements for the LOSSAN and Metrolink services.

### **Regional High-Occupancy Toll Lane Network**

The draft RTP includes the implementation of a regional high-occupancy toll (HOT) lane network. This network appears to utilize existing and planned high-occupancy vehicle lanes to generate new revenues by selling excess capacity to single-occupancy drivers. The proposed regional HOT lane network assumes that Orange County would include HOT lanes on Interstate 5 (I-5) between the San Diego County border and the southern end of State Route 73 (SR-73); along I-405 between the northern end of SR-73 and the Los Angeles County border; and along State Route 91 (SR-91) extending the Express Lanes west to the Los Angeles County border.

On December 12, 2011, the OCTA Board approved the Express Lane Planning and Implementation Principles (Attachment B). OCTA requests that these principles be incorporated into the assumptions for segments of the regional HOT lane network that are within Orange County. Furthermore, the proposed HOT lane improvements to I-5, and SR-91 should be subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility, prior to inclusion in the constrained plan.

### **East-West Freight Corridor**

Due to continuing growth at the ports of Long Beach and Los Angeles, and increasing congestion on freeways throughout the SCAG region, the draft RTP

highlights the need for a zero emission East-West Freight Corridor. The corridor would aid the movement of goods between the ports and warehousing facilities located inland. This reflects the findings from the Comprehensive Regional Goods Movement Plan and Implementation Strategy.

Several other corridors were examined, including the SR-91, through Orange County and Interstate 10. After considerable study, the State Route 60 corridor was selected for further study based on its proximity to current and future markets, feasibility and right-of-way constraints, future truck volumes, and potential for reducing truck-involved accidents. The SR-91 was not selected primarily due to right-of-way constraints throughout the corridor, and lack of good access to warehousing locations.

OCTA supports the East-West Corridor as it appears in the Draft 2012 RTP. OCTA believes that the findings from the Comprehensive Regional Goods Movement Plan and Implementation Strategy are accurate, and OCTA encourages SCAG to build on the progress of the East-West Corridor based on these findings.

### **Other Regional Strategies**

SCAG proposes a number of other investments within the draft RTP that affect Orange County, and go beyond the Long-Range Transportation Plan (LRTP). OCTA recognizes that it is within SCAG's purview to plan for regional strategies that enhance transportation, such as the ones discussed below. It should be noted that OCTA is committed to delivering the projects within the LRTP. OCTA will only consider additional investments after revenues are identified to account for these commitments. The regional strategies identified by SCAG do not have clear funding mechanisms, and it must be made clear that their inclusion in the RTP does not constitute a commitment to fund and/or implement the improvements.

Examples of regional strategies include the congestion management projects identified by the California Department of Transportation. In Orange County, these corridors include State Route 57, State Route 22, Interstate 605, SR-91, and I-405. The improvements consist of relatively low-cost operational improvements such as ramp metering, auxiliary lanes, and other ramp and interchange enhancements. These are in addition to what was already submitted to SCAG by the county transportation commissions (CTCs) such as OCTA, and rely on funding sources beyond those identified in the LRTP.

The draft RTP also proposes additional transit enhancements throughout the region. The key transit investments that go beyond what the CTCs have committed include expanding local bus service, additional bus rapid transit, and new express bus service. These improvements are not specified in the draft RTP, but the additional cost to the region for these services is estimated at about \$2.6 billion. These additional costs are covered by SCAG's assumed transportation funding levels, which are beyond the available and committed resources identified in the LRTP.

An additional emphasis is also placed on walking and bicycling, which is referred to as "active transportation." The draft RTP proposes to increase the regional investment in active transportation by about \$4.5 billion. When the committed investments submitted by the CTCs are accounted for, the total active transportation investment is approximately \$6 billion for the SCAG region. Again, this additional investment is over and above resources identified in the LRTP, and the improvements are addressed only at the regional level.

### **Transportation Induced Growth**

Throughout the draft RTP and PEIR, there are references to transportation projects inducing growth and influencing land-use development and demand. One such instance is on page 80 of the draft RTP, which states the following:

"Transportation projects including new and expanded infrastructure are necessary to improve travel time and can enhance quality of life for those traveling throughout the region. However, these projects also have the potential to induce population growth in certain areas of the region. Although SCAG does not anticipate that the RTP would affect the total growth in population in the region, the RTP has the ability to affect the distribution of that growth."

These types of statements are misleading for a number of reasons. For example, the excerpt quoted above states that the "RTP has the ability to affect the distribution of growth." This can be understood to imply that SCAG has the ability to influence growth through the development of the RTP. OCTA trusts that this is not SCAG's intent. OCTA recommends that such references be clarified, as land use decisions are within the purview of local agencies.

Moreover, and more importantly, statements such as the above excerpt imply a lack of coordination between land-use and transportation agencies, especially

in the light of the recent efforts to develop the Sustainable Communities Strategies at the subregional and regional levels. There should be an emphasis in the RTP on the fact that land-use and transportation agencies are coordinating better now than ever before. OCTA recommends that SCAG clarify the negative implication of the statements regarding induced growth, and highlight the elevated level of coordination occurring today.

### **Draft Program Environmental Impact Report**

The Draft PEIR is a program level document that is intended to serve as an informational document, disclosing all potential environmental impacts and possible mitigation measures. OCTA has coordinated with a number of agencies throughout Orange County who have expressed interest in reviewing and commenting on the draft 2012 RTP and PEIR (Attachment C). These agencies have identified a variety of concerns during their review of the documents, in particular with the list of 549 mitigation measures within the PEIR. The key concerns that have been identified include:

- The Draft PEIR states that it "has made a preliminary determination that the proposed mitigation measures are feasible and effective." It is unclear how this determination was made, and this assumption could prove to be inaccurate if and when these mitigation measures are considered at a project level. Therefore, any feasibility determinations in the PEIR must clearly state that they only apply at the program level.
- Several of the mitigation measures that identify SCAG as the acting agency propose measures that appear to exceed the purview of SCAG. SCAG must be mindful of local and county land-use and transportation authorities, and use great discretion when making commitments and/or suggesting policies and strategies that may impact and encroach upon local and county agencies' responsibilities.
- The PEIR includes mitigation measures that restate existing requirements enforced by other agencies and, therefore, do not need to be repeated in this list of mitigation measures.

Additionally, OCTA understands that only those mitigation measures that state that "SCAG shall" are required to be carried forward. Any mitigation measure that identifies an agency other than SCAG can be considered at the discretion of the appropriate agency; however, such consideration is not required unless the agency chooses to use the PEIR in order to tier when performing project level environmental analysis.

Mr. Hasan Ikhata  
February 14, 2012  
Page 7

OCTA understands the term "can and should" to mean that the agency identified by SCAG in a mitigation measure has the authority to implement the mitigation measure, and that SCAG encourages the agency to do so. The term is not intended to imply that the measures are feasible nor required.

Finally, SCAG's current Intergovernmental Review ("IGR") policy "encourages" the use of the mitigation measures identified in the 2008 RTP PEIR to "aid with demonstrating consistency with regional plans and polices." SCAG will most likely update the IGR policy to refer to the 2012 RTP PEIR mitigation measures. As explained above, and as already recognized by SCAG, compliance with the RTP PEIR mitigation measures is mandatory for SCAG only. These mitigation measures, therefore, should not be considered in any way during the IGR process to determine consistency with regional plans and policies.

While OCTA shares many of the concerns raised by partner agencies and stakeholders in Orange County, such as those described above, the attached list of comments on the PEIR (Attachment C) focuses on the issues within OCTA's purview that were identified through the coordination efforts. Please provide responses and clarifications with regard to these comments.

OCTA appreciates SCAG's work on the RTP and PEIR to date and looks forward to the adoption of a complete and accurate 2012 RTP and PEIR in April. If you have further questions, please contact Gregory Nord, Senior Transportation Analyst, at (714) 560-5885.

Sincerely,



Paul G. Glaab  
Chairman

WK:gn  
Attachments

c: OCTA Board of Directors  
Executive Staff



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December 22, 2011

Chairman Thomas J. Umberg  
Board of Directors  
California High-Speed Rail Authority  
770 L Street, Suite 800  
Sacramento, CA 95814

Dear Chairman Umberg:

On behalf of the Orange County Transportation Authority (OCTA), we appreciate the opportunity to review and comment on the California High-Speed Rail Draft 2012 Business Plan (Plan). As the only public agency to provide a financial contribution to the environmental clearance effort, OCTA has a vested interest in the California High-Speed Rail (CHSR) project, especially since the designated southern terminus for Phase 1 of the CHSR project is in Orange County.

The Plan is a marked improvement over the 2009 Plan and attempts to address many of the previous areas of concern raised by the Legislature, the Peer Review Group, the Legislative Analyst's Office (LAO), and affected communities. We are pleased that the Plan includes the blended approach as requested by OCTA and Los Angeles County Metropolitan Transportation Authority (Metro) in spring 2010. The plan recognizes the importance of existing passenger rail service providers and the need to link those systems with the CHSR project. We believe this is the key to the successful implementation of CHSR in Southern California, and the retention of federal support for this project. Linking into the existing successful rail services will provide the needed connectivity to regional transit systems to enable the full potential of the CHSR system.

While the Plan represents a more realistic assessment of the CHSR project, there remain areas of serious concern that should be addressed prior to submission to the Legislature and certainly prior to implementation. Below is a summary of our comments/ concerns:

- **Phased Delivery Approach:** We are pleased with the introduction of the phased delivery approach as it represents a more realistic delivery model and includes the blended operations approach as requested by OCTA and LA Metro; however, this approach begins with construction in the Central Valley instead of the Anaheim to San Fernando Valley and San Francisco to San Jose segments, often referred to as the bookends

of the system, which show much higher ridership and revenue, as well as providing connectivity to the most urbanized areas of the state. While there may be requirements which justify initial expenditures on the Central Valley, we believe it more prudent for the California High-Speed Rail Authority (CHSRA) to begin with project implementation at the bookends of the system. This approach will maximize the investment of the scarce state and federal funds and provide critical connections to the existing passenger rail systems in southern and northern California. If new track is constructed outside of the bookends in southern and northern California, it should be added between the San Fernando Valley and Bakersfield to connect the Pacific Surfliner and San Joaquin intercity rail corridors. This important infrastructure would fill the gap in passenger rail service which now exists between Los Angeles and Bakersfield.

- **Project Schedule:** We understand that the updated schedule aligns with the phased delivery approach, adding 13 years to the full Phase 1 project. Unfortunately, this change in schedule leads to significant cost increases due to inflation and escalation and it puts the existing funding sources in jeopardy due to timely use. Additionally, the updated schedule includes no contingency for project delay that may be caused by environmental clearance, legal challenges, gaps in funding, or limited availability of construction materials and qualified technical resources.
- **Cost Increase:** While we are aware that the previous cost estimate was in base year dollars and the updated cost estimate now includes normal escalation and inflation, the cost increase is significant. As stated in the business plan, the increased cost also does not address worst case scenarios for mitigations that may be required through the environmental process nor is it based on the high end of the range presented in 2010 dollars. These potential cost changes could be significant and should be addressed through contingency planning.
- **Funding/Financial Plan:** The funding plan is largely speculative and lacks any firm commitment of funding beyond the initial construction section. The current secured funding is not adequate to build either of the Initial Operating Sections, which the Plan states are the driving force behind attracting any private funding and future public funds. Additionally, the Plan relies heavily on scarce public funds on the front end of the project and could place the CHSRA in direct competition with existing rail service providers given the identified potential fund sources. This is of great concern to OCTA as it will directly impact existing and future planned programs. Specifically we are very concerned about the

assumptions on the use of federal Congestion Mitigation and Air Quality and Regional Surface Transportation Program funds that OCTA utilizes for highway and transit projects. In addition, the use of federal New Starts funds for the high-speed rail (HSR) program presents direct competition to OCTA and other local transportation agencies that rely on this program for the development of new fixed-guideway projects.

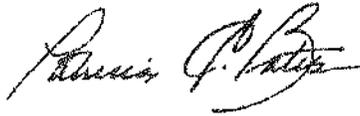
- **Compliance with Proposition 1A:** Proposition 1A Section 2704.08(c)(2) specifically states that any funding plan submitted to the Legislature "shall include ... all of the following," and items A through K are listed. Subdivision H requires that, "The corridor or usable segment thereof would be suitable and ready for high-speed train operation." "Corridor" is specifically defined in Section 2704.01 and refers to a "high-speed train system," which is defined in Subsection (e) of 2704.01 as a "system with high-speed trains and includes ... power system, rolling stock..." among other items. Additionally, Subsection K of 2704.08(c)(2) requires that, "The Authority has completed all necessary project-level environmental clearances necessary to proceed to construction." As noted by the LAO's November 29, 2011 report on the Plan, it would appear that there are serious questions that need to be fully analyzed as to whether the funding plan truly complies with the requirements set out in Proposition 1A.
- **Operational Assumptions:** The operating assumptions include some very aggressive service levels of up to nine trains per hour. This is likely to result in unnecessary frequency. The projected operating surplus of over \$1 billion per year is also speculative and based on an optimum number of trains; in our view, it is simply too optimistic.
- **Cost Comparisons:** The cost comparisons made in the Plan are based on a theoretical maximum of HSR capacity. More concerning is that the Plan does not include a build vs. no-build option for HSR and ignores existing capacity and other tools for managing congestion; in addition, the Plan compares a \$98 billion investment in HSR to a \$171 billion future investment in airports/roadways for equivalent capacity, but does not account for the roadway/airport work investment that will be required both with and without HSR.

The CHSR project represents the single largest public works project in California history, requiring extensive coordination and investment. OCTA is pleased to see the enhanced level of coordination between the CHSRA and existing service providers and railroad owners. However, we have grave

Chairman Thomas J. Umberg  
December 22, 2011  
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concern over what appears to be missing elements and unrealistic components of the Plan. We also urge the CHSRA to address the serious concerns regarding the Plan raised by the LAO prior to submission of this Plan to the Legislature. OCTA would further appreciate adequate responses to the issue raised in the letter. This project has the potential to provide significant improvements to California's transportation infrastructure, but must be done with prudent planning and judicious use of public funds.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia Bates". The signature is fluid and cursive, written over a light blue horizontal line.

Patricia Bates  
Chairman

PB:jlb

c: Board of Directors  
Executive Staff

## Express Lane Planning and Implementation Principles

### User Experience

1. Express lane projects shall be designed and implemented to provide safe, reliable, and predictable travel times.
2. Express lanes shall be planned and implemented to support improved regional connectivity.
3. Design and management of the interface of express lane facilities with existing freeway, high-occupancy vehicle, and express facilities shall seek to achieve a consistent, seamless user experience.

### Existing System

4. Express lane projects shall not be implemented to replace committed projects to be funded with local transportation sales tax revenues.
5. Although Caltrans and Federal Highway Administration control highway operations, OCTA does not intend to replace existing mixed-flow freeway lanes with express lanes.
6. Existing high-occupancy vehicle lanes may be functionally encompassed within an express lane project, provided:
  - a. The total number of lanes is increased by the project; and
  - b. Both vehicle throughput and average vehicle occupancy levels can be maintained and/or improved.

### Operations

7. Express lane operations policies shall:
  - a. Assure coverage of capital and operations costs as well as maintenance responsibilities.
  - b. Maximize overall corridor throughput and efficiency through congestion pricing.
  - c. Promote increased average vehicle occupancy, including incentives for carpools, vanpools, and transit services.

### Revenues

8. Any express lane project revenues in excess of what is needed for annual debt payments, financing requirements, and operations responsibilities shall be used for congestion relief projects and expanded transit options in the same corridor area.
9. Continued operations of express lanes, beyond bond retirement dates, shall be subject to demonstrated congestion relief measured by vehicle throughput and average vehicle occupancy levels in the corridor.



**Comments on the Draft 2012 Regional Transportation Plan –  
Program Environmental Impact Report**

**OCTA Comment #1**

MM-AQ1 – This mitigation measure states that SCAG shall implement Transportation Control Measures (TCMs). However, page 26 of the Transportation Conformity supplemental report to the draft 2012 RTP states that "Although project implementation remains an enforceable commitment by project sponsor agencies, SCAG is responsible for assuring the timely implementation of TCMs." OCTA recommends modifying this mitigation measure to describe SCAG's role as being limited to monitoring the timely implementation of TCMs, consistent with the language from the Transportation Conformity supplemental report.

MM-AQ1	<p>TCMs shall be implemented as appropriate by SCAG and can and should be implemented by local agencies and project sponsors as appropriate. TCMs included in the Plan are identified in the Transportation Conformity Appendix to the 2012-2035 RTP/SCS (starting on page 26). CAA Section 108(f)(1)(A) lists the following sixteen measures as illustrative of TCMs:</p> <ol style="list-style-type: none"> <li>I. Programs for improved use of public transit;</li> <li>II. Restriction of certain roads or lanes to, or construction of such roads or lanes for use by, passenger buses or HOV;</li> <li>III. Employer-based transportation management plans, including incentives;</li> <li>IV. Trip-reduction ordinances;</li> <li>V. Traffic flow improvement programs that achieve emission reductions;</li> <li>VI. Fringe and transportation corridor parking facilities, serving multiple occupancy vehicle programs or transit service;</li> <li>VII. Programs to limit or restrict vehicle use in downtown areas or other areas of emission concentration, particularly during periods of peak use;</li> <li>VIII. Programs for the provision of all forms of high-occupancy, shared-ride services, such as the pooled use of vans;</li> <li>IX. Programs to limit portions of road surfaces or certain sections of the metropolitan area to the use of non-motorized vehicles or pedestrian use, both as to time and place;</li> <li>X. Programs for secure bicycle storage facilities and other facilities, including bicycle lanes, for the convenience and protection of bicyclists, in both public and private areas;</li> <li>XI. Programs to control extended idling of vehicles;</li> <li>XII. Programs to reduce motor vehicle emissions, consistent with Title II of the CAA, which are caused by extreme cold start conditions;</li> <li>XIII. Employer-sponsored programs to permit flexible work schedules;</li> <li>XIV. Programs and ordinances to facilitate non-automobile travel, provision and utilization of mass transit, and to generally reduce the need for single-occupant vehicle travel, as part of transportation planning and development efforts of a locality, including programs and ordinances applicable to new shopping centers, special events, and other centers of vehicle activity;</li> <li>XV. Programs for new construction and major reconstruction of paths, tracks or areas solely for the use by pedestrian or other non-motorized means of transportation, when economically feasible and in the public interest; and</li> <li>XVI. Programs to encourage the voluntary removal from use and the marketplace of pre-1980 model year light duty vehicles and pre-1980 model light duty trucks.</li> </ol> <p>The Plan has been prepared to facilitate implementation of TCMs and they also serve as air quality mitigation measures for the purposes of the PEIR.</p>
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**OCTA Comment #2**

MM-BIO/OS45 – OCTA recommends revising this mitigation measure to indicate that SCAG will accept CTC adopted conservation and mitigation strategies for determining priority conservation areas and in developing regional mitigation policies.

MM-BIO/OS45	SCAG shall develop a conservation strategy in coordination with local jurisdictions and agencies including CTCs to determine priority conservation areas and develop regional mitigation policies. SCAG shall produce and maintain a list/map of potential conservation opportunity areas based on most recent land use data. These conservation opportunity areas may be used by local jurisdictions and project sponsors as priority areas for mitigating impacts to open space resources. SCAG's forthcoming regional conservation planning policy will include additional information on conservation opportunity areas.
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**OCTA Comment #3**

MM-LU9 – SCAG has no land-use authority to implement this mitigation measure. OCTA recommends removing any reference to SCAG implementing the coordinated mitigation programs.

MM-LU9	SCAG shall develop and implement coordinated mitigation programs for regional projects, with an emphasis on regional transportation projects.
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**OCTA Comment #4**

MM-PS34 – This mitigation measure is unclear regarding the specific funding opportunities and programs that would be affected. Any new requirements implied through this mitigation measure that affect funding for transportation projects are not supported by OCTA.

MM-PS34	SCAG shall consider consistency with ongoing regional open space planning in funding opportunities and programs administered by SCAG.
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**OCTA Comment #5**

MM-PS118 – OCTA recommends revising the language in this mitigation measure to read as follows:

"SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches, models, and levels of performance for regionally significant projects to be consistent with regional plans."

MM-PS118	SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches and models and to specify levels of performance for regionally significant projects to be consistent with regional plans.
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**OCTA Comment #6**

MM-TR6 – OCTA recommends revising this mitigation measure to indicate that SCAG will defer to the CTCs to plan and coordinate at the project level.

MM-TR6	SCAG shall establish transportation infrastructure practices that promote and enhance security. SCAG shall work with transportation operators to plan and coordinate transportation projects, as appropriate, with DHS grant projects, to enhance the regional transit security strategy (RTSS). SCAG shall establish transportation infrastructure practices that identify and prioritize the design, retrofit, hardening, and stabilization of critical transportation infrastructure to prevent failure, to minimize loss of life and property, injuries, and avoid long term economic disruption. SCAG shall establish a Transportation Security Working Group (TSWG) with goals of 2012-2035 RTP/SCS consistency with RTSS, and to find ways SCAG programs can enhance RTSS.
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**OCTA Comment #7**

MM-TR15 – OCTA recommends revising the language to indicate that SCAG will coordinate closely with CTCs and local agencies when developing advocacy strategies regarding congestion pricing.

MM-TR15	Congestion Pricing: SCAG shall advocate for a regional, market-based system to price or charge for auto trips during peak hours.
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**OCTA Comment #8**

MM-TR21 – SCAG has no authority to "ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation." Please modify the language to remove the "SCAG shall", and to state that "Local agencies can and should ensure" this effort "to the extent feasible".

MM-TR21	Transportation Planning: SCAG shall and local jurisdictions can and should ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.
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# OLDA

February 7, 2012

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

## Re: DRAFT Regional Transportation Plan and the OLDA Northern Corridor

Mr. Ikhata:

On January 11, 2012, the Orangeline Development Authority (OLDA) Board of Directors voted to communicate to you its support for including the OLDA Northern Corridor in the Constrained Projects List for the 2012 Regional Transportation Plan. This addition provides connectivity necessary for the success of the OLDA Southern Corridor (West Santa Ana Branch), which is in the constrained list. The OLDA Northern Corridor coincides with much of the list of improvements being studied by Metro as the Antelope Valley Line Infrastructure Improvement Strategic Plan and the currently planned alignment of the California High Speed Rail project. The likelihood that funds would be available for these set of improvements are enhanced by the Memorandum of Understanding (MOU) being negotiated for use of Proposition 1A (High Speed Rail) funds.

The Orangeline Development Authority (OLDA) is a joint powers authority consisting of 14 members connecting the West Santa Ana Branch and Antelope Valley Line from the City of Cerritos to the City of Santa Clarita. It includes members in the Gateway Cities Council of Governments and San Fernando Valley Council of Governments.

OLDA is committed to the development of a high speed, grade separated, environmentally friendly and energy efficient transit **system**. Currently, OLDA Southern Corridor is in the constrained plan (West Santa Ana Branch).

**Recent events and planning efforts have focused attention on the OLDA Northern Corridor from Downtown Los Angeles to Santa Clarita.** Based upon these efforts, OLDA would like to suggest that the OLDA Northern Corridor be included in the constrained plan (Antelope Valley Line). Specific planning efforts in the corridor include:

OLDA is a joint powers agency formed to pursue development of a high speed environmentally friendly transit system in Southern California. The Authority is composed of the following public agencies:

City of Artesia

City of Bell

City of Bellflower

City of Cerritos

City of Cudahy

City of Downey

City of Glendale

City of Huntington Park

City of Maywood

City of Paramount

City of Santa Clarita

City of South Gate

City of Vernon

Burbank-Glendale-Pasadena  
Airport Authority

### Chairman

Frank Quintero  
Council Member  
City of Glendale  
Commissioner

Burbank Glendale Pasadena  
Airport Authority

### Vice Chairman

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Mayor  
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City of Vernon

### Auditor

Scott A. Larsen  
Mayor  
City of Bellflower

### Executive Director

Michael R. Kodama

### General Counsel

Sandra J. Levin

### Ex-Officio

James McCarthy  
Caltrans, District 7



# OLDA

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#### Ex-Oficio

James McCarthy  
Caltrans, District 7

- **Bob Hope Airport** – The Burbank Glendale Pasadena Airport Authority and OLDA are conducting a \$5.4 million Ground Access Study. The grant provides planning and construction funds for improvements on the Antelope Valley Line and has become a catalyst for OLDA Northern Corridor improvements. The study focuses on multimodal transportation improvements linking to the regional system, including the feasibility of a new North Station on the Antelope Valley Line at Hollywood Way and San Fernando Road. The study has led to additional planning efforts that can lead to significant improvements linking Santa Clarita to Downtown Los Angeles. Further, the Airport is going to break ground on a Regional Intermodal Transportation Center (RITC). More details are in the SCAG RTP appendix entitled "Aviation and Airport Ground Access."
- **Antelope Valley Line Infrastructure Improvement Strategic Plan** - Metro is conducting a study to upgrade the Antelope Valley Line. The 75 mile corridor runs at-grade from Los Angeles Union Station to Lancaster and includes plans for several capital improvements. The Antelope Valley Line Study is providing the plan to create a shared corridor involving not only current Metrolink service but also part of the High Speed Train system. Results of this study should be available in March 2012 and are expected to include recommendations that meet many of the OLDA goals and objectives.
- **Memorandum of Understanding** - In January, 2012, a Memorandum of Understanding has been developed between the California High Speed Rail Authority, Southern California Association of Governments, Los Angeles County Metropolitan Transportation Authority, Southern California Regional Rail Authority and many other local transportation agencies. The MOU addresses advance investment of up to \$1 billion in Southern California as part of the CHSRA's commitment to a "Blended Approach" to the construction of the high speed train (HST) system in California. As you are aware, this MOU is a significant document that allows for this work to now be included in the Constrained portion of the Draft Regional Transportation Plan (RTP). This can lead to the planning and funding necessary to include OLDA's Northern Corridor in the Constrained portion of the RTP.



# OLDA

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#### General Counsel

Sandra J. Levin

#### Ex-Oficio

James McCarthy  
Caltrans, District 7

Again, on behalf of the OLDA Board, we would like you to work with us on how we can include the OLDA Northern Corridor in the Constrained Project list for the 2012 Regional Transportation Plan.

If you have any questions or need further information, please contact Michael Kodama, OLDA Executive Director at 562 663-6850.

Sincerely yours,

Frank J. Quintero  
Chairman



February 14, 2012

Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017  
VIA E-MAIL

Re: Comments on Regional Transportation Plan

To Whom It May Concern,

The Pasadena Chamber of Commerce has reviewed the Regional Transportation Plan and appreciates the time, effort, thought and work that went into the document. While we appreciate that a regional approach to traffic management, transportation and goods movement we also want to be sure that plans and implementations are truly regional and economics and impacts to local economies are given due consideration.

For example, we would be very concerned about user-based fee proposals to fund transportation projects. For us, we could not support any program or plan that would put the Pasadena area at a competitive disadvantage economically. Traffic, transportation, goods movement and customers need to be able to access Pasadena as easily, simply and cost-effectively as our neighbors in the region. Plans for programs that will charge vehicle drivers a fee to get to Pasadena should be implemented region-wide, not piecemeal, and certainly not in the San Gabriel Valley first. If, for example, congestion pricing schemes or toll roads are proposed, we would want those implemented region-wide, not in a way that puts our area at a disadvantage economically as increased costs to travel to, through or past Pasadena that do not exist in other places, put Pasadena at a competitive disadvantage compared to those places in the area that would not see those same programs implemented and those additional costs imposed.

Likewise, any program or plan to assess fees to mitigate development impacts need to be approved by the local government and funds generated need to be used by those local governments to reduce impacts in their area and existing local fees should exempt businesses within those jurisdictions from any additional costs.

We are also concerned that an agency with little understanding of the Pasadena economy, our local business community or community needs is proscribing programs, mitigations and measures that may be inappropriate or unworkable in our local jurisdiction. It is certainly prudent for SCAG, through the RTP, to set goals for everything from pollutants in the air to the time it should take to travel between cities in the region, but SCAG should not be determining what programs will achieve those goals, not what local costs will be to achieve them.

We also appreciate the linking of land use policies with transportation planning, however, we do not see how many local jurisdictions could achieve the goals, especially given the elimination of redevelopment agencies by the State of California. Quite simply, there is no mechanism for localities to support development of any kind, especially not more dense development in our downtowns that would likely require consolidation of properties. How is that to be accomplished when there is no mechanism to capitalize such endeavors?

In fact, we are very concerned that the funding mechanisms identified to finance projects will be very short of anticipated levels, and that some of these mechanisms may never be available as they are not currently implemented in California.

We are also concerned that, while it is important to move goods, vehicles and persons easily through the region, we should be very mindful of impacts to local streets and local economies. Putting in a freeway does no good if the resulting overflow traffic stifles local streets and strangles local business districts.

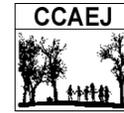
Finally, the Pasadena Chamber of Commerce cannot stress enough the importance of our local economies. Transportation planning, like every other government endeavor, needs to fully, accurately and appropriately take impacts to the local, regional and state economy into consideration. The best transportation plan imaginable is worthless if it stifles job and economic growth and puts our region, and its cities, at a competitive disadvantage.

Thank you for the opportunity to comment.



Paul Little  
President and Chief Executive Officer

cc: B. Bogaard, M.Beck, F. Dock,



BLACK WOMEN FOR WELLNESS



February 14, 2012

Attn: President Pamela O'Connor  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy**

Dear President O'Connor and Southern California Association of Governments Regional Council Members:

The undersigned appreciate the dedication and efforts of the staff at Southern California Association of Governments (SCAG) in completing the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS). We are encouraged by the recommendations in the plan that moves the region towards an improved transportation system while improving public health and air quality.

The 2012 RTP/SCS includes many smart growth strategies that will increase mobility, public health and environmental health standards. As advocates for improving public health and equity, we are encouraged to see SCAG's recommendations to:

- *Increase investment in active transportation strategies.*
- *Acknowledge that a regional zero emission freight system is needed in the region.*
- *Discuss gentrification issues as part of Environmental Justice.*
- *Monitor premature mortality due to PM2.5.*

Though SCAG has shown commitment to improving the region's *mobility, economy and sustainability* by including public health analysis in transportation planning policies, more can still be done to improve air quality, increase equity and improve our goods movement system.

The SCAG region faces immense public health and environmental challenges, and the RTP/SCS must be enhanced to address these issues. The SCAG region continues to have the worst air quality in the nation and contains "14 non-attainment and maintenance areas in four air

basins”<sup>1</sup>. Additionally, SCAG recognizes that 25% to 27% of the population “within the freeway adjacent areas are projected to see increases in their emission exposures to CO and PM”<sup>2</sup>. According to Figure 46 in the Environmental Justice Appendix, close to 60% of the population residing within 500 feet from the buffer area are Hispanic and in Quintile 1 (The Lowest Income Household). The issues of air pollution are even more acute in the SCAG region given the rampant prevalence of diesel equipment used in the freight industry. Residents in close proximity to highways, particularly those with high levels of diesel trucks, will experience increased rates of cardiovascular and respiratory disease, premature mortality, increased lung cancer incidence, decreased life expectancy, reproductive health problems, and increased asthma symptoms<sup>3 4 5 6</sup>. While we recognize that the goods movement sector is an economic driving force in the region, we cannot sit by idly and allow the immense damage to the health of our most vulnerable communities persist.

Given these challenges, we recommend several improvements that must be made to improve the RTP/SCS.

### **I. The RTP/SCS Must Do More To Promote Public Health Protections, Active Transportation and Equity.**

The RTP/SCS is the blueprint for years to come. As such, it must be designed to promote public health through choosing better transportation alternatives and making sure we spread the benefits of these investments to all residents in the region, regardless of race, income, or other social status. Moreover, we must make sure we minimize exposure to environmental harms.

### **II. The RTP/SCS Must Invest and Include Healthy and Equitable Policies.**

Implementing this recommendation requires addressing the following critical public health issues:

#### *A. Mitigate PM and CO exposure in high quality transit areas.*

The 2012 RTP/SCS will redirect 51% of new housing near High Quality Transit Areas (HQTA) providing an opportunity for healthy communities. Redirecting the growth of new housing closer to busy roads and freeways could violate the California Air Resources Board’s recommended 500 feet freeway buffer, and potentially increase CO and PM exposure and noise impacts. SCAG has acknowledged that 25% to 27% households living within freeway adjacent areas will see increases in their emission exposure to CO and PM. In addition to monitoring these areas for PM and CO, we recommend that SCAG also project and map out the areas that may be impacted as a result of the redirected growth up to the year 2035. We also recommend for SCAG to include current mitigation strategies in the EJ Toolkit and work with the local communities, health advocates and stakeholders to continue developing policies that will be included as part of the mitigation strategies for HQTA.

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<sup>1</sup> Pg. 18, VISON APPENDIX

<sup>2</sup> Pg. 122, EJ APPENDIX

<sup>3</sup> California Air Resource Board. Air Quality and Land Use Handbook: A Community Health Perspective. 2005. <http://www.arb.ca.gov/ch/landuse.htm>.

<sup>4</sup> Brunekreef B, Janssen NA, Hartog J. 1997. Air Pollution from truck traffic and lung function in children living near motorways. *Epidemiology* 8:298-303.

<sup>5</sup> VennAJ, Lewis S, Cooper M, Hubbard R, Britton J. 2001. Living near a main roadway the risk of wheezing illness in children. *Amer J Resp and Critical Care Med* 164(12):2177-80.

<sup>6</sup> Various studies:

Gauderman, W. James, Ph.D, et al., *N Engl J Med* 2004; 351:1057-1067.

Jun Wu et al., *Environmental Health Perspectives* 2009; 117: 1773-9.

McConnell, Rob MD et. al., *Lancet* 2002; 359:386-391.

Arden, Pope C III, PhD et al., *JAMA* 2002; 287; 1132–1141.

*B. Mitigate highway noise areas in communities of concern.*

Highway noise areas are also disproportionate to environmental justice communities with 22% of the affected population residing within roadway noise areas and 14% of the households below the poverty line<sup>7</sup>. Noise impacts have been associated with hearing impairment, hypertension and ischemic heart disease annoyance and sleep disturbance<sup>8</sup>. Further noise impact mitigation studies should be utilized in future 2012 RTP/SCS plans.

*C. Monitor and develop tools to avoid gentrification and displacement in TODs.*

SCAG's current analysis of 125 HQTAs around rail stations found that the demographics of HQTAs/TOCs are changing. Poverty rates are declining in these areas when compared to the rest of the region<sup>9</sup>. These results show that displacement and gentrification may be occurring in these areas. As such, gentrification should be acknowledged and policies need to be put in place to avoid this from happening. In addition to tracking the 125 rail stations, SCAG should:

1. Track commute time by race and income in Communities of Concern (COCs) and compare it to the region.
2. Set a baseline for jobs-housing fit by taking a "snap shot" of 4-to-5-mile buffer zone around major job centers, and compare the wages provided by those jobs to cost of housing within the buffer zone to see if there is a good jobs-housing fit. Continuing to monitor the jobs/housing fit over successive RTP/SCSs will be an important tool for transportation planning in rural, urban and suburban areas.
3. Use the Compass Blueprint Program to advance a policy toolkit that highlights and recommends anti-displacement and anti-gentrification policy options in TOD areas, as an eligible subject for a Compass Blueprint grant proposal.

**III. The RTP/SCS Must Ensure That the Region has a Complete Network of Transportation Strategies that Connect Travelers to a Wider Range of Transportation Options.**

This entails implementation of the following recommendations:

*A. Increase investment in active transportation.*

In order to achieve true walkable and healthy communities we recommend for SCAG to increase its investments in Active Transportation strategies beyond the \$6 billion currently recommended.

*B. Increase investment in public transportation.*

Prioritize investment in bus rapid transit and taking existing infrastructure to include bus-only lanes instead of expanding highway to accommodate for additional capacity.

*C. Access, mobility and safety.*

In order to better connect the region that depends on non-motorized modes of transportation, first-mile/last-mile strategies should also include close-the-gap strategies that integrate active modes of transportation to allow for accessibility to employment and services. To better do this, SCAG should identify geographic areas with high concentrations of communities of concern and track their transportation access, cost, mobility, rent, and gentrification and displacement patterns

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<sup>7</sup> Pg. 127, EJ APPENDIX

<sup>8</sup> Passchier-Vermeer, W. and Paschier F., W. Noise Exposure and Public Health. *Environmental Health Perspectives*, *Environmental Health Perspectives* 108(1):123-131, March 2000.

<sup>9</sup> Page 93, EJ APPENDIX

(using the seven indicators to track early signs of displacement or gentrification)<sup>10</sup>. The data can be used in future RTP/SCS and determine where close-the-gap strategies would best serve the region and address any adverse impacts that transportation projects can cause to communities of concern. SCAG should also use the data to determine what communities are underserved by transportation projects and connect those underserved communities to high opportunity areas.

#### **IV. SCAG Must Support Federal Policies That Benefit Active Transportation.**

Given the current state of the federal transportation bill and efforts to strip dedicated funding from MAP-21 in the Senate and the House American Energy and Infrastructure Jobs Act in the House, we are concerned that expected federal revenues for bicycle and pedestrian enhancements may not materialize.

To this end we request that SCAG fully support an amendment offered by Senator Lautenberg in the EPW Committee to ensure that total funds available in the “additional activities” reserve fund in MAP-21 for Recreational Trails, Safe Routes to School, and bicycle and pedestrian investments are equal to those currently in SAFETEA-LU. Additionally, this amendment would ensure that regions within states are able to have direct and first access to these funds so that cities throughout the SCAG region are able to directly apply for and receive funding for important bicycle and pedestrian projects. As the Senate bill progresses to the floor there will be opportunities for Senator Boxer to incorporate these provisions into the final bill and it is important for SCAG to make clear it supports them.

#### **V. The Freight Strategies in the RTP/SCS Must Be Improved.**

We remain deeply concerned about the freight elements of the RTP/SCS. While the plan acknowledges the need to move to zero emissions technologies, it provides little substance on how it will actually happen. The RTP must be more rigorous. To support this, we suggest the following improvements to the freight elements of the plan.

##### *A. The RTP/SCS must actually require creation of a zero-emission truck and freight goods movement for the region.*

Several issues must be addressed in the 2012 RTP/SCS before it is adopted with regard to how freight is moved through the year 2035. Goods movement strategies must ensure that the South Coast Air Basin meet federal air quality standards set forth in the Clean Air Act. Currently, the plan provides little detail on this issue, including how black box reductions will be achieved from the substantial portion of emissions from freight. While we agree with the many experts who “question the long-term viability of continued reliance on fossil fuels,” the RTP/SCS lacks details on how best to actually achieve this goal<sup>11</sup>. The “uncertainty of a petroleum-based future” needs to be at the forefront of the 2012 RTP/SCS where any expansion plans that increase a petroleum-based roadway system and raise Vehicle Miles Travel (VMT) must be curtailed<sup>12</sup>. The RTP/SCS needs to do more than just put words on paper about the need for this system. Future projects must be required to incorporate these technologies or they should not be built.

Financing these cleaner technologies is an important consideration for SCAG. Ensuring that funding mechanisms are in place to expedite the implementation of the zero and near-zero

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<sup>10</sup> Pg. 93, EJ APPENDIX

<sup>11</sup> Pg. 29, DRAFT 2012 RTP/SCS

<sup>12</sup> Pg. 29, DRAFT 2012 RTP/SCS

emission freight and truck strategies should be a central component of the strategy. For these reasons, we recommend that SCAG consider including the following funding strategies:

1. Develop a clear assessment of various financing options including various models of public-private partnerships that could make zero-emission technology options possible. Recommend a \$30 per twenty-foot container fee for moving either into or out of the ports. This strategy could generate as much as \$441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports<sup>13</sup>.
2. Use currently available clean truck technology and incentivize it through funding and or by way of preferential access lanes at terminals.
3. Reinststitute the diesel truck fee to incentivize clean, alternative fuel trucks.
4. Improve fee structure to give preference to clean alternative fuel trucks.

*B. The RTP/SCS must implement near-term solutions to reduce greenhouse gas emissions from freight.*

We are deeply concerned that the projected increase in freight volumes and traffic will undermine the gains of the 2012 RTP/SCS in other areas. In particular, CO<sub>2</sub> emissions from trucks would increase at least 30% by 2023 and at least 60% by 2035. Even more dramatically, CO<sub>2</sub> emissions from rail would increase at least 50% by 2023 and at least 123% by 2035<sup>14</sup>.

Given that “This RTP Goods Movement Environmental Strategy was developed to address community concerns, federal attainment requirements, and *climate change issues*,” it is problematic that near-term solutions are not more fully articulated<sup>15</sup>. Near-term strategies to clean up goods movement must be fully integrated into the 2012 RTP/SCS. We would like to work with you before the final version of the 2012 RTP/SCS to resolve this deficiency. Indeed as stated “For trucks, an aggressive program to bring more currently available, clean fuel trucks and hybrid trucks into service represents the best near-term strategy”<sup>16</sup>. Yet no such program is identified for either trucks or rail.

The ports of Los Angeles and Long Beach have left a gaping hole in clean air planning by not establishing targets and reduction plans for greenhouse gases (GHGs). SCAG and the 2012 RTP/SCS should demand that the Clean Air Action Plan be augmented with GHG reduction plans. Both ports have in the past promised to have such plans but neither has released one<sup>17</sup>. Such plans should complement and accelerate SCAG’s vision for increased efficiencies and the deployment of cleaner technologies.

While we commend the steps to evaluate and seek funding for longer-term zero and near-zero emissions technologies, the severity of the pollution and congestion from freight activities merits additional attention in the near-term. And while the 2012 RTP/SCS rightly considers heavy-duty trucks and rail emissions, it would be worth devising a set of strategies that account for the differences among local freight service and that of port origin/destination. Similarly, the sector of medium duty trucks may be targeted for technology improvements, given that it is the sector’s 2<sup>nd</sup> largest emitter of NO<sub>x</sub><sup>18</sup>.

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<sup>13</sup> Haveman, Jon, and Thornber, Christopher. Container Fees and Commercial Benefits of Improved Waterborne Goods Movement Infrastructure in California. *Beacon Economics*. August 2007. [http://www.coalitionforcleanair.org/images/stories/Haveman\\_Report\\_Final\\_Aug2007.pdf](http://www.coalitionforcleanair.org/images/stories/Haveman_Report_Final_Aug2007.pdf)

<sup>14</sup> Pg. 33, GOODS MOVEMENT APPENDIX

<sup>15</sup> pg. 33, GOODS MOVEMENT APPENDIX, emphasis added

<sup>16</sup> Pg. 39, GOODS MOVEMENT APPENDIX

<sup>17</sup> POLB has initiated a GHG mitigation fund to attempt to offset some of its increased emissions

<sup>18</sup> Pg. 32, Figure 8, GOODS MOVEMENT APPENDIX

In the section On-Dock/Near-Dock Rail Capacity Enhancements, the 2012 RTP/SCS appropriately expresses preference for on-dock rail “By allowing more on-dock rail, truck traffic between the San Pedro Bay Ports and distant rail yards can be reduced. Use of on-dock rail eliminates truck vehicle miles of travel (VMT) and associated emissions”<sup>19</sup>. SCAG should demand a sequencing of projects that maximizes on-dock rail and that reduces constraints on the expansion of on-dock capacity in advance of projects that expand off-dock capacity. Without appropriate sequencing, efficiencies could be lost.

#### **VI. The RTP/SCS Must Remove the East-West Corridor Route Project.**

Recommending to build an east-west corridor without analyzing the health, housing and demographic impacts of the project on the neighboring communities can have severe environmental, health and justice implications for the region and particularly for local communities of concern (COC). Additionally, if the east-west corridor project goes forward, an increase in truck traffic per day (from 58,000-78,000) could increase noise pollution and air pollution<sup>20</sup>.

*The Goods Movement Environmental Strategy and Action Plan* schedules full operational deployment of zero and near zero-emissions for trucks in 2018<sup>21</sup>. This plan prematurely predicts that the infrastructure, market and technology will be available for use without taking into consideration funding shortfalls and without putting in place earlier interventions. In the meantime, east-west corridor adjacent communities will be adversely impacted by displacement, or over-burden suffering from adverse health and quality of life impacts associated with the construction of the project and the trucks that will eventually utilize the route. SCAG must go beyond investing in research and guarantee that all lanes classified as zero-emission truck-only lanes only be used by zero-emission trucks.

Before considering adding this project to the RTP/SCS, SCAG must address the following:

1. Provide health and community demographic data on impact on the east-west corridor project. Specifically data that shows potential neighborhoods which may be displaced, noise and air quality impacts on surrounding communities, race, class, socio-economic status of the communities that will be impacted and how many of them are COCs.
2. Develop an analysis of the local roadway systems that trucks will utilize once they have reached their destination.
3. Develop an analysis of the total number of on-ramps and off-ramps planned for the east-west corridor, an approximation of where they will be (i.e. which streets will be used for entering and exiting the east-west corridor), and the configuration/style of each on-ramp and off-ramp.
4. Define the performance measures that would outline how success would be measured for the proposed east-west corridor, including anticipated truck traffic counts.
5. Set outreach and communication guidelines that allow for greater public participation from the general public and pertinent partners and timely feedback to questions asked.
6. Include an outreach and engagement plan that includes impacted COCs, stakeholders and health advocates, as part of the Goods Movement and Environmental Strategy Action Plan.

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<sup>19</sup> Pg. 27, GOODS MOVEMENT APPENDIX

<sup>20</sup> Pg. 20, GOODS MOVEMENT APPENDIX

<sup>21</sup> Pg. 21, GOODS MOVEMENT APPENDIX

## **VII. SCAG Must Support National Efforts to Create a Strategic Plan for the Freight System.**

Given the limitations with funding our goods movement and particularly the zero emissions and near zero emissions freight strategy, we encourage SCAG to include language that clarifies the current federal funding constraints and alter the 2012 RTP/SCS to reflect that these revenues are assumed but not assured and are contingent upon passage of the MAP-21 program on page 95 and 100. As a revenue source the inclusion of this funding is still in doubt as the current iteration of the House American Energy and Infrastructure Jobs Act does not include a national freight program or any dedicated freight funding and the establishment of this program is contingent upon a freight program making its way into the final federal transportation reauthorization and that legislation passing through both Senate and House.

SCAG should actively support the passage of a federal freight program that would deliver these revenues and clearly establish improving public health on the freight network and adjacent communities as an overarching priority and goal of the federal freight program, and support the inclusion of Senator Lautenberg's Freight Act of 2011 in the final federal transportation reauthorization with the competitive grant program and the goals and objectives as written. We support the addition of this language as offered by Senator Lautenberg and the inclusion of Senator Lautenberg's FREIGHT Act of 2011 (Focusing Resources, Economic Investment, and Guidance to Help Transportation) in the Commerce Committee bill S. 1950 the Commercial Motor Vehicle Safety Enhancement Act of 2011 which would create a national strategic plan for the freight system, a competitive grant program, and establish clear goals and objectives including reducing emissions, improving safety and efficiency, enhancing economic competitiveness, use of innovative technologies, and improving the state of repair of existing infrastructure.

## **VIII. The RTP/SCS Must Focus Attention on Cleaning Up Existing Freight Corridors, Not Just the Proposed New Projects.**

While we welcome zero emission technology by the year 2035, more short term gains must be implemented. SCAG should incorporate what can be done until a majority of truck traffic is zero or near zero emissions and consider using currently available technology while working to demonstrate future technology applications (such as maglev technology). Additionally, SCAG member governments must include a zero emission corridor from the ports to the ICTF or along Alameda Street and strengthen specific requirements in new projects beyond "bare minimum" standards used in current projects.

## **IX. The RTP/SCS Must Include Public Health as an Overarching Goal of the Goods Movement Element.**

More and more research is associating air pollution with asthma prevalence, poor lung function and a series of other health impacts. The California Air Resources Board states that the "prevalence of asthma in the U.S. has increased by more than 75% since 1980"<sup>22</sup>. Furthermore results from the USC Children's Health Study, a ten year study, show that children in Southern California's more polluted communities "suffer reduced growth of lung function, asthma exacerbations, more school absences, and new onset asthma"<sup>23</sup>. The public health evidence is growing. Our built environment plays a direct impact to our health and the transportation sector must take into consideration the public health implications to the region, and not just the region's economic growth. SCAG must:

<sup>22</sup> California Air Resources Board. Asthma and Air Pollution. <http://www.arb.ca.gov/research/asthma/asthma.htm>, May 25, 2010.

<sup>23</sup> Hricko, Andrea M. Road to An Unhealthy Future for Southern California's Children. *University of Southern California Urban Initiative, Urban Policy Brief*, 2004.

1. Include public health as an overarching goal in the Goods Movement Element and include performance standards to measure improvements.
2. Include public health as an overarching and priority and goal in the \$2.1 billion annual freight program included in the Environment and Public Works Committee.
3. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially in low income communities of color overburdened by air pollution and higher rates of uninsured residents.

**X. Public Participation Failures Must Be Remedied.**

Outreach and education to the public, especially on the onset on this process, was not sufficient to ensure that an adequate representation of members from impacted communities participate and give meaningful input. There were not enough public meetings or an adequate outreach strategy to ensure that there was more community involvement in this important process. Furthermore, a Goods Movement Steering Committee was established under SCAG to provide guidance and recommendations to SCAG's 2012 RTP/SCS, however, no formal process was established to receive formal recommendations from this group on the 2012 RTP/SCS.

We commend SCAG for completing the first Sustainable Community Strategy for the region and look forward to working with SCAG to ensure that it truly is a successful SCS by prioritizing health and equity.

If you have any questions about our recommendations, please do not hesitate to contact Patty Ochoa at 213-689-9170 or via email at [pochoa@psr-la.org](mailto:pochoa@psr-la.org).

Sincerely,

Patricia Ochoa, Environment and Health Coordinator  
Physicians for Social Responsibility- Los Angeles

Luis Cabrales, Deputy Director of Campaigns  
Coalition for Clean Air

Jocelyn Vivar Ramirez, M.P.H., Research and Policy Analyst  
East Yard Communities for Environmental Justice

Ruben Cantu, Program Director  
California Pan-Ethnic Health Network

Barbara Lott-Holland, Co-Chair of the Bus Riders Union  
Bus Riders Union

Maya Golden-Krasner, Staff Attorney  
Communities for a Better Environment

Sissy Trinh, Executive Director  
Southeast Asian Community Alliance

Isela Gracian, Associate Director  
East LA Community Corporation

Cynthia Babich, Founder and Executive Director  
Del Amo Action Committee

Penny Newman, Executive Director  
The Center for Community Action and Environmental Justice

Janette Robinson Flint, Executive Director  
Black Women for Wellness

Gisele Fong, PhD, Executive Director  
End Oil / Communities for Clean Ports

Jesse N. Marquez, Executive Director  
Coalition for a Safe Environment

Paulina Gonzalez, Executive Director  
Strategic Actions for a Just Economy

Gabrielle Weeks, Executive Director  
Long Beach Coalition For a Safe Environment

Drew Wood, Executive Director  
California Kids IAQ

Ricardo Pulido, Executive Director  
Community Dreams



February 3, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

**Re: Comments on the Draft 2012-2035 Regional Transportation  
Plan/Sustainable Communities Strategy**

Dear Ms. Lin:

On behalf of the Port of Long Beach, thank you for the opportunity to review and comment on the draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including the Goods Movement Report contained within the RTP/SCS and the draft Program Environmental Impact Report. In general, we find these reports are well-written and accurate with respect to maritime activities. We would like to offer one minor correction.

Maritime Ports

The statistic for the Ports of Long Beach and Los Angeles in the second paragraph, second sentence of the PEIR on page 3.12-15 is incorrect. The ports of Long Beach and Los Angeles combined are the world's sixth-busiest port complex in 2011 (15.8 million total TEU), after Singapore (23.2 million TEU), Hong Kong (22.4 million), Shanghai (18.1 million) and Shenzhen, China (16.2 million).

As noted in the PEIR, 34% of the jobs in the region depend on the goods movement industry. However, our region, with a combined population over 18 million residents, is bearing the brunt of traffic congestion, safety and air quality impacts. The Port of Long Beach is committed to developing programs that will support the anticipated growth in trade activities with minimum impact on the region's environment. The Port cannot do it alone –

**Ms. Margaret Lin**  
**February 3, 2012**  
**Page 2**

and we stand ready to work with you in implementing programs envisioned in the Regional Transportation Plan/Sustainable Communities Strategy.

Should you have any questions, please feel free to contact me at (562) 283-7180.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Shen", with a long horizontal flourish extending to the right.

Eric C. Shen, P.E., PTP  
Director of Transportation Planning



February 10, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

**Re: Additional Comment on the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy**

Dear Ms. Lin:

In addition to the comment that the Port of Long Beach provided dated February 3, 2012, the Port has one additional comment on the draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

California Coastal Trail

Please revise the map shown as Exhibit 19 to reflect the Coastal Trail route connecting San Pedro and Long Beach via Terminal Island. This is consistent with recent plans to include a Class 1 Bike Path as part of the Gerald Desmond Bridge Replacement Project, including Coastal Commission's condition of approval on the Harbor Development Permit for the project. The Class 1 Bike Path is also consistent with both the cities of Los Angeles and Long Beach Bicycle Master Plans.

Thank you for your consideration of this comment.

Should you have any questions, please feel free to contact me at (562) 283-7180.

Sincerely,



Eric C. Shen, P.E., PTP  
Director of Transportation Planning

3435 Wilshire Boulevard  
Suite 320  
Los Angeles, CA 90010-1904



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Puente-Chino Hills Task Force  
245 Verbena Lane  
Brea, CA 92823

February 13, 2012

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). The Puente-Chino Hills Task Force of the Sierra Club is based in Brea but our members come from the four counties that touch the Puente-Chino Hills. We offer hikes, sponsor educational events and provide input on projects that threaten the biological and recreational integrity of this important region. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR).

We are so pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is a remarkable first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership.

Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of *critical habitat* to mitigate impacts related to future transportation projects" [emphasis added]. We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the language to incorporate all "important habitat lands."

On page 79 of the Draft 2012 RTP/SCS we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use decisions.

We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Unfortunately, we noticed the lack of inclusion of wildlife linkages in this section. Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well.

We appreciate SCAG's effort to create a strategic planning process that would document important conservation lands in the region. We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values, historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this policy. Should you need to contact me, I can be reached at (714) 524-7763. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to [ericsoj@mindspring.com](mailto:ericsoj@mindspring.com).

Sincerely,

Eric Johnson, Chair  
Puente-Chino Hills Task Force of the Sierra Club

# REALTORS® *Committee on Air Quality*

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*Carol Banner, Chairman*

*4101 Sea View Avenue  
Los Angeles, CA 90065  
323/342-9373*

February 13, 2012

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

**Subject: Comment on Draft RTP/SCS and PEIR**

Dear Mr. Ikhata:

The REALTORS Committee on Air Quality is a voluntary coalition of Associations of REALTORS throughout the South Coast Air Basin. On behalf of property owners and the communities we serve, REALTORS are vitally interested in air quality and quality of life issues addressed in the Draft RTP/SCS. To this end, we have reviewed the Draft RTP/SCS and the accompanying Draft Program Environmental Impact Report.

We strenuously oppose SCAG's proposed PEIR mitigation measures PS-91 and PS-92 that would require REALTORS® and escrow officers to enforce energy audits and appliance change-out at the point of sale. These proposals ignore the existing Home Energy Rating System (HERS) program to encourage and incentivize energy efficiency in all homes. Further, we believe that mandating this approach will price many buyers out of home ownership, and will not achieve the desired energy use reductions until long past the Plan horizon of 2035. Our attached comments present information supporting our position, and recommend alternative approaches to upgrading energy features and appliances.

**Mitigation Measure Clarification:** Two proposed mitigation measures require clarification before the final PEIR is certified in order to insure the most efficient and least economically burdensome approach to improving energy efficiency of existing homes.

Mitigation Measure PS-91 instructs cities and counties to require energy audits when homes are sold. Further, Mitigation Measure PS-92 tells cities and counties to adopt an ordinance requiring energy upgrades at time of property sale. Unfortunately, these measures are not informed by the best information available on motivating the public to

implement energy efficiency features in their homes. California's Home Energy Rating Standards already allow buyers to request an energy audit as part of their home inspection, and energy efficient mortgages provide incentives for such audits. In fact, mandatory point-of-sale programs are the least efficient and least accelerated way to accomplish the goal of energy efficiency, and impose the greatest costs on home owners and home buyers at the most vulnerable point in the transaction.

**MM-PS91:** Local jurisdictions can and should require the performance of energy audits for residential and commercial buildings prior to completion of sale, and that audit results and information about opportunities for energy efficiency improvements be presented to the buyer.

**MM-PS92:** Local jurisdictions can and should create an outreach and incentive program to promote energy efficiency and conservation in the community, including:

- Launch an "energy efficiency challenge" campaign for community residents;
- Implement a low-income weatherization assistance program;
- Implement conservation campaigns specifically targeted to residents, and separately to businesses;
- Promote the purchase of Energy Star® appliances, including, where feasible, incentive grants and vouchers;
- Promote participation in the local "Green Business" program;
- Distribute free CFL bulbs or other efficiency fixtures to community members;
- Offer exchange programs for high-energy-use items, such as halogen torchiere lamps;
- Adopt an ordinance requiring energy upgrades at time of property sale.

Realtors support improving energy efficiency in homes, but we strongly object to this approach for the following reasons:

- **Too Slow.** Point of sale enforcement of energy audits can take more than 25 years to achieve the goal of more efficient homes, given that only a small percentage of existing homes is sold each year – and only if each and every jurisdiction selects this mitigation measure. In an extended slow market like the current one, properties change hands less frequently, which will further delay implementation of energy efficiency through property transfers. Programs that incentivize all homes, not just those being sold, to upgrade will be far more effective.
- **Too Late.** Enforcing energy upgrades as part of the escrow process comes too late in the property transfer to introduce a significant appliance removal and replacement or other energy efficiency upgrade. Energy upgrades can cost thousands of dollars, and are not comparable to the most common type of point-of sale improvement: toilet retrofits that cost \$100 apiece.
- **Inappropriately Shifts Responsibility.** Point of sale enforcement shifts the responsibility for enforcement to real estate professionals. REALTORS®,

brokers, escrow officers, home inspectors, appraisers and others in the real estate industry are not accountable to local jurisdictions, and have no certification in energy efficiency or appliance operation or installation. If carried out as proposed, local point of sale ordinances and enforcement could impose new legal liabilities on real estate industry professionals that do not relate to their expertise or function in property sales.

- **Incomplete Coverage.** Positioning REALTORS® as gatekeepers for energy audits and appliance upgrades would not reach all home sales or property transfers. In the first place, not all lead agencies may select this mitigation measure. Even if selected, not all homes buyers opt for a home inspection. Further, not all property sales or transfers are handled by REALTORS® or real estate licensees.
- **Increased Home Prices Disqualify Potential Home Buyers.** Increased home costs due to energy upgrades at the point of sale will price more households out of affording a home. These well-intentioned but misguided measures could prevent thousands of home buyers from completing a home purchase.

Recommended Revision: For all these reasons, PS-91 and PS-92 should be revised to implement energy audits and appliance upgrades on a broad, ongoing basis through utility incentives, subsidies, tax credits and other proven mechanisms effective in motivating property owners to accomplish energy upgrades. If these measures remain in the document, we recommend the following language for the final PEIR:

~~MM-PS91: Local jurisdictions can and should work with utilities to incentivize require the performance of energy audits for residential and commercial buildings prior to completion of sale, and that audit results and information about opportunities for energy efficiency improvements be presented to the buyer.~~

~~MM-PS92: Local jurisdictions can and should create an outreach and incentive program to promote energy efficiency and conservation in the community, including:~~

- Launch an "energy efficiency challenge" campaign for community residents;
- Implement a low-income weatherization assistance program;
- Implement conservation campaigns specifically targeted to residents, and separately to businesses;
- Promote the purchase of Energy Star® appliances, including, where feasible, incentive grants and vouchers;
- Promote participation in the local "Green Business" program;
- Distribute free CFL bulbs or other efficiency fixtures to community members;
- Offer exchange programs for high-energy-use items, such as halogen torchiere lamps;
- ~~Adopt an ordinance requiring energy upgrades at time of property sale.~~

**Separate Mitigation from Advice.** We also note that the voluminous mitigation measures aimed at local jurisdictions and project sponsors – both outside SCAG's authority – place a counterproductive burden on new housing needed to expand and

refresh our housing supply. The measures will reduce housing opportunities because they impose significant new implementation costs that will be passed on to homebuyers; impose new fees and taxes above and beyond the cost of the plan identified in the Draft RTP/SCS; and are so numerous that an individual project cannot feasibly address all of them even though the PEIR deems them “feasible.”

Recommended Revision: We urge SCAG to remedy these problems by restricting mitigation measures to those things that SCAG itself can implement. All other advice to cities, counties and project sponsors on best practices should be labeled as such.

**Comments on the Draft RTP/SCS.** The RCAQ finds that the Draft Plan does not discuss or quantify the impact of the Plan on the affordability and availability of housing in the region. This information is of the utmost importance to the public and to elected officials in order to understand the consequences of increased infill development, density, open space preservation and other proposals in the Draft Plan that will change the size, type, cost and distribution of housing in the region. The impact that these strategies will have on housing affordability, and home ownership rates must be explained. At present, the Draft Plan discusses the changing population composition and a shift to multifamily housing in only the most general terms. The Scenario Outcomes on page 116 look at energy costs and water cost – but fail to examine housing costs. The Economic Impact Technical Report is silent on the housing cost and affordability impacts of the proposed major shifts in the housing supply.

Recommended Revision: We request that the final Plan include a discussion in the SCS chapter that both qualitatively and quantitatively summarizes the proposed plan’s impact on housing cost and affordability.

Thank you for clarifying these matters in the PEIR and the Plan prior to certification and adoption. We are available to answer any questions you may have regarding these requested revisions. Please contact me at [carolabanner@gmail.com](mailto:carolabanner@gmail.com).

Sincerely,



**Carol Banner**  
**Chairman**  
**REALTORS Committee on Air Quality**



**REGENT PROPERTIES**

**JEFFREY A. DINKIN**

February 14, 2012

Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: Comments on Draft 2012-2035 Draft RTP/SCS

Dear Ms. Lin:

Thank you for the opportunity to comment on SCAG's Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy ("Draft RTP/SCS" or "SCS"). We understand that this is an enormous undertaking and appreciate SCAG's efforts in this process. We look forward to playing a constructive role in the further development of the SCS.

As explained below, we are concerned that the draft RTP/SCS as proposed would result in an inappropriate use of the regional growth forecast planning effort to encroach on local land use authority and jurisdiction. We therefore request that SCAG (1) extend the comment period and make transportation analysis zone (TAZ) data available for public review and comment; (2) correct the TAZ data and maps to accurately reflect current local planning decisions including entitled projects; and (3) revise the SCS so that consistency determinations are made not at the small-scale level of a TAZ, but at the jurisdictional level to allow reasonable flexibility and appropriate land use decision making authority at the local level.

**1. The SCS does not appear to account for projects already in process**

Regent Properties owns over 1,000 acres of land in Southern California and controls an additional 2,500 acres of land in Southern California and has a long history of quality developments in the SCAG region. However, we are concerned that the SCS process has not fully accounted for projects that are already in process. Regent has several projects in the area that are fully entitled and approved for build-out, as well as proposed projects with pending applications that represent a substantial investment of resources to design, plan and communicate with the community and responsible agencies. While the SCS itself states that it was created with input from local jurisdictions (see, for example, Draft RTP/SCS p. 111), we are concerned that the growth projections contained in the SCS and Land Use Pattern Maps do not in fact reflect the land use decisions that have been made by local jurisdictions. More specifically, while the Draft RTP/SCS indicates that it has shifted projected densities from less developed areas to the urbanized core, nowhere does the SCS clearly state that those shifts in density take into account development projects that are either already approved or that are reasonably foreseeable projects which local jurisdictions have already spent considerable resources processing.

## **2. Underlying TAZ data must be released to allow meaningful public comment**

Moreover, the SCS's treatment of approved projects is impossible to determine from the information that SCAG has made available to the public. The 2035 Land Use Pattern Maps, which are intended to depict projected density and land use, are at such a large scale, with such slight color gradations, that they cannot be interpreted in any meaningful way. The SCS itself does not seem to contemplate that these maps will be important to future transportation and land use decisions. Instead, the SCS focuses on the projected density contained in the data that underlies the maps -- data that SCAG has not released to the public. The SCS states that the land use projections contained in the SCS are based on the distribution of growth forecast data to transportation analysis zones. (RTP/SCS, p. 122.) According to the SCS, the TAZ data contains forecasted housing, population, and employment data, which the SCS used to create "Community Types" and more refined "Development Types" that contain average use designations, densities, and building intensities. The SCS states that a Development Type, including an average residential density, has been assigned to each TAZ for purposes of creating the SCS. (Draft RTP/SCS, p. 123.) However, it cannot be determined whether this assignment was made in a manner that takes existing conditions (including approved and reasonably foreseeable projects) as a baseline for these projections, nor can it be determined how the forecasting was done or how it was distributed across the TAZ.

Despite the critical role of the TAZ data in developing the SCS, we are not aware that SCAG has made this data available for public review and comment in any meaningful way. We were able to obtain partial data, showing housing densities only, from other agencies involved in the SCS process. These data do not contain employment or population forecasts, and do not contain any Community Type or Development Type designations which, according to the SCS, have been assigned to each TAZ. It is not possible for the public to provide meaningful comment on the SCS without access to the underlying data on which density and land use projections are based. In the absence of the underlying data and modeling supporting the proposed plan, we are substantially impaired in our ability to provide meaningful public comment on the technical and legal adequacy of the plan. In particular, we cannot assess whether the underlying data adequately reflects all developments as approved. Under the federal (5 U.S.C. § 500 *et. seq.*) and California Administrative Procedures Acts (Gov. Code §§11340 *et seq.*, including § 11346.2(b)(6)), the opportunity for public comment must include disclosure of the data and technical studies in time to provide meaningful public comment. *See, e.g. Solite Corp. v. EPA*, 952 F.2d 473, 484 (D.C.Cir.1991) (*per curiam*).

While we are not confident that the data is either accurate or complete, we have reviewed what data we were able to obtain. Based on our review we conclude that the forecasted housing densities do need to be corrected, as the numbers clearly do not reflect either existing entitlements or pending, reasonably foreseeable projects.

## **3. Implications of consistency with underlying TAZ data**

The importance of the TAZ data is not limited to understanding how the SCS was created. In addition to being the basis for creation of the SCS land use projections, according to the SCS, the TAZ data is to be relied on in future determinations as to whether a project is consistent with the SCS. The SCS states:

"SCAG suggests that utilizing community types at the TAZ level of geography (which an average size of 160 square acres) offers local jurisdictions adequate information and flexibility to make appropriate consistency findings for projects to be eligible to receive CEQA streamlining benefits." (Draft RTP/SCS p. 122.)

"One way of determining consistency [with the SCS] is if a proposed residential/mixed use or TPP [Transit Priority Project] conforms with the Development Type designated for a TAZ." (Draft RTP/SCS, page 148.)

Despite these explicit statements that the existing TAZ data will be critically important to future decisions affecting projects, SCAG has not provided the public the opportunity to review and comment on the TAZ data in any meaningful way.

Significantly, a project's consistency with the SCS -- which is to be determined at the TAZ level according to the SCS -- affects not only the availability of CEQA streamlining incentives, but can have adverse consequences for the availability of federal funds for transit improvements that would serve the project. Transit improvement projects relying on federal funding must be consistent with an approved RTP, and with the adoption of SB 375, that includes consistency with the Sustainable Communities Strategy portion of the RTP as well. (40 CFR 93.102; 42 U.S.C. 7506.) Thus, if the Draft RTP/SCS has shifted density away from approved or pending projects, those projects stand to lose critical transit improvements. The loss of transit improvements could impair project feasibility, or create new unmitigated impacts if traffic mitigations become unfunded, which could result in an unlawful taking of private vested property rights for those projects that have already been approved by local jurisdictions. In many cases, approved projects also involve executed development agreements, which means that violation of contractual rights could also result, causing difficult situations for developers and local jurisdictions.

We are concerned that a project's inconsistency with the growth projections contained in the SCS may have broader implications as well. Local jurisdictions will be under considerable pressure to conform their general plans to the density, intensity, and land uses contained in the SCS, or risk losing transportation funding throughout their jurisdictions. While all the implications of a project's inconsistency with the SCS have yet to be determined, we are concerned that by shifting density away from locally approved and pending projects, the SCS is creating land use policy in violation of SB 375's mandate that the SCS must not supersede the land use authority of cities and counties. (Gov't Code 65080(b)(2)(J).)

#### **4. RTP/SCS consistency should be determined at the jurisdictional level.**

The TAZ maps are a modeling tool for engaging in a regional planning and evaluation process. The feasibility of achieving the precise results in any particular TAZ area has not been evaluated or confirmed by any city council or board of supervisors, and as explained above it appears that the TAZ data and maps for 2035 do deviate from general plans and vested entitlements that have been approved by these elected officials. While we understand elected bodies or senior administrative staffs of local jurisdictions may have approved local input for the overall population and household numbers within their respective jurisdictions, we believe they have not approved the TAZ data or maps. Accordingly, requiring consistency determinations

concerning use designations, density, and building intensity at the small scale of each TAZ would be inappropriate and overly-prescriptive.

Again, SB 375 specifically precludes SCAG from interfering with local land use decisions.<sup>1</sup> SB 375 requires that an SCS “identify the *general* location of uses, residential densities, and building intensities *within the region*....” Calif. Government Code § 65080(b)(2)(B)(i) (emphasis added). Thus there is no legislative mandate that SCAG identify the location of land uses, densities and building intensities within the region more precisely down to a TAZ level. Instead, SCAG should appropriately identify these characteristics at a level consistent with the need for reasonable flexibility and local control. At the lowest, the level of comparison should be at a jurisdictional level – particularly given that there are nearly 200 jurisdictions within the SCAG region. Accordingly, we urge SCAG to identify such characteristics at no finer a scale than at the lesser of (i) the jurisdiction, and (ii) the sub-region (i.e., where unincorporated county land is divided into sub-regions).

Despite SB 375's mandate that the SCS not regulate land use, the draft RTP/SCS "shifts" households "from the periphery into the urbanized core" stating that much of this shift "will occur naturally in the marketplace," and that this "shift" was done "per consultation with the local jurisdictions." (Draft RTP/SCS p. 128.) However, this shift does not "occur naturally," nor through a "consultation" process between agency staff that excludes the public. Instead, such a shift can only occur, if at all, as part of a separate and lengthy discretionary development application process involving requests to local land use jurisdictions to amend their general plans, specific plans, areas plans, and zoning. In short, there is no "shift" to high-density housing in some local jurisdictions, and away from housing density already approved by other jurisdictions, unless and until the local land use jurisdictions adopt the requested discretionary approvals.

#### 4. Conclusion

The draft RTP/SCS represents a substantial and important regional planning effort. We believe the current draft needs to be corrected to reflect current local land use planning decisions,

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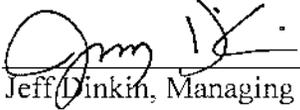
<sup>1</sup> SB 375 provides in pertinent part:

- "Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land . . ."
- "Nothing in this section shall be interpreted as superseding the exercise of the land use authorities of cities and counties within the region."
- "Nothing in this section shall be interpreted to authorize the abrogation of any vested right whether created by statute or by common law."
- "Nothing in this section shall require a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan . . ."  
(Gov't Code section 65080(b)(2)(J))

and to ensure that the regional growth projection process is not implemented in a manner that infringes on either vested property rights or the land use authority of local jurisdictions. We appreciate SCAG's consideration of the comments provided in this letter and look forward to your responses. If you should have any questions, please do not hesitate to contact me.

Sincerely,

Regent Properties, LLC  
a Delaware limited liability company

By:   
Jeff Dinkin, Managing Director

cc: Supervisor Jeff Stone, Riverside County Supervisor District 3



Susan D. Harrington, M.S., R.D.  
Director

February 14, 2012

President Pam O'Connor and Members  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear President O'Connor and Regional Council Members:

The Riverside County Department of Public Health thanks the Southern California Association of Governments (SCAG) staff for their hard work on the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and for recognizing that the decisions made in the planning process ultimately affect Public Health. While we believe the draft plan under review has many positive elements, we also believe strengthening measures are needed to assure that strong public health benefits are achieved through the plan.

The serious air pollution and health problems experienced in the Southern California region require strong action to transform transportation and land use planning. The Los Angeles region continues to be rated as the most polluted area for ozone in the country by the American Lung Association and the public health toll remains high. The Inland Empire continues to bear the brunt of this pollution due to weather patterns that concentrate pollution in the area leading to more severe health impacts.

The research by the American Lung Association in California shows that the six-county Southern California region could avoid over \$16 billion in cumulative health and societal costs through smart growth strategies that reduce the growth in the region's vehicle trips by 20 percent by 2035.

We offer the following comments and recommendations to ensure that the Sustainable Communities Strategy and future transportation investments place sufficient emphasis on promoting active transportation modes and transit oriented development, measuring and improving health progress, and ensuring that health and equity are imbedded in the decision making process for this plan and future planning efforts.

#### **Key Health Recommendations for SCAG SCS**

- **Improve Assessment of health benefits through new modeling approaches.** Utilize the new California Department of Public Health I-THIM screening tool to analyze the potential chronic disease reductions that can be achieved in the SCAG region based on increased transportation-related physical activity such as walking and biking. This model was used in the San Francisco Bay Area region to determine reductions in heart and respiratory disease, breast cancer and other health effects linked to active transportation scenarios. We urge SCAG to incorporate this tool in regional planning and decision making for transportation investments.
- In addition to monitoring premature mortality, SCAG should also assess reductions in asthma incidence and exacerbations due to traffic related pollution (NOX) and other targets through collaboration with local health departments, the South Coast Air Quality

Management District, academic researchers and community based organizations.

Improvements to the targets should be monitored and reported to the public every two years.

- **Focus investments on completing transit systems** and building out transit infrastructure, rather than highway expansion, including the following:
  - Doubling Metrolink ridership by 2020 and double it again by 2035
  - Expanding Bus Rapid Transit and regional bus service
  - Enhancing TOD planning and 1<sup>st</sup>-mile-last-mile investments near Metrolink stations
  - Doubling the bicycle network to 24,000 miles and improving pedestrian environment
- **Increase transit and transit oriented planning in Inland Empire.** Because so much of the planned growth in the Inland Empire is relatively low density and remote from transit, SCAG should work closely with Inland Empire governments to accelerate expansion and frequency of transit and rail to the area and focus more growth around transit corridors.
- **Front load active transportation funding.** SCAG should commit to a higher amount of transportation funding for bike and pedestrian infrastructure, especially in the early years of the 25-year RTP process. SCAG should work with local transportation agencies to prioritize bicycle and pedestrian projects and ensure the majority of funds are spent prior to 2020.
- **Increase investments in zero emission freight transportation** in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards. Ensure that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies and infrastructure. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially those living along the freight corridor.
- **Evaluate the number and type of new developments** that could be located in close proximity to freeways and high traffic roadways in the SCAG region under the new RTP. Work with air district, health departments and universities to develop and implement best practice policies for developments located near heavy traffic areas to reduce exposures to air pollution.

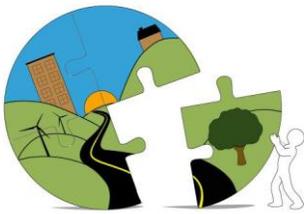
We appreciate the opportunity to be part of the RTP/SCS process and look forward to working with SCAG in the future. If you have any questions regarding this letter, please contact me at 951-358-5074 or email [mosur@rivcocha.org](mailto:mosur@rivcocha.org)

Sincerely,



Michael Osur,  
Deputy Director of Public Health

Cc: Bonnie Holmes Gen, American Lung Association in California



# RIVERSIDE COUNTY PLANNING DEPARTMENT

*Carolyn Syms Luna*  
*Director*

February 14, 2012

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

**RE: Southern California Association of Governments (SCAG) – Draft Regional Transportation Plan/Sustainable Communities Strategy 2012-2035 (RTP/SCS 2012) and Draft Program Environmental Impact Report (PEIR) (SCH# 2011051018)**

The County of Riverside Planning Department (“Planning Department”) appreciates the opportunity to comment on the draft 2012 RTP/SCS and the associated draft PEIR. The Planning Department supports the approach of resolving future challenges based on the economy, transportation, and land use. We recognize and understand the challenges that the region has been facing and will continue to face in regard to growth and development.

SCAG is already home to 18 million people, and it is anticipated that the region will add 4 million people by 2035. From the County’s perspective, it is important to note that the trend of such tremendous growth did not and will not occur evenly across the SCAG region. Much of the recent growth has occurred and projected growth will occur within the Inland Empire area, especially in Riverside County. According to the latest census, Riverside County was the fastest growing county in California between 2000 and 2010 both in absolute numbers (644,254) and in percentages (41.7%). This accounts for almost 20 percent of total growth in California. Similarly, over 20 percent of the regions household growth between 2014 and 2021 is projected to occur in Riverside County.

Nevertheless, many of the strategies and mitigation measures identified in the plan as well as in the PEIR should be refined to meet the individual needs of the counties within the SCAG region and account for the growth trends of the region. Because SCAG is a regional entity, Riverside County understands the difficulty of tailoring the proposed mitigations and policies to be specific to certain geographic locations, but having many blanket implementation measures without consideration of each local jurisdiction also leaves the assurance of the document implementation to be much desired when feasibility is concerned.

The Planning Department has the following comments:

## **1. Land Use**

One of the biggest changes in the RTP/SCS 2012 is its emphasis on higher density residential development and its concentration within the High Quality Transit Areas (HQTA) to accommodate the changing demand in types of housing. To a certain extent, this is true on a regional level; however, the trend is not necessarily mutual when each area is separated out of the SCAG region. Inland counties

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still see the demand for single family housing, and when the economy rebounds, the County of Riverside still plans on managing the growth of the single family housing market through its General Plan. SCAG should address the fact that growth is still occurring in the Inland counties as evidenced by the recent census. Table 4, 8, 10, and 11 of the RTP Growth Forecast shows the past, current and forecasted trends for each county in the region.

Example: Riverside County's share of regional population in 1990 was 8%, in 2000 it grew to be 9.4%, and then 12.1% in 2010. Even with SCAG assumptions shown in Table 8 of the Growth Forecast, the share of the population for Riverside County grows to 15% by 2035 equaling that of Orange County. In contrast, the share of population in Los Angeles County diminishes to 51% from 54% and employment to 51% from 57% by 2035. Riverside County would like to compare the projection numbers of 2020 and 2035 with SCAG's growth forecasts. Riverside County population projections of 2010 is 2,153,189 and 2035 is 3,396,287.

Using the example above, an inferred conclusion can be made that SCAG's HQTAs designations for 2035 (Exhibit 4.13 to 4.19) do not accurately reflect the population and employment trends shown in Table 8. It appears that HQTAs were designated based on existing Transit or Transportation corridors without considering the actual existing and proposed population centers of each jurisdiction in Riverside County. When HQTAs are compared together amongst all six counties, as in Exhibit 4.13, the share of HQTAs clearly do not show the 15% population share that Riverside County represents in 2035. Also, questions can be raised as to why Riverside County HQTAs do not connect to any of the surrounding counties such as San Diego County.

In addition, when city boundaries are overlaid on top of Exhibit 4.18 (see handout 1), the unincorporated section of the County contains only one corridor with an HQTAs on I-15 in Temescal Canyon. Currently, the unincorporated County has 355,718 people (excluding Jurupa Valley and Eastvale) and expects a population growth of 704,253 people by 2035, almost doubling the current number. Considering the County forecast and the historical growth trend of Riverside County, SCAG's placements of HQTAs become more questionable. How was SCAG able to redistribute 51 percent of the new residential growth in the unincorporated Riverside County? From Riverside County's perspective, the placements of the HQTAs are perceived to just be relocation of growth rather than managing growth. Riverside County would benefit greatly if the details of the land use and projection data analysis were shared with the local jurisdictions. Currently, based on the plan and the PEIR, the land use analysis and local inputs on the data incorporations are not clearly outlined.

Example: PEIR 2.25 states, "The SCS focuses the majority of new housing and job growth in High Quality Transit Areas (HQTAs) and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an **improved jobs-housing balance and more opportunity for TOD.**" Again, looking at the HQTAs on a macro level, the jobs-housing balance goal may have been achieved based on the provided locations of the HQTAs, but if the HQTAs are separated out by counties, jobs-housing balance cannot be achieved in the Inland Empire region. As stated, "The 2012-2035 RTP/SCS assumes that **51 percent** of new housing developed between 2008 and 2035 will be within HQTAs, along with 53 percent

of new employment growth (compared with 39 and 48 percent, respectively in 2008).” (PEIR p.2-31). As indicated above, if most of the growth is still projected to occur in the Inland Empire region, achieving the goal of locating 51 percent of the new growths in the limited HQTAs in the Inland Empire is not feasible. Creating more urban centers within suburban counties achieve far greater jobs-housing balance than having the employment concentration heavily depend on Orange and Los Angeles Counties.

## **2. Public Outreach and Data Usage (Land Use and Projections)**

Both of the SCAG documents have stated that the outreach efforts have allowed the organization to collect land use data from the local jurisdictions in developing the SCS, especially in Orange County and Los Angeles County (Gateway Cities COG). Riverside County also appreciates many opportunities and discussions on various levels of data sharing with SCAG. In the past, Riverside County has provided SCAG with General Plan Land Use data, Demographics/Socioeconomic data, and Growth Projections data with maps and comment letters on a TAZ level basis. All of these great efforts cannot be recognized if SCAG does not detail how they have incorporated the local jurisdiction inputs into the RTP/SCS and PEIR. Some projection data from SCAG was shared, but the discrepancies between SCAG and Riverside County data was not explained. (see attachment)

Example: SCAG RTP/SCS and PEIR state, “SCAG shall encourage cities and counties in the region to provide SCAG with electronic versions of their most recent general plan (and associated environmental document) and any updates as they are produced” (MM-LU1), and “...Lead and responsible agencies can and should then make any necessary adjustments to the applicable General Plan. Any such identified adjustment shall be communicated to SCAG” (MM-PS11 and PS56). “As a result of this comprehensive and integrated approach, the transportation projects and strategies included in the 2012-2035 RTP/SCS are generally consistent with the county and regional level general plan data available to SCAG.” (PEIR 3.8-13) SCAG should work with local jurisdictions to explain how the data provided by various agencies were used in the RTP/SCS, and SCAG also should ask local jurisdictions for interpretation of the provided land use data.

## **3. Greenhouse Gas (GHG)**

In light of recent updates and litigations on the GHG topic, it is a challenge to provide definitive comments. However, one comment is on the analysis conducted by SCAG (Calthorpe) on a per capita basis to meet the less than significant threshold outlined by the SB375. As the PEIR states in p.3.6-19, “...the Plan alone is not intended to meet the AB32 target. By meeting the SB375 targets, the Plan has successfully contributed its share of meeting the objectives of AB32”. SCAG’s PEIR does not quantify or attempt to meet the AB32 Scoping Plan challenges that most of the local jurisdictions face with their General Plan update processes and development of Climate Action Plans (CAP). Although SCAG correctly concludes Impacts 3.6-1 and 3.6-2 to be significant and unavoidable, as the regional MPO, more efforts should have been made to address the GHG issues outlined in AB32 Scoping Plan through quantifications to assist the local jurisdictions who are struggling with AB32 compliance.

#### **4. Use of Words “should and can” in the PEIR**

The PEIR of the RTP/SCS mitigation measures contain the phrase “...should and can...”. Such terms are not typically used in EIR documents to implement mitigation measures, especially when the measures are directed at another project proponents like the local jurisdictions. SCAG should provide more accurate information on the intent of the phrase “...should and can...” usage as well as obtaining opinion on its legal meaning. Currently, as it stands, it is perceived to convey a message that local jurisdictions are able to deliver on the implementation of the measures and that it must be completed as noted in the PEIR.

Example: RTP p.81 “Encourage cities and counties to update their general plans and provide the most recent plans to SCAG” vs. PEIR p.ES-37 “**MM-LU16:** Local jurisdictions can and should seek funding to prepare specific plans and related environmental documents to facilitate mixed-use development at selected sites, and to allow these areas to serve as receiver sites for transfer of development rights away from environmentally sensitive lands and rural areas outside established urban growth boundaries.”

In MM-LU16, SCAG does not have the enforcement ability to direct local jurisdictions to seek funding for mixed-use planning and development, especially when the measure is directing the implementing agencies to implement a planning concept that is exceptionally difficult to implement in areas such as Riverside County. (“transfer of development rights” (TDRs) and “urban growth boundaries”) Measures identified in the PEIR must be appropriate, feasible, enforceable, and implementable by the suggested responsible agencies. It is recommended that the words “...should and can...” be replaced with language that suggests that the mitigation measures should be considered where appropriate and possible. If this language is not changed, then it is suggested that SCAG seek legal opinion on whether effected entities are legally obligated to implement the mitigation measures.

#### **5. Geographic Feasibility**

While producing the RTP/SCS and PEIR is a massive effort due to the sheer size of the region that SCAG covers (38,000 sq. mi.), some geographically specific details should be available to the local jurisdictions that it impacts. In fact, because of the size and diversity of the region, SCAG should detail some aspects of the plan, analysis, and mitigation measures to target specific locations. It is correct that CEQA Guidelines 15152(c) does state that lead agency can defer the project-specific CEQA analysis for large plans like General Plans and RTPs (PEIR p.1-2); however, some sub-regional categorical analysis and mitigation measures are clearly necessary due to the “very complicated and highly diverse” nature of the region. (PEIR p.1-2) SCAG, as a regional entity, should not be oversimplifying the plan that leaves the local implementing agencies questioning details.

#### **6. Growth Forecast**

Growth forecasts at the jurisdictional level were approved by the Riverside County Board of Supervisors, the CVAG and WRCOG Executive Committees and were transmitted to SCAG in 2010. Subsequent to these policy level actions, County staff provided SCAG staff detailed growth forecast at the TAZ level. WRCOG did approve revised forecasts for the jurisdictions within its subregion and

SCAG staff did adjust the forecasts for the Cities of Hemet, Menifee, and San Jacinto. The growth distribution of households and employment utilized in the RTP/SCS are not consistent with the TAZ level data provided to SCAG staff. It is therefore recommended that the growth forecasts are not approved at the TAZ level. It is further recommended that no findings of consistency and conformity, recommendations on the placement of infrastructure, or recommended funding be based on the TAZ level forecast used in the RTP/SCS plan. From the perspective of local jurisdiction, it is alarming and disconcerting to find that the data provided to SCAG can be modified without adequate methodologies or explanations.

## 7. Financial Plans

“One of the most critical elements of the RTP/SCS is the financial plan. The RTP is required to be financially constrained, meaning that project costs must be matched with “reasonably available” revenues.” Riverside County agrees with other COG comments on the Financial Plans of the RTP/SCS. There are some innovative funding mechanisms identified in the plan (Table 3.3 and 3.4.4), however, once again, the feasibility of the revenue identified in the RTP is questionable. In fact, it is very unlikely that much of the new supplemental revenues identified in the plan will materialize. There are no other alternatives identified in the plan that would replace or augment the loss in revenue if the new funding measures fail. Implementation measures on the funding items should be more clearly outlined and planned for the local jurisdictions.

Examples: 15c per gallon in addition to 18c per gallon current California State gas tax is almost doubling the tax rate. A mileage-based user fees are also identified in the plan that estimates about 5c per mile starting 2025 replacing current gas tax. In addition, the plan identifies E-Commerce Tax, Highway Tolls, and Special Districts.

## 8. Minor Edits:

a. RTP p.54: Complete Streets Discussion: “Encourage local jurisdictions to adopt and implement the proposed SCAG Regional Bikeway Network.” Riverside County continuously implements and updates its own trails network to create connectivity and accessibility. We would like to find out how SCAG’s *Exhibit 2.5 Regional Bicycle Network* was developed before relying on the map provided in the regional plan. Such process should be a “bottom-up” process and not a “top-down” approach.

b. Mitigation measures in the PEIR should not reiterate current existing laws or regulations. Already mandated items cannot be used to further mitigate an impact. e.g. “**MM-CUL5:** As part of the appropriate project/environmental review of individual projects, project sponsors can and should consult with the Native American Heritage Commission (NAHC) to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.” “**MM-HM11:** If asbestos-containing materials (ACM) are found to be present in building materials to be removed project sponsors can and should submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and

regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health & Safety Code Section 25915-25919.7; and other local regulations as applicable.” “**MM-TR89**: Vehicle Idling: Local jurisdictions can and should enforce State idling laws for commercial vehicles, including delivery and construction vehicles.”

c. *PEIR 3.6 Greenhouse Gas Emissions* (p.3.6-7): “Green Riverside, Green Action Plan” is a plan within the City of Riverside and is not related to what the County is doing on GHG topic. Riverside County is in the process of developing its Climate Action Plan (CAP) and has finished the initial greenhouse gas inventory. Accordingly, County has finished the draft update of the Air Quality Element with draft implementation measures.

d. *PEIR 2.0 Project Description* (p.2-3): Table 2-1 should be showing 2035 projections for population, households, and employment in relation to “project” and “no project”, but the actual numbers are identical. It looks like a table formatting mistake.

The Planning Department formally request, pursuant to Public Resources Code Section 21092.5, to continue to be notified and be involved in the CEQA review process of the above referenced project until the adoption of the Final EIR. Further, Riverside County staff is available to work with SCAG to address issues and questions outlined in the comment letter. If you have any questions, please contact Josh Lee at **951-955-6864** or via email at [jlee@rctlma.org](mailto:jlee@rctlma.org).

Sincerely,

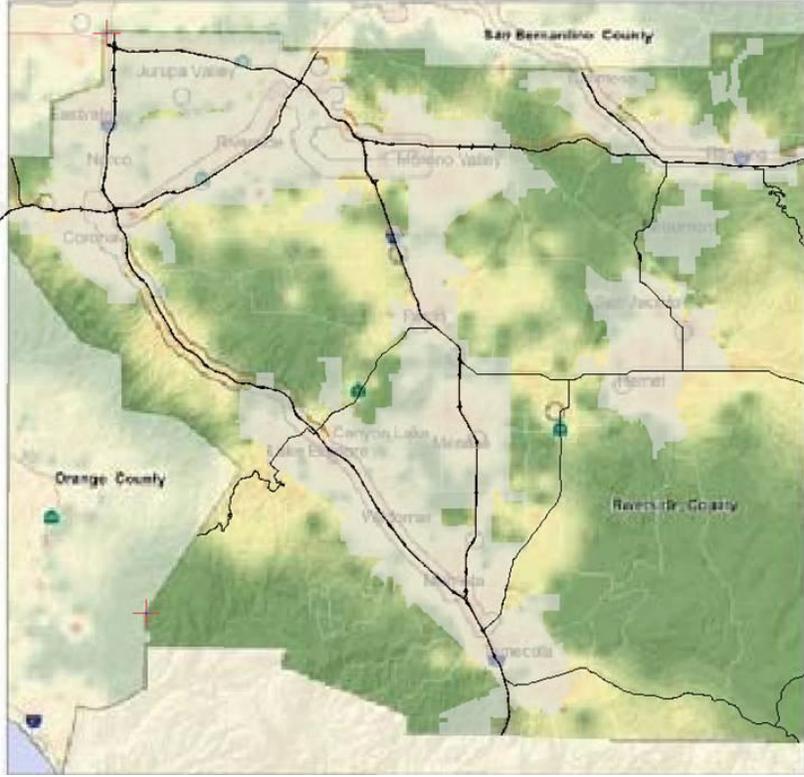
RIVERSIDE COUNTY PLANNING DEPARTMENT  
Carolyn Syms Luna, Director

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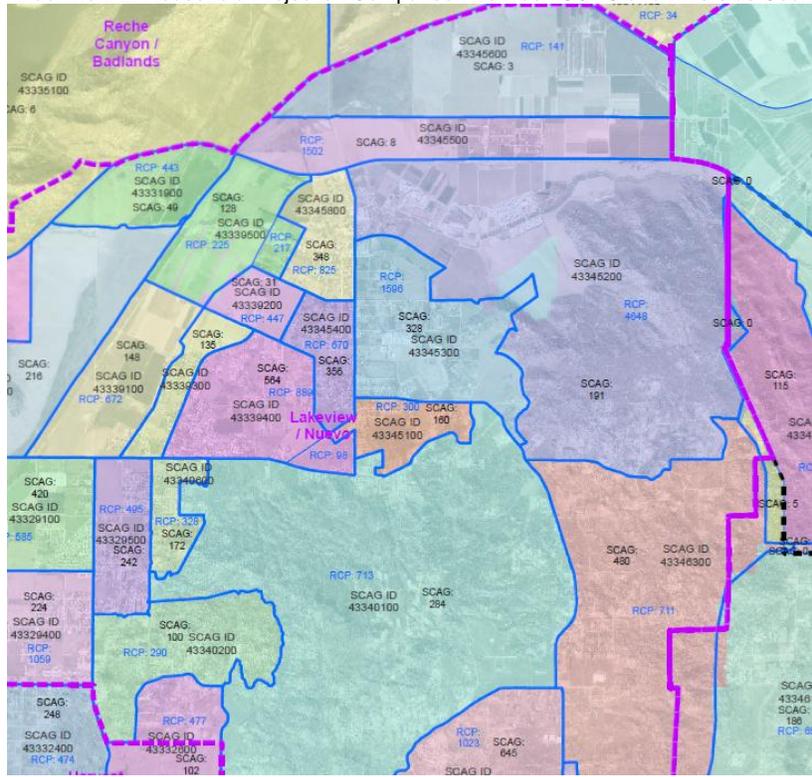
Lee, Josh – Urban Regional Planner IV

cc: George Johnson, Director, Transportation and Land Management Agency  
Carolyn Syms Luna, Director, Planning Department  
Juan Perez, Director, Transportation Department  
Frank Coyle, Deputy Director, Planning Department  
Tom Mullen II, Deputy Director, Transportation and Land Management Agency  
Mitra Mehta-Cooper, Principal Planner, Planning Department  
Bill Gayk, Consultant, Planning Department

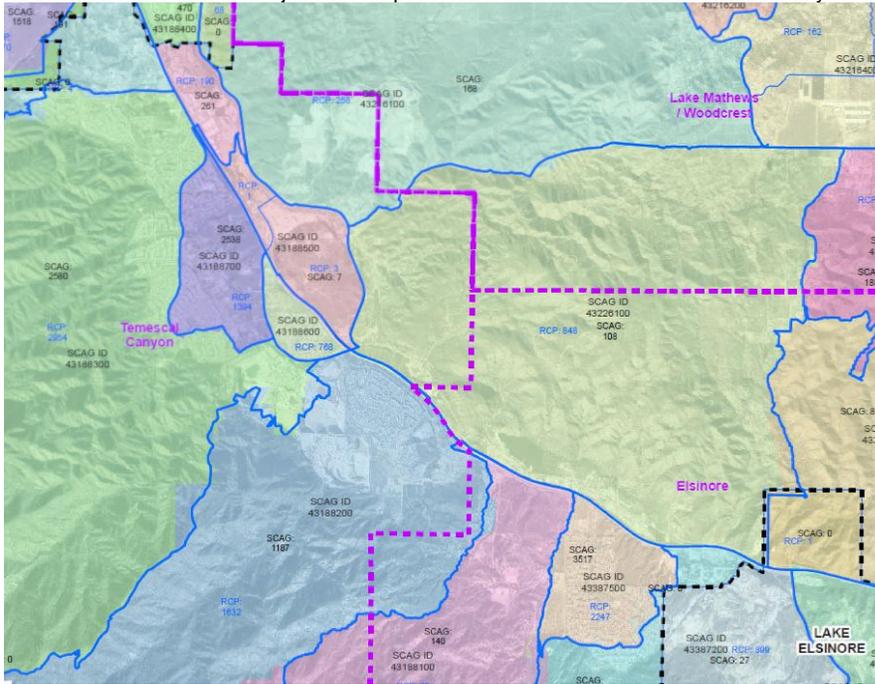
Attachment 1: Riverside County Cities in Relation to SCAG HQTAs Placements



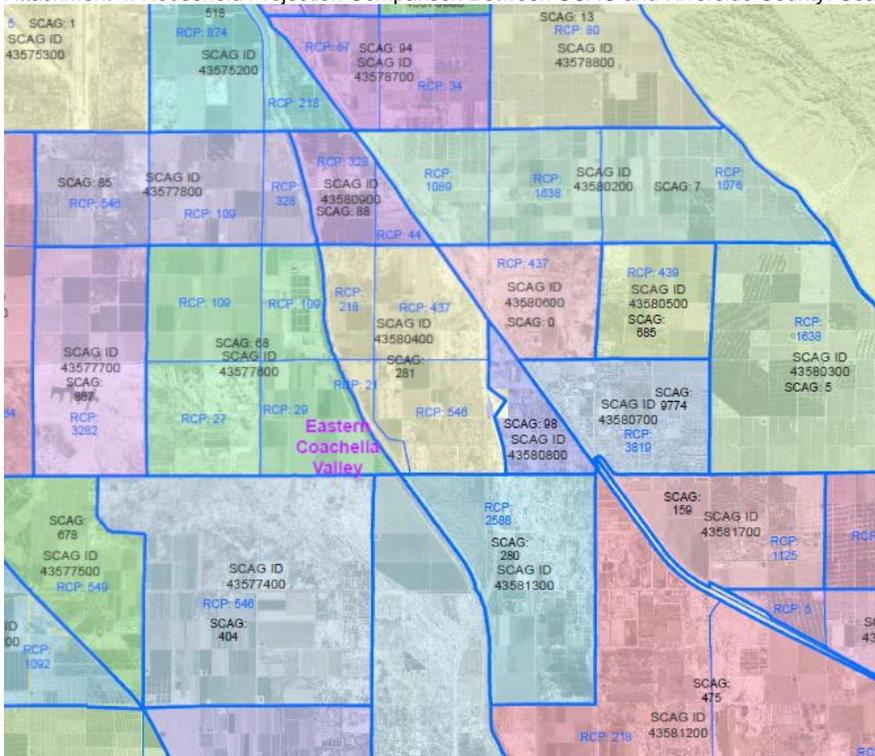
Attachment 2: Household Projection Comparison Between SCAG and Riverside County: Lakeview/Nuevo



Attachment 3: Household Projection Comparison Between SCAG and Riverside County: Temescal Canyon



Attachment 4: Household Projection Comparison Between SCAG and Riverside County: Coachella Valley



Riverside County Transportation Commission

February 14, 2012

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

Subject: Comments on the Draft 2012 Regional Transportation Plan

Dear Mr. Ikhata:



Thank you for the opportunity to comment on the Draft 2012 Regional Transportation Plan (RTP) for the Southern California Association of Governments (SCAG) region. This long range transportation plan reflects multimodal transportation projects and programs throughout the vast six county SCAG region including land use, demographic, environmental, and health considerations. The Riverside County Transportation Commission (RCTC) appreciates SCAG's effort in developing this comprehensive document using a bottom-up approach and broadening the public participation opportunities that were made available in developing the Draft 2012 RTP. RCTC also thanks SCAG for supporting county sales tax measure programs and projects in the RTP as this demonstrates a commitment to the voters that our measure programs will be implemented in accordance with the respective county measure ordinances.

RCTC is submitting its formal comments on the RTP and will submit minor comments/clarifications, including changes to the project lists, to reflect the most accurate information via the SCAG website as RCTC was informed the website has been set up specifically to accommodate project list corrections.

RCTC's formal comments are as follows:

**Chapter 2, Transportation Investments****Page 41, Congestion Management System**

The 2012 RTP Sustainable Communities Strategy (SCS) addresses federal requirements for the Congestion Management System (CMS). Specifically, the RTP SCS component contains Transportation Demand Management strategies, which is a required element for County Congestion Management Programs (CMP) to meet federal CMS guidance. The individual county CMPs, Caltrans CSMPs, and the SCS give the entire picture of the region's TDM efforts. Therefore, RCTC requests the following be removed:

“First, SCAG will incorporate a requirement in the FTIP guidelines that calls for submittal of documentation by the sponsoring agencies associated with significant roadway capacity projects (greater than \$50 million) to ensure documentation of all the alternatives considered in defining the project as well as identifying appropriate mitigation that would be implemented in conjunction with the project.”

This requirement should also be removed from the FTIP guidelines since a comprehensive view of the regions’ TDM projects and programs is clearly highlighted in county CMPs, Caltrans CSMPs, and the RTP SCS.

#### **Page 43, Completing Our System**

Table 2.2 Major Highway Completion Projects includes one to two projects per county emphasizing “critical gaps in the network that hinder access to certain parts of the region.” The project identified in Riverside County is “CETAP Intercounty Corridor A.” RCTC requests that this project be removed from the list and be replaced with the SR-79 realignment (RTP ID# RIV62024), and the I-215 widening project from Scott to Nuevo (RTP ID# RIV070309).

#### **Page 44, Completing Our System**

Table 2.3 identifies Major HOV Projects for each county. The I-215 Bi-county project is listed under San Bernardino County from Spruce Street to Orange Show Road. This project is also in Riverside County. RCTC requests that SCAG clarify that the project is in San Bernardino, from Orange Show Road to the Riverside-San Bernardino County line, and in Riverside County from the Riverside-San Bernardino County line to Spruce Street.

Table 2.3 does not include the SR-91 HOV lane project (RTP ID# 010212). RCTC requests that SCAG add this project to the table as it is a major highway project that will begin construction this year and, together with the I-215 Bi-county project, will provide a continuous HOV system from Orange County to San Bernardino County along the SR-91/I-215 corridor.

#### **Page 46, Strategically Expanding Our System**

Exhibit 2.1 Major Highway Project - This map highlights highway improvement projects to be implemented by 2035. RCTC requests that the Mid County Parkway (RTP ID# RIV031218) and SR-79 realignment (RTP ID# 62024) be added to the map.

**Page 76 – 79, Environmental Mitigation**

This section discusses Conservation Planning, Biological Resources and Open Space, Locations for Mitigation, etc. RCTC requests that SCAG include Riverside County's Multiple Species Habitat Conservation Plan (MSHCP) efforts in Western County and Coachella Valley in this section as an example of what counties are doing to mitigate environmental impacts. Information on the Western County MSHCP is available at <http://www.wrc-rca.org>. Information on the Coachella Valley MSHCP is available at <http://www.cvmshcp.org>.

**Pages 78 - 84, Summary of the Environmental Mitigation Program**

This section describes various mitigation programs for: Biological Resources and Open Space, Green House Gas, Air Quality, Transportation and Safety, Population and Housing, Land Use, Aesthetics, Public Services and Utilities, Geology, Soils, and Seismicity, Cultural Resources, Water Resources, Hazardous Materials, and Noise. Under each of these programs is a list of measures using action words such as "coordinating", "minimizing", "identifying", "work with", "encourage", etc. But some of the programs have measures that say "require the project implementation agencies to...." Examples of "require" statements for the public services and utilities program are below:

- Require the project implementation agencies to identify police protection, fire service, emergency medical service, waste collection, and public school needs and coordinate with local officials to ensure that the existing public services would be able to handle the increase in demand for their services; and
- Require the project implementation agencies to identify the locations of existing utility lines, and avoid all known utility lines during construction.

RCTC suggests that SCAG replace the word "require" in each mitigation section with either "encourage" or "support" as SCAG does not have the authority to "require" mitigation measures by agencies outside of its purview. Additionally, this section and the PEIR include mitigation measures that restate existing requirements enforced by other agencies. Therefore, RCTC suggests that such measures do not need to be repeated in this list of mitigation measures. Moreover, mitigation measures in the RTP should be programmatic in nature and not specific to individual projects. Individual project efforts at the local level are already required to comply with all state and federal environmental laws; providing specific mitigation actions in the RTP are redundant and could result in conflicts with project specific environmental approvals for voter approved and other transportation projects.

**Chapter 4, Sustainable Communities Strategy**

**Page 128, Resource Areas and Farmland**

This section talks about areas to be protected from development including parklands, open space, natural resource areas, and farmland. It says that “SCAG is also developing a natural lands acquisition and open space conservation strategy to encourage large-scale acquisition and management of critical habitat to mitigate impacts...” RCTC also requests that SCAG mention Riverside County’s MSHCP accomplishments in this section.

**Page 151, Table 4.4 Transportation Network Actions and Strategies**

Another action/strategy listed is “Cooperate with stakeholders, particularly county transportation commissions and Caltrans, to prioritize funding sources for preservation and maintenance of the existing transportation network.” RCTC agrees that there is insufficient funding for System Preservation. Each county transportation commission established projects and programs with various ways to fund and implement them. Funding is limited and it would be more beneficial to work with stakeholders in identifying a new funding source or increased funding levels instead of competing with very limited existing fund sources. RCTC suggests that SCAG revise the wording to “...to **prioritize identify new funding sources and/or increased funding levels** for preservation and maintenance..... ” This recommended change should also be reflected in Chapter 2, Page 39, under System Preservation.

RCTC thanks SCAG staff for their efforts in developing the 2012 Draft RTP for one of the largest areas with the highest population and diverse demographics in the state and nation. The challenges this region faces are plentiful; however, working cooperatively with our transportation partners will allow us to fully meet those challenges.

Sincerely,



Anne Mayer  
Executive Director

cc: RCTC Commissioners

Per our correspondence to Mr. Ikhata dated 2/14/2011 regarding the Draft 2012 Regional Transportation Plan (RTP), we would like to request modifications to the draft RTP project list for the following projects:

Page	Agency	RTP ID	Requested Change
Page 238	RCTC	3CR0702	Revise project description to remove PVL station at Hemet Airport and replace with station near new SR-79 alignment and Stetson Rd.
Page 239	RTA	3TC04TR6	Change the project description to “Construct new Hemet Transit Center (with approximately 4 bus bays) in the vicinity of State St and Devonshire Ave near the future courthouse location. Change the project location from Menifee to Hemet. Change the completion year from 2027 to 2015, and update the total project cost from \$5,926 to \$1,442.
Page 240	RCTC	3C01MA03	Change project description to “CETAP – Riverside County to Orange County – Construct new intercounty transportation Corridor A – 2 toll each dir on new facility parallel to SR-91, from from SR-241 to I-15, with IC at SR-241, SR-71, I-15”. Network year remains 2035. Update total project cost to \$2,720,000.  Move balance of project description “CETAP – Corridor B – 2 toll each dir on new facility from I-15/Mid-County Pkwy to SR-241/SR-133” to Strategic Projects Section.
Page 266	Coachella	3A07094	This is currently programmed as FTIP ID RIV071246. Network year should remain 2018 (previously requested to change to 2020). Update total project cost from \$4,853 to \$22,290.
New Project	RTA		Regional transit center for mass transit service in central western Riverside County along I-215 corridor. Network year is 2030 and the total project cost is \$10M.

We would like to request modifications to the project list that we have submitted to SCAG staff through the standard RTP long-range project list modification and FTIP database update processes:

**Major project modifications have been submitted for the following RTP projects:**

3A07262	3A01CV068	3TR04C
3A07205	3A07001	3TR04A, 3TR04B
3A07207	3120014	3ITS09
3A07024	3A01CV071	3TL1507
3A07040	3A07101	3TL1607
3A07069	3A07292	3TL1107
3A07088	3A01CV076	3TC04TR1
3120008	3A01CV075	3TC04TR10
3A01CV047A	3A01WT210	3TC04TR6
3A01CV047B	3A04WT187	3TC04TR8
3A01CV049	3A01WT045	3TC0702
3A01CV048	3A04WT046	3A01CV098
3A07074	3A01WT218	3120007
3A07031	3A04A22	3A01CV002
3ITS08	3A04WT198	3A04CV113
3A01CV123	3A01CV085	3A01CV004
3A01CV111	3A01CV086	3A01CV014
3A07018A	3A07097	3A07094
3A01CV104	3A07244	3A07164
3A01CV105	3A07079	3A07165
3A01CV103	3120012	3A01CV017
3120010	3A04WT078	3A07011
3A01CV060	3M01CV01	3A01CV018
3A01CV059A	3M0715	3A01CV016
3A01CV061	3M0702	3A01CV023
3A01CV063	3M01CV03	3A04CV027
3A04A25	3M0716	3A07078
3A07266	3M0708	3A07137
3A04WT165	3M0722	3A07029
3A01CV067	3TL504	3120004

**Major project additions have been submitted for the following RTP projects:**

3120015	3120021	3120030
RIV111201	3120022	3120031
3120016	3120023	3120032
RIV111131	3120024	3120033
3A04WT198B	3120025	3120034
3120017	3120026	3120035
3120018	3120027	RIV071250B
3120019	3120028	RIV050531
3120020	3120029	RIV071241

**Major project deletions have been submitted for the following RTP projects:**

3A07109 (project complete)  
 3A04WT070  
 3A01WT036 (project complete)  
 3A01WT035 (project complete)  
 3A07076  
 3M01WT021  
 3TK04MA13 (programmed as RIV120201 in 2011 FTIP A24)  
 3M04WT009 (programmed as RIV091012 in 2011 FTIP A24)

**Major project changes were submitted as part of 2011 FTIP A24:**

RIV071247	RIV62029
RIV031209	RIV091008 (3A07131)
RIV071253	RIV060111
RIV071267	RIV100107 (3M10WT03)
RIV050532	RIV091012 (3M04WT009)
RIV071250	RIV100104 (3M0725)
RIV090902 (3M0803)	RIV060114
RIV520109	RIV110825
RIV091007 (removed from A24)	RIV031218
RIV090622	RIV080917 (3A07155)
RIV071252 (3A07020)	RIV080918 (3A07156)
RIV071254 (3A07022)	RIV031209
RIV62034	RIV050535
RIV120201 (3TK04MA13)	RIV120202 (replaced with RIV090902)

**Additional Comments:**

Page	Agency	RTP ID	Comment
Page 83	Lake Elsinore	RIV091007	This project is not reflected in the Financially-Constrained RTP Projects list – please confirm project is modeled.
Page 90	Palm Springs	RIV090402	This project is not reflected in the Financially-Constrained RTP Projects list – please confirm project is modeled.

<b>Page</b>	<b>Agency</b>	<b>RTP ID</b>	<b>Comment</b>
Page 243	Riverside County/Indio	0	Programmed as FTIP ID 47520 (I-10/Jefferson IC).
Page 250	Moreno Valley	3M0712	Programmed as FTIP ID RIV080902.
Page 251	Moreno Valley	3M0801	Programmed as FTIP ID RIV080904.
Page 252	Coachella	3M0717	Programmed as FTIP ID RIV071274.
Page 255	RCTC	3M0738	Programmed as FTIP ID RIV110122.
Page 272	Moreno Valley	3A10WT01	Programmed as FTIP ID RIV091004.
Page 272	Riverside County	3A04WT137A	Programmed as FTIP ID RIV090903. Verify that project is modeled.
Page 280	Moreno Valley	3A01WT053	Programmed as FTIP ID RIV080908.
Page 286	Moreno Valley	3A04WT056F	Programmed as FTIP ID RIV080915.
Page 287	Moreno Valley	3A0805	Programmed as FTIP ID RIV080917.
Page 291/2	Rancho Mirage	3A07116/3A07128	Programmed as FTIP ID RIV091010.

**SUNLINE TRANSIT AGENCY - COMMUTER BUS SERVICE  
RTP ID 3TL907 – COMPLETION YEAR 2012**

Weekday  
Service

Westbound

	Thousand Palms	Morongo Casino	Banning Ramsey & Sunset	Beaumont-City Hall	Nason & Fir	Moreno Valley Mall	Downtown Riverside MetroLink Station	Downtown Riverside Transit Terminal
Palm Desert	5:00	5:33	5:54	6:05	6:25	6:36	7:06	7:19
4:45 am	5:00	5:33	5:54	6:05	6:25	6:36	7:06	7:19
5:45 am	6:00	6:33	6:54	7:05	7:25	7:36	8:06	8:19

Eastbound

Downtown Riverside Transit Terminal	Downtown Riverside MetroLink Station	UCR Lot 30	Moreno Valley Mall	Nason & Fir	Beaumont- City Hall	Banning Ramsey & Sunset	Morongo Casino	Thousand Palms	Palm Desert
5:19 pm	5:27	5:41	5:56	6:11	6:35	6:47	7:05	7:35	7:57
6:35 pm	6:45	6:59	7:14	7:27	7:51	8:03	8:21	8:51	9:13

February 14, 2012



**Riverside Transit Agency**

1825 Third Street  
P.O. Box 59968  
Riverside, CA 92517-1968  
Phone: (951) 565-5000  
Fax: (951) 565-5001

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

Subject: Comments on the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Draft 2012-2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) for the Southern California Association of Governments (SCAG) region. The Riverside Transit Agency (RTA) is submitting formal comments on the Draft RTP/SCS as follows:

- Transportation Investments, Chapter 2, Pages 49 and 50, under Transit Policies; RTA supports the need for increases in state and federal funding for sustaining the operation of transit services and infrastructure including future bus rapid transit and express bus service projects as included in the Draft RTP/SCS. In addition, as our region's population continues to age, increased operational funding support to provide paratransit services will be a continued need moving forward.
- Transportation Investments, Chapter 2, Pages 50 and 51, under Passenger and High-Speed Rail, the RTA requests that short term commuter rail service improvements be made in Riverside County. At this time of record ridership growth on RTA's services, these near term improvements would promote further bus and rail integration resulting in region-wide reductions in congestion due to reduced automobile traffic.
- Transportation Investments, Chapter 2, Page 41, under Transportation Systems Management, the RTA suggests that more emphasis be placed on developing a wider variety of capital funding sources to support and maintain Transit Automatic Vehicle Location (AVL) and Advanced Traveler Information systems. In this time of social media applications, this is highly important in attracting and retaining revenue to support the transit system.

**SCAG**

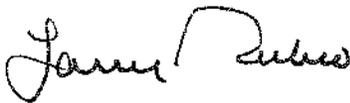
**FEB 15 2012**

**MAIL RECEIVED**

- With school districts continuing to lose state transportation funding, the RTA will be expected to provide additional service to schools throughout western Riverside County without the provision of additional operating funds. The RTA desires to work closely with SCAG and other regional agencies to develop funding solutions to accommodate this growing trend.
- Ensure modeled RTA transit projects included in the Draft RTP/SCS are accurately depicted based on system-wide high ridership results in 2011, continued reductions in unemployment within western Riverside County and forecasted gas price changes.

The RTA thanks and appreciates SCAG staff for their efforts in coordinating and conducting extensive public outreach meetings while developing the six-county comprehensive Draft RTP/SCS.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Rubio". The signature is fluid and cursive, with the first name "Larry" being more prominent than the last name "Rubio".

Larry Rubio  
Chief Executive Officer

cc: Doug McAllister, Chairman, RTA Board of Directors  
Anne Mayer, Executive Director, Riverside County Transportation Commission



February 14, 2012

Attn: Honorable Pam O'Connor, President of SCAG and Regional Council members  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**RE: Active Transportation in SCAG's 2012 Regional Transportation Plan (RTP)**

Dear Honorable O'Connor, Regional Council members and Policy Committee members:

On behalf of the Southern California Safe Routes to School Network and the signatory organizations and individuals to this letter, we would like to thank Southern California Association of Governments (SCAG) staff, Regional Council and Policy Committee members for the opportunity to participate in the 2012 Regional Transportation Plan (RTP). We recognize the multitude of efforts required to develop the long range plan and are appreciative of all of the hard work that has already been done.

The Safe Routes to School National Partnership is a national advocacy group representing over 500 organizations and professional groups that works to improve conditions for children to walk and bicycle to school.

Per 2009 National Household Travel Survey, 21 percent of all trips in the SCAG region are currently being done via walking and bicycling. And tragically, per SCAG 2012 Draft RTP, 25 percent of all roadway fatalities in the SCAG region are pedestrians and bicyclists. These are critical and dangerous trends that require our regional leaders to change the way transportation planning has been done for decades in Southern California. We encourage all regional leaders to implement this change starting with the 2012 RTP. The region does not need a plan that allocates \$22 billion on road widening and only \$6 billion on active transportation. It is imperative to change funding allocations to improve safety and public health throughout our region.

We ask that SCAG amend the Draft RTP/SCS to include the following:

1. Increase the overall percentage of RTP funds dedicated to active transportation from 1.3 percent of the 2012 RTP to 5-8 percent of the total 2012 plan. The request for 5-8 percent reflects the region's current mode split, collision trends, community interest and support, as well as current bicycle and pedestrian planning and implementation requirements, based on projections by the [Los Angeles County Department of Public Health \(LAC DPH\) Methodology](#) (released 12/2011). The LAC DPH determined in a rigorous study that the unmet regional funding need for a walkable and bikeable SCAG Region was close to \$40 billion. This represents roughly 8 percent of the total RTP budget, which is significantly larger than SCAG's proposed \$6B to address regional needs.

As local governments contribute resources to the construction of active transportation projects, all other funding sources for active transportation, such as the amount of RTP local (county sales taxes and other local revenues included in the 2012 RTP), state, and federal programming dollars, should be increased to aid these efforts. Additional state and federal funding will help cities do more with their local dollars, especially since often local funding is tied into federal funds.

As it stands in the draft 2012 RTP, eighty percent of the SCAG funds dedicated to active transportation investments in the 2012 RTP are not programmed until after 2026. Between 2016-2025, the funding for active transportation will be only one-half of the current annual 2012 budget. We encourage SCAG to prioritize active transportation funding and distribute these funds evenly over the 25 year period, which will bring the benefits of active transportation to fruition sooner for all communities.

While we encourage SCAG to increase funds to support Active Transportation, we recognize the constraints and importance of working with County Transportation Commissions (CTC's) to fast-track active transportation funding. We request the 2012 RTP include development of an Active Transportation Finance Strategic Plan by 2014 that identifies how each CTC is spending funds and the opportunities available for increasing funding for active transportation in each county during the next ten years. This plan ideally is developed by convening a *Regional Active Transportation Early Action Transportation Program* in which SCAG brings together each County Transportation Commission (CTC), elected officials and other stakeholders to discuss and prioritize what each County is doing regarding active transportation and funding areas which may be leveraged for the needed funding, for walking and bicycling and first mile/last mile projects, in the earlier stages of the 2012 RTP. We request that this Early Action Program have been adopted and include a 2014 implementation plan.

We have seen tremendous - and still growing - support and action from throughout the six-county region calling for policy makers to support and build walkable and bikeable neighborhoods. We encourage SCAG leaders to respond by supporting the impressive efforts underway throughout the region to create healthy and active communities for all.

2. Allocate Funding for Bicycle and Pedestrian Planning and Usage Counts: Improving the walking and biking environments in our region cannot be done without adequate planning at the local level. Unfortunately, many SCAG cities do not have bicycle or pedestrian master plans and project lists; in Los Angeles County, for example, only approximately 11 of 88 cities have bicycle master plans and only 4 cities have pedestrian plans. This lack of planning is a grievous impediment to improving infrastructure for cyclists and pedestrians. In addition, we must increase documentation of bicycle and pedestrian travel usage and demand by regularly assessing numbers of people walking and biking. Without such figures, it is difficult to forecast mode share and usage or measure the positive benefits of investments in these modes.
  - Identify funding sources in order to set aside at least \$19M in the 2012 RTP to support SCAG cities in developing bicycle and pedestrian master plans, safe routes to school plans and required, but overdue ADA transition plans. It is estimated that approximately \$200,000 per city is required to develop these plans (95 cities at \$200,000). Establish a goal of 50 percent of SCAG cities having completed at least one plan by 2016 in order to prepare for the 2016 RTP.
  - Create and fund a regional bicycle and pedestrian count program at SCAG establishing yearly usage counts at key locations in cities throughout the SCAG region. Use the data collected to establish trends, set performance goals, evaluate fund requests for facility improvements, prioritize improvements, and show the impacts of recent improvements. Set aside funds in SCAG's 2012/2013 OWP to create program and maintain this program in future years. (See [links: Nashville Metropolitan Planning Organization's program](#), [Technical Memorandum on Regional Pedestrian and Bicycle Count Procedures](#))
3. Adopt a Regional Complete Streets Plan by 2014: This plan will incorporate input from local jurisdictions to prioritize complete streets projects in programing efforts and dedicate a portion of system preservation and maintenance funding for improving the road conditions of all users.
4. Adopt a Safe Routes to School Regional Strategic Plan by 2014: Such a plan would be similar to the plan currently being adopted by SANDAG. In our region 14 percent of all morning congestion is caused by private car drop off at schools (*Traffic Injury Prevention*, August 2011). It is critical that transportation agencies look at the needs of the entire network when planning resource investments. SANDAG's Regional Safe Routes to School Strategic Plan works to establish a critical needs assessment for their Region on how students and their families currently go to and from school, creates data standards and guidelines, considers school siting and closures as possible land use strategies, bridges the gap between transportation planning agencies and school districts, and works to provide much needed technical assistance to local jurisdictions - with skill sets such as how to obligate federal Safe Routes to School funds in a timely manner.
5. School Siting and Joint Use Policies as land use elements of the SCS: School siting can often determine whether or not it is possible for children to walk and bicycle to school.

When schools are placed on the outskirts of urban areas it becomes necessary for children to be driven to school. As noted above, 14 percent of all morning congestion is caused by private car drop off at schools (*Traffic Injury Prevention*, August 2011). Therefore schools should be located within residential neighborhoods whenever possible and equitable to reduce congestion and increase opportunities for bicycling and walking.

Joint Use Policies allow school facilities such as playgrounds and recreational facilities to be used by the community when schools are not in session. This can open up recreational activities in neighborhoods that lack parks and open spaces. When schools are located within neighborhoods, community members can access these locations without the use of a private automobile which can lead to further reductions in congestion.

6. Set measurable safety and health goals for all users: Goals are set for the reduction of green house gases in the draft 2012 RTP/SCS. Active transportation plays a pivotal role in the reduction of these green house gasses. Similar measurable goals should be set for reducing crash rates for active transportation and for reducing the health impacts of obesity. These could include a report on the number of children walking and bicycling to school across the entire region as well as a report detailing access to parks, open spaces and quality active transportation networks.
7. Monitoring detailed population data and metrics in environmental justice communities: The analysis conducted by SCAG in the Environmental Justice Supplementary Report (“EJ Supp. Report”) provides detail on existing inequities in all modes of transit, housing, employment, environmental impacts, and health risks. The historical analysis in the Environmental Justice Supplementary Report confirms the challenges faced by the environmental justice population, as defined by SCAG:
  - longer commute times and distances than average,
  - vulnerability to gentrification and displacement from high quality transit areas (HQTA) or transit oriented communities (TOC),
  - higher proportional use of non-automobile travel, such as bus, rail, walk, and bicycle, and growth patterns concentrated within geographies of poor quality transit, lower housing costs, and fewer employment opportunities.

Concerns arise in the inconsistencies of the environmental justice analysis. SCAG’s analysis of travel time and travel distance savings shows “fairly similar and close” rates for all ethnic groups, including non-white Hispanics. Yet, the increase of transportation and infrastructure projects in HQTA/TOC will increase gentrification and displacement of environmental justice populations. The forecasted benefits for environmental justice populations are likely negated or overridden by predicted geographical shifts.

In order for SCAG to properly mitigate disparities in transportation, housing, and land use impacts in low-income and minority communities, it must monitor population changes by more detailed population segments (i.e. neighborhoods, census tract)

because root factors of inequities play out at these population segments. It is difficult to illustrate short-term impacts and long-term benefits on the environmental justice population without such details. For example, the continued poor job housing fit and balance in the SCAG region leave lower-income populations with no public or active transportation options in their daily commute. Metrics need to demonstrate immediate changes to transportation usage from ticket pricing, placement of rapid bus transit stops in high concentrations of lower-income and elderly groups, and safety programs for walking and bicycling. (see *link*: [Health Equity and Prevention Primer, Prevention Institute](#))

Additionally, SCAG should provide the tools and policies for local jurisdictions to develop strategies to reduce commute distances and relieve sedentary lifestyles for lower income and communities of color. Healthy, sustainable, and accessible place-making is crucial to the environmental justice population because geography and socioeconomic structure are influential predictors of obesity in the United States. Environmental justice populations must be ensured the opportunity to go to school, live, work, and play in all neighborhoods through land use strategies, incentives for businesses and developers, infrastructure and non-infrastructure programming, such as Complete Streets, first/last mile to transit, density bonus, parking reductions, safe and secure bicycle parking and street crossings, and affordable and work force housing in HQT/TOC. (see *link*: [Why Place & Race Matters, Policy Link](#))

SCAG does not adequately link RTP/SCS active transportation funding to its environmental justice obligations. The lack of active transportation funding disproportionately affects immigrant, lower-income, and minority populations because these neighborhoods have greater barriers to physical activity and transit access, higher numbers of busy regional arterial, poor pedestrian and bicycle infrastructure, unsafe neighborhoods, and lack of safe storage for bicycles and safe crossings. Thus, these neighborhoods would benefit from an increase in funding allocations (in order for SCAG to meet its Title VI obligations) and from a detailed strategic plan. (see *links*: [Do All Children Have Places to Be Active, Active Living Research](#); [Low Income Resource Guide, Safe Routes to School National Partnership](#))

Our policy requests are important commitments for creating robust networks for bicycles and pedestrians in the SCAG region, where walking and bicycling can be enjoyed by all with safety and ease irregardless of age or ability. Compliance with the SCS requirement of SB 375 and the well-being, safety, and health of citizens within the SCAG region will depend on the future development of our multi-modal transportation network, jobs, housing, education and healthy environments for families to live in.

We sincerely appreciate this opportunity to provide feedback for the 2012-2035 draft RTP/SCS. Please feel free to contact us with any questions or concerns; our contact information is listed below.

Respectfully Submitted,

Pauline Chow, Esq. Southern California Policy Manager  
Safe Routes to School National Partnership  
[pauline@saferoutespartnership.org](mailto:pauline@saferoutespartnership.org) 312-685-1685

Rye Baerg, Southern California Policy Manager  
Safe Routes to School National Partnership  
[rye@saferoutespartnership.org](mailto:rye@saferoutespartnership.org) 818-542-6478

Organizational Endorsements:

1. Deborah Murphy, Founder and Director, Los Angeles Walks
2. Alexis Lantz, Planning and Policy Director, Los Angeles County Bicycle Coalition
3. Jonathan Lopez, Southern California Coordinator, California WALKS
4. Wendy Alfsen, Executive Director, California WALKS
5. Rachel Morris, Executive Director, VCCool – Ventura Climate Care Options Organized Locally
6. Ventura Bicycle Union
7. Wes Reutiman, BikeSGV, [bikesgv.org](http://bikesgv.org)
8. Cynthia Rose, Director, Santa Monica Spoke, Regional Chapter LACBC
9. Mark Elliot, Campaign Organizer, Better Bike Honcho & Bike Beverly Hills, [betterbike.org](http://betterbike.org)
10. Samantha Ollinger, Editor, Bike San Diego, [BikeSD.org](http://BikeSD.org)
11. Ruben Cantu, Program Director, California Pan-Ethnic Health Network
12. Pete Van Nuys, Executive Director, Orange County Bicycle Coalition
13. Mark Vallianatos, Policy Director and Adjunct Professor, Urban and Environmental Policy Institute, Occidental College
14. Richard Risemberg, Bicycle Fixation, Los Angeles
15. Eric Yesayan, Interim Executive Director, Walk Bike Glendale
16. Kara Sergile, RN, MPH, KWS Consulting
17. Lars Clutterham, Partner, [downeygreen](http://downeygreen)
18. Jeremy Cantor, Program Manager, Prevention Institute
19. Seth Strongin, Assistant Director, The City Project
20. Cesar Covarrubias, Executive Director, Kennedy Commission
21. Eric Weinstein, Member, LACBC Planning Committee
22. Anthony Tróchez, Higher Education & Organizational Change, UCLA
23. Kevin Burton, Cofounder, West Hollywood Bicycle Coalition
24. Martha Cortes, Health Policy Coordinator, Alliance for a Better Community
25. Herbie Huff, Bike Coalition at UCLA
26. Barbara Lott-Holland, Co-Chair of the Planning Committee, Bus Riders Union
27. Andy Au, member, People for Bikes & BikeSGV
28. Madeline Brozen, Program Director, UCLA Complete Streets Initiative
29. Gwendolyn Flynn, Policy Director, Community Health Councils, Inc.
30. Josef Bray-Ali, Founder, Bike Oven

Individual Endorsements:

31. Alice Strong, San Gabriel
32. Alex Budiman, Upland
33. Ivy Dulay, Manhattan Beach
34. Ray Shofler, North Hollywood
35. Mable Everette, RD, Inglewood
36. Ezequiel Gutierrez, Adelanto
37. Arye Gross, Glendale
38. Ryan Johnson, Glendale
39. Nathalie Winiarski, Glendale
40. Elise Kalfayan, Glendale

February 14, 2012

Mr. Hasan Ikhata  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

Dear Mr. Ikhata:

This letter transmits San Bernardino Associated Governments' (SANBAG's) comments on the Southern California Association of Governments' (SCAG's) draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated draft Program Environmental Impact Report (PEIR). This is pursuant to SCAG's request for comments, with a closing date of February 14, 2012.

SANBAG recognizes and appreciates the extensive effort and deliberations that went into the RTP/SCS by SCAG staff and policy committees. We recognize that the RTP/SCS has been developed in the context of the largest and most geographically and demographically diverse metropolitan area in the United States, involving a great number of complex and challenging issues. SANBAG commends the efforts of SCAG staff and supports approval of the Plan by the April deadline, with some suggested clarifications. Our comments on the draft RTP/SCS and PEIR are as follows:

1. The RTP/SCS growth forecasts should be adopted at the County-level, not at the city or transportation analysis zone (TAZ) level. SANBAG needs the ability to adapt the forecasts to development trends and new information that will inevitably come to light at the small-area level over the next 4-year RTP/SCS cycle. This is consistent with SCAG's approvals in the past.
2. The growth distribution at the transportation analysis zone (TAZ) level needs to be adjusted to be consistent with the distribution of growth for households and employment being submitted by SANBAG in parallel with the comment letter. The growth distribution is based on the distribution of households and employment previously submitted by SANBAG, together with adjustments for the Plan Alternative of the RTP/SCS. No change is being suggested in the city-level distribution of growth.

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HI120214-lm

3. Please confirm that the East-West Freight Corridor (dedicated truck lanes) will continue from SR-60 northerly on the I-15 and terminate just to the north of I-10, with appropriate connector ramps to and from I-10 east of I-15. This is stated in the text of the draft RTP/SCS, but some of the maps and the transportation model networks are not yet consistent with this.

4. The Program EIR uses the phrase “local jurisdictions can and should...” or “project sponsors can and should...” in most of the local-level and project-level mitigation measures referenced in the EIR. SANBAG’s understanding is that the mitigation measures are designed to provide local jurisdictions and project sponsors with choices, not requirements, as they seek to implement local transportation and development projects in the context of the RTP/SCS goals and objectives. However, CEQA also requires that mitigation measures be feasible and enforceable (CEQA Guidelines Section 15126.4). As drafted with the language “local jurisdictions can and should,” the mitigation measures are implied to be feasible and enforceable. Therefore, SANBAG requests the mitigation measures be revised to clarify their intent. SANBAG suggests replacing the wording “local jurisdictions can and should...” or “project sponsors can and should...” with “SCAG shall encourage local jurisdictions to ....” SCAG should continue to play a role of facilitation for local jurisdictions and subregional agencies to build technical expertise, provide grant funds, disseminate information, and coordinate responses to regional issues. These are actions that are under the control of SCAG, the responsible party under CEQA, and can be monitored and enforced.

5. SANBAG recommends that those mitigation measures that are either the same as or similar to an existing regulation simply reference the regulation without restating the contents of the regulation. Local jurisdictions and project sponsors are already responsible for complying with regulations, and restating or paraphrasing a regulation in the PEIR could cause confusion in the future as regulations are modified. A summary of the regulation can be provided as information, but a restatement of the regulation in the PEIR with the “can and should” language may be counterproductive. The PEIR should also be careful to distinguish between guidelines and regulations. These changes will avoid potential future conflicts between a PEIR mitigation measure and an adopted regulation.

We would also like to request the following modifications to the project list, as submitted to SCAG staff through the standard RTP long-range project list modification and FTIP database update processes. These changes have been previously communicated to SCAG staff subsequent to the release of the Draft RTP and are being confirmed below.

**Major project modifications include:**

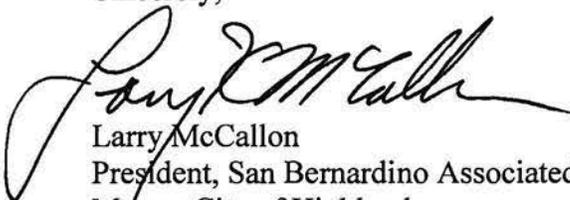
- 1830 – I-10 Cedar interchange – Schedule Change
- SBD41339 – I-10 Pepper interchange- Schedule Change
- 200152 – I-15 Arrow Rte. Interchange - Schedule Change
- 0H1300 – I-15 Duncan Canyon Interchange - Schedule Change
- 20061201 – I-15/215 Devore Interchange- Schedule Change
- SBD031279 – I-15 Rancho Interchange - Schedule Change
- 35556 – I-15 VV-Barstow - Schedule Change
- 200451 – US 395 from I-15 to 1.8 Miles S. of Desert Flower Road – Interim Widening from 2-4 lanes
- 34040 – US 395 Expressway – Widen from 2-4 lanes from High Desert Corridor to Farmington Road
- 981118 – Omnitrans Bus Service - Schedule Change
- 20040804 – Needles – I-40 Connector – Downscope project

**Major project deletions/completions include:**

- SBD31808 – I-10 Riverside – Completed Project
- 0H930 – I-10 Waterman – Completed Project
- 43320 – I-10 Live Oak – Completed Project
- 47221 – I-15 Etiwanda (rehab. SHOPP) – Completed Project
- 34041 and 34042 – US 395 New Expressway – Deleted Combined Projects
- 4G0117-LR – Safety Upgrade – Milliken Ave. – Delete Project
- 4A07039-LR – Valley from Cherry to Alder (2-4 lanes) – Delete Project
- 4H01011-LR – HOV Connector (I-10/I-15 North to West) – Delete Project
- 4H01010-LR – HOV Connector (I-10/I-15 South to West) – Delete Project
- 4H01009-LR – HOV Connector (I-10/I-215 South to East) – Delete Project

We look forward to a productive discussion of all the comments in the coming weeks and the approval of the RTP/SCS in April.

Sincerely,



Larry McCallon  
President, San Bernardino Associated Governments  
Mayor, City of Highland



# SAN FERNANDO VALLEY COUNCIL OF GOVERNMENTS

A JOINT POWERS AUTHORITY

5121 VAN NUYS BOULEVARD 2ND FLOOR • SHERMAN OAKS CA 91403  
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ARLETTA MARIA BRIMSEY, DEPUTY CITY  
ATTORNEY, CITY OF LOS ANGELES

February 14, 2012

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 W. Seventh St. 12th Floor  
Los Angeles, CA 90017-3435

## Re: Comments on the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy

Dear Director Ikhata:

SCAG is to be congratulated on the production of this unprecedented draft document that does laudable job of combining a Regional Transportation Plan and the inaugural "Sustainable Communities Strategy."

The San Fernando Valley Council of Governments represents the San Fernando and Santa Clarita valleys, a metropolitan region of over two million—more populous than 15 states, and one of the largest unified regions in the United States. Until now, we have not always had the opportunity to fully participate in SCAG planning activities as a region. We welcome this opportunity.

Because of the shortness of time, we will be unable to submit a full and substantive reply by the end of the public comment period on February 14, 2012. We note that SCAG's regional transportation modeling area covers the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. This modeling area is divided into 11,267 Transportation Analysis Zones (TAZs). Unfortunately, the TAZ maps were only made available on January 26th of this year. There has been very little time for meaningful analysis.

The City of Los Angeles and other respondents have noted that the plans tend to be inconsistent with existing Community Plans and General Plans. This could result in confusion, cost and needless litigation. We would like to reserve the opportunity to comment further as the process continues to unfold.

Substantive points have been raised by several credible groups. Given the significance of the RTP/SCS, we must approach this task with care, and the issues raised by SCLC, OCBC and the City of Los Angeles, inter alia, certainly bear further, and more detailed discussion.

Further consideration is needed on "Policies and Principles of a Sound RTP/SCS" as stated:

1. Provides Positive Economic Impacts ... A Plan that is pro economic growth and job creation

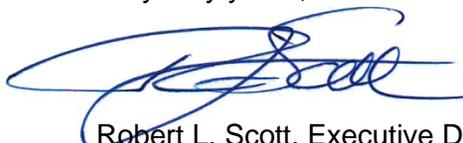
2. Provides Local Control ... A Plan that honors local control and flexibility over land use and transportation
3. Assures New Revenue Sources are Fair, Equitable and Economically Sound
4. Is Balanced and Accountable
5. Is CEQA Compliant and Defensible
6. Provides for CEQA Streamlining and Protects Against CEQA Abuse

As a matter of process, it is recommended as follows:

- Extend the public comment period to allow a more full and fair discussion of the issues.
- Create an Issue Matrix of all recommendations to allow easier reference, for discussion and resolution.
- Share the Issue Matrix, including pros and cons with all subregions, COGs, stakeholders and the Regional Council.
- Highlight controversial issues for detailed discussion and consensus building.
- Seek strategies that emphasize empowerment and incentives rather than compliance and regulation.
- Set forth overarching disclaimers [local jurisdictions' reservation of rights] to clarify what the RTP/SCS is not. Focus on the legal implications of the RTP/SCS and PEIR.
- Reconcile reduction in greenhouse gases (GHG) with loss of gas tax revenues.
- Provide outreach and public information that contains standardized references, metrics and common denominators—materials that can be readily understood by local leaders, constituents and the consuming public.
- Emphasize the economic realities of existing transportation systems, and explain the need for, and alternatives for future improvements.

Thank you for the opportunity to provide input on this important process.

Very truly yours,



Robert L. Scott, Executive Director  
San Fernando Valley Council of Governments



# San Fernando Valley Green Team

4335 Van Nuys Boulevard, Unit 296, Sherman Oaks, California 91403  
Phone 818-512-0512, Fax 818-322-1343  
[www.valleygreenteam.org](http://www.valleygreenteam.org)

February 14, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

Re: Draft SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy  
San Fernando Valley Green Team Comments

Dear Ms. Lin,

This letter presents our comments on the Draft SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy. The San Fernando Valley Green Team is a non-profit organization made up of business, academic, legal, regulatory, financial, marketing, and government experts and community leaders committed to bringing green practices, jobs and business opportunities to the region. We strongly support the overarching goal of the SCAG 2012-2035 RTP/SCS to reduce Greenhouse Gas (GHG) emissions through transportation and land use planning. We also support strategies that meet this goal while improving regional conditions and quality of life.

It is apparent that a great deal of time and effort have gone into the preparation of the Draft 2012-2035 RTP/SCS and the interactive version provided on the website provides an excellent format for the community to access and comment on the plan. That being said, this is the first time that we are seeing all of this work pulled together and we believe that the public needs more time to effectively comment on the plan. We strongly recommend extending the comment period by 30-60 days.

The following are our initial comments regarding the Draft 2012-2035 RTP/SCS. A more thorough analysis and response will be prepared if the comment period is extended.

1. Increase investment in and give higher priority to mass transit projects, especially local projects that improve the accessibility, frequency, and convenience of public transportation for getting around within and between local cities. As can be seen from the Orange and Red Lines, people will use public transportation that meets these standards. We need more projects that reach more locations. We need to increase the capacity of existing projects, such as the Orange Line, to meet growing demand. And we need to improve access to other projects such as the Red Line.
2. Focus funding for highways and streets on maintenance rather than expansion. It is better to reach our goals through reductions in vehicle miles traveled (VMT) than through expansion of vehicle access. We don't even have enough money to maintain our existing streets and

highways. Why would we add more lane miles to these conditions? Let's focus on improving what we have before building more.

3. Integrate transit stops and bicycle racks/storage with local communities. Consider multi-use parking facilities that accommodate complementary parking needs, such as transit and high density residential. Enhance linkages between transit stops and nearby commercial districts. Considered preferred parking at rail stations for carpool and/or vanpool.
4. Develop tourism and entertainment oriented transit. Provide rail service between cities and tourism destinations with weekend schedules that enable day and weekend trips (i.e., early morning and evening service). Configure bus routes and transit schedules on weekends to connect restaurant and entertainment districts in the City of Los Angeles and enhance these linkages with shuttle and pedicab services between transit stops and entertainment districts, such as between the North Hollywood transit station and the nearby North Hollywood commercial district.
5. Change the mileage based fee for vehicles to a GHG based fee collected as part of the vehicle registration process. Paying this fee as part of registration rather than as fuel taxes, raises individual awareness of vehicle related GHG emissions and the fee can be tiered to further incentivize fuel efficiency and reduced VMT. The fee can be based on vehicle miles traveled times the miles per gallon rating of the vehicle to determine GHG emissions. For many automobiles the actual gas usage is already available in their navigation systems. For others, vehicle mileage can be reported annually and trued up at time of sale.
6. Increase funding for Active Transportation, First Mile/Last Mile, and Transportation Systems Management.
7. Determine the cost effectiveness of high-speed rail relative to GHG reduction, congestion reduction and number of passengers served and compare to the cost-effectiveness of other transit projects. Set a standard for cost-effectiveness and design projects to meet this standard or withhold funding.
8. Set a goal to reduce vehicle miles traveled within the region rather than facilitating driving.
9. Plan for the retention and expansion of manufacturing capabilities in the region. Local manufacturing is a critical component of sustainability. It is essential to providing good paying jobs for skilled workers and supports the regional economy by retaining capital in the community and contributing to a more stable tax base, it reduces GHG emissions resulting from transportation related to importing goods from overseas, it showcases the resources and skills of the region, and it stimulates innovation by providing an outlet for new ideas. The purchase of regional materials/labor is good for the economy and good for the environment. Encourage this type of development by enhancing rail transit to and from local manufacturing centers, protecting industrial areas from encroachment of incompatible land uses and developing strategies to facilitate the growth of sustainable local manufacturing.

Ms. Margaret Lin  
February 14, 2012

The San Fernando Valley Green Team is committed to the economic and environmental sustainability of the region and is looking forward to actively participating in the implementation of the final plan. Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Carolyn Casavan', with a long horizontal flourish extending to the right.

Carolyn Casavan  
President



# San Gabriel Valley Council of Governments

1000 S. Ferris Ave., Unit 42, Alhambra, CA 91803 Phone: (626) 457-1800 FAX: (626) 457-1285 E-Mail: SGV@sgvccog.org

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*Fifth District, LA County  
Unincorporated Communities*

*SGV Water Districts*

**EXECUTIVE DIRECTOR**  
Nicholas L. Conway

February 23, 2011

Hasan Ikhata  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

## **RE: SCAG's Draft 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)**

Dear Mr. Ikhata,

At its Governing Board meeting on February 16th, the San Gabriel Valley Council of Governments (SGVCOG) Governing Board adopted a position of "support" for the above mentioned alternative for the SCAG Draft 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS).

The draft RTP/SCS includes four alternatives. The San Gabriel Valley Council of Governments supports Alternative B as this Alternative best addresses future transportation needs and anticipated changes associated with future growth.

Should you have any questions, please contact Nicholas Conway at (626) 457-1800.

Thank you for your consideration.

Sincerely,

Angel Carrillo  
President



*Fostering the success of business to enrich the quality of life in the greater San Gabriel Valley*

## **San Gabriel Valley Economic Partnership Regional Transportation Plan Comments**

December 1, 2011

SGVEP applauds the ongoing leadership of the Southern California Association of Governments and the Regional Transportation Plan.

The San Gabriel Valley Economic Partnership would like to make the following comments on the Draft RTP Alternative B.

- The Partnership supports the Gold Line Foothill Extension the Montclair as a part of the RTP constrained plan.
- The Partnership supports the completion of the Alameda Corridor East in the constrained plan.
- America Fast Forward (30/10 initiative) addresses the need for improving the Los Angeles County transportation infrastructure quickly. Specifically, projects that the Partnership continues to support that are included in the 30/10 initiative are the Goldline Eastside Extension SR 60 alignment as well as the Goldline Foothill Extension, and the Regional Connector. We support leveraging the voter approved Measure R funds to complete the above projects in an expedited manner.
- Adding express bus service as a part of the proposed High Occupancy Toll Lanes network is imperative if the project is to be successful. Additionally, we ask SCAG to evaluate the Metro Express Lanes Project before committing to a regional High Occupancy Toll network.
- Addressing increased east west truck traffic in the San Gabriel is important. However, the East West Freight Corridor proposed in the RPT has not had sufficient public input. Many of our member cities are opposed to the project as they understand it today. We ask that SCAG take the time necessary to consult with the community before moving forward.
- The Partnership recognizes that declining gas tax will impact the maintenance of our highway system unless alternative revenue sources are available. We support studying evaluating other revenue options including one based on vehicle miles traveled to replace gas tax. However, we are aware that other agencies are evaluating new transportation fees as well such as the traffic mitigation fee proposed by METRO.



*Fostering the success of business to enrich the quality of life in the greater San Gabriel Valley*

During these difficult economic times, any new tax or fee could result in additional job loss. Economic impacts need to be considered before asking voters for any additional transportation funding.

- The Partnership supports SCAG evaluating the impact of using funds earmarked for High Speed Rail to improve the current regional Metrolink service.
- Highway 71 in Pomona is a bottle neck point in the San Gabriel Valley. The Partnership supports SCAG in their plan to change the highway from an expressway to a full freeway between I-10 and SR-60 with the addition of 1 mixed flow lane and 1 HOV lane in each direction as part of the constrained plan.
- The Partnership recommends the RTP include carpool lanes on the I-10 Freeway from Route 57 to downtown Los Angeles.



# SAN GORGONIO CHAPTER

4079 Mission Inn Avenue, Riverside, CA 92501 (951) 684-6203

*Regional Groups Serving Riverside and San Bernardino Counties: Big Bear, Los Serranos, Mojave, Moreno Valley, Mountains, Tahquitz, Santa Margarita*

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)

February 8, 2012

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). The San Gorgonio Chapter – Sierra Club is based in Riverside, California.

Our mission is: **To explore, enjoy, and protect the wild places of the earth; To practice and promote the responsible use of the earth's ecosystems and resources; To educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives.**

Our organization represents approximately 5000 member/residents in San Bernardino and Riverside Counties. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR).

We are pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is an excellent first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership.

Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas **that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of *critical habitat* to mitigate impacts related to future transportation projects" [emphasis added].** We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the language to incorporate all "important habitat lands."

**On page 78 of the Draft 2012 RTP/SCS**, the document mentions the 2008 Regional Comprehensive Plan that inventoried protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park and recreation areas. We were pleased that SCAG completed this Plan showing what areas are protected and critical to maintaining functioning habitat reserves. We agree that the planning efforts SCAG undertakes in the future should involve updating the maps, but recommend expanding the language in this section to include all forms of protected lands. By limiting the acquisition and management opportunities of conservation lands to just Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) areas, decisions about priority conservation areas will be misinformed. In fact, it no longer demonstrates a comprehensive plan because of the limited scope (of pre-established mitigation sites, which are likely unrelated to transportation projects). Protected areas (e.g., National Forests, State Parks, Regional Parks, etc.) not in an NCCP/HCP are excluded from the big picture, yet they have extensive benefits to the entire open space system and often times link important habitat areas throughout the region. Consequently, we recommend having this updated map and mitigation site locations expanded to include more than just NCCP/HCP areas and instead include all levels of protected lands (federal, state, regional, and local).

**On page 79 of the Draft 2012 RTP/SCS**, we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use decisions. We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Unfortunately, we noticed the lack of inclusion of **wildlife linkages in this section. Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well.**

**We appreciate SCAG's effort to create a strategic planning process that would document important conservation lands in the region.** We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values, historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this policy. In addition, **we request to be included on any notifications (electronic or otherwise) about this policy's** creation and implementation, please send information to [kimffloyd@fastmail.fm](mailto:kimffloyd@fastmail.fm) .

Sincerely,

Kim F. Floyd  
Conservation Chair  
San Geronio Chapter – Sierra Club  
760-680-9479

Printed on Recycled Paper. ....To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness.



**Date:** *via Fax (213) 236-9689*  
February 14, 2012

02-14-12 19:02:00 ROY

**To:** Margaret Lin  
Southern California Association of Governments – SCAG

**From:** Jerry J. Paresa, Chief Administrative Officer  
San Manuel Band of Mission Indians  
26569 Community Center Drive, Highland, California 92346  
(909) 864-8933

**Attached:** Comments to Draft SCAG 2012-2035 Regional Transportation Plan  
Sustainable Communities Plan and Preliminary Environmental  
Impact Report

**Pages:** Cover + 3

————— *San Manuel Band of Mission Indians* —————

February 14, 2012

Mr. Jacob Lieb  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: San Manuel Band of Mission Indians – Comments to Draft SCAG 2012-2035  
Regional Transportation Plan Sustainable Communities Plan and associated  
Preliminary Environmental Impact Report

Dear Mr. Lieb:

The San Manuel of Band of Mission Indians ("Tribe"), a federally recognized Tribe, wishes to express its appreciation to the Southern California Association of Governments (SCAG) and Mr. Arnold San Miguel for the February 8, 2012 briefing on the Draft SCAG 2012-2035 Regional Transportation Plan Sustainable Communities Plan (RTP/SCP) and associated Preliminary Environmental Impact Report (PEIR). The Tribe appreciates the opportunity to comment on SCAG's Regional Transportation Plan as San Manuel actively participates in and supports community and regional economic and social initiatives. The Tribe supports long range planning that employs a sustainable-community approach to transportation projects and in land use, open space and preservation of biological and cultural resources. As a Serrano people whose ancestors inhabited a large area of San Bernardino County, the Tribe maintains a close spiritual relationship to many important cultural places in the landscape and feels a keen stewardship for the protection and preservation of these places. It is with this obligation in mind that the Tribe actively engages in consultation and preservation efforts for cultural resources throughout San Bernardino and other Southern California counties.

The Tribe believes that it is essential that SCAG and other regional agencies establish a meaningful and timely consultation process with the Tribe in accordance with the unique legal relationship existing between the United States and Indian Tribal governments set forth in the Constitution of the United States, treaties, statutes, Executive Orders and court decisions and the trust relationship of the United States and Indian tribes. The Tribe looks forward to working with SCAG in order to implement this consultation.

The Tribe's experience has shown that regular and meaningful consultation, including a meaningful and timely process for seeking, discussing and considering carefully the views of others and seeking agreement when possible in a manner that is cognizant of the cultural values and legal rights of all parties is most effective. Moreover, whenever appropriate, the use of "certified Native American monitors" (persons who are certified by a recognized institution to

monitor archaeological resources with specific knowledge in local ancestral California Native American village sites and cultural practices), may prevent costly delays and offer unique opportunities to contribute to all parties' efforts to preserve and promote an important part of cultural history.

The Tribe offers the following comments and language to the 2012-2035 RTP/SCS Draft PEIR 3.4-22 Mitigation Measures, which strengthen the processes for protection of cultural resources:

MM-CUL5. Language added as follows: ...NAHC to determine whether known sacred sites are in the project area and identify the Native American(s) and *Native American tribes (added)* to contact to obtain information about the project site. Add: *It is strongly recommended that federal and state lead agencies and cities and counties require that a check of the NAHC sacred lands files be undertaken in all projects and that the Native American tribes or individuals identified by the NAHC(GI)(AM) be contacted by project proponent for further information and consultation on the project.*

MM-CUL6. Add: *It is strongly recommended that state and federal lead agencies and cities and counties require that a qualified archaeologist conduct a record search at the appropriate Information Center in all projects.*

MM-CUL7. Add: *It is strongly recommended that state and federal agencies and cities and counties conduct a phase I archaeological or historic architectural survey for all projects that have not been previously surveyed or have been surveyed within the last 10 years.*

MM-CUL-8. Add: *It is strongly recommended that state and federal lead agencies and cities and counties require that a certified Native American monitor be employed by the project proponent or tribe to monitor the subsurface operations or any earth movement in all projects. It is also strongly recommended that a pre-excavation agreement be implemented with culturally affiliated tribes.*

MM-CUL9. Add: *Avoidance is the preferred alternative. If avoidance is not feasible, it is strongly recommended that state and federal lead agencies and cities and counties require that the project sponsors consult with culturally affiliated Native American Tribes in the determination of importance of the resource.*

MM-CUL10. Add: *It is strongly recommended that state and federal lead agencies and cities and counties require that the project sponsors consult with culturally affiliated Native American Tribes in the determination of importance of the resource.*

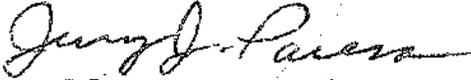
MM-CUL17: Add: *SCAG shall engage in government-to-government consultation with Indian tribes in development of the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, per the laws set out in 3.4.-1 - 3.4-5, California Senate Bill 18 (Government Code 65300 et seq) and in accord with the unique legal relationship existing between the United States and Indian Tribal governments set forth in the Constitution of the United States, treaties,*

*statutes, Executive Orders and court decisions and the trust relationship of the United States and Indian tribes.*

The Tribe appreciates your consideration of the proposed policy language as presented above as well as the opportunity to continue the government-to-government dialogue. Please do not hesitate to contact me if you have any questions.

Very truly yours,

SAN MANUEL BAND OF MISSION INDIANS



Jerry J. Paresa

Chief Administrative Officer

JP:AM:cjt

**SANTA MONICA MOUNTAINS CONSERVANCY**

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January 23, 2012

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

**2012-2035 Regional Transportation Plan and Sustainable Communities Strategy  
Draft Environmental Impact Report, SCH # 2011051018**

Dear Mr. Lieb:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State open space planning agency in Los Angeles and eastern Ventura Counties, comprising a substantial portion of the Southern California Association of Governments (SCAG) region in both land area and population. The Conservancy is primarily concerned with habitat loss resulting from many past decades of urban expansion and therefore promotes compact growth in existing urban areas to minimize future resource loss. Thus, the Conservancy shares many of SCAG's newfound regional objectives and looks forward to shaping growth in Southern California in a more sustainable and land-efficient direction.

The Conservancy's secondary interest is in creating an interconnected network of visitor-serving parkland that provides access to natural areas for all residents within the Conservancy Zone. As such, the Conservancy has a particular focus on multi-benefit projects such as river parkways that serve recreation, transportation, health, and economic development objectives while improving quality of life. The Conservancy is a major funder of revitalization efforts along the Los Angeles River and Ballona Creek. These river and trail corridors deserve a prominent place in regional transportation and land use plans in accordance with their multiple benefits.

The Conservancy has reviewed the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Draft Program Environmental Impact Report (PEIR) and offers the following comments in relation to our planning jurisdiction.

### **Avoidance of Growth in Resource Areas**

The RTP/SCS generally steers growth toward more compact forms in already urbanized areas, making efficient use of existing infrastructure and reducing impacts to resource lands. The policy decisions contained within the SCS are projected to save 408 square miles of nonurban land over the life of the plan. If realized, these gains are certainly an achievement, although there is no projection of where this growth will not occur and what mechanisms will preserve the land in perpetuity.

The lack of specificity makes it difficult for the Conservancy to evaluate the impacts of the proposed plan. While the projections are intended to be a meta-analysis of regional economic trends rather than a location-specific analysis of growth patterns, SCAG is clearly making assumptions about where development on resource lands is and is not appropriate. This process is not transparent. For example, the Regional Housing Needs Assessment (RHNA) assigns population targets for different subareas of the region, which are then used to justify additional development whether or not it is consistent with stated goals to encourage compact development within existing urban areas. Newhall Ranch has used the RHNA targets as the basis for its massive expansion into open space areas west of Santa Clarita, resulting in unmitigable habitat and connectivity loss. At least Newhall Ranch is contiguous with the existing Santa Clarita urban area. SCAG appears to endorse the proposed Centennial development at Tejon Ranch by projecting housing demand in the area--no doubt a self-fulfilling prophecy--despite flagrant inconsistency with SCS objectives. These decisions serve as the basis for urbanization of resource lands, yet are not made in consultation with resource agencies. With the understanding that land use authority belongs to local jurisdictions, a truly comprehensive regional plan would transparently set growth parameters in concert with resource conservation goals to eliminate these apparent contradictions. Projecting growth in resource areas sets in motion policies that induce that growth; therefore great care must be taken to ensure such growth meets regional objectives.

### **Wildlife Crossings of Transportation Facilities**

The Conservancy appreciates SCAG's recognition of the impact that linear transportation facilities have on natural areas and the need for well-designed wildlife crossings to partially mitigate these effects. Wildlife crossings serve two distinct purposes: reducing mortality and preserving genetic connectivity. Roads are the leading direct source of human-caused mortality for most species in Southern California and the entire country. They can become a population sink if a significant fraction of a local species is killed, affecting broader population distribution across the landscape. Additionally, for highly mobile predators,

individuals crossing roads are frequently dispersing from their home range in search of new territory and mates, a vital population dynamic that is devastating if interrupted. National Park Service research has documented significant genetic differences among carnivore populations on either side of the 101 Freeway in the Santa Monica Mountains.

Wildlife crossings need to be discussed in the context of habitat connectivity, which is the broader ecological goal for conservation areas. Wildlife crossings are but one critical tool to ensure that indicator species are able to safely move about their environment. The Conservancy has partnered extensively with the National Parks Service, U.S. Geological Survey, and UCLA to research movement corridors in Southern California, with an emphasis on our core jurisdiction in the Santa Monica Mountains, Simi Hills, Santa Susana Mountains, San Gabriel Mountains, and Verdugo Mountains. While much has been learned about movement patterns in these areas and the way in which key transportation facilities create genetic barriers to connectivity, the measures that might mitigate these impacts have not been thoroughly researched. Wildlife corridor design is a field in its infancy with few scientifically verified best practices for crossing dimensions and landscape features. Given that this research is needed to properly mitigate transportation impacts, SCAG should invest in connectivity research with a program specifically designed to establish measures that can be incorporated into the 2016 RTP revision. Such a program would aggregate existing research, propose new study areas, and develop design best practices specifically tailored to the Southern California eco-region.

### **Environmental Mitigation Program**

SCAG has identified the need for a regional Natural Lands Acquisition and Open Space Conservation Strategy to protect remaining resource lands and mitigate for impacts from transportation improvements. The Conservancy looks forward to working with SCAG on the development of such a strategy. In addition to mitigation banking, transfer of development rights, and payment of in-lieu fees, the Conservancy recognizes conservation easements as a powerful preservation tool for habitat areas. Conservation easements should be listed in the plan alongside the other preservation mechanisms.

The Conservancy has supported the establishment of transfer of development rights (TDR) programs in multiple updated general plans as a potentially useful market-based preservation mechanism that supports regional density goals. SCAG should take a leadership role in setting guidelines and best practices for these new county and municipal programs as well as explore the creation of a regionally unified TDR program.

### **High Quality Transit Areas and CEQA Streamlining**

SB 375 provides that developments that are consistent with the Sustainable Communities Strategy be rewarded with a streamlined CEQA process in order to incentivize dense developments in appropriate locations near transit. While the Conservancy is generally wary of processes that weaken CEQA protections, the law's narrow provisions are appropriate in this instance. However, SCAG's designated High Quality Transit Areas (HOTA) are overly broad with a low threshold of minimum transit service (15-minute frequency only during weekday peak) to qualify for the exemption. This threshold is not sufficient to attract significant mode share that would justify the CEQA exemption, as the off-peak headways in most of these "high quality" areas are likely not adequate to facilitate a car-light lifestyle in most of the designated HOTA corridors.

Of greater concern to the Conservancy, judging from the available HOTA maps, SCAG's methodology appears to reward proximity to transit lines rather than transit stops or stations. This creates absurd outcomes where properties are given an incentive to densify even if they are not serviced by transit or topographically suitable for urban development. Many of the "high quality" lines are actually point-to-point express buses run on the freeways. Within the Conservancy's area of interest, the Sepulveda Pass, Cahuenga Pass, and Conejo Grade corridors fit this description. This methodological problem could be corrected by excluding freeway service (which is not favorable for transit-oriented development anyway) from HOTA designation and by determining the quality of transit based on off-peak frequency, which is a better indicator of whether it supports the intended urban lifestyle.

### **River Parkways and Active Transportation**

As mentioned previously, the Conservancy is interested in urban river projects for their multiple recreational, environmental, and transportation benefits. The RTP/SCS should fully fund build-out of these active transportation corridors throughout the region. When well designed, these facilities serve as "bicycle freeways" connecting various parts of the region with uninterrupted travel for nonmotorized users. For this reason, the Los Angeles River trail featured prominently in the "Carmageddon" race between Jet Blue and a group of elite bicyclists from Burbank to Long Beach. Separated from traffic, such facilities are also inviting for bicyclists of all ages and abilities, which is necessary to attract substantial mode share away from automobiles. The draft Los Angeles County Bicycle Master Plan, among others, calls for build-out of the river trail system and includes preliminary cost estimates.

The RTP/SCS calls for \$6 billion over the next two decades for active transportation investments, which seems low when compared to the identified need in local bike and pedestrian plans. Given the central role active transportation plays in meeting regional planning objectives, funding levels should be set based on full build-out of local bicycle and pedestrian plans, with an appropriate amount projected for those jurisdictions that have not yet completed such plans. The currently proposed funding level does not appear to be rooted in such a need-based assessment. It is not adequate to simply compare the proposed expenditures with past levels independent of a needs assessment.

In addition to the total funding level, the proposed timing of active transportation investment is inadequate. Only 20 percent of the proposed expenditures would occur during the first 15 years of the 25-year planning period, leaving the vast majority of expenditures for the highly speculative future and of little use to current residents. Transit and transportation demand management are similarly back-loaded with only highway-related investments receiving funding priority in the near term. These non-highway investments are the ones most likely to generate greenhouse gas emissions savings, among other benefits, and the earlier they are made the longer the benefits can accumulate. The proposed expenditure plan runs directly counter to the stated emphasis of the SCS.

Active transportation projects, including the river parkways, are suffering for lack of funding. The most visionary plans, such as the City's Los Angeles River Revitalization Master Plan, require extensive funding to come to fruition and provide their multiple benefits. Planning is well underway, but capital dollars are in short supply for these projects. Furthermore, achieving greenhouse gas reduction and air quality goals requires early mode shift to maximize cumulative benefits over the life of the plan. The Conservancy suggests that the plan's funding priorities be reversed to immediately fund active transportation investments at a sufficient level to achieve build-out of the region's bicycle and pedestrian networks in the near and medium term. Such a change would make the RTP more consistent with the land use and mode share objectives outlined by the SCS, the intent of SB 375.

### **Environmental Justice and Public Health**

Like SCAG, the Conservancy takes its commitment to environmental justice seriously as a State agency. The Conservancy is therefore delighted to see equal access to parks, one of its core missions, considered as a performance measure for environmental justice. The SCAG model does not currently include programs intended to ameliorate these access issues, such as the Mountains Recreation and Conservation Authority's (MRCA) Transit to Trails

program. Given the inherent remoteness of open space parkland, it is likely infeasible to run regular transit service to most parks. The highly successful Transit to Trails fills this gap, but is perpetually underfunded in comparison to the access demand. Funding for such programs from SCAG transportation funds would be appropriate mitigation for impacts to environmental justice populations.

Part of embracing environmental justice as a core mission includes looking holistically at issues that affect the community. Poor air quality is not the only impact from a transportation system that is overly reliant on cars. Obesity and related illnesses are a direct result from community design that does not allow for safe opportunities to walk and bike for everyday transportation. The RTP/SCS should therefore include obesity-related health outcomes as a performance measure for the regional transportation system. The currently unequal health outcomes will require targeted investments in disadvantaged communities to create active transportation networks that provide access to services, jobs, schools, and parks. River parkways directly address this need by providing bikeways through many of the poorest communities in the region.

Additionally, the safety performance measure appears to discount the health benefits of active transportation while overstating risks. SCAG methodology rewards shifts to "safer" modes, but uses datasets that penalize pedestrians and bicyclists for being hit by cars. This methodology would discourage investments that increase active transportation when it is precisely these investments that address the safety issues faced by those bicycling and walking on public streets. The methodology further does not include the well-documented "safety in numbers" phenomenon that decreases risk for active modes the more people utilize them. Likewise, it does not consider improved public health outcomes that have been calculated to more than offset risk. The poor safety performance of walking and bicycling modes is justification for increasing investment in active transportation, particularly separated facilities for bicyclists.

## **Comments on Proposed PEIR Mitigation Measures**

### *Biological Resources and Open Space*

The PEIR includes many mitigation measures for potential impacts to biological resources. Overall, these measures are comprehensive and based on sound practice. Inclusion of the proposed mitigation measures in project selection and design will greatly improve ecological outcomes in the SCAG region compared to a baseline scenario. The specific measures

calling for minimum mitigation ratios reflect current accepted practices without limiting the discretion of resource agencies to require greater mitigation if warranted.

The proposed measures addressing habitat fragmentation and connectivity are thorough and appropriate (MM-BIO/OS36 through MM-BIO/OS40). These impacts have been all too often unmitigated for transportation projects in the past.

The Conservancy looks forward to collaboration on regional conservation planning policy to address cumulative impacts to biological resources (MM-BIO/OS45). The Conservancy's joint powers partner MRCA administers highly successful restoration and preservation mitigation programs in close coordination with state and federal resource agencies. SCAG's planning and funding expertise is a welcome addition to ongoing efforts. The Conservancy requests an invitation to participate in this process.

The primary impact from transportation facilities is often the indirect and cumulative impact from growth induced by new improvements. As projects increase access and reduce commute times from remote areas, these resource lands become economic to develop. The Conservancy is therefore pleased to see SCAG recognize these impacts and call for their mitigation (MM-BIO/OS47). Without appropriate growth management along transportation corridors, wildlife crossings cannot mitigate connectivity impacts from expanding development footprints. Furthermore, induced growth along new corridors often negates the benefits of new transportation capacity, prompting even greater impacts from future facility expansion. SCAG should develop best practices that would be applicable to new transportation corridors such as the High Desert Corridor to prevent new development from extending into resource lands.

#### *Land Use and Agriculture Resources*

As stated previously, the Conservancy is encouraged to see transfer of development rights programs included in the RTP/SCS (MM-LU16). Los Angeles County and several municipalities in the Conservancy's jurisdiction are including programs in their respective general plan updates. SCAG should provide technical assistance and facilitate interjurisdictional transfer programs among member governments as appropriate.

The Conservancy is pleased to see strategic planning that encourages recreational access to natural lands be coupled with efficient land use strategies to preserve these lands (MM-LU25 and 26). Location-efficient and compact development is better for the economy and

environment by reducing infrastructure costs, increasing tax revenues per acre, and reducing consumption of agricultural land and habitat.

Urban growth and service boundaries are a critical tool local jurisdictions have to protect resource areas within greenbelts (MM-LU42). The Conservancy strongly supports efforts by local jurisdictions to establish such policies. SCAG should promote best practices in greenbelt planning and facilitate interjurisdictional collaboration to protect resource areas that separate discrete urban communities. The Conservancy notes that effective policies restrict densities to no more than one dwelling unit per ten acres outside of urban growth boundaries. Densities above this threshold begin to affect resource values, particularly habitat connectivity and sensitive species. One unit per ten acres is an appropriate maximum density to reduce the proliferation of "ranchette" developments that highly fragment habitat in rural areas.

The Conservancy supports using variable development fees as an economic incentive to direct growth to desired areas. In particular, increasing impact fees for development in greenfield areas would recognize the resource impacts of such developments while rewarding new developments that minimize the burden on public infrastructure by locating in existing urban areas (MM-LU81). Such fees would need to be considerable to actually have an effect on land economics at the regional scale. SCAG should undertake an economic analysis to determine what level of fees would be required to achieve regional growth objectives.

#### *Public Services and Utilities*

The PEIR lacks a public safety mitigation measure that promotes project design that minimizes urban-wildland interface, which is the source of wildfire risk to persons and property. Past development patterns include long, meandering urban edges with high risk exposure to catastrophic events, causing great strain on local and State firefighting resources largely subsidized by those living in lower risk locations. A mitigation measure should include two components addressing both project location and project design. First, development that extends into high fire hazard areas should be discouraged. Second, there should be an emphasis on utilizing project design strategies to reduce risk, such as building within compact and defensible footprints and minimizing perimeter length. Projects should be sited in order to reduce impacts of required brush clearance on native habitat areas, including adequate buffers to protect sensitive resources from brush clearance impacts. The draft Los Angeles County Significant Ecological Area Ordinance contains model language to this effect.

The Conservancy concurs that project sponsors and local jurisdictions should work to increase public access to open space (MM-PS21 and 26). River parkways and other urban natural parks serve a vital purpose in connecting urban residents to natural parkland (MM-PS22). The City and County of Los Angeles have both recognized these projects in master plans for their respective river corridors. While planning for these projects is the responsibility of local jurisdictions and partners, SCAG has a critical responsibility for funding by including bikeway projects in the RTP.

Regional partnerships are necessary to achieve open space conservation objectives (MM-PS29). The City of Santa Clarita partnered with the Conservancy to form the joint powers Santa Clarita Watershed Recreation and Conservation Authority, an example of the kind of local partnership that should be encouraged throughout the region. The City of Santa Clarita brought to the table a local assessment that can be used for open space acquisitions outside the City boundaries to establish a continuous greenbelt for its residents to enjoy. As previously mentioned, the Conservancy welcomes SCAG's assistance with planning and identifying funding sources for open space acquisition (MM-PS31 and 34). SCAG's participation in coordinating regionally significant trail networks is also appreciated, however the greatest contribution SCAG could make to these efforts would be including those greenways that serve transportation functions, such as the river parkways, in the RTP so that they can be fully developed in the short and medium-term (MM-PS33). SCAG should focus on projects that close gaps in regional networks, such as the bikeway gap from Riverside Drive to Vernon along the Los Angeles River through downtown, and projects that provide connectivity across jurisdictional boundaries.

Regarding renewable energy development projects in open space areas, the Conservancy concurs that it should be allowable, but with careful attention paid to biological and visual resources to ensure compatibility and minimal impacts (MM-PS98). The constraints analysis approach outlined is an appropriate framework for renewable energy decisions (MM-PS97).

### *Transportation*

As previously mentioned, the Conservancy plays an active role in developing bicycle and pedestrian trails that access parks and open space (MM-TR42). The Conservancy looks forward to SCAG support and urges that ample funding be provided for full build-out of the planned river parkway system, combining transportation and recreation functions to improve the quality of life for Southern California residents. These parkways often connect with schools, parks, libraries, and other community facilities (MM-TR43). Such connections should be enhanced through regular transportation improvements and the development of

Mr. Jacob Lieb, Southern California Association of Governments  
2012-2035 Regional Transportation Plan and Sustainable Communities Strategy  
January 23, 2012  
Page 10

regional and local networks of multi-use trails with adequate end-of-trip facilities (MM-TR78).

### *Water Resources*

The Conservancy believes that preservation of remaining riparian resources should be the highest priority at both the regional and project level, followed by restoration of previously impacted areas (MM-W1 and 9). To the extent feasible, natural methods for stormwater control, water quality improvements, and infiltration should be encouraged.

SCAG sets an appropriate standard that new projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters (MM-W22). When evaluating projects during the environmental review process, SCAG should identify regionally significant projects that may impact downstream waters and include comments to that effect in NOP and EIR responses. This is a critical issue wherever natural rivers interact with urban areas, such as the Santa Clarita Valley in the Conservancy's area of interest. Recent approval of the Landmark Village of Newhall Ranch did not meet this standard of ecological sustainability, threatening the natural hydrogeomorphology of the Santa Clara River by elevating the 100-year flood plain and armoring the natural banks along the development's edge. SCAG should participate in the development of models of natural processes for the remaining natural rivers in the SCAG region to ensure that environmental review can comprehensively evaluate project impacts based on the best available information.

Thank you for your consideration of these comments. If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200, ext. 128.

Sincerely,



ELIZABETH A. CHEADLE  
Chairperson

2012 RTP Comments

Walter Siembab, Siembab Corporation

February 14, 2012

Comments: Telecommuting in the 2012 RTP

Despite its relative low capital cost and high cost-effectiveness, telecommuting remains in 2012 a marginal strategy for reducing GHG emissions and congestion.

The 2012 RTP could lay out the path by which telecommuting could reach its potential, particularly in an RTP with such a gigantic revenue shortfall. But it doesn't.

Table 4.5 of the SCS lists only one specific telecommuting action/strategy, and it will do nothing to change the marginal role of telecommuting over the next 4 years.

"Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options."

The discussion of Telecommuting/Work-at-Home in the TDM Appendix is equally unhelpful, focusing on barriers to telecommuting and mentioning a few policies to overcome those barriers, none innovative nor likely to make a difference.

One of the basic problems with telecommuting in the 2012 RTP (and previous RTPs) is that the strategy is treated as a member of the TDM family of policies.

However, among all the TDM options, only telecommuting mimics land use. Telecommuting, like other network applications associated with "distributed organizations" (such as tele-medicine, e-retail, distance education, etc), can affect the location of destinations. For example, portions of auto-oriented employment centers can be strategically re-located into walking neighborhoods. In other words, telecommuting can impact the spatial distribution of functionality. It is really a way of implementing "location efficiency."

Beyond that conceptual revision, there are a number of strategic options that should be added to the 2012 RTP.

Goal should be for every employee except for those involving physical materials-handling or other hands-on activity (like truck driving) to expect some to be offered some telecommuting option; with every employer expected to authorize an alternative work site within 4 miles of every eligible employee's home. This is consistent with

existing travel patterns to other destinations; is compatible with short-range electric vehicles; and will reinforce the “neighborhood oriented development” (NOD) strategy.

Four initiatives are required to reach that goal.

### 1. Regional Telework Facilitator

Public agencies trying to encourage the telework strategy tend to do so through corporate demonstration programs. The AQMD recently funded such a program which is in process today. Demonstration programs have been repeatedly found to produce short term but not long term results. When the funding goes away, the active teleworkers begin to decline back to pre-demonstration levels.

Establishing the institutional infrastructure that will support telework in the long run is the most effective step that could be taken. Similar to the old “Commuter-Computer” for ride sharing, this regional organization would market the telework option (in all of its varieties – home based, satellite, shared work center, network access center, etc.) to employers. Other tasks include maintaining best practices, offering first line technical assistance, and making referrals to implementation consultants.

A five year public commitment would be best, giving the organization the opportunity to develop a business plan in order to continue operating with a minimal public subsidy. Technology firms with products used in telework are good candidates to serve as private partners.

### 2. Opinion Leaders

Elected officials, public sector executives plus leading private CEOs committing their own organizations to an aggressive telework program is also essential. The organizations and their commitments should have a high profile. The practice should also include the full range of distributed applications such as distance education, telemedicine, e-retail, etc. The Regional Telework Facilitator should organize and maintain this public-private leadership council.

### 3. Telework Facilities Exchange

The Telework Facilities Exchange (TFX) was a work-station sharing program for government employees that I designed and implement in the mid-1990s, sponsored by the League of California Cities and funded by the SCAQMD. Government employees (city, county, state, federal) were matched to a vacant work station in another government building near their residence. It was, at the time, the largest multi-

jurisdictional telework program in the nation. The planning and advocacy function of the project was the prototype Regional Telework Facilitator.

#### 4. Network Access Centers

Network Access Centers (NAC) are a new type of public facility that will contribute to transportation access, economic development, and education. A NAC is a multi-function, multi-user facility that provides technical assistance, fast network connections, information technology, work stations, meeting space, and special programs that include distance education classes, tele-medicine consultations and so forth. A NAC is essentially a programmable building whose functionality can be changed hour by hour, day by day to satisfy community need for travel.

NACs should be added to transit stops (especially multi-mobility hubs), public schools, public libraries, neighborhood centers, and downtown districts.

The Blue Line TeleVillage in Compton, funded by Metro in the late 1990s, established proof of concept in LA County. Yet it was not replicated.

With institutional infrastructure like the Regional Telework Facilitator, physical infrastructure like NACs, and programs such as the TFX, telework will become a significant employment option throughout the region.



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April 20, 2011

SANDAG Board of Directors

Via E-mail: [pjo@sandag.org](mailto:pjo@sandag.org) (Phillip Johnston)

**Re: California Air Resources Board (CARB) Greenhouse Gas (GHG) Reduction Targets, Issued to SANDAG, in Accordance with SB 375, for the Year 2035**

**SANDAG Board Chair Jerome Stocks and Members of the Board:**

I appreciate the opportunity to communicate with you concerning this important topic.

The subject targets were issued on September 30<sup>th</sup> of 2010. On September 20<sup>th</sup>, I sent a letter to CARB<sup>1</sup> asking them to issue targets that would uphold the Executive Order S-3-05<sup>2</sup> GHG reduction trajectory, for cars and light-duty trucks. CARB's Scoping Plan gives no reason to not apply the straight-line trajectory, implied by the S-3-05 reductions, to the GHG emissions from cars and light-duty trucks. S-3-05 names CARB as one of the agencies that must create plans and progress reports to ensure that the reductions in S-3-05 are achieved.

Unfortunately, CARB gave you (SANDAG) the Year 2035 reduction that you (SANDAG) requested, which is only a 13% reduction, for year 2035.

**“GHG” is really “VMT” and Other Important Details on the Reductions**

These reductions are per capita, with respect to *driving* in 2005. This can be understood by carefully considering the following two items:

- 1.) Page 8, of [http://arb.ca.gov/cc/sb375/staffreport\\_sb375080910.pdf](http://arb.ca.gov/cc/sb375/staffreport_sb375080910.pdf), which says, “The RTAC recommended that targets be expressed as a percent reduction in per-capita greenhouse gas emissions from a 2005 base year”; and
- 2.) The first footnote in the table of CARB calculations, <http://arb.ca.gov/cc/sb375/mpo.co2.reduction.calc.pdf>, which says: “The CO2 emissions presented in this table do not include reductions from Pavley and LCFS regulations.”

“Greenhouse gas (GHG)” emissions are used as equivalent to the more accurate “CO2 emissions.” In the second item, “Pavley” (named after Senator Fran Pavley) refers to a lowered average CO2 per mile driven. Also in the second item, “LCFS” refers to the “Low Carbon Fuel Standard”. Both “Pavley” and the “LCFS” reduce the emissions per mile driven. Since these reductions are not being counted, the reductions shown come only from per capita, percent reductions in driving, or “vehicle miles travelled”, VMT. Therefore the so-called GHG reductions are really VMT reductions.

<sup>1</sup> The letter is Reference 1, listed at the bottom of this letter and attached in the email with this letter.

<sup>2</sup> S-30-05 is shown in Reference 2, listed at the bottom and attached in the email with this letter.

## More Background Information

In 2007, you (SANDAG) adopted your current Regional Transportation Plan (RTP). It includes a 38% increase in the total number of freeway-lane miles, in San Diego County. My job as Transportation Chair for the Sierra Club is to stop all freeway expansions, as specified in our National Policy. Our Chapter has commented extensively on the I-5 expansion Draft Environmental Impact Report. As you know, it would add either 4 or 6 lanes, to an eight-lane freeway, over a length of 27 miles.

You (SANDAG) are now in the process of approving a new RTP, with even more freeway expansions. However, your staff now claims that by Year 2035, they will reduce GHG (really VMT, as explained above) from cars and light-duty trucks by 19%. You (the SANDAG Board) and staff can therefore claim, correctly, that you are going to exceed your CARB target, for Year 2035.

However, the GHG reductions of S-3-05 must be achieved by mankind, if we are to have any reasonable chance of stabilizing our climate. A destabilization will likely have disastrous environmental and human consequences.

The purpose of this letter is to show you that the GHG (really VMT) reduction achieved must be at least 35%, not the 13% given by CARB and not the 19% that your staff now claims they can achieve by 2035.

## Overview of Relationships and Derivation of Key Formula

The S-3-05 net reduction in GHG emissions, from cars and light-duty trucks, expressed as a fraction of 2005 emissions, is obtain by multiplying four factors together. The definitions of Table 1 apply.

**Table 1                      Factor Definitions, with Respect to Year 2005**

<b>Factor Definitions</b>	
<i>All are for for the year of interest, with respect to year 2005 values. Except for Population, all are for cars and light-duty trucks.</i>	
<b>f</b>	<b>net factor of the emissions of Greenhouse Gas</b>
<b>f_Pavley</b>	<b>factor of the average statewide mileage</b>
<b>f_Fuel</b>	<b>factor of the reduction of GHG due to fuels that burn less carbon</b>
<b>f_Population</b>	<b>factor of the population in the region of interest</b>
<b>f_PerCapitaVMT</b>	<b>factor of per capita driving</b>

The following equations apply.

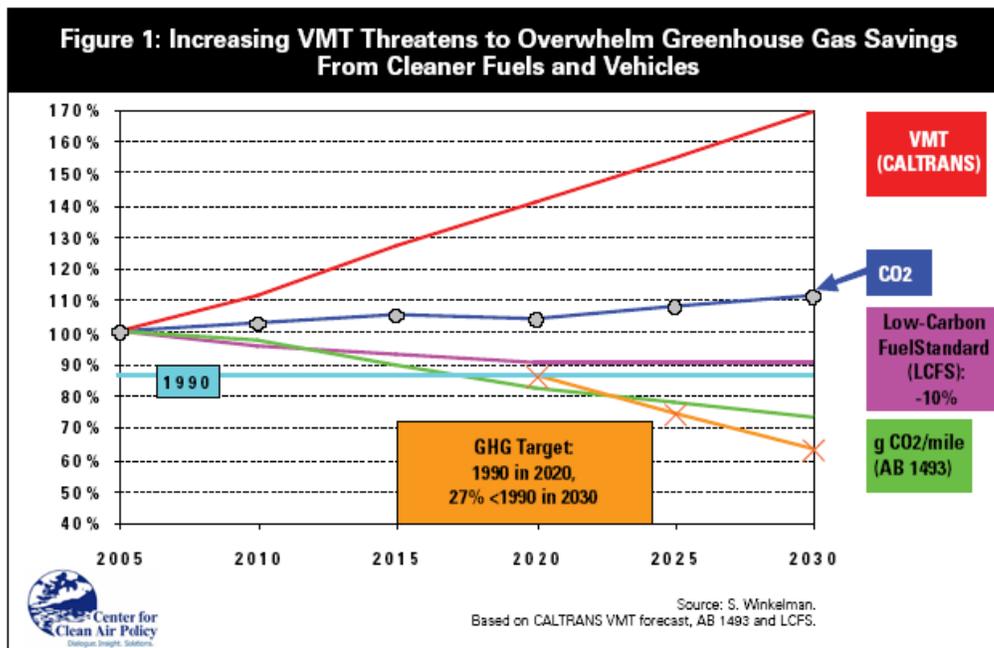
**Eq. 1**     $f = f_{Pavley} \times f_{Fuel} \times f_{Population} \times f_{PerCapitaVMT}$

Eq. 2 is derived from Eq. 1.

**Eq. 2**     $f_{PerCapitaVMT} = f / ( f_{Pavley} \times f_{Fuel} \times f_{Population} )$

Figure 1 is from <http://www.nrdc.org/globalWarming/sb375/files/sb375.pdf>, a widely-respected report on SB-375. Note that all of its values are in the units of factors (same as fraction) of their values in year 2005. Figure 1 will supply all of the needed values, except for the factor of population. (Neither the red line nor the blue line are used.) Its gold line is the S-3-05 trajectory that CARB ignored when it issued the driving reduction values for year 2035.

**Figure 1** GHG Reductions from Pavley (AB 1493, in Green); the Low Carbon Fuel Standard (in Purple); the Predicted Driving (VMT, in Red); the Net Result of GHG (CO2, in Blue); and & the S-3-05 Trajectory (in Gold)



### Getting the Net Factor of the Emissions of Greenhouse Gas in 2035, with Respect to 2005 Values

To get the net factor of the emissions of GHG, for year 2035, and with respect to year 2005, it is necessary to extrapolate the Governor’s Executive Order target values (the gold line of Figure 1), out to year 2035. The gold line shows that this factor is 0.87 in 2020 and is 0.64 in 2030. Therefore, in year 2035, the factor will be

$$0.64 + [(0.64 - 0.87) / (2030-2020)] * (2035-2030) = 0.525$$

### Getting the Factor of the Average Statewide Mileage in 2035, with Respect to the 2005 Value

To get the Pavley reduction factor, for Year 2035, it is necessary to extrapolate the average statewide mileage factor data, which is Figure 1’s green line, out to Year 2035. It is 0.82 in 2020 and it is 0.73 in 2030. Therefore, in year 2035 the statewide mileage factor data will be

$$0.73 + [(0.73 - 0.82) / (2030-2020)] * (2035-2030) = 0.685$$

Pavley 1 ends in Year 2017. It is widely assumed that it will be replaced by what is often called “Pavley 2”. The extrapolation computed here is based on the assumption made by the author of

Figure 1, as shown in the slope of the green line from year 2020 to 2030. Based on the authoritative credentials of the authors of Figure 1, this is the best assumption that can be made. Assuming that the California fleet will continually get more efficient, in terms of CO2 per mile driven, relies on an assumption that a significant fraction of our car owners will be able to purchase newer-model cars.

### **Getting the Factor of the Reduction of GHG Due to Fuels that Burn Less Carbon**

Looking at the purple line of Figure 1, it is clear that this factor will be 0.9 in 2035.

### **Getting the Factor of the Increase in Population**

The factor for population in San Diego County is computed using the populations estimated in CARB's <http://arb.ca.gov/cc/sb375/mpo.co2.reduction.calc.pdf>, namely 3,034,388 people in 2005 and 3,984,753 people in 2035. So the factor, from 2005 to 2035 is  $3,984,753/3,034,388 = 1.313$ .

### **Computing the Required Driving Reduction, for 2035**

The 4 values computed above are used in Eq. 2 to compute the required factor.

$$\text{Eq. 2} \quad f_{\text{PerCapitaVMT}} = .525 / ( .685 \times 0.9 \times 1.313 )$$

Therefore,  $f_{\text{PerCapitaVMT}} = .649$ . **This corresponds to a 35.1% reduction in per-capita driving, in year 2035.**

### **In Conclusion**

You must not conspire with CARB to violate S-3-05. Your RTP must achieve a 35% reduction. Reference 1 shows how this can be done. You have a responsibility to get CARB and SANDAG back on a path of moral and responsible leadership. The current 2035 targets undermine S-3-05.

Respectfully submitted,



Mike Bullock, 760-754-8025

Chair of the Sierra Club San Diego Transportation Committee

### **References Attached with Email**

**Reference 1:** PROPOSED REGIONAL GHG EMISSION REDUCTION TARGETS FOR AUTOMOBILES AND LIGHT TRUCKS PURSUANT TO SENATE BILL 375 (Released: August 9, 2010, for a September 23, 2010 Consideration) and the Failure of Its Proposed SANDAG GHG Reductions to Protect Health, Support S-3-05, and be Just and Reasonable

**Reference 2:** S-3-05, with additional comments

Copies: C. Chase, P. Epstein, Richard Miller

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**The San Diego Chapter of the Sierra Club is San Diego's oldest and largest grassroots environmental organization, founded in 1948. Encompassing San Diego and Imperial Counties, the San Diego Chapter seeks to preserve the special nature of the San Diego and Imperial Valley area through education, activism, and advocacy. The Chapter has over 14,000 members. The National Sierra Club has over 700,000 members in 65 Chapters in all 50 states, and Puerto Rico.**





**Sierra Club Toiyabe Chapter/Southern Nevada Group**  
**Motion for Support Environmentally-Sound Road-Use Fees**  
**DRAFT May 2 with Oct. 4<sup>th</sup>, 16<sup>th</sup>, Nov. 9 & Jan21, 2011 Revisions**

<p><b>Chapter Leads:</b> Mike Bullock, San Diego Transportation Chair (assigned by Jane Feldman) and Energy Task Force Chair Joe Johnson <b>Sponsor (if not SNG):</b> <b>Topic Area:</b> Conservation, Transportation <b>Desired Effective Date:</b> March 2011, if possible <b>Time Sensitive:</b> ASAP, due to global warming <b>Reason for Time Sensitivity:</b> NDOT wants comments <b>Approved by Conservation Committee:</b> Date</p>	<p><b>Brief Description of Proposed Position:</b> Support for an Equitable and Environmentally-Sound Road-Use Fee Pricing and Payout System, to be submitted to our state of Nevada, as it considers what NDOT is currently calling a “VMT” fee.</p>
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**Resolution**

WHEREAS, unchecked Green House Gas (GHG) emissions will destabilize our earth’s climate, causing a human catastrophe; 27% of Nevada’s GHG emissions are caused by on-road transportation; in order to keep GHG levels below 450 PPM, it will be necessary for the world to reduce emissions to 1990 levels by 2020 and 80% below 1990 levels by 2050; to obtain these reductions in on-road emissions, Nevada must significantly reduce driving; and

WHEREAS, the current gas tax cannot provide the money needed for road repairs; Nevada has not raised its gas tax in 18 years and there is no known significant support for such an action; the gas tax is effectively our only road-use fee; better mileage and more electric vehicles will reduce gas tax revenue; a gas tax cannot account for time, place, driver’s income, vehicle weight, vehicle pollution levels, vehicle noise levels, or roadway congestion level; Sierra Club national policy opposes subsidized road use, even for battery-powered cars; and

WHEREAS, road expansions are promoted using fear of current or predicted congestion; the Toiyabe Chapter currently has no viable, low-cost, short-term strategy to alleviate congestion; reducing driving through full-cost pricing and congestion pricing is a proven, short-term, free-market strategy to alleviate congestion; the under pricing of road use contributes significantly to air pollution, congestion, sprawl, and GHG emissions; revenue from taxes that are unrelated to driving are used to support roads; on July 11, 2009, the California Nevada Regional Conservation Committee of the Sierra Club passed a resolution supporting a “comprehensive road-use fee pricing system”; the Nevada DOT is accepting comments on a “VMT Fee” proposal; Article 9, Section 5 of the Nevada constitution requires that any charge, with respect to the operation of any motor vehicle, be used exclusively for the construction, maintenance, and repair of the public highways of the State; and, finally, while sprawl-supporting schemes, consisting of in-project road building and “development fees” to widen existing access roads, are better than subsidies from the general public, they are still a hidden and unfair subsidy to driving, that increases driving, because the ultimate payers of these costs pay an amount (for example in the cost of a home or in the cost of some other consumer item or service) or at a rate (for example a reduced wage or increased rent), which is unaffected by how often they personally chose to drive on the constructed, in-project roads or added lanes on access roads.

THEREFORE LET IT BE RESOLVED, that the Sierra Club Toiyabe Chapter/Southern Nevada Group supports a comprehensive road-use fee pricing and payout system, along with the required amendment to the Nevada constitution, provided that the pricing and payout system (1) would pay for all road-use costs, including the environmental and health costs caused by driving; (2) would pay out to cover all costs and repay all those losing money because of such things as road construction and operation; (3) could still include a fuel tax or fee; (4) would have a vmt fee (price-per-mile) that would vary by such things as the weight (to account for road wear), pollution level, noise level, and safety record of the vehicle (to reduce insurance rates, if it is shown that such payments are needed, as described in Item (2) of this paragraph; (5) would have a vmt fee (price-per-mile) that would vary by such things as road, road segment, date, and time of day; (6) would include instantaneous congestion pricing when that

technology becomes feasible; (7) would keep the per-mile price incentive to drive energy-efficient cars at least as large as it is with today's fuel excise tax; (8) could be accompanied by tax reductions sized to achieve either net-revenue neutrality or near-net-revenue neutrality; (9) would adjust the green-field development road-building and development-fee-assessment scheme so that a fair share of road-use revenue is paid to those that lost or are losing money, due to the scheme; (10) may be used to fund such things as bicycle facilities, bicycle education, bus pullouts, bus stops, sidewalks, and landscaping; (11) would mitigate impacts on low-income users by, for example, giving low-income drivers price reductions, especially for necessary driving; (12) would have ACLU-approved privacy protections that would include a prohibition of government access without court approval and would also include periodic and random software and hardware checks by ACLU-approved experts, to prevent the creation of infrastructure for routine surveillance.

THEREFORE LET IT BE ALSO RESOLVED, that the Sierra Club Toiyabe Chapter/Southern Nevada Group will communicate this position to the Nevada Department of Transportation ([vmtfeestudy@vmtfeenv.com](mailto:vmtfeestudy@vmtfeenv.com)), the Governor, the state legislative bodies, our federal representatives for use in climate protection legislation, the media, our local government officials, other interested environmental and/or civic-minded groups, all interested political parties, and our membership through website and newsletter communication, as our limited resources will permit.

### Supporting Data

- National Sierra Club policy on transportation, <http://sierraclub.org/policy/conservation/trans.aspx>, is opposed to all subsidies to road use, saying, "These subsidies should be publicly scrutinized and eliminated".
- According to a State website, <http://www.vmtfeenv.com/questions.html>, "The current federal and state fuel taxes were last increased in 1992. During the last 18 years, inflation has eroded the purchasing power of fuel taxes by approximately 52%. Whereas, during the same time, construction costs have gone up significantly."
- Also (same website), "Vehicle fuel efficiency increased from an average of 11.8 miles per gallon in 1970 to nearly 20 today. Fuel-efficient vehicles now entering the marketplace will further increase the average miles per gallon. While beneficial from an environmental and energy conservation perspective, and something the state wants to encourage and reward, fuel-efficient vehicles alter the ability to fund the maintenance, preservation and modernization of our roads."
- Also (same website), "If a VMT fee were to become law, the legislature could determine a per-mile rate. The rate could be flat, treating everyone the same, or it could be varied to consider other state policies like environmental issues, time of day and congested roads, type of vehicles, or urban/rural issues. Options might include charging a lower rate-per-mile for vehicles that achieve a certain level of fuel efficiency, for motorists that avoid rush hour zones, or for those making other environmentally-friendly decisions."
- According to Table ES-1 of the *Nevada GHG Inventory and Reference Case Projections, 1990-2020* ([http://www.wrapair.org/ClimateChange/NV\\_GHG\\_I&F\\_Report\\_WRAP\\_08-20-07.pdf](http://www.wrapair.org/ClimateChange/NV_GHG_I&F_Report_WRAP_08-20-07.pdf)) the MMT CO<sub>2</sub>e fraction of emissions due to on-road transportation, of the gross total emissions, is  $14.4/53.7 = 26.8\%$ .
- The CNRCC Resolution of July 11<sup>th</sup>, 2009, in support of a "comprehensive road-use fee pricing system", and its "Reference Document" are attached.

### Supporting References

- Club's national policy on transportation, <http://sierraclub.org/policy/conservation/trans.aspx>

- Club's internal site  
<http://clubhouse.sierraclub.org/login.aspx?ReturnUrl=%2fca%2fcnrcc%2findex.asp>, then, after typing in the password and getting the home page of the CNRCC, within the “Records and Archives” box, seen on the left side after scrolling down; select the “Resolutions Archives” and then the “July 2009” link to see both the Resolution and the “Reference Document” for all of the background information. (Dr. Stewart will make this final link active.)
- The other references are given above in the “Supporting Data” section

### **Description of Club Policy (or references)**

These are given in the Resolution, Supporting Data, and Supporting References sections.

### **Counter-Arguments and Response**

- 1.) We can meet our responsibility to oppose subsidized driving by simply being in favor of increasing the gas tax, even though this does subsidize cars that are electric and there is no discussion of this option currently.
- 2.) Talking about the cost of driving will make us unpopular, or, in more sophisticated language, this will “spend our political capital” that we need for more important battles.
- 3.) If we send a letter to the Nevada DOT, they will misuse our support to claim we support a flat-fee VMT charge regardless of weight, mileage and so on.

### **Chapter Commitment Required Resources (time, money, etc)**

a. This resolution will be meaningful if the only action is an email to the Nevada DOT. Since all actions can be accomplished by email, the only resource needed is volunteer time. b. The second “Therefore let it also be resolved” lists the actions in the approximate order in which they should be taken. However, the actual order will also depend on volunteer choice.

### **Next Steps**

Upon approval, begin work on a letter to the Nevada DOT.

### **Campaign Planning Matrix**

If we want to educate our members and get them to also send emails of support, this could be done.

From the Sierra Club's publication Grassroots Organizing Training Manual, 1999

Available at

[http://clubhouse.sierraclub.org/leaders/training/training\\_manual/index.htm](http://clubhouse.sierraclub.org/leaders/training/training_manual/index.htm)

#### **1. Issue focus**

What's the environmental problem you are seeking to address?

This work seeks to address our climate crisis and all the other impacts from automobiles.

How does it relate to the Club's national conservation priorities?

This work advances the Club's national policy goals regarding transportation, land use, and climate change.

## 2. Campaign goals

Increase community respect by submitting constructive principles into an important, on-going debate. The goal is to make a better environmental outcome more likely. This work will increase our profile and may therefore increase our membership and funding. This will establish working relationships into government that currently do not exist.

### Conservation goals

Reduced driving and a more sophisticated understanding of economics and how it drives environmental outcomes.

### Organizational goals

A functioning Transportation Committee to respond to all stages of relevant decision making in Nevada.

## 3. Lay of the Land

Nevada citizens are opposed to a VMT fee. They worry about privacy. They underestimate the danger of climate change. The Nevada DOT website on this issue however shows a rational approach to a serious funding and political problem.

### Organizational Strengths and Weaknesses

The chapter has leaders that are open-minded, dedicated, and frankly brilliant. They know the important environmental issues in their area and are in touch with Nevada politics. However, it has no one with a long-standing interest in the economics of transportation.

### Allies and Opponents

The Universities should appreciate our help. There will be a considerable amount of interesting mathematical work to achieve all goals. The University may come to see a different aspect of Sierra Club concerns. Elements within the Nevada DOT may appreciate our efforts. Those who benefit from ever-increasing VMTs and sprawl may be opposed to this work. All citizens that understand global warming will want to help us. This may include some religious groups, Unitarian Universalists, for example. Groups that fear government and change may oppose this effort.

## 4. Strategy

As communications go out, it would be best, if time permits, to schedule meetings and establish as many long-lasting relationships as possible.

### Strategic vehicle

### Targets

Decision makers (primary targets): DOT

Decision makers (secondary targets): elected officials

Public groups: civic, political (Democrats, Republicans, Greens, Etc) and including our own membership

## 5. Campaign communication

Message and slogan: start with resolution title “Equitable and Environmentally-Sound Road Use”

Story: start with resolution

Media outlets: use chapter members that have experience with media.

## 6. Tactics and timeline

The Nevada DOT needs input this year. Start there and work down the list as time permits.

## 7. Resource management

Budget: none

Donors/fundraising: none needed

Volunteer recruitment and stewardship: Transportation Committee Membership and others as needed

# A Plan to Efficiently and Conveniently Unbundle Car Parking Costs

Paper 2010-A-554-AWMA

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## ABSTRACT

The *Introduction* shows documented driving reductions due to the pricing of parking. It notes that although the benefits of priced and shared parking are known, such parking has not been widely implemented, due to various concerns. It states that a solution, called “*Intelligent Parking*,” will overcome some of these concerns, because it is easy to use and naturally transparent. It asserts that this description will support a “Request for Proposal” (RFP) process. Eight background information items are provided, including how priced parking would help California achieve greenhouse gas reduction targets. A story demonstrates some of the key features of *Intelligent Parking*. Arguments for less parking, shared parking, and priced parking are made. Barriers to progress are identified. The fair pricing of parking is described. New ways to characterize transportation demand management are presented. Seven goals of *Intelligent Parking* are listed. Eleven definitions and concepts, that together define *Intelligent Parking*, are described. This includes a method to compute a baseline price of parking and how to adjust that price instantaneously to keep the vacancy above 15% (“Congestion Pricing”). An implementation strategy is described.

## INTRODUCTION:

It has been well established that appropriately priced parking will significantly reduce driving<sup>1</sup>. Most case studies presented in Table 1 are evaluations of the most general type of “car-parking cash-out”: *a program that pays employees extra money each time they get to work without driving*. They show that a price differential between using parking and not using parking will significantly reduce driving, even when transit is described as poor. Since driving *must* be reduced<sup>2</sup>, the pricing of parking is desirable.

Shared parking is also recognized as desirable because it can sometimes result in less parking being needed.

Although the advantages of pricing and sharing parking have been recognized for many years, these practices are still rare. This paper identifies some of the reasons for this lack of progress. The pricing and sharing method of this paper has a natural transparency and ease of use that would reduce many of the concerns. This paper also suggests that those governments that have the necessary resources can take the lead role in developing and implementing the described systems. These governments will recover their investments, over time.

This paper describes how parking facilities could be tied together and operated in an optimum system, named *Intelligent Parking*. The description of *Intelligent Parking* is sufficient to support a “Request for Proposal” process, leading to full implementation.

There are two distinct parts to *Intelligent Parking*. The first is how to set the price. The second is how to distribute the earnings. Briefly, the earnings go to the individuals in the group for whom the parking is built.

**Table 1      Eleven Cases of Pricing Impact on Parking Demand**

<b>Location</b>	<b>Number of Workers @ Number of Firms</b>	<b>1995 \$'s Per Mo.</b>	<b>Parking Use Decrease</b>
<b><i>Group A: Areas with poor public transportation</i></b>			
West Los Angeles	3500 @ 100+	\$81	15%
Cornell University, Ithaca, NY	9000 Faculty & Staff	\$34	26%
San Fernando Valley, Los Angeles	850 @ 1	\$37	30%
Costa Mesa, CA	Not Shown	\$37	22%
<b>Average for Group</b>		<b>\$47</b>	<b>23%</b>
<b><i>Group B: Areas with fair public transportation</i></b>			
Los Angeles Civic Center	10,000+ @ "Several"	\$125	36%
Mid-Wilshire Blvd, Los Angeles	1 "Mid-Size" Firm	\$89	38%
Washington DC Suburbs	5,500 @ 3	\$68	26%
Downtown Los Angeles	5,000 @ 118	\$126	25%
<b>Average for Group</b>		<b>\$102</b>	<b>31%</b>
<b><i>Group C: Areas with good public transportation</i></b>			
U. of Washington, Seattle, WA	50,000 employees, students	\$18	24%
Downtown Ottawa, Canada	3,500 government staff	\$72	18%
Bellevue, WA	430 @ 1	\$54	39%*
<b>Average for Group, except Bellevue, WA Case*</b>		<b>\$45</b>	<b>21%</b>
<b>Overall Average, Excluding Bellevue, WA Case*</b>			<b>25%</b>

\* Bellevue, WA case was not used in the averages because its walk/bike facilities also improved and those improvements could have caused part of the decrease in driving.

## **PERTINENT BACKGROUND INFORMATION**

- Vehicle miles traveled (VMT) are a major cause of global warming and pollution<sup>2,3</sup>.
- California's Metropolitan Planning Organizations (MPOs) will need to adopt strategies that reduce vehicle miles traveled (VMT), in order to meet SB375 GHG reduction targets, to be issued by the California Air Resources Board in late 2010, for years 2020 and 2035<sup>2</sup>.
- The appropriate pricing of parking is one of the least costly documented tools to reduce VMT.
- New technologies, such as sensors feeding computer-generated billing, offer the potential to efficiently bill drivers for parking and alert law enforcement of trespassers.
- Reformed parking policies can increase fairness, so that, for example, people who use transit or walk do not have to pay higher prices or suffer reduced wages, due to parking.

- Methods to unbundle parking cost are inefficient unless they support the spontaneous sharing of parking spaces. Shared parking with unbundled cost would ultimately allow cities to require significantly less parking.
- Typical systems of timed parking and metered parking are far from ideal. Parking has no automated record keeping, so it is difficult to know where there is too much or too little.
- Good policies will eventually let cities turn parking minimums into parking maximums.

## **A GLIMPSE INTO A POSSIBLE FUTURE**

Jason is driving to work for the first time in several years. He has decided to save money by carrying home a new 3-D, big-screen computer, which he plans to purchase at a store near his office after work. He wanted to avoid paying delivery charges.

Things have been changing around his office development since they unbundled the cost of parking at the near-by train station. Many people who caught the early trains and lived close to the station stopped driving and parking in the best parking spaces; demand for housing close to the station went up; and wealthy riders, who insisted on driving, did so, confident that they could always find parking as close to the platform as their schedules required, due to congestion pricing. Who would have guessed how much those people were willing to pay? It was shocking. Parking-lot earnings, paid to round-trip train riders, meant that the net cost to ride the train went significantly down. Ridership and neighborhood vitality both went significantly up. All Jason knew was that the price to park at his office had been going up yearly because of increased land values. His parking-lot earnings from his office had been increasing almost every month, due to the ripple effect of train riders parking off-site at cheaper parking. Some of them were using his office parking.

As he pulls out of his driveway, he tells his GPS navigation unit his work hours (it already knew his office location), the location of the store where he plans to buy the computer, and his estimated arrival and departure times at the store. He tells the GPS unit he wants to park once, park no more than 1 block from the store, walk no more than 1 mile total, and pay no more than an average of \$2 per hour to park. He is not surprised to hear the GPS tell him that his request is impossible. He tells the GPS he will pay an average of \$3 per hour and learns that the GPS has located parking.

It guides him into a church parking lot. He hopes the church will use his money wisely. The GPS tells him the location of a bus stop he could use to get to work and the bus's next arrival time at the stop. With automatic passenger identification and billing, the bus has become easy to use, except that it is often crowded. Jason gets out of the car and walks to work, with no action required regarding the parking.

Three weeks later, when Jason gets his monthly statement for his charges and income for automotive road use, transit use, parking charges, and parking earnings, he finds that the day's parking did indeed cost about \$30 for the 10 total hours that he parked. He notes that the parking-lot earnings for his office parking averaged about \$10 per day that month. He then notices the parking lot earnings from the store, where he spent about \$1000 dollars. He sees that the parking-lot earnings percent for the store that month was 1.7%, giving him about \$17. So for the day, Jason only spent a net of about \$3 on parking. Then he realized that he should have had the computer delivered after all. If he would have bicycled that day, as he usually did, he would have still gotten the \$27 earnings from the two parking facilities and he would have paid nothing

for parking. So the choice to drive cost him \$30. He remembers that the delivery would have only been \$25 dollars. Oh well. He enjoyed his before-work and after-work walks.

## **THE CASE FOR LESS PARKING**

Less parking will support more compact development.<sup>1</sup> This makes walking and biking more enjoyable and less time consuming. There would certainly be less “dead space”, which is how parking lots feel to people, whether they arrive by car or not, after they become pedestrians.

Since parking can be expensive, less parking can reduce overhead costs significantly, such as leasing expense and parking-lot maintenance cost. Less overhead means more profit and less expense for everyone. A need for less parking can create redevelopment opportunities at existing developments and reduce project cost at new developments.

At new developments, car-parking costs could prevent a project from getting built.<sup>2</sup>

## **THE CASE FOR SHARED PARKING**

Shared parking for mixed uses means that less parking is needed. For example, shared parking could be used mostly by employees during the day and mostly by residents at night.

Fully shared parking means that very little parking would be off limits to anyone. In a central business district with shared parking, drivers would be more likely to park one time per visit, even when going to several locations. Pedestrian activity adds vitality to any area.

## **THE CASE FOR APPROPRIATELY-PRICED PARKING**

### **To Reduce Driving Relative to Zero Pricing**

#### *Traditional Charging or Paying Cash-out Payments*

As shown in the Introduction, this relationship (pricing parking reduces driving) is not new.<sup>3</sup>

Using results like Table 1, at least one study<sup>4</sup> has used an assumption of widespread pricing to show how driving reductions could help meet greenhouse gas (GHG) target reductions. Dr. Silva Send of EPIC <http://www.sandiego.edu/epic/ghgpolicy/> assumes that all work locations with 100 employees or more in San Diego County will implement cash-out, to result in 12% less driving to work. Currently, almost all employees in San Diego County “park for free”, unless they happen to work in a downtown core area.

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<sup>1</sup> This is especially true of surface parking, which only accommodates 120 cars per acre.

<sup>2</sup> On September 23, 2008, a panel of developers reviewed the Oceanside, Ca. “Coast Highway Vision” [http://www.ci.oceanside.ca.us/pdf/chv\\_finalvisionstrategicplan.pdf](http://www.ci.oceanside.ca.us/pdf/chv_finalvisionstrategicplan.pdf). Parts of this plan were described as smart growth.

At the review, developer Tom Wiegel said, “Parking is the number 1 reason to do nothing,” where “do nothing” meant “build no project.” The other developers at the meeting agreed.

<sup>3</sup> For many years the Victoria Transport Policy Institute (VTPI) has been recognized as a source of reliable information on “Transportation Demand Management”, or TDM.

From [http://www.vtpi.org/tdm/tdm72.htm#\\_Price\\_Parking](http://www.vtpi.org/tdm/tdm72.htm#_Price_Parking):

Even a relatively small parking fee can cause significant travel impacts and provide significant TDM benefits. “TDM Benefits” refers to the many public and private benefits of having fewer people choosing to drive.

### ***Current, Best-Practice “Unbundling”***

The “best-practice” use of the phrase, “unbundled parking cost”, is to describe the case where either the cost of parking, for the case of a condominium, or the rent for parking, for the case of an apartment, is separated from either the purchase price and common fees or the rent of the dwelling unit.

This gives the resident families the choice of selecting the number of parking spaces they would like to rent or buy, including the choice of zero. This would tend to reduce the average number of cars owned per dwelling unit and, in this way, would also tend to reduce driving. Its major drawback is that this method does not encourage sharing.

### **To Increase Fairness and Protect the US Economy**

It is stated above that almost all employees in San Diego County “park for free”. Of course there is really no such thing as “parking for free”. So-called “free parking” always reduces wages or increases costs. At a work site, it reduces everyone’s wage, even those employees that never drive. At an apartment complex, so-called “free parking” increases the rent. Therefore, “free parking” at work or at apartments violates the fundamental rule of the free market, which is that people should pay for what they use and not be forced to pay for what they do not use. Parking should at least be priced to achieve fairness to non-drivers.

The US economy would also benefit. Reductions in driving would lead to reductions in oil imports, which would reduce the US trade deficit.<sup>4</sup>

### **BARRIERS TO PROGRESS**

Given all this, it might seem that the widespread pricing of parking should have happened by now. However there are barriers. In 2007, a majority of the City Council of Cupertino, Ca. indicated that they wanted their City Manger to negotiate reduced parking requirements with any company that would agree to pay sufficient cash-out payments. To this date, no company, including Apple Inc., has expressed an interest. Most companies probably perceive cash-out as expensive. Even if they realize they could get a reduced parking requirement in exchange for paying sufficient cash-out amounts and even if the economics worked in support of this action (quite possible where land is expensive), they want to stay focused on their core business, instead of getting involved in new approaches to parking, real estate, and redevelopment.

On the other hand, simply charging for parking and then giving all the employees a pay raise is probably going to run into opposition from the employees, who will feel that they would be losing a useful benefit.

In addition, neighbors fear the intrusion of parked cars on their streets. Permit parking, which could offer protection, is not always embraced. City Council members know that a sizable fraction of voting citizens believe that there can actually never be too much “free parking”,

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<sup>4</sup> From [http://en.wikipedia.org/wiki/Balance\\_of\\_trade#Warren\\_Buffett\\_on\\_trade\\_deficits](http://en.wikipedia.org/wiki/Balance_of_trade#Warren_Buffett_on_trade_deficits), Warren Buffet wrote in 2006,

“The U.S. trade deficit is a bigger threat to the domestic economy than either the federal budget deficit or consumer debt and could lead to political turmoil. Right now, the rest of the world owns \$3 trillion more of us than we own of them.”

Professor Shoup's famous book<sup>5</sup> notwithstanding. Some Council members probably feel that way themselves.

It doesn't help that current methods of charging for downtown parking are often very inefficient.<sup>5</sup> For example, downtown Oceanside, California has parking meters that will only accept coins. Besides this, all their on-street, downtown parking is timed, with maximums from 10 minutes to 4 hours. These time limits are enforced by a city employee, who applies chalk from a tire to the street and then records the time. However, by watching the time and moving their car soon enough, drivers can avoid getting a ticket. Of course, they could instead drive to the mall and not have to worry about having coins or elapsed time since parking. It is not surprising that downtown merchants often object to charging for parking.

In summary, those that resist charging for parking, *based on their perceptions*, include

- Companies, *who fear the complexity and expense of paying cash-out payments*;
- Employees, *who fear of losing a current benefit*;
- City leaders, *who fear the political repercussions*;
- Downtown patrons, *who dislike the inconvenience and worry*;
- Downtown business owners, *who fear that it will drive away customers*.

## **THE COST, VALUE, AND FAIR PRICE OF PARKING**

### **Estimated and Actual Capital Cost**

#### ***Surface Parking***

One acre of surface parking will accommodate 120 cars. Land zoned for mixed use is sometimes expensive. At \$1.2 million per acre, the land for a single parking space costs \$10,000.

Construction cost should be added to this to get the actual, as-built cost of each parking space. Estimated cost can be determined by using appraised land value and construction estimates. For new developments, after the parking is constructed, it is important to note the actual, as-built cost.

#### ***Parking-Garage Parking***

One acre of parking-garage will accommodate considerably more than 120 cars. The construction cost of the garage and the value of its land can be added together to get the total cost. Dividing that total cost by the number of parking spaces yields the total, as-built cost of each parking space. Adding levels to a parking garage may seem like a way to cut the cost of each parking space, for the case of expensive land. However, there is a limit to the usefulness of this strategy because the taller the parking garage, the more massive the supporting structural members must be on the lower levels, which increases total cost. Parking-garage parking spaces are often said to cost between \$20,000 and \$40,000. The actual costs should be noted.

#### ***Underground Parking***

In order to compute an estimate for the cost of a parking space that is under a building, it is necessary to get an estimate of the building cost with and without the underground parking. The difference, divided by the number of parking spaces, yields the cost of each parking space. The

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<sup>5</sup> According to Bern Grush, Chief Scientist of Skymeter Corporation <http://www.skymetercorp.com/cms/index.php>, often two-thirds of the money collected from parking meters is used for collection and enforcement costs.

cost or value of land plays no role in the cost of this parking. However, it does not follow that this parking is cheap. Underground parking spaces are often said to cost between \$60,000 and \$90,000 dollars each. Although there will be an “as built” cost of the building with the parking, there will never be an “as built” cost of the building without the parking. However, after the construction is done, the estimate for the cost of the underground parking should be reconsidered and re-estimated if that is needed. The final, best-estimate cost should be noted.

## **Value**

Initially, value and cost are the same. For surface parking and parking-garage parking, the value would initially be the same as the as-built cost. For underground parking, the value would initially be the same as the best-estimate cost. However, over time, the value must be updated. Both construction costs and land-value costs will change. The value assigned to a parking place should always be based on the current conditions.

## **Fair Pricing**

Parking space “values”, as described above, must first be converted to a yearly price by using a reasonable conversion factor. This conversion factor could be based on either the “cost of money” or the “earnings potential of money”. It is expected that this conversion factor would be 2% to 5% during times of low interest rates and slow growth; but could be over 10% during times of high-interest and high growth. For example, if the surface parking value is \$12,000 and it is agreed upon to use 5% as the conversion factor, then each parking spot should generate \$600 per year, just to cover capital costs. The amount needed for operations, collection, maintenance, depreciation, and any special applicable tax is then added to the amount that covers capital cost. This sum is the amount that needs to be generated in a year, by the parking space.

The yearly amount of money to cover capital cost needs to be re-calculated every year or so, since both the value and the conversion factor will, in general, change each year. The cost of operations, collection, maintenance, depreciation, and any special applicable tax will also need to be reconsidered.

Once the amount generated per year is known, the base price, per unit year, can be computed by dividing it (the amount generated per year) by the estimated fraction of time that the space will be occupied, over a year. For example, if a parking space needs to generate \$900 per year but it will only be occupied 50% of the time, the time rate charge is \$1800 per year. This charge rate per year can then be converted to an hourly or even a per-minute rate. The estimated fraction of time that the parking is occupied over a year will need to be reconsidered at least yearly.

## **NEW DEFINITIONS TO PROMOTE AN OBJECTIVE VIEW OF PRICING**

- The “fair price” means the price that accounts for all costs.
- The “baseline amount of driving” means the driving that results from the application of the fair price.
- “Zero transportation demand management” (“zero TDM”) is the amount of demand management that results when the fair price is used. It will result in the baseline amount of driving.
- “Negative TDM” refers to the case where the price is set below the fair price. This will cause driving to exceed the baseline amount. Since TDM is commonly thought to be an action that reduces driving, it follows that negative TDM would have the opposite effect.
- “Positive TDM” refers to the case where the price is set above the fair price. This would cause the amount of driving to fall below the baseline amount.

Clearly, so-called “free parking” is an extreme case of negative TDM. The only way to further encourage driving would be to have a system that pays a driver for the time their car is parked.

## **THE GOALS OF *INTELLIGENT PARKING***

- There is only one agency operating all parking. (“All parking” does not include driveways and garages in single-family homes.) *Intelligent Parking* is designed and installed by regional or state government, using low-bid contractors, with design and start-up costs covered by the overhead portion of collection fees.
- Nearly all parking is shared. Almost always, anyone can park anywhere. Those who want exclusive rights to parking will pay “24/7” (all day, every day).
- Parking is operated so that the potential users of parking will escape the expense of parking by choosing to not use the parking. This characteristic is named “unbundled” because the cost of parking is effectively unbundled from other costs.
- Parking is priced and marketed to eliminate the need to drive around looking for parking.
- Parking at any desired price is made as easy as possible to find and use.
- Records of the use of each parking space are kept, to facilitate decisions to either add or subtract parking spaces.
- The special needs of disabled drivers, the privacy of all drivers, and, if desired, the economic interests of low-income drivers are protected.

## **DEFINITIONS & CONCEPTS OF *INTELLIGENT PARKING***

### **Parking Beneficiary Groups**

There are at least 7 types of beneficiary groups. Note that in all cases, members of beneficiary groups must be old enough to drive.

- 1.) People who have already paid for the capital cost of parking. An example of this type of beneficiary group would be the owners of condominiums, where parking has been built and the cost is included in the price of the condominium. Note that although they have technically already paid for the parking, if they borrowed money to pay for some portion of the price, the cost is built into their monthly payment. This illustrates why the value of parking and the cost of borrowing money (rate of return on money) are key input variables to use to compute the appropriate base, hourly charge for parking.
- 2.) People who are incurring on-going costs of parking. An example of this type of beneficiary group is a set of office workers, where the cost of „their” parking is contained in either the building lease or the cost of the building. Either way, the parking costs are reducing the wages that can be paid to these employees.<sup>6</sup>
- 3.) People who are purchasing or renting something where the cost of the parking is included in the price. Examples of this beneficiary group are people that rent hotel rooms, rent an apartment, buy items, or dine in establishments that have parking.

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<sup>6</sup> Such parking is often said to be “for the benefit of the employees”. Defining this beneficiary group will tend to make this statement true, as opposed to the common situation where the employees benefit only in proportion to their use of the parking.

- 4.) People who own off-street parking as a business. They could be the individual investors or could be a government or government-formed entity.
- 5.) People who are said to benefit from parking, even though the money for the parking has been supplied by a source that may have very little relationship to those that are said to benefit. An example of this group would be train riders that make round trips from a station which has parking that is said to be “for riders”. Students at a school with parking would be another example.
- 6.) People who are considered by many to be the logical beneficiaries of on-street parking. Owners of single-family homes are the beneficiaries of the parking that is along the boundaries of their property. The same status is given to residents of multi-family housing.
- 7.) Governments. Since they build and maintain the streets, they should get a significant benefit from on-street parking.

### **Unbundled Cost and Spontaneous Sharing**

“Unbundled cost” means those who use the parking can see exactly what it costs and those who don’t use the parking will either avoid its cost entirely or will get earnings to make up for the hidden parking cost they had to pay. This conforms to the usual rule of the free market where a person only pays for what they choose to use. Unbundled cost is fair.

“Spontaneous sharing” means that anyone can park anywhere at any time and for any length of time. Proper pricing makes this feasible.

#### ***How to Unbundle***

The method of unbundling can be simply stated, using the concept of “beneficiary group” as discussed above. First, the fair price for the parking is charged. The resulting earnings<sup>7</sup> amount is given to the members of the beneficiary group in a manner that is fair to each member. Methods are described below.

#### ***Why this Supports Sharing***

Members of a beneficiary group benefit financially when “their” parking is used. They will appreciate users increasing their earnings. They are also not obligated to park in “their” parking. If there is less-expensive parking within a reasonable distance, they might park there, to save money. This is fine, because all parking is included in the *Intelligent Parking* system.

#### ***Computing the Earnings for Individuals***

*Intelligent Parking* must be rigorous in paying out earnings<sup>7</sup>. For a mixed use, the total number of parking spaces must first be allocated to the various beneficiary groups. For example in an office/housing complex, 63.5% of the parking might have been sold with the office. If so, the housing portion must be paying for the other 36.5%. For this case, it would follow that the first step is to allocate 63.5% of the earnings to the workers and 36.5% to the residents.

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<sup>7</sup> The earnings amount is the revenue collected minus the collection cost and any other costs that will have to be paid due to the implementation of *Intelligent Parking*. The costs associated with the parking, paid *before* the implementation of *Intelligent Parking*, should *not* be subtracted from the revenue because they will continue to be paid as they were before the implementation of *Intelligent Parking*. Therefore, these costs will continue to reduce wages and increase the prices of goods and services.

How the monthly earnings are divided up among the members of the beneficiary group depends on the beneficiary group type. For each member, the group's total monthly earnings amount is always multiplied by a quantity and divided by the sum (the sum is the denominator) of that quantity, for all members.

For example, for each employee, the multiplier is the number of hours that the employee worked over the month while the denominator is the total number of hours worked by all employees over the month. At a school, for each student, the numerator is the total time spent at the school, over the month, while the denominator is the sum of the same quantity, for all the students.

For a train station with parking being supplied for passengers that ride on round trips of one day or less, the numerator is the passenger's monthly hours spent on such round trips, over the month; while the denominator is the total number of hours spent by all passengers on such round trips, over the month. Radio Frequency Identification (RFID) units on passengers could support an automated calculation of monthly charges for fares, as well as monthly hours on round trips.

At a shopping center, the numerator is the sum of the money spent by the shopper, over the month, while the denominator is the total amount of money spent by all shoppers over the month.

At a condominium, the numerator is the number of parking places that were paid for (directly or indirectly) by the resident family and the denominator is the total number of parking places at the condominium project; similarly, for apartment complexes.

### ***Where Earnings Are Low***

The goal is that if someone doesn't park, they don't pay, either directly or indirectly, because the earnings that they get will balance out their losses (like reduced wages, for example). However, charging for parking that few want to use will not sufficiently compensate the people that have been forced, or are being forced, to pay for such parking. The only remedy in this case is to redevelop the parking or lease the parking in some other way, for storage, for example. The earnings from the new use should go to those that are in the beneficiary group that was associated with the low-performing parking.

### ***Why This Method of Unbundling Will Feel Familiar to Leaders***

Developers will still be required to provide parking and will still pass this cost on, as has been discussed. There will be no need to force an owner of an exiting office with parking to break his single business into two separate businesses (office and parking).

Parking beneficiaries are identified that conform to traditional ideas about who should benefit from parking.<sup>8</sup>

### ***Unbundling the Cost of On-Street Parking***

The revenue from on-street parking in front of businesses will be split evenly between the city and the business's parking beneficiaries. All of the earnings from on-street parking in front of apartments or single-family homes will be given to the resident families.<sup>9</sup>

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<sup>8</sup> Showing exactly where parking earnings go will reduce the political difficulties of adopting pay parking in a democracy where the high cost of parking is often hidden and rarely discussed.

<sup>9</sup> Although governments own the streets, often, back in history, developers paid for them and this cost became embedded in property values. Admittedly, how to allocate on-street parking earnings is somewhat arbitrary. With

### ***Special Considerations for Condominiums***

Unbundling for a condominium owner means that, although their allocated amount of parking has added to their initial cost, their allocated amount of parking also earns money for them. Unbundling for a condominium could also mean that an owner can choose to have control over a single or several parking places. Such parking spaces could be equipped with a red light and a green light. If the red light is lit, this will mean that the space is not available for parking, except for the person who is controlling the spot. If the green light is lit, it will mean that the space is available to anyone. A space that is being reserved with a red light is charged at the full price to the condominium owner that has control over the space. The owner that controls these spaces can change the state of the parking space (available or not available) by either a phone call, on line, or at any pay station system that might be in use for the system. After condominium owners experience the cost of reserving a space for themselves, they might give up on the idea of having their own, personal, unshared parking space; especially since *Intelligent Parking* will give most owners and their guests all the flexibility they need in terms of parking their cars.

Some people think that condominium parking should be gated, for security reasons. However, parking within parking garages needs to be patrolled at the same frequency level as on-street parking, which is enough to ensure that crime around either type of parking is very rare. Cameras can help make parking garages that are open to the public safe from criminal activity.

### ***Special Considerations for Renters***

Unbundling for renters means that, although their allocated amount of parking increases their rent, their allocated amount of parking also earns money for them. Therefore, their traditional rent (includes parking) is effectively reduced by the money earned by those parking spaces allocated to them. Renters will be motivated to either not own a car or to park in a cheaper location. Parking in a cheaper location is not a problem because all parking is part of the *Intelligent Parking* system. Renters will welcome anyone to park in “their” parking, because it will increase their earnings.

### ***Special Considerations for Employers***

At first, companies may want the option of offering “free parking” to their employees so as to be able to compete with traditional job sites. This means giving employees that drive every single day an “add-in” amount of pay so that the sum of the add-in and their parking-lot earnings equals their charge, for any given monthly statement. The operator of the parking, which sends out statements, can pay out the “add in” amount, in accordance with the company’s instruction. The company will then be billed for these amounts. There could be no requirement for the company to provide any such “add-in” amount to the employees that don’t drive every day. This would allow the company to treat its every-day drivers better than other employees and so this would be a negative TDM. However, this economic discrimination would be substantially less than the current, status-quo, economic discrimination, where drivers get “free” parking and non-drivers get nothing.

## **Clusters of Parking**

Clusters are a contiguous set of parking spaces that are nearly equal in desirability and thus can be assigned the same price. They should probably consist of from 20 to 40 spaces. For off-street

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congestion pricing and efficient methods, governments may earn significantly more than they are under current practices.

parking, they could be on either side of the access lane to the parking spaces, so that an observer could see the 20 to 40 cars, and get a feel for the vacancy rate. At a train station, clusters will normally be organized so that their parking spaces are approximately an equal distance from the boarding area. On-street clusters would normally conform to our current understanding of what a block is, which is to say from one cross street to the next cross street. The width of the street and the length of the block should be taken into account in defining on-street clusters of parking and in deciding if the parking on either side of the street should or should not be in the same cluster of parking spaces.

## **Examples of Good and Bad Technology**

### ***Parking Meters or Pay Stations***

Parking meters are a relic of an earlier period, before computers. Pay stations do not add enough usefulness to merit their inclusion in *Intelligent Parking*, except as a bridge technology. Once good systems are set up, pay stations should cost additional money to use because of their expense. It would be best to devise an implementation strategy that will minimize their use when the system is first put into effect and will take them out of service as soon as possible.

### ***Radio Frequency Identification Backed Up by Video-Based “Car Present” and License Recognition***

Government will eventually enter into an RFID (Radio Frequency Identification) age. Organizers of large athletic events already have. Organizers that put on large open-water swims, foot races, and bike rides have routinely used RFID for many years.<sup>10</sup> An RFID vendor in San Diego<sup>11</sup> states that passive RFID units cost less than \$5, are reliable, are durable, and they could be used to identify cars as well as people. He also sees no problem in implementing most of the features of *Intelligent Parking*.<sup>12</sup>

### ***Automatic Data Collection and Sending Out Statements***

Note that the “back end database” of Dr. Carta’s written statement<sup>12</sup> refers to the ability to send statements of earnings and billing to students.<sup>13</sup>

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<sup>10</sup> For example, over 20,000 people ran the 2008 Bay-to-Breakers foot race in San Francisco. Each runner had a “chip” in their shoe lace. Each runner’s start time and finish time were recorded and all results were available as soon as the last runner crossed the finish line.

<sup>11</sup>David R. Carta, PhD, CEO Telaeris Inc., 858-449-3454

<sup>12</sup> Concerning a Final Environmental Impact Report-approved and funded new high school in Carlsbad, California, where the School Board has signed a *Settlement Agreement* to consider “*unbundled parking*”, “*cash-out*”, and “*pricing*”, Dr. Carta wrote, in a January 13<sup>th</sup>, 2010 written statement to the Board,

I wanted to send a quick note discussing the technical feasibility of tracking cars into a lot without impacting students or requiring the need for gates. Mike Bullock and I have discussed this project; it can be accomplished straightforwardly by utilizing Radio Frequency Identification and/or Video Cameras integrated with automated license recognition systems. The cars would need to register with the system at the start, but it would be fairly painless for the users after the initial installation. The back end database system can also be implemented both straightforwardly and at a reasonable price.

This is not necessarily a recommendation of the proposal for unbundled parking. Rather it is strictly an unbiased view of the technical feasibility of the proposal to easily and unobtrusively track cars, both registered and unregistered, into a fixed lot.

<sup>13</sup> In an earlier email on this subject, Dr. Carta wrote,

## ***Putting it Together***

Certainly, government, and in particular transit agencies and parking agencies, could use RFID-based technology. For example, when a person with an RFID unit which is tied to a billable address or a credit card with an open account gets on a bus or a train, they should not have to pay at that time, visit a pay station, or “swipe a card” that has a positive balance. Utility customers that pay their bills are not required to pre-pay. The same courtesy should be extended to transit riders, people that drive on roads, people that get parking-lot earnings, and people that park cars. There should be one monthly bill or statement, for all four activities.

## ***Global Positioning Systems GPS***

An alternative model is to have GPS systems in cars that would detect the car’s parking location, that location’s current charge rate, and would perform all of the charging functions in the car. The only information the parking-lot-enforcement system would need is whether or not a car being parked is owned by a bill-paying owner. The car owner’s responsibility would be to pay the bills indicated by the box in the car. The box would need to process a signal that a bill had been paid. It would also need to process pricing signals.

## ***Not Picking Winners***

The purpose of this report is to describe what an ideal system would do, *not* how it is done. How a proposed system works is left to the systems, software, and hardware engineers that work together to submit a proposal based on this description of what an ideal system does.

## **Privacy**

Privacy means that no one can see where someone has parked, without a search warrant. Also, the level of the detail of information that appears on a bill is selected by the customer.<sup>14</sup>

## **Ease of Use for Drivers**

For credit-worthy drivers that have followed the rules of the system, pay parking will not require any actions other than parking. Paying for all parking fees over a month is then done in response to a monthly billing statement. Parking will feel to the consumer like a service provided by a municipality, such as water, energy, or garbage. One important difference is that users belonging to a “beneficiary group” will get an earnings amount in their monthly statement. Those that earn more than what they are charged will receive a check for the difference. This ease of use will make all parking less stressful.

## **Base Price**

### ***Off-Street***

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This is not too tough - we probably would integrate with a service that already sends physical mail from an electronic submission instead of re-inventing this wheel.

<sup>14</sup> License plates that have no RFID tags fail to use the best technology to accomplish the primary purpose of license plates, which is to identify and help intercept cars used in a crime. Identifying cars is a legitimate government goal. Protecting privacy is also a legitimate goal. Both goals can be realized with good laws, good enforcement, and good systems engineering.

Off-street parking is priced so that even if demand does not threaten to fill the parking beyond 85%, the money generated will at least equate to an agreed-upon return on the parking value and pay all yearly costs. Equation 1 shows the calculation of the hourly rate.

$$r_{BaselineHourly} = \frac{(r_{Investment} \times v_{Parking}) + c_{YOPD}}{(n_{HoursPerYear} \times f_{TO})} \quad \text{(Eq. 1)}$$

where:

$r_{BaselineHourly}$	=	the computed baseline hourly rate to park
$r_{Investment}$	=	yearly return on investment, such as .06
$v_{Parking}$	=	value of a parking space, such as (parking garage) \$40,000
$c_{YOPD}$	=	yearly operations <sup>15</sup> plus depreciation, per space, such as \$100
$n_{HoursPerYear}$	=	number of hours per year, 24 x 365 = 8760 Hours per Year
$f_{TO}$	=	fraction of time occupied, such as 0.55.

For the example values given, the base hourly rate of parking, to cover the cost of the investment, operations<sup>15</sup>, and depreciation is \$0.519 per hour. This could be rounded up to \$0.52 per hour. This price could also be increased to result in positive TDM, to reduce driving more than the fair-price, zero-TDM amount.

### ***On-Street***

If on-street parking is located within walking distance (one-quarter mile) of off-street parking, its base price is set equal to the closest off-street parking's base price. Otherwise, it is set to some agreed-upon value, like fifty cents per hour. However, on-street parking has a special meaning for downtown merchants and for neighborhoods, two powerful political forces in any city. Merchants that have few cars parking on their street, even though it is permitted, are probably failing in their businesses. They would like free parking to help draw visitors to their store front. Neighborhoods that are not impacted by parking would probably prefer no pricing. For these reasons, for any on-street parking cluster, no price is charged until the cluster occupancy reaches 50%. (Time of day is irrelevant.)

### **Congestion Pricing**

The time-rate price of parking is dynamically set on each cluster of parking, to prevent the occupancy rate from exceeding 85% (to reduce the need to drive around looking for parking). An 85% occupancy rate (15% vacancy) results in just over one vacant parking space per city block<sup>5</sup>. If the vacancy rate is above 30%, the price is left at the baseline hourly rate. If vacancies fall below 30%, the price can be calculated in a stair-step method, such as shown in Table 2.

Equation 2 is an alternative method.

In either case, the total charge is time parked, multiplied by the time-averaged, time-rate price. The base multiplier would be adjusted to be just large enough to keep the vacancy rate from falling below a desired level, such as 15%, so it is always easy to find parking.

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<sup>15</sup> This includes money for policing, cleaning, maintenance, any applicable parking tax, and all collection costs. Collection costs will need to include an amount to recover the development and installation costs of *Intelligent Parking*.

**Table 2 Hourly Rates for 2 Base Multipliers and a Baseline Hourly Rate of \$0.52**

Vacancy Rate	Base Multiplier = 2			Base Multiplier = 2.5		
	Multiplication		Hourly Rate	Multiplication		Hourly Rate
	Formula	Value		Formula	Value	
Above 30%	$2^0$	1	\$0.52	$2.5^0$	1	\$0.52
25% to 30%	$2^1$	2	\$1.04	$2.5^1$	2.5	\$1.30
20% to 25%	$2^2$	4	\$2.08	$2.5^2$	6.25	\$3.25
15% to 20%	$2^3$	8	\$4.16	$2.5^3$	15.625	\$8.13
10% to 15%	$2^4$	16	\$8.32	$2.5^4$	39.0625	\$20.31
5% to 10%	$2^5$	32	\$16.64	$2.5^5$	97.6563	\$50.78
Below 5%	$2^6$	64	\$33.28	$2.5^6$	244.1406	\$126.95

$$r_{HourlyRate} = r_{BaselineHourly} \times (B^{(30-V)/5}), \text{ for } V < 30; r_{BaselineHourly}, \text{ otherwise (Eq. 2)}$$

where:

- $r_{HourlyRate}$  = the congestion-priced hourly rate to park
- $r_{BaselineHourly}$  = the baseline hourly rate to park, such as \$0.52 per hour (taken from from Eq. 1.
- $B$  = the base of the multiplier being computed, such as 2.50
- $V$  = the vacancy rate percent, such as 17.5, for 7 vacancies in a cluster of 40 spaces,  $100*(7/40) = 17.5$

For the example values given, the hourly rate of parking would be \$9.88 per hour.

### Pricing Predictions and Notifications

Drivers will develop strategies for their routine trips. The computer system that keeps records of parking use will also provide help for users. The *Intelligent Parking* website will direct a user to an appropriate cluster of parking if the user provides the destination location or locations, the time and date, and the hourly rate they wish to pay. If the walk is going to be long, the website could suggest using transit to get from the cheaply-priced parking to the destination. In such cases, the website may also suggest using transit for the entire trip.

Another user option is to specify the time, location, and the distance the user is willing to walk. In this case, the computer would give the cheapest cluster of parking available at the specified walk distance. The price prediction would be provided.

All price predictions would also have a probability of correctness associated with them. If a user can show that a computer has predicted a much lower price than what actually occurred, with a sufficiently high probability, it would be reasonable to charge the user the predicted price rather than the actual price.

Websites could routinely inform viewers when occupancy rates are expected to be unusually high, due to a special event (for example, a sporting event). The parking system website will always give current and predicted hourly rates for all locations. The hourly rates of parking will also be available at a phone number and possibly at pay stations. The base-price hourly rate, for any parking cluster, would be stable and could therefore be shown on signs. Parking garage entrances could have large video screens showing both predicted and existing price. Users will also learn to look at parking and judge whether congestion pricing applies, or could apply, while

their car is parked. It would not be long before these capabilities are added into GPS navigation systems.

## **Prepaid RFID**

To be inclusive, pay stations or convenience stores will offer a pre-paid RFID that can be set on the dashboard of a car. This will support drivers with poor credit or drivers who have not obtained the necessary equipment to support the normal, trouble-free methods. This will also work for drivers that do not trust the system to protect their privacy for a certain trip (by removing or disabling the permanent RFID) or for all trips. No billing would occur.

## **Enforcement**

The system would notify the appropriate law enforcement agency if an unauthorized car was parked. Authorized cars would need either a pre-paid RFID or equipment indicating that their owners had *Intelligent Parking* accounts and were sufficiently paid up on their bills.

## **IMPLEMENTATION**

This description of *Intelligent Parking* will help to implement efficient parking systems. Parking at train stations, schools, and government buildings could introduce many of these concepts. This description of *Intelligent Parking* is sufficient to support a “Request for Proposal” process, which could lead to full implementation. Widespread installation should be done by a government agency, to minimize actions required on the part of the private sector. Laws would simply require the cooperation of all private-sector and government entities.

## **SUMMARY**

A parking plan, *Intelligent Parking* has been described.

1. Technology will make it easy to use for most drivers.
2. Its parking is almost always shared, to support mixed uses.
3. It unbundles cost by charging and having earnings go to the parking beneficiaries.
4. Traditional groups, such as single-family home owners, employees, tenants, train riders, and students benefit from parking. The benefit is equal for drivers and non-drivers.
5. Baseline prices are computed primarily from the value of the parking and an agreed-upon rate of return. On-street parking is free until it is half full, at which time its base price often matches that of the closest off-street parking.
6. For all parking, price is dynamically increased to guarantee availability. Earnings are therefore only limited by what people are willing to pay.
7. Technology helps drivers find parking and decide if they want to drive or use transit.
8. Prepaid RFIDs provide service to those who have poor credit or don't want to be billed.
9. Disabled and perhaps low-income drivers will have accounts that allow them to park at reduced prices and perhaps avoid congestion pricing. Specially designated spots might also be required for disabled drivers.
10. The system will provide reports showing where additional parking would be a good investment and where it would be wise to convert existing parking to some other use.

11. Privacy will be protected. Law enforcement officials would need a search warrant to see where someone's car has been parked. The level of detail on billing would be selected by the car's owner.

12. Implementations could begin in carefully selected locations and expand.

Global warming, air pollution, trade deficits, and fairness are some of the significant reasons that governments have a responsibility to implement *Intelligent Parking*.

## ACKNOWLEDGEMENTS

The following people have offered encouragement, specific information, and/or special insights.

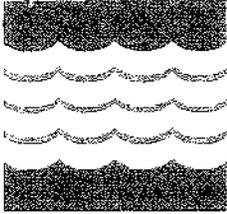
Dr. Dennis Martinek, Oceanside Planning Commissioner; Sandra Goldberg, California Deputy Attorney General; Jerry Kern, Oceanside, City Council; Amy Volzke, Principal Planner, City of Oceanside; Dr. Nilmini Silva-Send, Senior Policy Analyst of the Energy Policy Initiative Center; Diane Nygaard, Director of Preserve Calavera and founder of Nelson Nygaard, Consulting Associates; Lisa Rodman, Trustee, Carlsbad Unified School District; Dr. Michael McQuary, President, La Jolla Democratic Club; Joan Bullock; Judy Jones, San Diego County Central Committee, California Democratic Party; Patrick Siegman, Principal and Shareholder, Nelson Nygaard; Andy Hamilton, San Diego Air Pollution Control District; Renee Owens, Conservation Chair, San Diego Sierra Club; Caroline Chase, Executive Committee Chair, San Diego Sierra Club; Ed Mainland, Co-Chair, Energy-Climate Committee, Sierra Club California; Bern Grush, Chief Scientist, Skymeter Corporation; and the following San Diego Area Government (SANDAG) employees: Susan Baldwin, Senior Regional Planner; Bob Leiter, former Director of Land Use and Transportation Planning; Coleen Clementson, Principle Planner; and Stephan Vance, Senior Regional Planner.

## REFERENCES

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- 5 Shoup, D. *The High Cost of Free Parking*. Chicago University Press, June 7, 2005.

## KEYWORDS

A&WMA, Parking, Unbundled, Shared, TDM, cash-out, pricing, beneficiary, greenhouse gas, GHG, GPS, RFID



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**RECEIVED**

February 13, 2012

**FEB 15 2012**

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

**SOUTHERN CALIFORNIA ASS'N.  
OF GOVERNMENTS**

Dear Hasan,

On behalf of the South Bay Cities Council of Governments (SBCCOG), I would like to congratulate you and your staff for the excellent work preparing the complex 2012 RTP including the region's initial SCS, associated Appendices and Program Environmental Impact Report (PEIR). Thank you for this opportunity to comment on the draft documents.

The SBCCOG lacks the resources to comprehensively review and comment on the RTP and PEIR. We have reviewed the comments being submitted by the Orange County and Gateway Cities Councils of Governments and are in general support them.

In particular, we want to reinforce the following:

- Gateway COG's question regarding the Financial Plan - Table 3.4.1 which presents Core and Reasonably Available local sources of revenue and includes development mitigation fees for Orange and Riverside Counties. Does the revenue estimate include any assumption of funds from the potential adoption of a development fee in Los Angeles County?
- OCCOG's request regarding the Mitigation Monitoring Program mentioned in the PEIR to clarify what obligations local agencies may have regarding SCAG's mitigation monitoring efforts.
- OCCOG's request that SCAG provide the mitigation measures as a "toolbox" to local agencies for use within their discretion if and when appropriate for projects within their respective jurisdictions.
- OCCOG's request that SCAG adopt growth forecast numbers at the county level rather than lower geographical levels such as city or census tract.

Our focus was on the SCS portion of the RTP. Our comments address strategies included in Tables 4.3 and 4.4 and we request the following changes:

**LOCAL GOVERNMENTS IN ACTION**

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita  
Los Angeles Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills  
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

### Land Use Actions and Strategies, Table 4.3

#### **Add the following new options:**

Update local zoning codes, General Plans and other regulatory policies and pursue opportunities to develop appropriately scaled mixed office-retail commercial centers within walking distance of residential neighborhoods

Responsible parties: Local jurisdictions

Update local zoning codes, General Plan and other regulatory policies to accelerate adoption of land use strategies that will over time convert auto oriented intersections of major arterials into mixed office-retail commercial centers.

Responsible parties: Local jurisdictions

Expand Compass Blueprint priorities to support member cities and sub-regional COGs adopting neighborhood oriented development as a land use strategy and range-limited electric vehicles as a mobility strategy.

Responsible parties: Local jurisdictions, COGs, SCAG

#### **Amend the following existing options (as indicated in italics):**

Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the RTP/SCS Alternative, *or that have been formally adopted by any sub-regional COG that is consistent with regional goals.*

Responsible parties: Local jurisdictions

Pursue joint development opportunities to encourage the development of housing and mixed-use projects around existing and planned rail stations, along high-frequency bus corridors, in transit oriented development *and in neighborhood oriented development.*

Responsible parties: Local jurisdictions, CTCs

Support projects, programs, policies and regulations to protect resource areas, such as natural habitats and farmland from future development; and *support project, programs, policies, and regulations that lead to development of "complete communities" on greenfields. (A diversity of housing choices and educational opportunities; jobs for a variety of skills and education; recreation and culture; a full-range of shopping, entertainment and services; all within a relatively short distance)*

Responsible parties: Local jurisdictions, SCAG

### Transportation Network Actions and Strategies, Table 4.4

#### **Add the following new options:**

Promote the use of range-limited battery electric vehicles through land use policies that bring origins and destinations closer together such as the neighborhood oriented development strategy; and through transportation infrastructure such as complete streets (designed to accommodate slow speed electric vehicles) and EVSE deployment in homes and in public parking lots.

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Encourage the development of new, short haul, cost-effective transit services such as DASH and demand responsive (DRT) in order to both serve and encourage development of compact neighborhood centers.

Responsible parties: CTCs and municipal transit operators

Ensure every sub-region has multiple access points to the regional high speed transit network with at least one of them being a candidate for development into a multi-mobility hub (MMH).

Responsible parties: CTCs and local jurisdictions

Lobby the state to provide funding for complete streets planning and implementation in support of reaching SB 375 goals.

Responsible parties: SCAG, State

**Amend the following existing options (as indicated in italics):**

Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities, accessibility to transit via non-auto modes *and ZEV modes, and accessibility via ZEV modes.*

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations *and neighborhood commercial centers.*

Responsible parties: Local jurisdictions, SCAG

Collaborate with local jurisdictions to provide a network of local community circulators that serve new TOD, IIQTAs, and *neighborhood commercial centers* providing an incentive for residents and employees to make trips on transit *and/or stay in the local communities.*

Responsible parties: Local jurisdictions, SCAG, and CTCs

Develop first mile/last mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking or *driving neighborhood electric vehicles or other ZEV options.*

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Encourage the development of a Complete Streets policy, *explicitly accommodating slow speed and other ZEVs.*

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Develop infrastructure plans and educational programs to promote active transportation *and ZEV options.*

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Emphasize active transportation projects *and slow speed ZEV modes* as part of complying with the Complete Streets Act

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Collaborate with local jurisdictions *and sub-regional COGs* to develop regional policies regarding TSM

Responsible parties: Local jurisdictions, COGs, SCAG,

Collaborate with local jurisdictions *and sub-regional COGs* to update the ITS inventory.

Responsible parties: Local jurisdictions, COGs, SCAG

Collaborate with the State and Federal Government *and sub-regional COGs* to examine potential innovative TDM strategies

Responsible parties: SCAG, State and COGs

In addition, the 2012 RTP should include a preliminary cost estimate for implementing the Regional PEV Readiness Plan and the sub-regional strategies to develop infrastructure and supportive land uses mentioned in Table 4.7. The completed PEV Readiness Plan will provide such an estimate however that will occur after RTP adoption so that an estimate as place holder should be added in this plan.

Once again, thank you for the opportunity to respond.

Sincerely,

A handwritten signature in cursive script that reads "Ellen Perkins".

Ellen Perkins, SBCCOG Chair  
Councilmember, City of Palos Verdes Estates

cc: Pam O'Connor, SCAG President



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

EMAILED: February 21, 2012

February 21, 2012

Mr. Jacob Lieb  
Southern California Association of Governments  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

## **Comments on the Draft 2012-2035 Regional Transportation Plan, Sustainable Communities Strategy, and Draft Program Environmental Impact Report**

The South Coast Air Quality Management (AQMD) staff appreciates the opportunity to comment on the Draft Program Environmental Impact Report (Draft PEIR) and the Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (Draft RTP/SCS). AQMD staff appreciates the inclusion of strategies in the Draft RTP that will reduce vehicle miles travelled (VMT). These strategies are a fundamental aspect of the plan and are needed to achieve transportation conformity requirements under the federal Clean Air Act. However, additional pollutant reductions beyond transportation conformity requirements must be found for the South Coast Air Basin (SCAB) to achieve National Ambient Air Quality Standards (NAAQS). Pursuant to the Clean Air Act, if the SCAB does not meet NAAQS on time, the region could lose federal transportation funding. This loss of funding could hinder achieving the goals of the Draft RTP/SCS. In addition, new tools and funding sources for SCS implementation will be required to overcome the additional hurdles that local jurisdictions face with the recent loss of redevelopment agencies. Therefore, we look forward to SCAG's continued significant involvement in the development of the 2012 Air Quality Management Plan in order to ensure that the transportation system contributes its fair share of pollutant reductions in our basin.

### Transportation and Goods Movement Strategy

The AQMD staff appreciates that the lead agency has worked with our staff and the California Air Resources Board staff to develop an aggressive plan containing transportation policies that promote zero emission technologies. These policies and projects will provide regional and local air quality benefits. For example, as a part of the plan's goods movement strategy, the lead agency has included full deployment of zero emission transport for all container drayage between the ports and near-dock rail yards by 2020 (Goods Movement Appendix to RTP, page 34). Further, the Draft RTP has included zero emission freight corridors that could yield significant regional emission reductions and reduce near roadway emissions exposure in a timely

manner. AQMD staff looks forward to our joint efforts with SCAG staff on future demonstration and deployment of these important technologies, including a zero emission on-road demonstration project within the next one to three years. Further information in the Final EIR and RTP about the following strategies would be helpful to provide clarity in how these aspects of the plan impact air quality.

- Although zero emission technologies are described in the Draft RTP, it is not clear to what extent the emission reductions from these projects have been included in the constrained plan (e.g., RTP Table 2.11). The Final RTP/SCS and PEIR should include specific details about how much of the emission reduction benefits of the I-710 corridor project, East-West freight corridor project, and zero emission deployment from the ports to near dock rail yards are included in the 2035 emission calculations.
- SCAG should work with local transportation agencies, the ports, and other private and public stakeholders to identify funding in the constrained plan for zero-emission technology demonstrations (or initial deployments) in the port to near dock rail yard corridor. These should involve multiple technologies, including technologies with potential for regional application, and should involve major truck manufacturers. Such demonstrations can and should be initiated by no later than 2013 and should include testing and evaluation of wayside power (e.g., catenary trucks), battery electric trucks, and fuel cell trucks. AQMD will partner in supporting this measure (e.g., funding, seeking funding partners, and developing other support).
- The Draft RTP/SCS includes several key port-related projects such as the Southern California International Gateway (SCIG) and Modernization of the Intermodal Container Transfer Facility (ICTF) that are considered critical to the regional goods movement system and will have serious air quality implications for the basin and substantial impact on the heavy duty truck distribution in the region. Specifically, the Draft RTP/SCS indicates these projects are needed to address an overall growth volume at the San Pedro Bay Ports of up to 43 million containers by 2035 - more than tripling current levels. In addition, this significant growth in heavy duty truck traffic calls for the need to develop zero and near-zero emission goods movement technologies.

#### Freeway Impacts to Sensitive Receptors

The Draft PEIR indicates that the proposed project will place an additional 200,000 people within 500 feet of freeways in the SCAG Region. Areas within 500 feet of a freeway typically experience significantly elevated levels of mobile source pollution compared to areas outside this buffer zone. The AQMD staff recognizes that the placement of concentrated populations next to freeways is in response to the SCS policies that encourage growth adjacent to transit and other transportation facilities, however, it is not clear how SCAG determines that the potential impacts to future residents in these areas are insignificant.

Specifically, page 3.2-31 in the Draft RTP/SCS PEIR states that Mitigation Measure-AQ19 (MM-AQ19) will reduce this impact to a less than significant level. MM-AQ19 describes requirements that lead agencies should implement for conducting Health Risk Assessments, maintaining buffer zones from some pollution sources, and installing particulate filters in building ventilation systems to reduce particulate exposure. However, it is not clear how this

mitigation measure will be implemented. Because the Draft RTP includes substantial growth in population in these freeway proximate areas, SCAG should commit to researching the effectiveness of mitigation to reduce pollutant exposures in these areas and working with other state and local agencies on further policy development to reduce near freeway exposure.

### Implementation Monitoring and Tracking

#### *SCS Performance Measures*

One of the primary goals of the SCS is to decrease per-capita greenhouse gas emissions from passenger vehicles and light duty trucks. These greenhouse gas reductions will have the co-benefit of reducing emissions of criteria pollutants. Because the SCS is an integral part of the RTP and therefore the AQMP, timely implementation of the SCS goals is relied upon to meet air quality standards. As a result, the AQMD staff requests that the plan be revised to include a periodic tracking and reporting element for the SCS that would occur more frequently than the regular RTP cycle. Specifically, staff requests that the tracking process not be limited to policy review of the SCS, but also include identification of revenue sources (see Funding comments below), and other metrics deemed appropriate by SCAG. These reported metrics should be made available to the public to ensure that our basin remains on track to meet AQMP goals.

#### *Funding of the RTP*

As required by federal regulation, SCAG has included a financial plan to demonstrate how the transportation plan can be implemented [23 C.F.R. §450.322(f)(10)]. The plan includes financial resources that are “reasonably expected to be available” to carry out the plan [§450.322(f)(10)(ii)]. However, about \$219.5 billion out of a total of \$524.7 billion in costs of the proposed 2012 RTP are expected to be funded by “new” sources of funds that are not currently available (“core” funds). This means that over 40% of the total cost of the plan is dependent on future new funding. Federal regulation provides that in the case of new funding sources, “strategies for ensuring their availability shall be included.” [450.322(f)(10)(iii)]. A review of the “new” funding sources indicates that most would require further action by the state legislature, Congress, and/or a vote of the people. Moreover, federal regulations require the financial plan to “address the specific financial strategies required to ensure the implementation of TCMs in the applicable SIP.” [§450.322(f)(1)(vi)]. We are concerned that these strategies are not sufficiently identified and assured of implementation.

State law also requires the RTP to include a financial element, which must summarize “the cost of plan implementation constrained by a realistic projection of available revenues.” [Government Code §65080(b)(4)(A)]. The financial element may recommend the development of specified new sources of revenue. However, in describing the requirement for “financial constraint,” the treatise *California Transportation Law* (Solano Press, 2000; March, Jeremy) provides at page 139 that the plan should:

- “Explain the consequences of living with existing revenues only, including what parts of the plan would not be achievable (without new revenues).”

- Indicate alternative policy directions if proposed revenues are not realized, and the time frame when the change in policy direction should be undertaken if proposed revenues are not forthcoming.”

The RTP does not currently present sufficient information to demonstrate why the “new” funding sources must actually become available. Moreover, it does not identify which measures or projects are to be funded by “core” revenues (those already available or committed) and which are to be funded by “new” sources. In order for the public and policymakers to have a clear understanding of why the “new” funding sources must become available, and thus to implement the needed steps for this to occur, the RTP should clearly identify the consequences if the plan were forced to depend only on “core” funding.

### Transportation Control Measures

AQMD staff initially requested that SCAG prepare an analysis in the Final RTP/SCS of what transportation control measures would be needed to offset growth in emissions due to growth in VMT, if the decision in *AIR v. EPA* were to become final [632 F.3d 584 (9<sup>th</sup> Cir. 2011)]. The conformity section of the Draft RTP acknowledged in a footnote that the RTP would not be sufficient, but did not explain what would be required. On January 27, 2012, the Ninth Circuit Court of Appeals denied EPA’s petition for rehearing in that case. As a result, AQMD staff is now requesting a scenario analysis that includes the incremental emission impact in the SCAB due to VMT growth. This scenario analysis would use the difference between 2035 VMT and the VMT from years 1997, 2008, and 2012, and applicable vehicle emission rates in 2035. The Draft EIR compares today’s emissions with future emissions, and compares emissions with the project compared to emissions without the project. We request that SCAG analyze the emissions impact of growth in VMT. For illustration purposes, staff reiterates its request that the RTP also include an analysis of what additional Transportation Control Measures (TCMs) it would take to comply with this decision.

### Public Availability of SCS Details

In order to provide certainty and transparency to the public, the details regarding the planning assumptions in the RTP/SCS (such as housing density, distribution of employment, etc.) should be made publicly available upon approval of the Final RTP/SCS. Because the RTP/SCS will be used to determine whether future projects can utilize new CEQA streamlining procedures, stakeholders need to have a readily available data source that describes what planning assumptions are included in the SCS. This final SCS planning scenario at the local level should be published and available to the public, and any future changes/amendments should also be made available for review so that all stakeholders can evaluate the consistency of future projects with the SCS.

### Economic Analysis

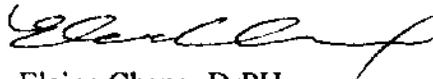
The AQMD staff appreciates SCAG’s participation at the February 1, 2012 study session on the economic impact of the Draft RTP/SCS. At that meeting SCAG acknowledged and clarified the limitations of the Draft RTP/SCS economic analysis released in December of 2011 and presented the results from additional analyses. Based on our understanding of the economic analysis from

that meeting, we request that SCAG provide further clarification on its methods in assessing RTP employment impacts. This information is crucial because the AQMP heavily relies upon employment figures generated by the RTP for emission projections. For example, the Draft RTP assumes that employment will be the same with and without the plan (Table 3.10-10 of the Draft EIR). Any additional analysis conducted after the draft document on job impacts should be released prior to approving the Final RTP and should provide more detailed description on the analysis assumptions and proper interpretation of the results. Also, the AQMD staff recommends inclusion of the financing component of operation and maintenance expenditures in the job impact assessment of the RTP/SCS.

#### Contact Information

The inclusion of these items coupled with a continued emphasis on zero and near zero emission transportation technologies in the region could formulate a plan that provides a path for sustainable communities, achieving regional air quality goals, and reducing public health impacts from future transportation infrastructure. The AQMD staff looks forward to continuing to work with SCAG in pursuit of air quality standards in the region and improve air quality for all residents in the South Coast Air Basin. Please contact me at (909) 396-3186 should you have any questions regarding these comments.

Sincerely, \



Elaine Chang, DrPH

Deputy Executive Officer

Planning, Rule Development & Area Sources

PG:BB:IM:SL:DG

ALL121229-01

Control Number



February 14, 2012

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

RF: Comments on the Drafts of the 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR)

Dear Mr. Ikhata:

For the past three years, business and industry representatives from throughout Southern California have participated in the Southern California Association of Government's extensive process used to develop the region's Draft 2012 Regional Transportation Plan (RTP), which includes an inaugural Sustainable Communities Strategy (SCS). Our interest in this process has been particularly keen given both the significant economic challenges currently facing our region's economy and the fact that the inaugural SCS could – if not considered from many viewpoints – have unforeseen negative consequences.

In light of our ongoing participation and understanding, we appreciate the tremendous effort that SCAG's staff and leaders have put into the process that led to the Draft 2012 RTP/SCS & PEIR. The development of this RTP/SCS followed an inclusive approach with SCAG holding hundreds of meetings with SCAG's public and private stakeholders. We also appreciate the extensive economic analysis that SCAG has performed on the Draft RTP/SCS in order to provide all stakeholders and SCAG's Regional Councilmembers with an understanding of the financial impacts of the plan.

As representatives of Southern California's broader business community, we recognize the crucial roles that transportation and infrastructure have in maintaining our region's economy and quality of life. Accordingly, through this letter, we join together to provide SCAG with general comments regarding remaining significant concerns about the contents of both (i) the Draft 2012 RTP/SCS, and (ii) the Draft Program Environmental Impact Report (PEIR).

From the beginning, representatives of businesses and industries have agreed upon the qualities of a good RTP/SCS. Those qualities can be summarized as follows. The RTP/SCS should:

- Foster economic growth and job creation in a balanced and accountable manner and in recognition of foreseeable regional population growth;
- Utilize all revenue sources very efficiently, and utilize new revenue sources only if they are economically sound and equitable;
- Honor the prerogatives that local governments – as the level of government with the greatest understanding of and sensitivity to community interests and context – should continue to enjoy concerning land use and community development;
- Comply with the California Environmental Quality Act (CEQA) and federal environmental laws and regulations (e.g., federal Clean Air Act conformity); and
- Allow for expeditious review and approval of projects that are consistent with a sound and reasonably accommodating RTP/SCS.

Despite our overall appreciation for the work put in by SCAG's staff, there are important aspects of the Draft 2012 RTP/SCS and Draft PEIR which, we believe, require much more consideration and correction or clarification before SCAG approves the 2012 RTP/SCS and the Final PEIR. Corrections or at least substantial clarifications – are needed in order to bring the Final 2012 RTP/SCS and PEIR back into line with the principles set forth above.

Stated here in the most general terms, SCAG's staff and ultimately its Regional Council should address the following concerns and correct the final 2012 RTP/SCS and the accompanying PEIR.

- 1) The Draft PEIR is unduly prescriptive and imposes mitigation requirements that are not suitable for mandatory consideration at the individual project level. Simply put, many of the prescribed mitigation measures address matters at too small a scale for a regional transportation and land use strategy. The Draft PEIR lists more than 500 discrete mitigation measures that cover a broad range of topics; and it asserts that SCAG has preliminarily found that all such mitigation measures are feasible and "can and should" apply to all future projects in the region. Many of these mitigation measures were drawn from "model policies" that were drafted in 2009 and were intended for consideration only at a jurisdictional planning level – not an individual project level. Many of the mitigation measures listed are not reasonably considerable let alone feasible generally at a project level throughout Southern California.
- 2) Many of the mitigation measures set forth in the Draft PEIR have no relationship to the RTP/SCS or its impacts. For example, the Draft PEIR invokes mitigation measures ranging from low-flow toilets to green roofs. Such mitigation measures have nothing to do with the regional dispersion of future development and redevelopment or its indirect effects on emissions from vehicular use (which is the proper focus of the RTP/SCS).
- 3) The Draft PEIR attempts to etch in stone the project-level consideration and potential incorporation of mitigation measures that conflict with, or inevitably will conflict with, highly-evolved and dynamic subject-matter regulations. For example, the Draft PEIR would prescribe mitigation requirements concerning matters ranging from storm water management to energy efficiency standards to fire protection to landscaping to water supply analyses – all matters that are highly regulated and subject to dynamic standards that either are now or are bound to be at odds with the PEIR.

In light of the above-stated problems with the Draft PEIR, we believe that it needs to be substantially rewritten to clarify what we understand was intended by SCAG's staff and leaders – that the PEIR should not subtract from or interfere with local governments' reasonable prerogatives under CEQA. As the Draft PEIR now stands, the environmental analysis and suggested mitigation requirements would likely lead to more CEQA litigation rather than to CEQA streamlining as California Senate Bill 375 (2008) promised.

Turning to the substance of the RTP/SCS as a policy matter, we have the following additional general comments:

- 4) The RTP/SCS is undergirded by analysis which shows the dispersion of populations and employment shown and categorized at the level of sub-jurisdictional "transportation analysis zones" (TAZs). The TAZ level of detail is, we believe, too small and precise a level at which to prescribe the spatial dispersion of development and redevelopment, particularly in light of the regional nature of the RTP/SCS. Page 148 of the SCS should therefore be clarified to indicate that questions of consistency with the RTP/SCS should be substantively measured and determined at a jurisdictional or sub-regional level, not at a TAZ level.
- 5) The RTP/SCS should aim to reflect and accommodate both the short-term future of the SCAG region and its long-term future. For example, the RTP should better anticipate the need for and reasonable likelihood of a gradual transition in the region's overall vehicle fleet (e.g., gradually towards alternative fuels) and the ongoing need for enhancements to vehicular mobility even as more mass transit comes to fruition.
- 6) More detail, clarity and explanation are needed concerning the new revenue sources that are outlined within the plan document. New revenues account for \$219.5 billion out of the total \$524.7 billion needed for the transportation plan, yet there is very little detail explaining these significant new fees and impositions (see page 95 & 96 of the Draft RTP/SCS).  
To fully and fairly evaluate these proposals, the business community and all stakeholders need the benefit of additional detail and explanation. In particular, we need clarity and assurance regarding the following:
  - a. The new revenue concepts assumed within the RTP/SCS must be fair, equitable and economically sound, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.
  - b. The new revenue sources within the RTP must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it is proposing.
- 7) New revenues from fees on businesses operating in the SCAG region – and particularly the "Freight Fee/National Freight Program" listed on page 96 of the Draft RTP – need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region's competitiveness will be compromised.
- 8) In the RTP, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system. It would be helpful for SCAG to state clearly in the RTP that, to date, stakeholders have not reached consensus on technologies, timing, funding, or emissions impacts of the various options that SCAG examined in the RTP. For example, SCAG discusses long-term steps towards a "Zero Emissions Container Movement System" (ZECMS). If SCAG chooses to pursue such a fundamental shift in new technology, it would need to work with all goods movement stakeholders to clearly establish whether and, if so, when and where within the transportation infrastructure a ZECMS option could be demonstrated and evaluated without negatively affecting the velocity and throughput of the system.
- 9) With the recent elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is challenged, given the costs related to aging or inadequate infrastructure capacity and high development costs for higher density projects. The elimination of redevelopment agencies also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. In fact, since the passage of SB 375, the State of California has stripped local governments of funds that were previously available for

transit, transportation and redevelopment. This follows many years in which the state diverted revenues from gasoline, sales, income and other taxes needed for local government programs. Local governments cannot help to fulfill the 2012 RTP/SCS without increased, not decreased, state support. SCAG should emphasize the need for the state to restore support for planning, transit, transportation and redevelopment or other necessary funding to pre-SB 375 levels in order to speed the attainment of mandated goals.

While we find many very positive aspects in the plan, especially related to principles and direction, these significant issues need to be addressed. The short list of general concerns set forth above is not meant to be exhaustive. Many of the organizations that subscribe to the above-stated comments will be commenting more robustly in separate writings. We join here, however, to express our unity in finding the Draft 2012 RTP/SCS and PEIR to be in need of significant clarification and correction. We are also jointly committed to completing this process and, over the remaining weeks, working closely with SCAG to develop and adopt a smart, flexible, accountable, and economically sound RTP/SCS.

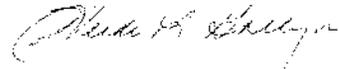
Respectfully,



Jim Clarke  
Executive Director  
Apartment Association of Greater Los Angeles (AAGLA)



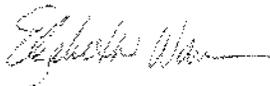
Andrew R. Henderson  
Vice President and General Counsel  
Building Industry Association of Southern California, Inc.



Heidi L. Gallegos  
Executive Director  
Eastvale Chamber of Commerce



Hilary Norton  
Executive Director  
FAST – Fixing Angelenos Stuck in Traffic



Elizabeth Warren  
Executive Director  
FuturePorts



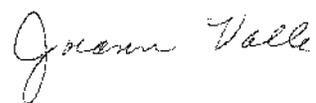
John Kelsall  
President & CEO  
Greater Lakewood Chamber of Commerce



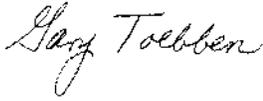
Gene Hale  
Chairman  
Greater Los Angeles African American Chamber



Paul C. Granillo  
President & CEO  
Inland Empire Economic Partnership



Joann Valle  
Executive Director  
Harbor City/Harbor Gateway Chamber of Commerce



Gary Toebben  
President & CEO  
Los Angeles Area Chamber of  
Commerce



David Fleming  
Founding Chairman  
Los Angeles County Business  
Federation



Hugo W. Merida  
Chairman of the Board  
Los Angeles Metropolitan Hispanic  
Chamber of Commerce



Kate Klimow  
Vice President of Government Affairs  
Orange County Business Council



T.I. Garrett  
Vice President  
Pacific Merchant Shipping  
Association



Sandy Cajas  
President & CEO  
Regional Hispanic Chamber of  
Commerce



Rich Lambros  
Managing Director  
Southern California Leadership  
Council



Ron L. Wood  
President & CEO  
The Valley Economic Alliance



Stuart Waldman  
President  
Valley Industry & Commerce  
Association (VICA)



Patty Sencal  
Manager, Southern California Region  
and Infrastructure Issues  
Western States Petroleum Association



Michael W. Lewis  
Senior Vice-President  
Construction Industry Air Quality  
Coalition (CIAQC)



Michael W. Lewis  
Senior Vice-President  
Construction Industry Coalition on  
Water Quality (CICWQ)



Alexander Pugh  
Senior Project Manager - Policy &  
Project Management  
Southern California Edison



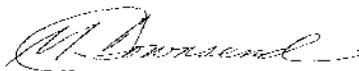
Bill Allen  
President & CEO  
Los Angeles County Economic  
Development Corporation



John Guerra  
Director, Regional Public Affairs  
SoCalGas



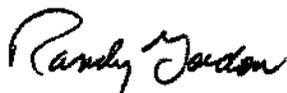
Michael Carroll  
Regulatory Flexibility Group



Madame M C Townsend  
President & CEO  
Regional Black Chamber of  
Commerce – San Fernando Valley



Bob Amano  
Executive Director  
Hotel Association of Los Angeles



Randy Gordon  
President/CEO  
Long Beach Area Chamber of  
Commerce



Jay McKeeman  
Vice President, Government  
Relations & Communications  
California Independent Oil  
Marketers Association (CIOMA)



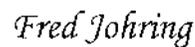
Christina Davis  
President & CEO  
LAX Coastal Chamber



LaDonna DiCamillo  
Senior Manager Government Affairs  
BNSF Railway



Lupe Valdez,  
Director of Public Affairs  
Union Pacific Railroad



Fred Johring  
President  
Harbor Trucking Association



Eric Sauer  
Vice President Policy and Regulatory  
Affairs  
California Trucking Association

# Southern California Contractors Association, Inc.

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(323) 726-3511  
Website: [www.sccaweb.org](http://www.sccaweb.org)



Los Angeles, California 90040  
FAX: (323) 726-2366  
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February 13, 2012

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Rita Vigil Ferguson

Mike Zanaboni

Hasan Ikhata

Executive Director

Southern California Association of Governments

SCAG Main Office, 818 W. 7th Street, 12th Floor

Los Angeles, CA 90017

## RE: Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)

Mr. Ikhata:

On behalf of the Southern California Contractors Association's (SCCA), more than 300 union contractors, crane operators and industry suppliers engaged in heavy civil construction in southern California, I write you today provide comments on the Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). SCCA has served the union heavy construction industry since 1974, including contractors' signatory with the Operating Engineers, Laborers, Cement Masons, Ironworkers, Carpenters and Construction Teamsters.

Thank you to SCAG for the hard work and forward thinking that has gone into the RTP/SCS planning process. Thank you also for the opportunity to provide comments on behalf of SCCA.

SCCA appreciates SCAG's goals of optimizing system performance (including preservation and maintenance), investing in completing transportation system gaps and strategic investments to expand the system as the population grows.

As you know, not only is southern California's population expected to grow dramatically over the next 25 years, but according to the American Road & Transportation Builders Association freight movement is projected to double. Protecting our existing transportation infrastructure and making strategic investments to expand infrastructure will be key to safely moving people and goods for decades to come.

According to the Construction Industry Research Board, based in Burbank, total construction in California dropped from \$98 billion in 2005 down to \$42.4 billion in 2010. This represents a 57 percent reduction in total construction activity in the state. The market low was 2009 with total construction at \$39 billion.

California construction employment has a direct correlation with total construction activity. According to the California Employment Development Department, Labor Market

**PAST PRESIDENTS**  
1974 Edwin M. Kalish  
1975 Leonard Brutocean\*  
1976 Lee Volmer  
1977 Charles W. Poss  
1978 Don Thompson\*  
1979 Jack Saiz, Jr.  
1980 John J. Clarke  
1981 Donald Gladden  
1982 Bill Maness\*  
1983 Tim MacDonald  
1984 Arnold S. Nelson  
1985 Dan Grandpre  
1986 Donald L. McCoy  
1987 James D. Sprinkel  
1988 George B. Cooke  
1989 LeRoy McAfee\*  
1990 Jon Salata  
1991 James T. Gasparo  
1992 Dean Rasmussen  
1993 Les Farrow  
1994 Stan Howard  
1995 Doug Burhoe  
1996 Jack Blakely  
1997 Greg Erickson  
1998 Jim O'Kane  
1999 Brad Cooke  
2000 George Bragg\*  
2001 Chuck Poss  
2002 Greg Dineen  
2003 Mike Crawford  
2004 Paul Von Berg  
2005 Dorra Scaez  
2006 Doyle Powell  
2007 David Elsbury  
2008 Seth Hammond  
2009 Larry Nodack  
\* Deceased



Information Division, California construction employment dropped from 933,700 in 2006 to 559,800 in 2010. That represents a 40 percent reduction in construction employment over a five year period.

The RTP calls for \$524.7B in infrastructure investment which will significantly boost construction activity in southern California. The SCCA supports this plan. However, we echo the concerns voiced at the February 2 Public Input Hearing by the Southern California Leadership Council and we would like to see more clarity on the \$219.5B in new revenue sources outlined in the plan.

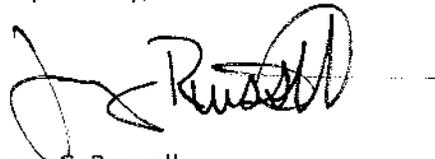
According to the American Road & Transportation Builders Association in Washington, D.C., "Greenfield" infrastructure projects can take up to 19 years from concept to construction due to the National Environmental Policy Act and California Environmental Quality Act processes.

Therefore, SCCA has concerns with the number of mitigation measures in the PIER. We encourage SCAG to further examine the economic impacts of mandates on local governments and contractors, and the potential for project delays and future litigation.

SCCA supports a balanced approach to providing multi-modal transportation alternatives to southern California. We encourage SCAG to ensure a truly balanced approach that balances transit, highway, freight rail, bridge and roadway improvements with smart land use strategies that encourage walking, biking and other transportation options.

Again, thank you for all of your hard work in developing the RTP and SCS. We look forward to continuing to work with you on sustainable solutions that work for everyone.

Respectfully,

A handwritten signature in black ink, appearing to read "Larry C. Russell". The signature is stylized and written over a horizontal line.

Larry C. Russell  
Executive Vice President

February 14, 2012

**SCAG**  
**FEB 21 2012**  
**MAIL RECEIVED**

Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: Comments on the Drafts of the 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR)

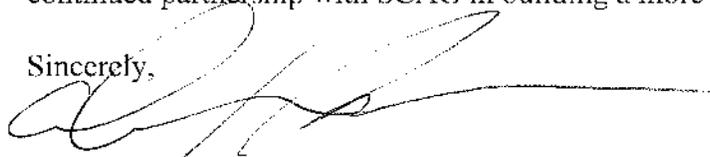
Dear Mr. Ikhata:

Southern California Edison (SCE) values the opportunity to provide comments on the PEIR and RTP/SCS. As an electric utility and infrastructure provider, SCE understands the importance of long-term planning to ensure safe, reliable and affordable service. SCE recognizes SCAG's immense effort in working with multiple stakeholders within the region to develop this plan and appreciates having been included in this process.

The RTP/SCS sets out long-term goals to meet mobility, housing, sustainability and economic needs of Southern California, which are accomplished by transportation agencies and stakeholders. Similarly, SCE will be constructing transmission and distribution projects to maintain and expand its electric system, ensuring long-term reliability and delivering a 33% renewable energy mix for the same growing population. Further, SCAG will play a critical planning role as transportation systems incorporate zero and near-zero emissions technologies, which it has already begun to demonstrate through its leadership on regional electric vehicle infrastructure planning. SCE looks forward to continuing its collaboration with SCAG and other stakeholders to ensure that the land-use, economic and other requirements of sustaining a safe, reliable and affordable electric system are taken into consideration in this and future regional planning initiatives.

Attached are specific comments on the Public Services and Utilities, Air Quality, Green House Gas and Aesthetics sections of the PEIR. Please feel free to contact me at (626) 302-3819 should you have any questions regarding SCE's comments. Once again, SCE appreciates the opportunity to comment on the 2012-2035 RTP/SCS and PEIR and looks forward to its continued partnership with SCAG in building a more sustainable transportation system.

Sincerely,



Alexander Pugh  
Senior Project Manager

CC: Chairwoman Pam O'Connor  
Jacob Lieb  
Margaret Lin

### ***Comments on Section 3.11 Public Services and Utilities:***

#### **Local Energy Partnerships**

Please update page 38 to include all of the active local energy partnerships within the SCAG subregions. In addition to the San Gabriel Valley Energy Efficiency Partnership noted in this section, other partnerships exist with the South Bay Cities COG, Coachella Valley Area Governments, Ventura County, and Cities (Ventura County Regional Energy Alliance) and with the County of Los Angeles.

#### **Growth in the Use of Electric Vehicles**

Assumptions about the number of battery and hybrid plug-in electric vehicles (PEV) in Southern California between now and 2035 may be higher than accounted for within the RTP/SCS and PEIR. Currently, SCE is planning for three scenarios for PEV growth within its service territory by 2020: low - 175,000; medium - 450,000; and High – 1,000,000. In January, the California Air Resources Board passed the Advanced Clean Car Initiative calling for more than one million PEVs in California by 2025. Additionally, planners and researchers in Southern California, including SCAG and the UCLA Luskin Center, are conducting research to guide the build-out of publically accessible charging stations region-wide. This too may further support the growth of the PEV market.

#### **Electric Vehicles Description and Charging**

On page 43-44, please update the description of the status of electric vehicles and charging stations. In 2011, almost 20,000 units of Chevrolet Volt and the Nissan Leaf were sold nationwide according to Automotive News. The US Department of Energy ([www.fueleconomy.gov](http://www.fueleconomy.gov)) indicates that more than a dozen PEV models are slated to come on the market in the next two years. In regards to charging infrastructure, great strides have been made in Southern California to update the older 1990's paddle chargers to the new J1772 standard. Moreover, there are a number of charging station installers and equipment manufactures in Southern California, which means both a direct positive environmental and economic impact comes from electric vehicle growth.

#### **Renewable Energy**

Please note on page 44 in the renewable energy discussion that SCE is investing in hundreds of megawatts of distributed solar generation through a reverse auction mechanism for photovoltaic systems up to 10MW. This is one of many programs that SCE offers to distributed renewables. A more complete listing of SCE incentives can be found on the SCE website: <http://www.sce.com/PowerandEnvironment/Renewables/Solar/default.htm>

#### **Thresholds of Significant Impacts to Utilities**

On page 45, the range of significant impacts to a utility should also include major relocations caused by the any of the projects in the PEIR. Similarly, under the impacts section on page 46, please mention utility relocations caused by projects covered in the PEIR. In addition, please indicate in comparison with the “No Project Alternative” where there would be significant utility relocation impacts.

### **Energy Consumption Projections**

With regards to future energy consumption projections, there are several factors that may increase future electric load growth, including the electrification of transportation systems, which are considered in the RTP itself. Three broad transportation categories that are likely to use more electricity in the study period include light-duty passenger vehicles, bus and rail transit, and multiple modes of goods movement. As an illustration, the PEIR includes projects from Metro’s Measure R building campaign, which include twelve new electric light rail and subway projects during the study period. Eight of these are in SCE’s territory. The PEIR and the RTP/SCS also indicate greater adoption of electric technology within the goods movement sector. The RTP includes zero-emission truck corridors on the I-710 and expansion to an east-west alignment as well as electrification of rail yards operations and routes throughout the region. SCE will work closely with transportation providers to better understand energy needs and air quality benefits of these projects as they come online. However, it is worth noting in the PEIR that these changing conditions will impact long-term demand.

### **SCE Facilities, Rights-of-way and Easements**

The RTP references use of utility right-of-way for open space and transportation improvements. As stated in SCE’s comment letter on the RTP/SCS, SCE will need to coordinate with SCAG and other transportation stakeholders to ensure impacts to SCE’s critical facilities are addressed in order to meet CPUC mandates and to meet the core mission of providing safe, reliable and affordable electricity service to customers within its 50,000- square-mile service territory. Also, the RTP must underscore that the “tiering” provisions of this PEIR does not preclude the requirement that local land use planning decisions be coordinated with SCE to prevent direct and indirect encroachment of residential, commercial and industrial uses with SCE facilities.

Good long-term coordination is critical to building and maintaining functional public services. SCAG, SCE and other service providers throughout the region could benefit greatly by working together on joint corridor planning.

### **Public Service and Utilities Section 3.11 Mitigation Measures**

While it is important for project sponsors to consider energy efficiency, renewable generation, and coordination with utilities during construction, SCE strongly recommends SCAG to direct project proponents to comply with existing regulations and best practices set by regulatory agencies. In the utility sector, these agencies include the Public Utilities Commission (PUC), California Energy Commission (CEC), Southern California Joint Pole Committee (SCJPC), and

many others. Any additional mitigation measures should be provided as optional. It should also be noted that many of the individual project EIRs already include many of the mitigations described in this and other sections. Our specific suggestions include:

MM-PS33 –SCE’s primary responsibility is to provide safe, reliable and affordable service to customers. Trails, parks, and other open space may not be compatible with SCE’s operating requirements or land rights. SCE asks that this mitigation be removed or amended to say, “Coordinate with utilities based on the compatibility of future use.”

MM-PS57 –It is important to coordinate utility relocations to reduce impacts to city streets and other public property and right-of-way. Project proponents should consult impacted utilities early in the planning process and coordinate the environmental review and construction timing of such impacts with the utilities.

MM-PS60 – Prior to considering any renewable energy investments, SCE recommends that project sponsors maximize energy efficiency upgrades.

MM-PS61 – For any of the mitigation measures related to implementing energy efficiency measures, project sponsors should check with their utility to learn about up-to-date best practices and any incentive programs that might be offered. Further, SCE recommends that project sponsors comply with any existing building codes, ordinances, and standards on the best ways to conserve energy.

MM-PS65 – Local jurisdictions should also consider EV readiness education for residents and businesses. There are also several best practices for inclusion of EV readiness building codes for new construction and major remodels, such as those laid out in the California Green Building Standard Codes.

MM-PS70 – Similar to PS61, before installing renewable energy generating equipment, project proponents should maximize energy efficiency upgrades.

MM-PS112 – For all mitigation measures related to local jurisdiction energy efficiency planning, SCE encourages participation in municipal energy efficiency partnerships as mentioned in PS122.

MM-PS120 – SCE encourages SCAG to expand this mitigation to pursue infrastructure planning for PEVs throughout the region in partnership with stakeholders in the private sector, local government, and with planning and regulatory agencies.

### *Section 3.2 Air Quality and 3.6 Green House Gas Emissions*

As stated in the previous section, SCE urges SCAG to consider the net positive impact of electric vehicles to air quality and greenhouse gas emissions in the region. According to the CEC and CARB Alternative Fuels Plan from December 2007, electric cars have a dramatically better well-to-wheels emissions profile than conventional fossil fuel internal combustion engine vehicles;

Carbon dioxide emissions are 72% lower and criteria pollutant emissions are 99% lower. When charging is shifted to off-peak evening hours (more than 80% of SCE EV customers charge off peak), new load from PEVs benefits both the environment and ratepayers. Similar comparisons can be drawn for heavy-duty vehicle use.

SCE comments on specific mitigations in these two sections are as follows:

MM-AQ1 – An additional Transportation Control Measure that should be included from the South Coast Air Quality Management district Rule 2202 is the installation of workplace PEV charging stations.

MM-TR86 – If local jurisdictions are requiring new construction to provide prioritized parking for electric vehicles, they should also include requirements to install EV infrastructure such as appropriate access to electrical outlets. Rolling Hills Estates has developed such an ordinance that can serve as a template.

MM-TR88 –The siting of locations for PEV and other alternative fueling stations should be coordinated with regional infrastructure plans.

### *Section 3.1 Aesthetics*

SCE may have to develop new generation, transmission and distribution facilities to support RTP/SCS goals and future transportation needs. Therefore, SCE urges SCAG to encourage collaboration between affected stakeholders including Caltrans, transit agencies, railroad companies and the ports when planning decisions for these projects are contemplated. Such collaboration will minimize potential conflicts with identified viewshed, and further land use compatibility goals.



**Hector Madaraga**  
Director  
Environmental Affairs  
555 W 5th St  
Los Angeles, CA 90013



February 10, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017-3435

Dear Ms. Lin:

Southern California Gas Company (SoCalGas) respectfully submits these comments regarding the Southern California Association of Governments' (SCAG) 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

SoCalGas, a regulated utility of Sempra Energy has been delivering clean, safe and reliable natural gas to its customers for more than 140 years. It is the nation's largest natural gas distribution utility, providing service to 20.9 million consumers connected through nearly 5.8 million gas meters in more than 500 communities. SoCalGas's service territory encompasses approximately 20,000 square miles throughout Central and Southern California, from Visalia to the Mexican border. These comments address those portions of the RTP/SCS related to use of natural gas fuel in SCAG's region.

Our overarching concern and comment is that the RTP/SCS is not balanced in terms of options presented for alternative vehicle fuels. There is an obvious and inexplicable predisposition towards electric and zero-emission vehicles (ZEVs) without apparent backup documentation regarding the cost-effectiveness and feasibility of such an "all" electric strategy. We respectfully request that SCAG produce a more balanced and pragmatic RTP/SCS that truly considers both the short-term and long-term future of the region, by incorporating options for cost-effective, practical, and immediately available, alternative-fuel motor vehicles such as natural gas-fueled vehicles (NGVs).

Having a broad array of clean-fuel options makes sense for your member agencies given the diversity of your six counties and 191 cities. Many of your members have already made significant commitments to NGVs powered by clean, compressed natural gas (CNG), in terms of infrastructure, training and vehicle purchases. For example, as recently as last year, the LA County Metropolitan Transportation Authority retired its last diesel bus and now operates 2221 CNG-powered buses serving the communities comprising the County of Los Angeles. This important decision was made within the context of financially constrained budgets, especially given the order of magnitude higher cost for purchasing, operating and maintaining electric and

fuel-cell transit buses. Furthermore, since affordable near-zero vehicle technology is developing faster than fuel-cell and electric vehicle technology, it is imperative that more-effective, readily available, alternative-fuel options are included in the RTP/SCS as possibilities for all of your member agencies. SoCalGas would like to share data with SCAG staff on cost-effective, readily available near-zero vehicle technologies, such as NGVs.

In the spirit of assisting SCAG in developing the most comprehensive and legally defensible RTP/SCS, the discussion below provides support for why SCAG should incorporate options for cost-effective, practical, and immediately available alternative-fuel motor vehicles such as NGVs, in its RTP/SCS.

1. SB 375 (Steinberg, 2008) - Addressing Greenhouse Gas Emissions from the Transportation Sector via Regional Transportation Plans

The RTP/SCS needs to incorporate the use of other alternative-fuel vehicles, such as NGVs in order to fully meet all of SB 375's requirements. This is because SB 375 requires plans such as the RTP/SCS to be "*balanced*" and "*pragmatic,*" and to consider "*both the short-term and long-term future.*" Consequently, the RTP/SCS should incorporate cost-effective, practical, and immediately accessible alternative-fuel motor vehicles such as NGVs. The planning and infrastructure necessary for deploying electric and fuel-cell vehicles is an extremely resource-intensive and long-term process. Indeed, if the RTP/SCS were to mandate solely electric and fuel-cell vehicles, then SCAG would be making the same mistakes that CARB made when it implemented its Zero Emission Bus (Z-Bus) program ten years ago.

CARB adopted the Z-Bus program in 2000 as part of its Transit Fleet Rule which basically requires transit-bus fleets (with over 200 buses) to have by 2010, 15% of their new bus purchases be Z-Buses, such as battery-electric or fuel-cell buses, or electric trolleys. Over the last ten years, however, a number of demonstration projects conducted by a number of large transit agencies showed that these Z-Buses were very expensive, performed poorly, were unreliable, and its key components (batteries, fuel-cells) were extremely expensive to replace with a very short life span, e.g., a fuel-cell has a life span of 5,000 hours and costs over \$1 million to replace.

In September 2010, Foothill Transit took delivery of three battery-electric powered Z-Buses, costing \$1 million each. Each bus had a 30-mile range requiring a 10-minute recharge period. Worse, the recharging periods for these electric buses would occur during peak-electric periods when electricity is at highest cost and potentially overloading already strained California power grids. As a result, CARB is in the process of revising the Z-Bus rule to allow for greater flexibility and to give the bus-transit agencies more time.

Therefore, in order for the RTP/SCS to succeed in meeting the requirements of SB 375, it must take note of what CARB learned from its Z-Bus program and broaden its scope beyond just fuel-cell and electric vehicles, to include other alternative-fuel vehicles such as NGVs.

In addition, the RTP/SCS's current limitation of alternative-fuel vehicles to just fuel-cell and electric vehicles belies a narrow focus solely on tailpipe emissions. While it is true that ZEVs

have zero tailpipe emissions compared to near-zero or low-emission vehicles (LEVs) such as NGVs, it would not be accurate to say that ZEVs generate zero emissions overall compared to low-emission vehicles. For example, electric vehicles receive their power from generating facilities that also generate combustion emissions. Emissions are also generated by the processes used to manufacture the special batteries needed for such vehicles. These emissions cannot be ignored nor discounted, particularly with respect to attainment of the National Ambient Air Quality Standard for ozone, or contributing to any new “*or existing violation of any standard in any area.*”

Furthermore, there is efficiency loss using electrical power rather than directly using natural gas to power vehicles. Indeed, in the course of producing useful electric energy in the U.S., “we waste or discard about 70 percent of the initial raw energy found in coal or most other fuel sources.<sup>1</sup>” It is more energy efficient, therefore, less wasteful and less polluting to directly use natural gas to power vehicles rather than generating electricity transmitted long distances over power lines and then used to power an electric vehicle. Therefore, energy efficiency should be taken into account to fulfill the SB 375 requirement for “a balanced” and “pragmatic,” RTP/SCS.

## 2. AB 32 (Núñez 2006) - Global Warming Solutions Act

The RTP/SCS needs to broaden its scope beyond electric vehicles and incorporate the use of alternative-fuel motor vehicles such as NGVs in order to be fully consistent with the policy objectives of AB 32, which is an overall reduction of California’s greenhouse gases (GHG) emissions. As discussed above, energy is wasted when natural gas is used to generate electricity for electric vehicles, compared to natural gas used directly to power NGVs. In addition to this, using natural gas to generate electricity for electric vehicles creates more GHG emissions compared to natural gas used directly to power NGVs. This point is illustrated in a recent study which found that if you compared an electric-resistance water heater to a natural-gas water heater on a full fuel-cycle basis, the natural-gas water heater emits over 50 percent less CO<sub>2</sub> equivalent emissions annually.<sup>2</sup>

Furthermore, the RTP/SCS also needs to be consistent with the goals of AB 32’s low-carbon fuel standard (LCFS). The LCFS is designed to ensure the use of low-carbon transportation fuels in order to achieve the lower GHG levels intended by AB 32. This is achieved through the development of a carbon-intensity index which is measure of a transportation fuel’s GHG emissions generated through its life cycle, i.e., GHG emissions generated from obtaining the fuel’s raw materials, manufacturing the fuel, transporting the fuel from the producer to the ultimate consumer, and using the fuel. Electricity as a transportation fuel has a carbon-intensity index, as well as CNG, hydrogen, gasoline, and other transportation fuels.

If the RTP/SCS solely focuses on fuel-cell and electric vehicles, and excludes other alternate-fuel vehicles, such as NGVs that have lower carbon-intensity index values, it would be inconsistent

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<sup>1</sup> Cooper, Roger. (2011; p.6) *Natural Gas Reconsidered*. Progressive Policy Institute.

<sup>2</sup> American Gas Association. (2009; p. 16) *A Comparison of Energy Use, Operating Costs, and Carbon Dioxide Emissions of Home Appliances*. Policy Analysis Group.

with the broader GHG reduction goals of AB 32, which is the law that forms the very foundation for SB 375 and the SCS requirement.

3. AB 118(Núñez 2007), amended by AB 109 (Núñez 2008) - Alternative and Renewable Fuel and Vehicle Technology Program

Assembly Bill 118 created and authorized the California Energy Commission (CEC) to “*develop and deploy innovative technologies that transform California’s fuel and vehicle types to help attain the state’s climate change policies.*” With an annual budget of \$100 million, the CEC must accomplish this goal by, among other things, funding projects that provide for “*a measurable transition from the nearly exclusive use of petroleum fuels to a diverse portfolio of alternative fuels*” (emphasis added). Over the last three years, the CEC has allocated AB 118 funding to a variety of projects including, but not limited to, installing electric vehicle-charging stations, installing CNG dispensing facilities, deploying the use of heavy-duty natural-gas vehicles and promoting biofuels such as biomethane. For 2012-13, CEC is planning to spend \$2.5 million on new CNG refueling facilities, \$12 million for NGV incentives and \$20 million towards the production of biomethane.

In order not to undermine the gains made by AB 118 and devalue the substantial investments made by the CEC in CNG refueling infrastructure, NGVs, and biomethane, SCAG should incorporate a diversity of alternative-fuel motor vehicles into the RTP/SCS, including NGVs. It would be a sad waste of public funds and resources if the RTP/SCS did not become more diverse and better align its goals with those of AB 118.

4. CEQA - RTP/SCS Draft Program Environmental Impact Report (Draft PEIR)

SoCalGas appreciates the time and effort that SCAG has put forth in preparing the Draft PEIR for the RTP/SCS. SoCalGas nonetheless notes that SCAG’s focus on fuel-cell and electric vehicles in the RTP/SCS continues through in the Draft PEIR. For example, Section 2, Table 2-12 of the Draft PEIR contains a summary of the various modes of freight-movement strategies (taken from the RTP/SCS), together with the analysis which determine that significant emissions benefits could be achieved from the implementation of these different strategies. However, this modeling does not appear to take into account whether such savings could similarly be achieved with the inclusion of NGV’s. SoCalGas recommends that the analysis of the Draft PEIR be reconsidered and modified to the extent necessarily to include NGV’s as part of its implementation strategy. Additionally, SoCalGas recommends that SCAG’s revisions to the Draft PEIR give meaningful consideration to the cumulative impacts to air quality caused by the generation of the massive amounts of electricity that will be used to power the ZEVs as contemplated in the Project Description. Finally, SoCalGas recommends that the mitigation measures set forth in the Traffic, Safety and Security element of the Draft PEIR (Section 3.12) make clear that NGV’s should be included in any mitigation measure or strategy that includes a call for LEVs or ZEVs. Doing so would help ensure that mitigation measures are entirely feasible and capable of real impact minimization.

SoCalGas commits to assisting SCAG to include additional fuel options in the RTP/SCS, as we are similarly committed to protecting and conserving the environment for our employees, our customers and the diverse communities in which we operate and provide service. We look forward to additional discussion and sharing data with your agency on the topics discussed above.

Sincerely,

Hector Madariaga  
Director Environmental Affairs

Attachments:

1. Cooper, Roger. (2011; p.6) *Natural Gas Reconsidered*. Progressive Policy Institute.
2. American Gas Association. (2009; p. 16) *A Comparison of Energy Use, Operating Costs, and Carbon Dioxide Emissions of Home Appliances*. Policy Analysis Group.



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February 14, 2012

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

RE: Southern California Leadership Council Comments on the Draft 2012  
Regional Transportation Plan & Sustainable Communities Strategy  
(RTP/SCS) and the Draft Program Environmental Impact Report (PEIR)

Dear Hasan,

On behalf of the Southern California Leadership Council (SCLC), we would like to acknowledge the Southern California Association of Governments (SCAG) and both its staff and leadership who have worked diligently to prepare the Draft 2012 Regional Transportation Plan (RTP), Sustainable Communities Strategy (SCS) Program Environmental Impact Report (PEIR), and associated documents. This first of its kind effort, as called for under SB 375, has taken over three years and involved an unprecedented level of collaboration between SCAG and its public and private sector stakeholders from throughout the region. The degree of outreach and engagement is exceptional and SCAG should be applauded for its efforts.

As you know, the Southern California Leadership Council is a non-partisan, non-profit, business-led public policy partnership. The Leadership Council exerts strong leadership on issues of regional significance, providing a common voice on major public policies critical to economic vitality, job growth and quality of life in Southern California. The Leadership Council unites business and community leaders from throughout the seven-county region into one effective leadership organization whose membership includes three former California governors and two dozen presidents and CEO's of top Southern California companies.

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Billie Greer  
*President*  
  
Richard Lambros  
*Managing Director*

SCLC appreciates its strong working relationship with SCAG and its ability to provide business and industry input into SCAG policies and initiatives. In particular, SCLC has been an active participant in the over three year long process of crafting and developing the RTP/SCS. Based on this extensive involvement, SCLC offers the following general comments and recommendations on the draft plan and requests that this letter be included in public record as our collective comments on the Draft RTP/SCS, PEIR and associated documents.

**SCLC's Position** – SCLC supports a 2012 RTP/SCS that recognizes the critical importance of transportation and infrastructure to economic vitality, job creation and the quality of life for all Southern Californians. We also support an RTP/SCS that honors market forces, local control and flexibility as it works to secure an integrated approach to land use, transportation, housing and environmental planning in order to achieve GHG emission reductions under the SCS.

In evaluating SCAG's Draft 2012 RTP/SCS to determine if it is such a plan, from early on SCLC has applied a consistent set of policies and principles related to good planning, to assure that the RTP/SCS is a smart, feasible, flexible, accountable plan that is CEQA compliant, economically sound and preserves existing employment and enhances job creation.

The following is the specific set of key policies and principles that SCLC and others in the business community have applied in evaluating the plan; and we believe that they represent the qualities of a good and sound RTP/SCS.

- **Provides Positive Economic Impacts ... A Plan that is Pro Economic Growth and Job Creation** – The RTP/SCS must undergo a true economic cost/benefit analysis so that economic impacts are understood and known by both SCAG Regional Council members and stakeholders well before making a final decision on the RTP/SCS.
- **Provides Local Control:**
  - Any new transportation revenues or fees collected must be under the control of the local transportation agency/authority.
  - Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use, transportation and community development.
- **Assures New Revenue Sources are Fair, Equitable and Economically Sound** – New transportation revenue concepts within the RTP/SCS must undergo cost/benefit and other appropriate analysis to assure that they are economically sound. They must also be fair and equitable, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.
- **Is Balanced and Accountable** – The plan's call for new revenue is balanced with performance measures, reforms and guarantees that assure the RTP/SCS is effective, efficient and responsible to the citizens and taxpayers of Southern California.
- **Is CEQA Compliant and Defensible** – The RTP/SCS is processed correctly from an environmental impact perspective and built to withstand a CEQA Challenge.
- **Provides for CEQA Streamlining and Protects Against CEQA Abuse** – The plan is crafted so as to capture and make feasible all available CEQA benefits, especially streamlining, while also anticipating and limiting opportunities for CEQA abuse.

**SCLC's Comments and Recommendations** – In measuring the draft plan against these key policies and principles, we find many very positive aspects of the RTP/SCS – especially those related to the plan's core principles, approach and direction. Likewise, we find a number of other aspects of the Draft 2012 RTP/SCS in need of much more consideration, correction and clarification before SCAG finalizes and approves the plan. Most notable among our concerns is the Draft PEIR, which we believe is in need of significant amendment in order to be more in-line with the same core principles, approach and direction reflected in the Draft RTP/SCS.

Outlined below, in very general terms, are SCLC's comments and recommendations related to specific aspects of the Draft RTP/SCS and PEIR that we believe need to be addressed and corrected in the final plan documents.

1. **PEIR** – The Draft PEIR document, unlike the Draft RTP/SCS, does not feel like it honors the same principles of local control and local flexibility that SCAG has employed throughout the RTP/SCS process. Instead, the PEIR feels like a “top-down”, prescriptive, “one-size-fits-all” imposition by SCAG. That is because the PEIR contains a huge litany of mitigation measures that will be imposed mainly upon local government, business and private project proponents. The more than 500 mitigation measures outlined are highly prescriptive and many promote and/or mandate policies which will have no effect in reducing GHG. Additionally, a significant percentage of the measures are redundant to or supersede the regulatory requirements of other agencies that are themselves vested with the authority to oversee such issues (i.e. Regional Water Quality Control Boards, Air Quality Management Districts, US Fish and Wildlife, etc.). Ultimately, a review of the PEIR leaves one feeling that the document is fundamentally inconsistent with the Draft RTP/SCS.

SCLC's specific concerns and recommendation regarding the PEIR are as follows:

- a. **Correct the PEIR's “blanket determination” of feasibility** – The introductory section of the PEIR includes what amounts to an overarching determination that all of the over 500 mitigation measures in the PEIR are feasible for application to all future projects throughout SCAG's region. By making such a statement (which cannot possibly be based on sound evidence) SCAG would impose at least crushing procedural costs on every plan and project throughout the region. Effectively eliminating local flexibility and local authority to determine feasibility on a project by project basis. This blanket finding of feasibility must be removed from the final PEIR.
- b. **Prevent the loss of appropriate project-level flexibility** – The Draft PEIR uses the phrases “local jurisdictions can and should” and “project proponents can and should” require or incorporate a whole host of suggested mitigation measures. Thus, the Draft PEIR seems to pre-determine the anecdotal consideration and possible feasibility of these measures, which could ultimately force local governments and project proponents to “rule out” each and every mitigation measure listed. The use of “can and should” needs to be corrected within the final PEIR.



- b. The new revenue sources within the RTP/SCS must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it is proposing.
4. **Federal Level Fee Imposition** – New revenues from fees on businesses operating in the SCAG region – and particularly the “Freight Fee/National Freight Program” listed on page 96 of the Draft RTP/SCS – need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region’s competitiveness will be compromised.
5. **Goods Movement** – In the RTP/SCS, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system.
6. **Economic Analysis of the Draft RTP/SCS** – Throughout the process of developing the RTP/SCS and especially in the last few months leading up to the release of the Draft Plan, SCLC regularly called for a valid economic analysis of the plan – one which would provide a true cost benefit analysis. It should be noted that SCLC was not the only one concerned about the plan’s potential economic impact. In fact, this past summer, when SCAG conducted a series of 18 RTP/SCS Public Outreach Workshops, a majority of participants indicated that the economy was the most important priority for the region – finishing ahead of transportation and the environment.

As a result of this and the clear linkage between the RTP/SCS and the economy, SCAG deployed a team of outside economists to do a complete economic impact analysis of the Draft RTP/SCS. SCLC applauds SCAG’s commitment to providing thorough economic analysis, including an evaluation of the plans impact on jobs and job creation. With the work of the economists now mostly complete, their impact analysis of the plan has produced some extremely positive data, showing the costs of the plan to be far exceeded by the benefits the RTP/SCS will provide in the way of job creation and economic growth in our region. SCLC strongly encourages SCAG to widely communicate this economic data and to be sure and include all appropriate new economic data sets and analysis in the final RTP/SCS.

7. **Phase II Economic Recovery Strategy** – SCLC agrees with SCAG’s GLUE Council, that if SCAG utilizes the work done last year to develop and adopt SCAG’s first ever regional Economic Recovery Strategy and couples this with the outstanding economic analysis conducted by SCAG in support of the RTP/SCS, SCAG is well positioned to develop a Phase II Economic Recovery Strategy as a companion measure for adoption in conjunction with (or shortly thereafter) the final RTP/SCS.

The Phase II Economic Strategy would be a way for SCAG, its GLUE Council, local government the business community and other stakeholders to come together and support critically necessary regulatory reforms and strategies to help reinvigorate the region's economy and support the full implementation of the RTP/SCS. The Phase II Strategy would also give SCAG and GLUE a vehicle for establishing a true Regional Economic Plan to go along with SCAG's other regional plans such as the RTP, the SCS and RHNA.

**Conclusion** – While SCLC finds a number of very positive aspects in the plan, especially related to principles and direction, there is still work to be done, significant issues to be addressed, and details to be developed. With this in mind, SCLC is committed to completing this process and working closely with SCAG.

Just as it has done over the multi-year process that has lead up to the Draft RTP/SCS and PEIR, SCLC will remain very active and engaged on this issue throughout the remainder of the process as we work together to finalize and approve a 2012 RTP/SCS and PEIR for our region that is business friendly, economically viable, promotes job creation and enhances the quality of life for all Southern Californians.

Respectfully submitted,



Billie Greer  
President  
Southern California Leadership Council



Richard Lambros  
Managing Director  
Southern California Leadership Council

February 14, 2012

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> floor  
Los Angeles, CA 90017

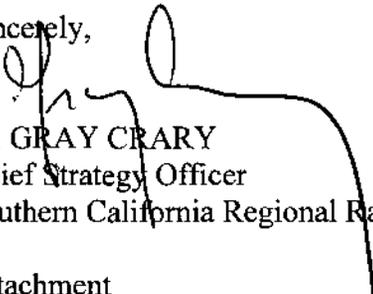
Dear Mr. Ikhata,

Subject: Southern California Regional Rail Authority Comments on the Draft 2012 RTP

Southern California Regional Rail Authority (SCRRA) appreciates the opportunity to comment on the 2010 Draft Regional Transportation Plan (RTP) prepared by the Southern California Association of Governments (SCAG). The document identifies key challenges facing the region, and underscores the need for continued investment in our transportation infrastructure. We would also like to commend SCAG for its extensive stakeholder outreach, and thank SCAG staff for their cooperation and assistance during the RTP preparation process.

The attached table contains SCRRA's comments on the draft RTP. If you have any questions, please contact Karen Sakoda at (213) 452-0264, or [sakodak@scrra.net](mailto:sakodak@scrra.net).

Sincerely,



W. GRAY CRARY  
Chief Strategy Officer  
Southern California Regional Rail Authority

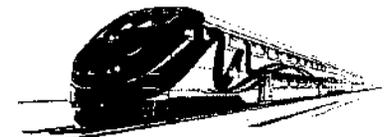
Attachment

Cc: K. Sakoda – SCRRA  
P. Torres-Bruno - SCRRA  
O. Yero – SCRRA



## SCRRRA Comments on the Draft 2012 Regional Transportation Plan (RTP)

Document	Page	Comment
RTP	5	We understand that Metrolink's list of constrained projects is included in the \$3.9 billion Transportation Investment cost for Commuter Rail, along with other commuter rail projects submitted by the County Transportation Agencies.
RTP	21	In addition to the four routes mentioned that share portions with the LOSSAN corridor, the Antelope Valley Line shares a segment between Los Angeles Union Station and Burbank Junction. We also recommend removing the reference to the Dodger trains, and replacing the team name with a more general reference to trains for sporting events, and other special events.
RTP	51	Recommend modifying wording that states existing rail service will eventually meet 110 mph. Speeds will vary considerably depending on track configuration and geography, and 110 mph may be attained where safely possible.
RTP	53	Improvements to the LOSSAN Corridor section contains a sentence "...AVL travel time between Palmdale and LAUS can be shortened by 33% simply by skipping less used station stops." Recommend revising AVL express train wording to state, "travel time could be shortened by 25% by skipping selected station stops..."
RTP	73	Goods Movement Rail Strategy - We support expansion of the rail system to accommodate anticipated increases to freight and passenger rail services. Funding capacity expansion, safety improvements and grade separation projects will be crucial to meeting regional goals.
RTP	84	For new projects that result from implementation of the RTP, noise mitigation measures should be addressed through associated project environmental reviews.
RTP	184	Environmental Justice Mitigation Toolbox - Rail Related Impact mitigations pose some challenges. We cannot support the recommendation that rail operators improve the acoustical insulation of dwelling units where setbacks and sound barriers do not sufficiently reduce noise. Also, recommending speed limits and limits on hours of operation to mitigate noise inhibits Metrolink's ability to operate and expand.



Document	Page	Comment
RTP	197	Greater Vision for our Commuter Rail System – Text states that Metrolink operates 164 trips on weekdays. Currently, Metrolink operates 163 trips per weekday. Also, the document states, “With the investments proposed within the Constrained Plan, we expect to achieve more than double the ridership by 2035.” Recommend adding investments proposed in the Strategic Plan which are also necessary to achieve the stated ridership growth.
Passenger Rail	5	Text states that Metrolink operates 164 trips on weekdays. Currently, Metrolink operates 163 trips per weekday.
Passenger Rail	10	Recommend clarifying which “Authority” is being discussed. It is sometimes not clear whether the Authority is the HSR Authority, or SCRRA.
Passenger Rail	20	Recommend adding wording to include investments in the Constrained Plan and the Strategic Plan to achieve a doubling of ridership by 2035.





**STEPHEN W. ROGERS, P.E. CONSULTING**

820 CHURCH ST. REDLANDS, CA 92374

PHONE: 909.556.1988 (CELL) EMAIL: STEVE\_ROGERS@VERIZON.NET

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January 18, 2012

City of Redlands

Development Services Department, Planning Division

210 East Citrus Avenue

Redlands, CA 92373

Attn: Robert D. Dalquest, AICP (e-mail: [rdalquest@cityofredlands.org](mailto:rdalquest@cityofredlands.org))

**Subject: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR REDLANDS CROSSING CENTER (SC# 2007081111), dated 11/21/11**

Dear Mr. Dalquest:

The following comments are offered herewith, pertaining to the subject document, reserving the right, however, to make additional comments in writing, or during the public hearing process, when the project and associated entitlement applications are presented to the Redlands Planning Commission and City Council:

1. The project description as published with the original Notice of Availability (NOA) refers to applications for associated documents that have not been made available to the public for review at this time, and in conjunction with a review of the project DEIR; to include, but not be limited to: Super WalMart Conditional Use Permit (CUP) and Tentative Parcel Map. CEQA requires all associated entitlement applications needed for project approval be processed concurrently, and not to be processed in a piecemeal fashion.
2. The project with the proposed mitigation measures identified in the DEIR, is not compatible or consistent with the 2008 Regional Transportation Plan (RTP), the Draft 2012-2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and Program Environmental Impact Report (PEIR), or the San Bernardino County Congestion Management Plan (CMP) and RTIP. Especially troubling is the response letter to the 2007 Project NOA from the Southern California Association of Governments (SCAG), dated September 11, 2007 indicating, "We have reviewed the Redlands Crossing, and have determined that the proposed project **is not regionally significant** per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206)."

3. The traffic study in the appendix, as prepared by Urban Crossroads for Michael Bradman Associates, is technically deficient and has not been properly prepared pursuant to the San Bernardino County Congestion Management Plan (CMP) Traffic Impact Analysis (TIA) standards and guidelines. See the attached “Exhibit A” listing regarding specific shortcomings and concerns. Especially troubling is the wording contained on page 17, under Analysis Overview: “It should be noted that consistent with the requirements of Measure “I”, formal compliance with the CMP traffic impact analysis guidelines is no longer required with the City’s adoption of a development impact fee (DIF).”

## Exhibit A

The following clarifications are requested pertaining to the Traffic Impact Analysis (TIA) prepared by Urban Crossroads for the Redlands Crossing Center:

- 1) Reason why AM peak analysis was not completed (esp. considering proximity to Citrus Valley High School).
- 2) Tennessee St / Lugonia Avenue - disagree that there is room for WB right turn lane as the lane is only 20' wide for about 2 car lengths
- 3) Alabama Street / San Bernardino Avenue- disagree that there are 2 EB through lanes as the receiving lanes merge less than 125' from the intersection
- 4) Many of these intersections are close together. Was a coordinated analysis done to see if the traffic from one intersection would back up into another intersection?
- 5) Exhibit 3-1 The number of existing lanes on Lugonia Avenue is wrong in several locations. It nears to 1 lane eastbound in several places. Nowhere is it 4 lanes in each direction as noted between Alabama Street and Tennessee Street. If the author meant 4 lanes total, then it has 4 lanes in several locations that are shown on the exhibit as 2.
- 6) Table 3-2 It looks like the number of mainline freeway lanes includes auxiliary lanes and ramp lanes and they should not be included. The auxiliary lanes and ramps should be analyzed separately. Miles between the segments were not included so the density calculation could not be checked.
- 7) The traffic level of service on San Bernardino Ave. between Alabama Street and New York Street does not operate properly today. The project TIA should analyze how the 210 ramp/ San Bernardino Avenue signalized intersection area could be enhanced in order to operate appropriately with project traffic.
- 8) Did the improvements at the SR-210 and the San Bernardino Avenue Interchange area take into consideration the Caltrans 210 PSR dated April 2008? Both construction alternatives include realigning Tennessee Street between San Bernardino Avenue and Lugonia Avenue, and ramp improvements that impact the subject development project site.
- 9) Did the cumulative projects include the major development proposed in Highland east of Wabash Avenue?
- 10) Did the traffic study include any improvements anticipated under the Congestion Management Plan NEXUS program?
- 11) Page 6-1 indicates that the methods used for the 2013 traffic forecasts are discussed in Section 6. Where in Section 6 are they discussed?
- 12) Is East Valley Traffic Model the correct model to model this area? With number of project trips, why wasn't a model prepared for this project TIA. Since the 2030 without project volumes are based on 2030 model volumes less the project trips, this would assume the project was included in the 2030 EVTm. Was the Redlands Crossing (incl. Super WalMart) included in that model?

- 13) Who is reviewing the traffic study on behalf of the City of Redlands?
- 14) Is the choice of 2030 for the future year scenario appropriate? Should the analysis instead be based upon 2010 (current) traffic data and a future year scenario for 2035 (at least 20 years past proposed opening year 2013)?



February 21, 2012

Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
Attn: Margaret Lin Sent by email to: [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

**SUBJECT:**

**FEDERAL TRANSPORTATION IMPROVEMENT PROGRAM  
(FTIP) PROPOSED AMENDMENT #11-24, 20 FOR DRAFT 2012-  
2035 REGIONAL TRANSPORTATION PLAN/ SUSTAINABLE  
COMMUNITIES STRATEGY (RTP/SCS) PROGRAM  
ENVIRONMENTAL IMPACT REPORT (PEIR)**

Dear Ms. Lin:

Thank you and SCAG for this opportunity to provide written public comments pertaining to the subject Draft PEIR document for the 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/ SCS) document, dated December 2011, and Federal Transportation Improvement Program (FTIP) Proposed Amendment # 's 11-24, -20:

The following highway projects in the City of Redlands area of San Bernardino County, have been mistakenly left out of the identified FTIP projects lists and associated RTP/SCS documents:

1. Redlands Boulevard/ Colton Ave./ Alabama St./ RR-X's (SanBAG) Intersection(s) reconstruction
2. San Bernardino Avenue/ I-210 Freeway Interchange Upgrade (impacting proposed Redlands Crossing (super WalMart) development (see comment letter pertaining to Redlands Crossing Draft Environmental Impact Report, attached.)
3. Alabama Street/ I-10 Freeway Interchange Upgrade

C: San Bernardino County Board of Supervisors  
City of Redlands City Council



**STEPHEN W. ROGERS, P.E. CONSULTING**

820 CHURCH ST. REDLANDS, CA 92374

PHONE: 909.556.1988 (CELL) EMAIL: STEVE\_ROGERS@VERIZON.NET

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February 14, 2012

Southern California Association of Governments

818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor

Los Angeles, CA 90017

Attn: Margaret Lin Sent by email to: [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

**SUBJECT: DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN/  
SUSTAINABLE COMMUNITIES STRATEGY (RTP/SCS)  
PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)**

Dear Ms. Lin:

Thank you and SCAG for this opportunity to provide written public comments pertaining to the subject Draft PEIR document for the 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/ SCS) document, dated December 2011. The following additional mitigation measures and sustainable community strategies are proposed for SCAG's consideration and inclusion in the Final Program Environmental Impact Report (PEIR), as appropriate:

1. The *Friendly Communities* program is being developed as a private-public partnership, to focus on the needs and quality of life issues unique to residents of unincorporated area communities, and other communities of special interest. This program could be replicated statewide/nationwide.
2. A Countywide *Vehicle Asset Management Plant Program (VAMPP)* should be considered for strategic location along major routes within the regional highway network, to improve the implementation of standardized maintenance programs for governmental, transit and private fleet asset services management. This program could be replicated statewide/nationwide.
3. Technological advances in vehicle, truck and heavy equipment lubrication, translating into significant emissions reductions and extended oil service drain intervals, can be realized by the use of *Synthetic Lubricants* and fleet conversion to bypass filtration. In a recent study, reported December 2011, *Amsoil Synthetic Lubricants Increased Fuel Economy 6.54 %* in diesel trucking applications.

C: San Bernardino County Board of Supervisors  
City of Redlands City Council



February 14, 2012

President Pam O'Connor  
Board of Directors  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Re: Draft 2012 – 2035 Regional Transportation Plan/Sustainable Communities Strategy

**Dear President Pam O'Connor and Honorable Members of the SCAG Regional Council:**

On behalf of the Los Angeles chapter of the American Institute of Architects (AIA|LA), I am writing to express our thoughts on the draft 2012 – 2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP). With great respect for the process to draft such a comprehensive plan, we commend you on the progress made so far.

As AIA|LA supports smart growth policies that facilitate infill development projects and concentrate our investments in areas that sustain the vibrancy of the urban core, we encourage you to adopt Alternative 3 (Envision 2 Alternative) of the draft plan. This option will foster smart growth land use and housing patterns to achieve superior environmental results in air quality, aesthetics, open space and farmland preservation, water conservation, greenhouse gas emissions reductions, mobility, and land use.

Transit projects and active transportation investments should take precedent over highway expansion projects. Infill development and transit-first policies are natural allies of each other. Accelerating transit infrastructure and associated joint-use, mixed-income development also helps our region achieve its social, economic and cultural development goals.

AIA|LA is concerned that the current draft plan provides for a disproportionate share of funds towards highway capacity improvement that will facilitate greenfield development. The consequence of additional freeway lanes will be more VMT and more sprawl, with the associated air quality and infrastructure maintenance requirements. Environmentally and economically, facilitating more compact urban development and design conserves our natural resources and our tax dollars. In short, adopting the Envision 2 Alternative Plan will help S.C.A.G. emphasize its leadership role to shape emerging land-use and transportation plans.

Moving forward we invite the S.C.A.G. Board of Directors and staff to work with AIA|LA to shape an environmentally healthy and economically compelling vision for the future of Southern California.

Very truly yours,

Will Wright  
Director, Government & Public Affairs

February 14, 2012

Attn: President Pamela O'Connor  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy**

President O'Connor and Southern California Association of Governments Regional Council Members:

**The Center for Community Action and Environmental Justice** appreciates the efforts of the Southern California Association of Governments (SCAG) in completing the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS). We are encouraged by the concerted efforts put forth in the draft towards improving the transportation system which also includes some measures to address Public Health and Air Quality in our region.

We have joined with other concerned organizations to outline comments on the plan and incorporate those comments with ours, however we do have some specific concerns which we feel will directly impact our communities in the City of Jurupa Valley (formerly known as unincorporated Mira Loma community in Riverside County) and the City of San Bernardino Westside communities.

The communities in the Jurupa area have for many years seen an influx of warehousing slowly encroaching into our neighborhoods. Many of these projects are at the fence line of homes and schools. Residents in close proximity to highways, and busy streets with high levels of diesel truck traffic, will experience increased incidents of asthma, cancer risks, cardiovascular and respiratory disease, premature mortality, decreased life expectancy, reproductive health problems.

**Components of the Regional Goods Movement System**

SCAG has addressed the fact that the Inland Valley is already home to (2008) about 837 million square feet of warehousing space with another 185 million square feet in developable land. An estimated 15 percent of the occupied warehouse space served port-related uses while the remaining 85 percent supported domestic shippers. National and regional distribution facilities tend to be located in the Inland Valley and concentrated in the Jurupa Valley/Fontana area. The impacts to the surrounding communities from the diesel spewing trucks drawn to these warehouses create severe health outcomes and disruption of the quality of life for local families. SCAG must address these impacts in a significant manner as to minimize to the furthest extent possible the environmental and health risks posed from exposure to diesel exhaust.

The implementation of specific truck routes to keep truck traffic away from communities of concern as project specific strategies tend not to address specific impacts to these communities. Other measures such as establishment of green zone/buffer area between diesel sources and residents of at least 1000 feet are necessary to be protective of residents in close proximity. Additional mitigation measures of trees and foliage that help to trap many of the ultra fine particles to lessen the impacts to communities

of concern, sound walls to lessen the noise pollution from residential areas that are too close to freeways and heavily traveled thoroughfares.

### **Regional Clean Freight Corridor System**

The truck corridor that SCAG has proposed will heavily impact the inland valley communities as SCAG has indicated the increase of truck traffic to our area will grow from 58,000 to 70,000 trucks per day although these trucks would be removed from general purpose lanes when they get to Interstate 15 and State highway 60. That traffic will then be dumped into our communities at a rate that will create an even greater health crisis for our communities. The disregard for the impacts of the plan upon the Inland Valley communities south of the 15/60 interchange must be addressed. The residents can't wait until 2035 for a solution to this huge impact. Goods movement strategies must ensure that the South Coast air basin meet federal air quality standards set forth in the Clean Air Act. The technologies mentioned must be required for future projects and incorporate these technologies or they should not be built. The RTP/SCS must remove the East-West Corridor Route Project.

Recommending building an east-west corridor without analyzing the health, housing and demographic impacts of the project on the neighboring communities can have severe environmental, health and justice implications for the entire region, and particularly for local communities of concern as previously stated.

Communities like the City of San Bernardino Westside are an example of one of the worst impacted by the BNSF Intermodal Railyard which after a health risk assessment conducted in 2008 found that residents living in close proximity faced an increased cancer risk from diesel emissions as much as 15 times higher than the Union Pacific Railyard UP in Colton and 3 times higher than any other railyard in the region. To these residents the point of maximum impact is 3,300 people in a million are at greatest risk.

The RTP/SCS must focus attention on cleaning up existing freight corridors. Rail companies should not expand until rail yards like San Bernardino's BNSF Facility implement zero emissions technology. These communities with the highest health risk cannot wait until 2030 for solutions. As freight transport increases, SCAG must encourage the incorporation of evolving technologies to specific high risk areas first and not just for proposed new projects. SCAG should use the highest polluting facilities for testing and evaluation, as well as for the use of advanced technology locomotive demonstrations.

The public health evidence is insurmountable to deny. Our built environment plays a direct impact to our health and the transportation sector must take into consideration the public health implications to the region, as well as those communities of concern and not just the region's economic growth.

**The Center for Community Action and Environmental Justice**  
**Penny Newman Executive Director**

February 14, 2012

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Irvine, CA 92614  
949 250 0909  
fax 949 263 0647

Attn: Honorable Pam O'Connor, President of SCAG  
Regional Council Members  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**RE: Comments on SCAG's Draft 2012 RTP/ SCS**

Dear Honorable O'Connor,

The Kennedy Commission (the Commission) is a broad based coalition of community organizations and advocates that focus on building sustainable communities through the creation of affordable home opportunities for families earning less than \$20,000 annually in Orange County.

The Commission would like to acknowledge the extensive work that the Regional Council and staff of the Southern California Association of Governments (SCAG) have done to embark on the development of a first-ever Sustainable Community Strategy (SCS) in the 2012 Regional Transportation Plan (RTP). The RTP/SCS is moving in the right direction as it provides land-use, transportation and housing strategies that will achieve and exceed the greenhouse gas emission reduction targets set by the California Air Resources Board (CARB).

The implementation of the RTP/SCS will create more sustainable and healthier communities in the SCAG region, however, the Commission believes the strategies linking housing and transportation can be strengthened to facilitate the development of affordable homes. Locating homes, specifically affordable homes, near accessible public transportation, job centers and neighborhood amenities will allow individuals to afford to live in the same community in which they work in. This type of planning will effectively address the goals of SB 375 and decrease long distance commutes, vehicle miles traveled (VMT) and highway congestion that all leads to greenhouse gas emissions.

The Commission would like to comment on the following:

**Integrating Affordable Homes Near Job Centers and Transportation Hubs**

The RTP/SCS identified High-Quality Transit Areas (HQTA) in the region as opportunity planning areas for the majority of future housing and employment growth. It is projected that by the year 2035, 51 percent of new homes and 53 percent of new employment growth will be developed in HQTA.<sup>1</sup> While the HQTA encourages higher density and compact development near and around job centers and transit amenities, this type of development does not necessarily

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<sup>1</sup> Regional Transportation Plan 2012 RTP Sustainable Communities Strategy Towards a Sustainable Future, p. 128, December 2011.

facilitate the development of affordable homes throughout the SCAG region. While there are several jurisdictions that have initiated urban infill or transit-oriented developments, many of these housing developments have been planned or developed to provide housing opportunities affordable to higher income households. These developments lack mixed-income housing opportunities that would be available to many working families, especially lower income families, who want to live and work in the City.

While future growth in HQTAs reflects the emerging demographic trends and is the recommended major land use scenario, the RTP/SCS acknowledges that there are potential impacts of displacement of lower income households and gentrification resulting from new transit oriented developments that attract affluent residents in the neighborhood. The Commission recommends that SCAG closely analyze, monitor and mitigate any potential impacts or environmental justice inequalities stemming from future development. In addition, the Commission strongly supports SCAG's land use and housing mitigation measures to help reduce these impacts:

- **MM-LU11:** Significant adverse impacts to community cohesion resulting from the displacement of residences or businesses can and should be mitigated with specific relocation measures as dictated by local, state or federal requirements on a project-by-project basis. Such measures include assistance in finding a new location, assistance with moving, or compensation for losses. Where it has been determined that displacement is necessary and displaced individuals are eligible, a relocation assistance program consistent with the State Uniform Location Assistance and Real Properties Acquisition Policies Act provides compensation and assistance in finding new residence for displaced individuals.<sup>2</sup>
- **MM-LU53:** SCAG shall promote infill, mixed-use, and higher density development, and provide incentives to support the creation of affordable housing in mixed use zones.<sup>3</sup>
- **MM-LU61:** Local jurisdictions can and should mix affordable housing units with market rate units as opposed to building segregated affordable housing developments.<sup>4</sup>
- **MM-LU73:** Local jurisdictions can and should locate affordable housing in transit-oriented development whenever feasible.<sup>5</sup>

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<sup>2</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.8-17, December 2011.

<sup>3</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.8-21, December 2011.

<sup>4</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.8-22, December 2011.

<sup>5</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.8-23, December 2011.

- **MM-POP4:** Project sponsors shall mitigate impacts to affordable housing as feasible through construction of affordable units (deed restricted to remain affordable for an appropriate period of time) or payment of any fee established to address loss of affordable housing.<sup>6</sup>

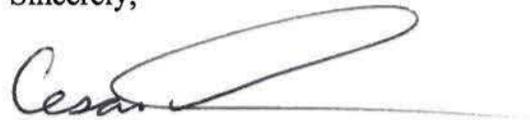
### **Jobs-Housing Fit Performance Measure**

On the June 30, 2011 SCAG Environmental Workshop, participants commented on the need for a performance measure such as a jobs-housing fit analysis in the RTP/SCS.<sup>7</sup> This analysis would evaluate the types of jobs being created in the community to the housing types and affordability levels of homes being developed. The RTP/SCS has instead provided a performance measure on jobs-housing imbalance or jobs-housing mismatch that analyzes the socio-economic profiles of long distance commuters.<sup>8</sup> This is a small step towards the right direction but the Commission recommends there needs to be more research and thorough analysis, specifically on the jobs-housing fit, to provide a better understanding of how we can strengthen the link between jobs and housing development for all economic segments of the community.

The Kennedy Commission looks forward to working with SCAG Regional Council and staff to achieve our mutually beneficially goals in creating more sustainable, healthier and equitable communities. Specifically, the Commission welcomes the opportunity to continue our dialogue that will result in the production of new homes affordable to extremely low, very low and low-income households throughout the region.

If you have any questions, please feel free to contact me at (949) 250-0909 or [cesarc@kennedycommission.org](mailto:cesarc@kennedycommission.org).

Sincerely,



Cesar Covarrubias  
Executive Director

cc: Hasan Ikhata, SCAG

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<sup>6</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.10-11, December 2011.

<sup>7</sup> Regional Transportation Plan 2012 RTP Sustainable Communities Strategy Towards a Sustainable Future, Environmental Justice, p. 4, December 2011.

<sup>8</sup> Regional Transportation Plan 2012 RTP Sustainable Communities Strategy Towards a Sustainable Future, Environmental Justice, p. 4, December 2011.



*Southern California's Leading Transit Advocacy Group*

P.O. Box 567 \* San Fernando, CA 91341-0567

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

The Transit Coalition (a project of LACBC) is a nonprofit public charity exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code

**Tuesday, February 14, 2012**

**Southern California Association of Governments  
Attention: Margaret Lin  
Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017-3435**

**RE: Comments on SCAG DRAFT 2012 RTP and the Plan EIR**

**Dear Ms. Lin:**

**We wish to express our concerns on elements of the draft SCAG RTP, as we don't see the AB32 and SB375 goals being achieved, without some modifications to the document, as our comments outline.**

**Identify the Measure R Van Nuys and Sepulveda Pass transit projects as corridors rather than designating them as 'busways,' which could improperly preempt and prejudice the environmental clearance process. Note that neither Measure R nor Metro have chosen the mode for either corridor; "Rapidways" describe rapid transit corridors regardless of mode.**

**Converting existing High Occupancy Vehicle (HOV) carpool lanes to High Occupancy Toll (HOT) must allow carpools to have access to these lanes free of charge and without mandatory transponders. Otherwise, the intent of the RTP/SCS will be undermined and its outcome will underperform the potential of these lanes due to a reduction in both the number of carpools and the average number of passengers per vehicle.**

**Converting loading and unloading activities at the ports to direct ship to rail (excluding any intermediate truck sorting steps) will enable greater capacity at lower cost and environmental impact. Creation of a freight pipeline from the Ports to the Inland Empire with an underground alternative to the 60 Truck Freightway should be an alternative.**

**In addition to a regional gas tax for transportation, SCAG should implement a diesel fuel tax that accounts for both the wear and tear on roadways as well as pollution. Receipts from both taxes should be kept together in a regional transportation matching fund.**

**We recommend that you include these modifications in the RTP.**

**Sincerely,**

**Bart Reed  
Executive Director**



**Transportation Corridor Agencies**

February 13, 2012

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

RE: Comments on the Draft 2012 Regional Transportation Plan/  
Sustainable Communities Strategy and Program Environmental Impact Report

Dear Mr. Ikhata:

The Foothill/Eastern Transportation Corridor Agency and the San Joaquin Hills Transportation Agency (TCA) appreciates the opportunity to review and provide comments on the Draft 2012-2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and associated Draft Program Environmental Impact Report (PEIR). TCA commends the SCAG staff for the tremendous amount of work and effort in putting these documents together. TCA also recognizes and supports the timely adoption of the RTP/SCS to enable the Southern California region to proceed with the planning and implementation of regionally significant transportation projects. Further, TCA recognizes that the SCS is particularly important for the region to meet its state mandated greenhouse gas (GHG) emissions reduction targets for 2020 and 2035.

Please find below TCA's specific comments on both the draft RTP/SCS and PEIR.

**DRAFT 2012-2035 RTP/SCS**

**Page 23, Vision, Transportation Demand Management**

Transportation pricing is not identified as part of the RTP/SCS "vision" either as a transportation demand management method or as a financing tool, even though it is clearly a component of the transportation plan and financial plan for implementation. The Orange County SCS includes a description of the current and planned priced transportation network that should be adapted to address the entire region.

***Recommended Clarification:***

Add information from the Orange County SCS (pages 126 and 127 of the Subregional Sustainable Community Strategies Technical Appendix) that describes the existing and

*Thomas E. Margro, Chief Executive Officer*

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planned inter-operable priced transportation network in the region, including toll roads, express lanes and high occupancy toll (HOT) lanes. The text can be expanded to address HOT lanes, toll2 facilities, express lanes and tolled truck lanes in the region as a whole, and should include the following points:

- Tolled centerline miles in the region will increase from 61 in 2008, to 408 in 2035, including toll roads, express lanes, HOT lanes, and tolled truck lanes.
- Priced lanes provide flexibility and options as part of the congestion relief toolbox of measures designed to help meet sustainability and emission reduction goals related to SB 375 and other state and federal mandates.
- “Priced facilities are an especially important tool for providing intra-county, inter-county and interregional capacity.”
- “The existing priced transportation network serves the locations where major employment and housing growth are projected to occur.”
- “Toll roads and express lanes charge users a fee for travel, but typically offer less congested traffic lanes than nearby freeways and roadways. Reduced congestion provides improved and more efficient mobility with fewer air pollutants and greenhouse gas (GHG) emissions caused by congestion.”
- “The toll road system is designed to interrelate with transit service. The toll roads can accommodate Bus Rapid Transit and express bus service, and toll road medians are sized and reserved to provide the flexibility for future transit, if appropriate.”
- Priced facilities such as the Orange County toll roads are privately funded. This insures that these facilities can relieve congestion and associated air pollution and GHG emissions without further stressing limited state, federal and local transportation funding resources.

**Page 42, Major Highway Completion Projects, Table 2.2**

SR-241 (ORA052) is identified in Table 2.2 as a major highway completion project. However, the completion year is listed as 2020-2030. Although widening will occur in the 2020 to 2030 timeframe, the official project description identifies the completion date as 2030.

***Recommended Clarification:***

- In Table 2.2, we request that the completion date for SR 241 be clarified as 2030, consistent with the project description for ORA052.
- In the interest of establishing that some major highway projects in Table 2.2 provide emissions reduction benefits without burdening limited federal, state and local

funding resources, we request the following clarifying footnote: *SR 241 is a privately funded Transportation Control Measure.*

### **Page 56, Express/HOT Lane Network**

This appears to be the only “priced transportation” discussion in the transportation investments chapter. It does not identify how many miles of priced lanes exist now, or how much that network will be expanded in the plan. Toll roads are included in the priced transportation network, along with express lanes, and HOT lanes, but are not included in the discussion. However, TCA’s Toll Roads are depicted in Exhibit 2.6, Regional HOT Lane Network. The terminology should be clarified.

#### ***Recommended Clarification:***

- Retitle this section, “Express Lanes, HOT Lanes and Toll Roads: The Priced Transportation Network.”
- Table 2.6 should be retitled “Express Lanes, HOT Lanes and Toll Roads”
- The text should provide brief definitions of each type of facility that makes up the priced transportation network, as Express Lanes, Toll Roads and HOT Lanes each operate differently.
- The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities.
- The text should discuss that all priced facilities in the SCAG region insure interoperability by using a common technology, FasTrak, to collect user fees.
- The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing, which is beneficial to reduced criteria pollutants and GHG emissions reductions.

### **Page 76, Conservation Planning Policy**

The description of this policy requires clarification to express the intent of SCAG’s Energy and Environment Policy Committee and the coalition of more than 20 public, non-profit and private sector interests, including TCA that urged SCAG to include it.

#### ***Recommended Clarification:***

Add a paragraph that explains why the conservation program benefits GHG emissions and other criteria pollutants reductions. Specifically, in addition to meeting Safe, Accountable, Flexible, Efficient Transportation Equity Act: A legacy for Users (SAFETEA-LU) requirements, the open space lands conservation program would use natural land acquisition to sequester (store) carbon, avoid GHG emissions, and reduce

vehicle miles traveled (VMT). This proposed program allows for early implementation and mitigation opportunities. Jurisdictions would have the option to invest early in this open space strategy which offers immediate GHG emissions avoidance benefits, while simultaneously proceeding with the longer term and planning intensive projects to build transportation centers near existing residential areas, or employment centers near transit stations, etc.

Suggested steps to develop a regional conservation planning policy should be expanded to include the following key points supported by SCAG's Energy and Environment Committee and the coalition that recommended this program:

- Build upon existing open space land acquisition and open space programs in the region, tailoring programs to each individual county in the region. These include, but are not limited to, OCTA's Measure M Mitigation Program, and TCA's open space mitigation program, which has protected 2,200 acres in perpetuity to date.
- Pursue open space conservation in a voluntary manner, working with willing private sector landowners.

#### **Page 78, Greenhouse Gases**

The draft document states that "The transportation sector, primarily, cars and trucks that move goods and people, is the largest contributor [to greenhouse gas (GHG) emissions] with 36.5 percent of the State's total GHG emissions in 2008. On road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total." This statement covers only part of the transportation system's GHG emissions role. The text must recognize projects that reduce transportation network GHG emissions by relieving congestion and insuring free-flow conditions.

Because GHG emissions from vehicles increase in stop-and-go traffic, congestion relief projects that eliminate bottlenecks and maintain free-flow conditions actually reduce transportation network GHG emissions, much as Transportation Control Measures are transportation projects that reduce criteria pollutants. Further, the SB 375 Regional Targets Advisory Committee (RTAC) recommends tracking the performance of such strategies "to smooth extreme congestion to more carbon-friendly speeds" in its final report to the California Air Resources Board.

#### ***Recommended Clarification:***

Insert the following statements on page 78:

- Congestion relief projects reduce transportation network GHG emissions, which otherwise result from idling.
- Consistent with the SB 375 RTAC's recommendation in its final report to the California Air Resources Board, the RTP/SCS includes projects and strategies designed "to smooth extreme congestion to more carbon-friendly speeds."

- A subset of projects included in the Draft RTP/SCS reduce GHG emissions by providing relief of existing and projected congestion. These include toll roads, express lanes, HOT lanes, high occupancy vehicle (HOV) lanes, and dedicated truck toll lanes.
- Congestion pricing is a powerful transportation demand management tool incorporated in the Draft RTP/SCS for reducing GHG emissions. SCAG has launched a two-year study of congestion pricing strategies that can provide needed transportation facilities while reducing the region's GHG emissions associated with vehicle trips.
- Orange County's toll road network is a prime example of priced congestion relief projects. The toll roads have variable pricing incentives that spread out vehicle use to limit peak-hour congestion that leads to increased GHG emissions.
- Other examples of projects that reduce GHG emissions on the regional transportation network include express lanes, HOT lanes, HOV lanes and dedicated truck toll lanes for goods movement.

#### **Page 79, Air Quality**

Transportation Control Measures (TCMs) are mentioned as mitigation measures, but are not defined or illustrated. The importance of TCMs needs to be clarified and expanded to clearly communicate their air quality role in the RTP.

##### ***Recommended Clarification:***

- Provide a brief description of projects that qualify as TCMs.
- Explain the role of TCMs in reducing emissions.
- Provide a reference to the list of TCMs contained in the Conformity Technical Report.

#### **Page 86, Financial Plan, Introduction**

The draft document states that "We have successfully implemented toll systems in the past with the Transportation Corridor Agencies' network of toll roads and the SR-91 Express Lanes in Orange County. This kind of innovation in transportation continues as neighboring counties within our region consider a broader network of toll systems." However, the statement needs to clarify the financial planning importance of privately funded toll facilities.

##### ***Recommended Clarification:***

Priced transportation facilities also provide the opportunity for financial innovation. The Orange County toll roads (SR 73, SR 133, SR 241, and SR 261) are privately funded. They provide congestion relief and associated air pollution and GHG emissions reduction without further stressing limited federal, state, and local transportation funding.

**Page 92, Core Revenues, Regional Revenues**

Table 3.6, Regional Revenues, identified federal, state and local sources of transportation funding for the plan. Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, expansions, and new tolled facilities that are privately funded are included in the plan and in the total cost of the plan.

Accurately describing the extent of private funding is an important public disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding.

***Recommended Clarification:***

- Clarify in the text the percentage of total funding contributed by private sources. This sum should include the privately funded Orange County toll roads (SR 73, SR 133, SR 241, and SR 261).
- A companion pie-chart, similar to Table 3.6, showing the split between public and private funding would also clarify this point.

**Page 103, Table 3.5 2012 RTP Revenues (in Nominal Dollars, Billions)**

Until such time that the TCA Board reviews, considers, and/or approves a VMT-based user fee; TCA is not in a position to support an increase in fees as proposed in the draft Plan. Furthermore, the draft does not clarify how the cost of a proposed new VMT fee, increased gas tax fee, tolls and user fees would layer over each other. It appears that they would accumulate for individual drivers, with a potentially significant economic impact on drivers and households. Drivers paying to use toll roads, express lanes and HOT lanes would be paying twice for the same mileage.

**Page 145, Exhibit 4.17, Land Use Pattern Orange County (2035)**

The southerly portion of SR 241 (ORA052), from Oso Parkway to the San Diego County border, has been inadvertently left off this map.

***Recommended Clarification:***

- Please show the SR 241 alignment on Exhibit 4.17 consistent with the project modeling list and other transportation network maps in the Draft RTP/SCS.

**Page 161, Performance Outcomes**

This text should clearly state that performance measures and outcomes are not intended to apply to individual areas or projects, but rather to the region as a whole.

***Recommended Clarification:***

We recommend that the following clarification be inserted:

- Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.

**Page 207, Strategic Plan**

SCAG assumes \$100 billion will be available from a future VMT fee starting in 2025, but funding for mileage-based user fee demonstration projects and implementation strategies are not included in the constrained RTP/SCS; they are listed in the unfunded Strategic Plan. The TCA Board has made no decision on the use of VMT fees and until such time is unable to support its use in the proposed in the draft Plan.

**Highways and Arterials Technical Report**

**Page 15, Express/ High Occupancy Toll (HOT) Lane Network.**

As with the comment on page 57 of the main RTP/SCS document, the technical report should clearly include toll facilities in the description of projects included in this category. Orange County toll roads are not categorized as express or HOT lanes, but collect tolls as a means of insuring low-emission free-flow capacity and funding the construction and operation of the facility. Toll roads integrate with express lane and HOT lane facilities via the common FasTrak technology that allows inter-operability and convenience for drivers.

***Recommended Clarification:***

- Retitle this section, “Express Lanes, HOT Lanes and Toll Roads: The Priced Transportation Network.”
- Table 2.6 should be retitled “Express Lanes, HOT Lanes and Toll Roads”
- The text should provide brief definitions of each type of facility that makes up the priced transportation network, as express lanes, toll roads and HOT lanes each operate differently.
- The text should discuss that all priced facilities in the SCAG region ensure inter-operability by using a common technology, FasTrak, to collect user fees.
- The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities.
- The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing which is beneficial to reduced criteria and GHG emissions reductions.

**Performance Measures Technical Report**

**Page 2, discussion of types of performance measures.**

As with the comment on page 160 of the main RTP/SCS document, the text must make clear that the performance indicators are intended to be applied to the RTP/SCS at the regional level and are not proposed for project-specific application.

***Recommended Clarification:***

We recommend that the following clarification be inserted:

- Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.

**SCS Background Documentation**

**Pages 36 and 37, Land Use Pattern Maps for 2020 and 2035.**

Both of these maps are inconsistent with transportation network maps in the document and do not include SR 241 (ORA052), specifically called out in the RTP as a TCM and priced transportation project in southern Orange County.

***Recommended Clarification:***

Please show the SR 241 alignment on the Land Use Pattern Maps for 2020 and 2035 consistent with the project modeling list and other transportation network maps in the Draft RTP/SCS.

**Page 54, Pricing and Vehicle Policy Assumptions.**

This discussion only refers to a 2-cent per mile VMT fee; the Plan proposes a 5-cent per mile fee. This inconsistency should be eliminated.

***Recommended Clarification:***

- Amend the reference to a 2-cent VMT fee to a 5-cent per mile VMT fee starting in 2025, consistent with the RTP/SCS main document.

Add the following sentence:

- Toll roads, express lanes and HOT lanes charge varying tolls per mile for use of their facilities. Tolls are project-specific and typically vary by time of day and day of the week. Tolls collected for existing toll roads in Orange County are dedicated to operational expenses and retiring the bonds issued for construction.

### **Transportation Conformity Technical Report**

#### **Page 14, Toll Roads**

The discussion of toll road assumptions specifically mentions express lanes and HOT lanes, but not tolled facilities such as existing toll roads SR 73, SR 241, SR 133 and SR 261 in Orange County.

#### **Recommended Clarification:**

- SR 241 should be added to Table 6 as a tolled facility and the effect of the toll charges on it should be incorporated into the highway assignment procedure.
- Table 6 should be retitled appropriately to include “Express Lane, HOT Lane and Toll Road Networks.” This change should also be made in the main RTP/SCS document.

### **Transportation Security Technical Report**

#### **General**

This report addresses the need for the transportation system to enhance emergency preparedness, and transportation security and preparedness. Projects that enhance the region’s security are not identified.

#### ***Recommended Clarification:***

Provide illustrations of transportation projects needed in the RTP/SCS to improve transportation security. For example, the southerly extension of SR 241 provides an alternative route connecting the SCAG and San Diego Association of Governments coastal regions, which have very high current and projected travel volumes. This route will ease future projected congestion to ensure critical capacity for access and evacuation in times of environmental or other emergencies, such as earthquakes, wildfires, traffic accidents, and potential nuclear threats at the San Onofre plant. The need for an alternative route was recently illustrated by the lack of evacuation capacity from the 2007 North San Diego County wildfires.

### **DRAFT PROGRAM EIR**

#### **General**

The Draft PEIR sets forth 500 mitigation measures that SCAG states are “feasible” and reasonable to assume that they will be implemented. Further, it is difficult to sort through these voluminous mitigation measures to identify those that are mandatory vs. advisory and those that apply to transportation projects as opposed to other types of developments. This can be improved by reformatting and clarifying the proposed mitigation measures as follows:

#### ***Recommended Clarifications:***

- Provide a clear statement to the following effect: All mitigation measure recommendations to project sponsors and agencies are advisory. Lead agencies are

responsible for identifying and addressing those measures they deem practical and feasible, or applicable to specific projects.

- Sort out mitigation measures so that those that are mandatory upon SCAG appear first in each category and can be easily distinguished from Best Management Practices or Best Available Control Measures that SCAG is recommending to project sponsors and other agencies.
- For mitigation measures that simply restate existing regulatory agency requirements or recommendations, e.g. California Department of Fish and Game survey protocols and mitigation requirements, reference the specific regulation and include in the description “or successor regulation or guideline” so that as time moves forward the measure does not recommend out of date regulations or guidance.

**Page 3.6-15 and 17 Greenhouse Gas Emissions, Transportation Network Improvements.**

On page 3.6-15, the Draft PEIR states that the transportation sector is a major source of California’s greenhouse gases. Further, on page 3.6-18, the discussion cites information on the GHG emissions from new vehicle trips. However, in both places, the document does not clarify that certain transportation projects reduce greenhouse gases by virtue of their design, location and operation. Similar to the way that Transportation Control Measures reduce precursors to ozone, projects that reduce congestion and idling reduce GHG emissions from the regional transportation network. The PEIR must explain the relationship between GHG emissions and congestion relief, and the components of the RTP that provide congestion and idling relief on the regional network.

***Recommended Clarification:***

Consistent with our recommended clarification for page 78 of the Draft RTP/SCS document, the PEIR text should state the following on pages 3.6-15 and 3.6-18:

- Congestion relief projects reduce transportation network GHG emissions due to idling.
- Consistent with the SB 375 RTAC’s recommendation in its final report to the California Air Resources Board, the RTP/SCS includes projects and strategies designed “to smooth extreme congestion to more carbon-friendly speeds.”
- A subset of projects included in the Draft RTP/SCS reduce GHG emissions by providing relief of existing and projected congestion. These include toll roads, express lanes, HOT lanes, HOV lanes, and dedicated truck toll lanes.
- Congestion pricing is a powerful transportation demand management tool incorporated in the Draft RTP/SCS for reducing GHG emissions. SCAG has launched a two-year study of congestion pricing strategies that can provide needed

transportation facilities, while reducing the region's GHG emissions associated with vehicle trips.

- Orange County's toll road network is a prime example of priced congestion relief projects. The toll roads have variable pricing incentives that spread out vehicle use to limit peak-hour congestion that leads to increased GHG emissions.
- Other examples of projects that reduce GHG emissions on the regional transportation network include express lanes, HOT lanes, HOV lanes and dedicated truck toll lanes for goods movement.

## Maps 2, Project Description

### General, SR 241 Missing from 2035 Base Maps

Please ensure that all 2035 base maps include the southerly extension of SR 241, For example, Map 2.13, 2035 Grade Separation Projects, does not show SR 241, which will be completed by 2030, on the base map, while it is depicted on Map 2.6 and 2.8. Map 2.19, Land Use Pattern in Orange County, does not depict SR 241; this is accurate only if the map is intended to show 2008 land use; SR 241 should be included in all maps for 2020 and 2035.

#### ***Recommended Clarifications:***

Consistent with the transportation modeling network and TCM timely implementation report, show SR 241 as part of the 2035 base map for all transportation maps in the PEIR. Specifically, add SR 241 to Map 2.13 and Map 2.19.

TCA thanks you in anticipation of your written responses to these comments. We look forward to the amendments in the final 2012-2035 RTP/SCS and PEIR to incorporate the recommended changes. Should you have any questions or require any clarification regarding these comments, please feel free to contact Ms. Valarie McFall, Director, Environmental Services at 949.754.3475 or via email: [vmcfall@thetollroads.com](mailto:vmcfall@thetollroads.com).

Sincerely,



Scott Schoeffel, Chair  
San Joaquin Hills Transportation Corridor  
Agency



Bill Campbell, Chair  
Foothill/Eastern Transportation Corridor  
Agency

cc: Jacob Lieb, SCAG, Manager of Environmental and Assessment Services  
TCA Board of Directors



February 14, 2012

Attn: President Pamela O'Connor  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy**

Dear President O'Connor and Southern California Association of Governments Regional Council Members. Thank you for seeking public input on the draft Regional Transportation Plan and Sustainable Communities Strategy. The Urban and Environmental Policy Institute at Occidental College supports transportation and land use policies and spending to make the region more just, green, and livable. We are pleased that the draft RTP and SCS have a number of positive elements expanding clean transportation, encouraging more sustainable land uses, and reducing greenhouse gas emissions:

- The planning process took account of the relationship between transportation, land use, sustainability, environmental justice and economic development.
- The draft plan calls for significant investments in transit construction, operations and maintenance.
- The draft plan increases investments in active transportation compared to previous RTPs.
- The draft plan anticipates that vehicle miles traveled will increase less than population growth.
- The sustainable communities strategy quantifies how different forms of growth will have very different impacts on sprawl, energy and water use and other sustainability indicators.
- The draft plan anticipates adoption of zero emission technologies towards the end of the plan time frame.
- The draft plan supports high speed rail.
- The draft plan anticipates a reduction in greenhouse gas emissions from transportation in line with the goals of SB 375.
- The single largest anticipated funding source in the draft plan is implementation of a fee on driving or an increase in the gas tax, either of which would discourage driving.
- Much of the new highway space proposed in the draft plan is toll roads, HOV lanes, or HOT lanes (open to HOV or Tolls) and therefore may lead to less new, induced driving than the provision of free, multiuse lanes.

We however believe that the plans can do more and need to do more to expand alternatives to driving; price car and truck traffic to reflect their negative externalities; reduce the amount of space given to cars, trucks and parking; create good places rather than sprawl; and clean up the goods movement industry.

## Recommendations

**A. Rapidly create a more balanced transportation system.** The SCAG region has 21,638 center-line miles of road (55,890 lane miles of roads), 4315 miles of bikeways of varied quality (almost zero of it protected lanes on streets), and 470 miles of passenger trains (only 80 miles of which is light rail/subway, the rest metrolink). Opportunities and infrastructure to walk, bike, and take transit should be rapidly expanded so residents have choices for how to get around.

1. Significantly increase investments in active transportation from the \$6 billion budgeted. The Los Angeles County Department of Public Health calculates that \$40 billion is needed to fix sidewalks, implement jurisdictions' bike plans; and invest in last mile infrastructure near transit stations.

[http://saferoutescalifornia.files.wordpress.com/2011/11/dph-cost-methodology-presentation\\_dec14\\_2-11\\_notes.pdf](http://saferoutescalifornia.files.wordpress.com/2011/11/dph-cost-methodology-presentation_dec14_2-11_notes.pdf)

- Streets are our most important public spaces so we should reconfigure them to be vibrant, safe, healthy places rather than spaces designed to move as many cars as possible without regards for impacts on adjacent activities. Active transportation funding should convert existing arterials and local streets to be world class living and complete streets. SCAG should encourage jurisdictions to follow the street design standards contained in the Model Design Manual for Living Streets
- Most cities in the SCAG area have not developed bike or pedestrian plans so part of this funding should go towards assisting these cities in developing plans early in the implementation years.
- Most people will not ride bicycles in traffic (or separated from traffic by a painted line). In the developed world, every nation with high rates of cycling has separated bike facilities while every nation with low cycling rates lacks this infrastructure.

<http://www.ta.org.br/site/Banco/7manuais/VTPIpuchertq.pdf> Let's start creating a network of protected bike lanes/ cycletracks in all urbanized areas of Southern California, like the Dutch did beginning in the mid 1970s. <http://www.youtube.com/watch?v=XuBdf9jYj7o> Budget at least \$1 billion for the construction of 1000-2000 miles of protected bike lines to increase rates of cycling among non traditional cyclists (protected lanes recently constructed in Long Beach

<http://www.bikelongbeach.org/News/Read.aspx?ArticleId=85> cost approximately \$580,000 per mile).

2. Expand and accelerate transit investments so all planned transit projects in the RTP are constructed by 2022. Existing and new transit services should be funded so as to be affordable with frequent service. Rapid buses should serve all major streets in urban areas so that buses become the default motorized transportation choice. <http://www.humantransit.org/2010/11/los-angeles-some-thoughts-on-the-challenge-for-the-source.html>

**B. Pay for additional active transportation and transit investments by defunding harmful highway projects and by identifying local revenue sources that tax harmful transportation.** Moving people by cars and materials by trucks and diesel trains and separating where we live from where we work and shop produces fatal collisions, <http://map.itoworld.com/road-casualties-usa> cancer and heart disease, <http://hydra.usc.edu/scehsc/web/Resources/Key%20Research%20Studies/Resources-%20Key%20Research%20Studies.html> obesity and diabetes <http://designinghealthycommunities.org/> and climate change <http://www.pnas.org/content/early/2010/02/02/0906548107.full.pdf?with-ds=yes> , with a disparate impact on residents of low income neighborhoods bisected by highways and living near ports, warehouses, railyards and intermodal facilities. SCAG should projects that increase harmful transportation and tax driving and freight transport to pay for clean transportation.

1. Cancel highway expansion projects to pay for more active transportation and transit. Among the dozen most expensive road expansion projects in the RTP are: east west freight corridor (\$15.2 billion), Riverside to Orange County CETAP (\$13 billion), high desert corridor (\$6.9 billion), 710 corridor expansion (\$6.1 billion), 710 gap closure (\$5.6 billion), 5 north capacity enhancements (\$5.3 billion), 241 expansion (\$2.7 billion), mid county parkway (\$2.3 billion), 15 widening (\$ 1.7 billion), 405 widening in Orange County (\$1.7 billion), 5 widening (\$1.6 billion), and 79 expansion (\$1.4 billion). Building these highways projects will expand driving (and, if built in areas with predominately rural or suburban land uses, also expand sprawl). Cancelling them can allow the \$63.5 billion budgeted for these projects to be spent on active transportation and transit.
2. Support local revenue sources that price driving, parking, and freight transport to reflect the externalities of motorized transportation. There are a variety of methods for increasing the price of driving, some of which are contemplated in the RTP's financial plan. [http://rtpscs.scag.ca.gov/Documents/2012/draft/2012dRTP\\_03\\_Financial.pdf](http://rtpscs.scag.ca.gov/Documents/2012/draft/2012dRTP_03_Financial.pdf) higher gas taxes, carbon taxes, charges based on miles driven, appropriately and dynamically priced parking <http://sfpark.org/> , and congestion charges aimed at commuters entering central city areas <http://www.tfl.gov.uk/roadusers/congestioncharging/> are all useful policies.

**C. Reduce rather than increase the space granted to cars and trucks in order to reduce driving.** Roads and parking currently take up too much of our land, which encourages car-based transportation and all the problems that accompany it. Driving increases when roads are constructed, lengthened or widened.

1. Do not add any lane miles of highways or major arterials. The SCAG region currently (base year 2008) has 21,638 miles of road and 55,890 lane miles of roads. The draft RTP anticipates adding 948 centerline miles/ 7419 lanes miles which would be a 4.4%/ 11.1% increase. As Duranton and Turner have shown, "For interstate highways in the densest parts of metropolitan areas we

find that vkt increases in exact proportion to highways, confirming the ‘fundamental law of highway congestion’ suggested by Downs (1962, 1992). This relationship also approximately holds for other important roads in dense areas and for interstate highways in less dense parts of metropolitan areas.” <http://ideas.repec.org/p/tor/tecipa/tecipa-370.html> Converting mixed flow lanes to toll, HOV or HOT lanes or converting HOV lanes to toll or HOT lanes would still be acceptable.

2. Set a target to reduce vehicle miles travelled from the baseline year of 2008. Vehicle Miles travelled in the baseline year 2008 was 445,844 daily, approximately half on freeways, half on arterial roads. SCAG calculates that this number will rise to 546,806 daily by 2035 without any changes to roads (a 22.6 % increase). Under their plan, VMT will still rise, to 516,990 (16% increase). They also anticipate that VMT for trucks will grow even faster, expanding from 30,201 to 53,431 under their 2035 plan (a 76.9% increase). [http://rtpscs.scag.ca.gov/Documents/2012/draft/SR/2012dRTP\\_Highways\\_and\\_Arterials.pdf](http://rtpscs.scag.ca.gov/Documents/2012/draft/SR/2012dRTP_Highways_and_Arterials.pdf) Instead of planning for this increase, set a target for a reduction in VMT.
3. Plan for highway removal or modification. Learning from cities removing highways <http://www.cnu.org/highways/freewayswithoutfutures2012> , agencies and municipalities should plan to remove, cover or alter and reclassify as arterials highways that divide communities, negatively impact valuable natural resources such as rivers and coasts, or channel excessive traffic into neighborhoods. Freeway stubs such as the 710 N above the 10 or the 2 as it approaches Silverlake are ripe for removal or conversion and the 101 through downtown Los Angeles has been the subject of advocacy for capping for a park. <http://www.park101.org/>

**D. Pursue stronger sustainable communities strategies to create good places rather than sprawl.** People are drawn to diversity [http://www.amazon.com/Life-Between-Buildings-Using-Public/dp/1597268275/ref=sr\\_1\\_1?ie=UTF8&qid=1328728803&sr=8-1](http://www.amazon.com/Life-Between-Buildings-Using-Public/dp/1597268275/ref=sr_1_1?ie=UTF8&qid=1328728803&sr=8-1) in the built environment [http://www.amazon.com/American-Cities-Anniversary-Modern-Library/dp/0679644334/ref=sr\\_1\\_2?s=books&ie=UTF8&qid=1328728897&sr=1-2](http://www.amazon.com/American-Cities-Anniversary-Modern-Library/dp/0679644334/ref=sr_1_2?s=books&ie=UTF8&qid=1328728897&sr=1-2) , so municipalities should increase interesting, mixed-use neighborhoods by focusing growth near transit and altering zoning rules that restrict mixed use development to a small fraction of cities’ land area.

1. Adopt alternative 3 (the envision 2 alternative) smart growth land use and housing patterns) rather than the planned project. [http://rtpscs.scag.ca.gov/Documents/peir/2012/draft/2012dPEIR\\_4\\_0\\_Alternatives.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012/draft/2012dPEIR_4_0_Alternatives.pdf) This alternative version of the plan relies on smart growth land use and housing patterns to achieve superior environmental results in air quality, aesthetics, open space and farmland preservation, water conservation, greenhouse gas emissions reductions, mobility, and land use.
2. Fund local jurisdictions to allow them to update their general plans and zoning codes to reflect sustainable community and smart growth principles.

3. Encourage sensitive densification of existing single family zoned areas by encouraging municipalities to allow cottage housing, duplexes, accessory dwellings, and small lot subdivisions in R-1 zones.
4. Encourage all jurisdictions to eliminate mandatory parking minimums for existing and new buildings.  
<http://shoup.boi.ucla.edu/ProblemsWithParkingRequirementsInZoningOrdinances.pdf>

**E. Clean up goods movement industry before planning to expand it.** Do not invest in goods movement roads and rail expansion in the hopes that zero emission technologies will emerge decades later. Invest more in zero emissions trucks and locomotives now as a precondition before expanding freight infrastructure. Otherwise impacted communities will continue to suffer disproportionately from pollution from good movement. <http://departments.oxy.edu/uepi/publications/GlobalTrade.pdf>

1. Require widespread adoption of zero emissions trucks and rail in the region as a precondition for funding any expansion of goods movement infrastructure.
2. Recommend a \$30 per twenty-foot container fee for moving either into or out of the ports to help pay for mitigation of existing environmental impacts and to help pay for research into zero emission alternatives. This strategy could generate as much as \$441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports.
3. Require maximum development of on dock rail before funding any off dock projects.

We look forward to working with you to improve the plan and create a more just, green and livable region.

Mark Vallianatos  
Policy Director  
[Mvalli@oxy.edu](mailto:Mvalli@oxy.edu)  
323 259 1458



February 14, 2012

Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**SUBJECT: 2012-2035 Regional Transportation Plan**

Dear Ms. Lin,

On behalf of the Valley Industry and Commerce Association (VICA), thank you for your commitment to the transportation needs of Southern California.

While we appreciate the inclusion of a handful of major San Fernando Valley-centered projects in the Regional Transportation Plan (RTP), we are disappointed by the insufficient appropriations for these projects and the lack of investment overall in the San Fernando Valley. Specifically, no funding is directed to renovations of I-101 between downtown Los Angeles and the city of Calabasas or improvements to I-405 north of the I-101 interchange. Furthermore, I-134, I-170, and the major arterials of the Valley receive minimal investment.

Despite \$40 billion in financing secured for Measure R projects in the greater San Fernando Valley, the only Valley projects in the Federal Transportation Improvement Plan (FTIP) are the renovation of the Interstate-101 off-ramp at Van Nuys Boulevard; the freeway connector at the I-101 and I-405 interchange; the I-405 Corridor Mass Transit project through the Sepulveda Pass; the studies of the Van Nuys corridor and Burbank-Glendale-Pasadena Airport intermodal ground access; and expansion of transit centers at Pierce and Mission Colleges. These projects are of vital regional significance to the Valley, but they are only the tip of the iceberg.

Key sections of the I-101 freeway need to be renovated to relieve bottlenecks and increase roadway safety between the Valley and downtown Los Angeles. These sections include the I-101 interchanges with the I-170 and I-134, which connect commuters and clients with the north, east and west San Fernando Valley. The roadway degradation along this I-101 corridor requires immediate attention and should be included in the RTP.

The north and west Valley also depend heavily on I-405. To reduce traffic and enable quicker, more efficient transportation between the Valley and West Los Angeles, mass transit solutions are necessary. The I-405 Mass Transit project through the Sepulveda Pass is the first step. A planning process and full financing must be put into place without delay.

While renovation of I-101 and I-405 are pressing, their effective use will not be possible without proper maintenance of the transportation system that serves these freeways. While the Financially-Constrained RTP Projects and Strategic Plan lists contain a few projects along major Valley arterials,

this system requires immediate restoration and improvement. Van Nuys Boulevard, Sepulveda Boulevard, Riverside Boulevard, Ventura Boulevard, Mulholland Drive, Laurel Canyon Boulevard, Victory Boulevard, Sherman Way, Burbank Boulevard, Reseda Boulevard, Topanga Canyon Boulevard, De Soto Avenue, Vineland Boulevard, Hollywood Way, Canoga Avenue, Vanowen Street, Nordhoff Street and Lankershim Boulevard are just a few of the several roadways critical for employees and clients to access the Valley using I-101 and I-405. The City of Los Angeles recently submitted a list of additional "Local Highway" projects, the majority of which target major Valley arterials. We ask that you review this list and include several—if not all—of the identified projects in the Strategic Plan.

The sections of I-170, I-134 and I-5 freeways connecting the east San Fernando Valley cities of Burbank and Glendale to the rest of Los Angeles County also receive only minor attention in the RTP. Roadway repair and mass transit options along these routes are necessary for Bob Hope Airport access and mobility into and within these east Valley cities. We ask that you increase investment in the Burbank-Glendale-Pasadena Airport intermodal ground access study and add renovations of the East Valley arterials to the Strategic Plan.

Thank you for considering our recommendations. We look forward to full funding of the San Fernando Valley projects on the Federal Transportation Investment Plan and Financially-Constrained RTP Projects lists, as well as expansion of the Strategic Plan to include critical Valley projects.

Sincerely,



David Adelman  
Chair



Stuart Waldman  
President

CC: Hasan Ikhata  
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Los Angeles, CA 90012

Robert Scott  
San Fernando Valley Council of  
Governments  
14410 Sylvan Street  
Van Nuys, CA 91401

## Rachel Morris

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**From:** Rachel Morris [rachel.earth@gmail.com]  
**Sent:** Tuesday, February 14, 2012 4:50 PM  
**To:** 'rtp@scag.ca.gov'; 'lin@scag.ca.gov'; 'John Procter'  
**Subject:** Signatures supporting increased funding for Active Transportation

Dear SCAG and Margaret,

I am the executive of a Ventura local non-profit started in 2007 that works to reduce climate change. VCCool (Ventura Climate Care Options Organized Locally), can be found at [www.vccool.org](http://www.vccool.org).

First thank you for all you've done to engage the community in the RTP and SCS effort for 2012. I especially appreciate the 18 Workshops in the SCAG region because that help our organization to learn of SCAG and the critical effort of the Regional Transportation Plan. We would also like to thank the Safe Routes to School Partnership for helping us to become engaged.

Our concern is that a large body of the population is not currently represented in your 2012 RTP draft. These are the people who bicycle, who walk, or who would like to use Active Transportation but are too afraid because of the real threat of them or their children being killed or injured inadvertently by people in automobiles.

To this end we have collected 1,241 signatures from people across the SCAG region urging you to reconsider the small, and delayed funding for a clean, green, economical form of transportation who is now receiving 25% of traffic fatalities in the SCAG region. Our on-line petition and video can be found out [www.active-transit.org](http://www.active-transit.org)

We will post the signature files to Drop Box so you can download them.

Here is the break down, and what you will find in our SCAG dropbox folder:

- 775 online signatures, including name, zip, e-mail, plus comments from many of the signers
- 355 paper petition signatures including name, zip, and e-mail address
- 111 youth/student signatures – including name of student.

Concerning files, I am including:

- The composite of the online signatures,
- Jpg files of scanned adult signatures that came in on paper
- A letter explaining the youth signatures from one of the teachers.
- An excel with the unique signatures. (The kids signed multiple times for emphasis, so we went through and typed a list of the unique names, deleting any duplicates.

I would also like to include this link to a front page article in our county-wide newspaper. It was on the front page of the Ventura County Star, with the printed version headline "Bicyclists Demand Respect."

<http://www.vcstar.com/news/2012/feb/12/petition-drive-for-more-bicycle-safety-in-scag/>

We urge you to rethink the delay in funds for Active Transportation, and we urge you to increase funds budgeted in the RTP. Please do not hesitate to call me if you would like to meet, or if you have any questions about our petition, our effort, or anything else.

**To find the actual petition information please go to [www.dropbox.com](http://www.dropbox.com) in VCCool's SCAG RTP Petition 12, and download the files therein.**

Warmly Yours,

*Rachel Morris*

VCCool Executive Director

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

office (805)648-1267

cell (805)258-9369

*VCCool is a Climate Change Action Group dedicated to engaging the people of Ventura to reduce greenhouse gasses. We strive to influence policy, provide tools and expertise for lifestyle change, support a localized green economy, and foster a grass-roots community that supports sustainable living.*



Fullname	E-mail	Age	Address	Country	Post Code	Note	Created	IP
Rich Reid					93022		2012-02-15 00:45:10	
Heidi Buccola					93003		2012-02-15 00:31:37	
Lisa Myers					93022		2012-02-15 00:13:55	
Laurie Walters					93023	I would use my bike much more often if there were safe bike lanes! There are MANY of us who want to reduce our carbon footprint - help us create a culture of active transportation in Ventura County!	2012-02-15 00:10:23	
david comden					93003	In Copenhagen, Amsterdam and Davis, California, riding a bicycle is an important way to move around. Why not in western Ventura County? In part, because it's dangerous. Let's do something about that - let's put a small amount of funding towards Active	2012-02-15 00:05:51	
Chad Ress					93001		2012-02-15 00:01:59	
curtiss montague					93003		2012-02-14 23:51:09	
Stephanie Washburn					93001		2012-02-14 23:49:55	
Noel Douglas-Roth					93023		2012-02-14 23:46:32	
Brian Nilsen					90024	I've just started commuting by bicycle in the past 8 months. My health has improved drastically, I've saved a ton of money on gas and insurance, and I no longer get stuck in horrible westside LA traffic. The only downside to my commute is the road inf	2012-02-14 23:30:14	
John Roger Essick					93023		2012-02-14 22:50:42	
walker ferguson					93001		2012-02-14 22:36:24	
Ruth Farnham					93023		2012-02-14 22:35:36	
Barbara Washburn					93023		2012-02-14 21:59:54	
David Newman					91362		2012-02-14 21:55:53	
Maile Schulbach					93001		2012-02-14 21:51:15	
David Crowell					92057	When I lived in Ventura, I had a roommate that had been hit 6 times on his bike. One restaurant wouldn't even let him use their phone to call for help while he stood with a broken bike and a bleeding head.	2012-02-14 21:41:37	
Jan A. Sovich					93001	Please allow for people to walk and ride safely.	2012-02-14 21:40:13	
Rylan Swift					93035	I've got hit by a car before due to a poorly defined bike lane. I don't want to get hit again.	2012-02-14 21:37:05	
Bill Hickman					93003		2012-02-14	

Nick Bobroff	
Michael Weaver	
Andrea Kish	
Dianne Bullard	
Justin Buswell	
Debra Barringer	
Matthew R. Sayles	
Brian Stark	
Marc Wilde	
Elizabeth Bachman	
Cheryl Frei	
sergio guizar	
Charles Slosberg	
Alex Laine	
Robert Stanley	
Catherine Stanley	
michael j. shapiro	
Susan Williamson	
Derek Poultney	
Cheryl Endo	
mark shimahara	

		21:35:35	
93013		2012-02-14 21:24:00	
93023	As a society, we need to rationalize the best forms of transportation to the appropriate travel purpose. As an example, it makes no sense to take an airplane from LAX to John Wayne Airport in Orange County. We need efficient and comfortable public transpo	2012-02-14 21:22:17	
93001		2012-02-14 21:08:25	
93023	We need public transit and weill maintained bike lanes throughout this area.	2012-02-14 21:07:24	
92058		2012-02-14 21:07:11	
93001		2012-02-14 21:07:02	
93001	25 years is a long time to wait if we don't get this right. Let's take the steps now to create the infrastructure that the future will require!	2012-02-14 21:06:04	
91360		2012-02-14 21:05:59	
93001		2012-02-14 21:01:38	
93023		2012-02-14 20:42:45	
93001		2012-02-14 20:41:05	
91390		2012-02-14 20:36:55	
93001		2012-02-14 20:26:07	
93022	With more and more people riding bikes and looking to ride bikes because of high gas prices, PLEASE fund that part of transportation to make it safer and more inviting.	2012-02-14 20:20:59	
93001		2012-02-14 20:19:32	
93001		2012-02-14 20:18:55	
93023	Any dent in our dependency on fossil fuels - i.e. use of our cars and freeways - is crucial if we are to be able to evolve as a species.	2012-02-14 20:11:49	
93023		2012-02-14 20:05:19	
93023	It would be criminal not to increase the amount for Active Transportation to 5%-8%	2012-02-14 20:01:12	
93001	More bike paths please!	2012-02-14 19:49:54	
93001		2012-02-14 19:49:39	

sacha halenda	[REDACTED]
Vanessa Frank Garcia	[REDACTED]
David Romero	[REDACTED]
Patricia Leavitt-Pagaling	[REDACTED]
Robert A Perks	[REDACTED]
Amanda Happle	[REDACTED]
Karen Bednorz	[REDACTED]
Gina Jaramillo	[REDACTED]
Alison Perks	[REDACTED]
Eric Unmacht	[REDACTED]
Terri Laine	[REDACTED]
Tom Herrell	[REDACTED]
John Dutton	[REDACTED]
Diane French	[REDACTED]
Danielle Egge	[REDACTED]
Irvin Fox-Fernandez	[REDACTED]
Susan Trinidad	[REDACTED]
jim little	[REDACTED]
Anne Leis	[REDACTED]
David M. Denio	[REDACTED]
Mark Trinidad	[REDACTED]

80306	There is NO downside to improving cycling & running infrastructure.	2012-02-14 19:30:29	[REDACTED]
93003		2012-02-14 19:30:10	[REDACTED]
93003	Any and all cyclists in Ventura County can attest to the severely degraded state of the roadway infrastructure we currently have. Please allocate more funding to bike lane improvements!	2012-02-14 19:29:02	[REDACTED]
93023	Together, we can create a healthy, sustainable Ventura County!	2012-02-14 19:28:11	[REDACTED]
93001	As a resident who has built my life and business around walking and cycling for my primary transportation I find it imperative that we as a community devote a greater portion of our tax dollars to these modes of transportation, the current allotment in th	2012-02-14 19:26:32	[REDACTED]
93003		2012-02-14 19:24:25	[REDACTED]
93004	Critical need	2012-02-14 19:20:36	[REDACTED]
93010		2012-02-14 19:19:51	[REDACTED]
93001	We need Bike lanes for people who want to commute and stay fit for exercise purposes. Please consider this money well spent on a useful infrastructure!	2012-02-14 19:16:15	[REDACTED]
93001		2012-02-14 19:12:48	[REDACTED]
93022		2012-02-14 19:12:45	[REDACTED]
93001	More bike lanes will decrease the traffic. Make it safer for cyclist and pedestrians please!	2012-02-14 19:12:13	[REDACTED]
93110	I work in Ventura and bike in twice a week from SB. I'm very interested in making my ride in safer.	2012-02-14 19:11:11	[REDACTED]
93001	Let's make Ventura a GREAT place to ride a bicycle, every day of the year, from families to tourists!	2012-02-14 19:10:11	[REDACTED]
93001	stoked!!!!	2012-02-14 19:09:11	[REDACTED]
93003	Bicycling with my family is good exercise. More bike lanes and safer bike routes would be great around Ventura.	2012-02-14 19:08:11	[REDACTED]
93012		2012-02-14 19:07:11	[REDACTED]
93023	It's far cheaper to take some cars off the road, rather than enabling more, by creating new, safer and improved opportunities to walk and cycle.	2012-02-14 19:06:11	[REDACTED]
93023		2012-02-14 19:05:11	[REDACTED]
90266	Let's make LA County the country's PREMIER LOCATION for biking and pedestrian friendly neighborhoods!	2012-02-14 19:04:11	[REDACTED]
93012		2012-02-14 19:03:11	[REDACTED]

Sadie Iverson	
BAYARD CHANNING HILLWAY	
Scott Wilson	
Anthony Ferguson	
Paul Jenkin	
dana swanson	
Claire Johnson- Winegar	
Ed Bialack	
Chon Torres	
Daniel Herzog	
Steve Messer	
Matthew Meyer	
Michael Craig Johnson	
Steve Branch	
Carolyn Blount Brodersen	
Wendy Darling	
Saydie Grewe	
Weston Grewe	
Tammie Grewe	
William Grewe	
Janet Marie Fort	
Joseph Sesto	
Mario A. Aguillon Jr.	
Robert F Anderson	

93003		2012-02-14 18:50:53	
93001-1477	The importance of this issue cannot be overemphasized.	2012-02-14 18:50:40	
93023		2012-02-14 18:50:16	
93001	Please help in making non-motorized modes of transportation a safer way to travel and a focus for our future.	2012-02-14 18:49:30	
93001		2012-02-14 18:39:23	
93010		2012-02-14 18:32:00	
93036		2012-02-14 18:09:54	
91367		2012-02-14 17:54:54	
93003		2012-02-14 17:40:18	
93003		2012-02-14 17:39:50	
90041	I rely on a bicycle as my primary transportation.	2012-02-14 17:24:25	
93003		2012-02-14 16:52:34	
93003	My son is 9 years old. Please don't turn his hometown into a pedestrian-free, bike-free wasteland.	2012-02-14 16:43:23	
93065		2012-02-14 16:29:13	
93003		2012-02-14 16:26:37	
93001-3106		2012-02-14 15:54:23	
93003		2012-02-14 15:23:29	
93003		2012-02-14 15:23:03	
93003		2012-02-14 15:22:36	
93003	I, my spouse and four kids cycle in Ventura County roads making, on average, between 25 to 30 trips weekly.	2012-02-14 15:21:47	
93001	I walk and ride my bike all the time! Please help us have safer roads and areas for bikes and walkers to be safe!	2012-02-14 15:05:18	
93041		2012-02-14 07:14:44	
91311		2012-02-14 05:09:40	
93004		2012-02-14	

					05:06:32	
Hope Bowles			93030	we should be ashamed of the condition of our bike lanes in Ventura county. They have been neglected and as a result pose a real danger to cyclists who ride these roads	2012-02-14 05:05:44	7
Jonathan Lopez			93021	Please add me to all your email lists and meeting notifications.	2012-02-14 04:59:47	2
Joey Marquez			93004		2012-02-14 04:58:16	1
Karen Randall			91320	I am a bike commuter and pleasure rider for 35 years.	2012-02-14 04:43:13	1
Gene Evans			90041		2012-02-14 04:12:49	7
Geoffrey H. Parker, Jr.			93003		2012-02-14 04:08:28	1
Zachary Pritchard			91360		2012-02-14 04:06:36	7
David Sanchez			91106		2012-02-14 03:47:33	7
Daniel Paul Githens III			93010	We need this funding now.	2012-02-14 02:44:13	7
Linwood Howe			93003-2141		2012-02-14 02:40:56	7
Erica Wolchuck			93003		2012-02-14 02:22:36	7
Eileen Marie Tracy			93030	We have more and more bicycle riders, in spite of the lack of safety on our streets.	2012-02-14 00:49:10	9
James Hickey			91320		2012-02-13 23:14:21	7
Alex Purves			90405		2012-02-13 23:10:57	1
Bret Katz			91311		2012-02-13 23:05:24	6
john weldon eliot jr			93003		2012-02-13 23:05:13	2
Ronald DeMarco			33065		2012-02-13 22:09:17	1
Joel Angel Juarez			93030		2012-02-13 22:08:54	1
Ville Maanpaa			92629	Limit right turn on red to rural areas, not cities.	2012-02-13 21:57:53	1
Laura Murphy			91362		2012-02-13 21:39:57	7
Henry E. Riley			91343	Please recognize all the benefits that come from sharing the road with all the users.	2012-02-13 21:37:18	1
Jerry Hicks			93010		2012-02-13 20:55:34	6
Steven Herbert			90230		2012-02-13 20:46:33	2
					2012-	

Roy Rodriguez		93030		02-13 19:47:27
Jim Trout		93030		2012- 02-13 19:46:40
Nestor Albances		93030	Riding is healthy and fun	2012- 02-13 19:44:28
Justin McClure		93065		2012- 02-13 19:32:41
Jessica DeLacy		90254	Biking in LA is awful, but the city is perfect for it! Lets make it safer and more accessible to all!	2012- 02-13 19:19:47
Thomas J Privitelli		93003		2012- 02-13 19:14:25
Thomas M. Jakowczyk		91311	Livable communities for cycling and walking must be a priority.	2012- 02-13 19:08:17
Steven Robertson		93063		2012- 02-13 19:07:59
Gerard J Fontes		93010	As a rider, and a former Obese individual - we need to get people out of their cars and moving under their own power.	2012- 02-13 19:05:48
Lindsay Nordberg		02139	I am signing this to support increased safety for my mother who rides her bike. Thank you.	2012- 02-13 18:58:02
Marck Aguilar		93101	Please increase the percentage of the draft budget alloted to bicycles and pedestrians. Expenditures aimed toward encouraging people who's schedules and life circumstances would allow them to walk or bicycle will pay off. I know, because I used to be a "d	2012- 02-13 18:50:13
Mark E. Capron		93033	Or work with vehicle manufacturer's to deploy electronic technology providing virtual force fields of protection for pedestrians, bicyclists, and motor vehicles at a fraction of the all other safety measures.	2012- 02-13 18:46:14
Sonia Kroth		93001		2012- 02-13 18:42:53
Tom Amick		93010	If the roads were safer more people would ride bicycles. This increase in funding is desperately needed to help achieve the goal of safer streets. Thank you for considering my opinion.	2012- 02-13 18:33:26
Tom Berube		93063		2012- 02-13 18:32:14
Alfredo Aldaco		93033		2012- 02-13 18:19:05
Claudia Armann		93001	As a pedestrian, I often feel unsafe on the streets of Ventura and Santa Barbara and feel that much more safeguards are needed in our neighborhoods. I'm also a transit user, and every transit trip, also involves walking and/or biking. Safety for those who	2012- 02-13 18:16:16
David Jason Lamon		91390	Pedestrians and cyclists are dying every day in traffic accidents....We need safer infracture to be healthy reduce pollution / oil dependance.	2012- 02-13 18:13:34
Rafael Olivares		91362	I fully support this petition	2012- 02-13 18:09:51
				2012-

Patricia Powell		93063		02-13 18:06:23
Wes Parsel		92620	I Bikes!	2012- 02-13 17:27:53
Loretta Baker		91326	Please take a proactive, forward thinking approach to transportation planning. We must increase public funding for active transportation now in order to have adequate transport options in place for our future generations. It must happen or we will suffer	2012- 02-13 17:20:16
Arthur E. Flynn		93003	spending more on pedestrian and bicycle safety will have a cascade effect on popularizing these forms of transportation in Southern California. Better and safer bikeways will certainly increase usage which will in turn increase awareness of these alterna	2012- 02-13 17:17:57
Jessica M. Chiang		93012		2012- 02-13 17:12:43
Tristan Borgeson		93004	Yes	2012- 02-13 16:51:28
Charles Bertok		93010		2012- 02-13 16:43:41
Steve Lai		91307		2012- 02-13 16:19:24
Kevin Clerici		93001		2012- 02-13 16:05:58
Emilio Plaza		93041		2012- 02-13 15:55:52
Eric Pham		93030		2012- 02-13 15:54:11
Mike Shaffer		93004		2012- 02-13 15:49:12
Jeri Edwards		91361		2012- 02-13 15:39:50
David Harris		93036		2012- 02-13 15:36:45
patrick pascal		90027		2012- 02-13 15:30:31
Allan S. Gottlieb		93010-1650	Please allocate more funds for cycling and pedestrian safety. Too many health conscious citizens are being needlessly injured and killed while doing their part to stay healthy and reduce pollution and global warming. Thank you.	2012- 02-13 15:20:43
Patrick Kennedy		93001		2012- 02-13 15:17:11
Peter Dziewaltowski		91204		2012- 02-13 15:02:02
Christopher E. Botti		93023		2012- 02-13 14:45:32
Lorelle Dawes		93001		2012- 02-13 14:37:16
Marla Cohn		93010		2012- 02-13 13:54:00

Max Hogan		93010		2012-02-13 05:52:15
Fred Eubanks		93036		2012-02-13 05:17:05
Ginnette M Waterman		93001	I want safe routes for walking and riding my bike every day.	2012-02-13 05:14:46
jose vertin		93001		2012-02-13 04:37:14
Nick Steel		91360		2012-02-13 04:01:35
Chris Rokusek		93004-1388		2012-02-13 03:32:04
Kelsey McMahon		91320		2012-02-13 02:57:34
Steve Hobbs		91362		2012-02-13 02:48:21
Karen Armstrong		93065		2012-02-13 01:54:30
Chris Armstrong		93065		2012-02-13 01:53:52
Stephanie Ramirez		90016		2012-02-13 00:56:08
Richard Risemberg		90036		2012-02-13 00:28:19
Vanessa Gray		90026		2012-02-12 21:26:39
Joel Garfield		91356	cyclist use of the roads is NOT less important than automobiles. as citizens, we pay taxes for these roads through our own auto use and other local taxes.	2012-02-12 21:19:38
Christine Robert		91359	This is very important to me!	2012-02-12 17:16:55
Daniel Martinez Jr.		90042		2012-02-12 16:50:03
Daniel Gerlach		91362		2012-02-12 16:37:31
Gary Ammirati		90065		2012-02-12 15:38:06
Eric Polin		91325		2012-02-12 06:36:07
Yariv Donde		92629		2012-02-12 04:58:44
Edward Earl Cable		92128		2012-02-12 03:17:49
Brian C. Hammer		91362		2012-02-12 01:39:36
Sy Einstoss		93003	We need wider road shoulders	2012-02-12 01:02:15
			Please increase the 2012 Regional Transportation Plan from 5% to 8% for Active Transportation. we need	2012-

John Banks		91361	more infrastructure for bicyclist and walkers. Southern California is a beautiful area but it caters to a car culture. Please increase areas for walking	02-12 00:44:02
Michael Ursprung		91304		2012-02-12 00:07:57
Michelle Harden		91343		2012-02-12 00:04:04
Kathleen Kassie Rae Ambrose		91320		2012-02-11 17:49:30
Andrew Miliotis		90036		2012-02-11 17:41:49
Michael Hallahan		93001		2012-02-11 17:17:47
Laura Healy		91320	Make cycling safe!	2012-02-11 15:33:04
Ronald Partridge		93063-6409		2012-02-11 15:27:00
William Honnef		93012		2012-02-11 15:18:32
Lynda Thompson		91362		2012-02-11 14:56:43
Ben Riker		91361		2012-02-11 14:46:48
Brian Davies		93063		2012-02-11 14:37:02
William Capelaci		91362	Its just good common sense	2012-02-11 14:35:56
Frances T. Muzio		91304		2012-02-11 14:34:17
Robert J. Muzio		91304		2012-02-11 14:33:29
Andy Au		91030	Bikes and Pedestrians for an obese population. What else makes sense?	2012-02-11 10:50:52
gary J. Mellinger		93065	We need more funds for cyclists.	2012-02-11 07:38:11
James Doane		91361		2012-02-11 07:08:52
Jeff Mayeda		93021		2012-02-11 06:48:45
thomas e. friedman		93001		2012-02-11 04:48:09
Douglas O'Brien		93003	Get the priorities straight!	2012-02-11 03:40:28
Ed North		91362		2012-02-11 03:25:30
Peter Ippel		93001	I am 100% making bicycles an active part of life in Southern California. We need safety.	2012-02-11 02:22:47
Kate Faulkner		93001	Let's get people out of their cars and solve several problems at the same time.	2012-02-11 01:46:46

harlan demuth		93023		2012-02-11 01:39:34
Richard I Light		91406-5640		2012-02-11 01:36:37
Ryan Locante		90029		2012-02-10 21:29:30
Jesse Kretschmer		90036		2012-02-10 21:10:22
Douglas Johnson		93003		2012-02-10 20:24:23
Arthur Scotti		90046		2012-02-10 19:47:06
Jessica Vergara		90045	I am a proud Female cyclist	2012-02-10 19:35:41
Scott Newton		91364	I disagree with the Global Warming bit and I do not stand with Barbara Boxer. I agree with the rest of the petition	2012-02-10 19:14:39
Steve Heinold		91364		2012-02-10 18:56:23
Kyle Lawrence		93001	Healthy is Sexy Ride a Bike	2012-02-10 18:32:59
Carlos Sandoval		90242	I feel that is very important to have bike lanes for many reasons. 1- do to gas prices more people are riding to school and to work like myself. 2) There are people like my parents that have diabetes and cholesterol that need to go out and walk everyda	2012-02-10 18:28:31
Martin Lopez-Iu		90034		2012-02-10 18:15:19
Edgardo Paredes		90240		2012-02-10 17:45:22
Kristina Fukuda-Schmid		90230		2012-02-10 17:28:46
Gerardo Ramirez		91367	Every dollar spent on active transportation will save thousands that would need to be spent on other types of transportation. It is also good to establish new habits for our future generations.	2012-02-10 17:16:12
Michelle Craven		90401		2012-02-10 17:15:28
Barry C Nicholls		90278	Save fuel ,stop polution.increase health .what other program has similar benefits??	2012-02-10 17:05:39
Carl Wurtz		91505		2012-02-10 16:42:10
sharon nemec		91356		2012-02-10 16:10:21
Jessica Howen		90639	Please support alternatives to the car!	2012-02-10 14:16:00
Bryan Florer		93060		2012-02-10 08:15:08
Kristin Bruun-Andersen		91436		2012-02-10 07:45:24

JC Olsson		91042		2012-02-10 07:42:31
Derek Vilmos		91042	Ride for health. Ride for companionship. Ride to enjoy the air, the sun and the sky. Ride for life.	2012-02-10 07:41:54
Kelly Wolschon		90278		2012-02-10 07:39:30
Mark Wolschon		90278		2012-02-10 07:38:50
Aaron Lipstadt		90068		2012-02-10 07:13:11
Robyn Shultz		90029		2012-02-10 07:03:27
ralph Q smith		quincypics@aol.com		2012-02-10 06:50:41
Ivan I. Light		90048		2012-02-10 06:30:55
Bruce Wilkoff		91320		2012-02-10 06:14:24
John Koerber		91304-4455		2012-02-10 05:01:29
Craig Rettig		90046		2012-02-10 04:56:05
Yuki Kidokoro		90004		2012-02-10 04:53:09
Christian Schrader		90005-3996	There are a lot of us out here. Please don't ding us for not always driving a car. I am trying to teach my daughters to ride bicycles, but am afraid there will be no place for them to ride when they learn. Thanks for your time and consideration.	2012-02-10 04:09:30
Holly Miller		92869		2012-02-10 03:45:15
Stephen Turk		90045	I walk, I ride, and I drive. Our infrastructure needs to support all modes of transportation and recreation, and help us build communities.	2012-02-10 03:39:28
Karen Canady		90019		2012-02-10 03:38:18
Rachel Cushing		90034		2012-02-10 03:36:34
Jazmin Luna		90019		2012-02-10 03:12:47
Joshua Stanley		90278		2012-02-10 02:57:59
Dan Hanasono		90293		2012-02-10 02:34:40
Chi Nghe		90041		2012-02-10 02:29:43
Laura Edith Rivas		90201		2012-02-10 02:27:59
			2 bikes, 1-100% electric car, solar	

Byron Head		91607	panels to charge the car and run the house...I'm doing my part. Please contribute.	2012-02-10 02:22:11
Michael Nilsson		90069		2012-02-10 02:06:25
David Hartson		91040	Funding = safety & less motor vehicle use	2012-02-10 01:56:22
bonnie freeman		90065		2012-02-10 01:54:01
jonathan kim		90278	We desperately need more funding for bike lanes so people can actually be safe when they want to be more active and lose weight.	2012-02-10 01:39:47
James Cadenhead		93109		2012-02-10 01:38:10
Yolanda Brandick		91320		2012-02-10 01:19:06
Charles Bankston		91361		2012-02-10 00:20:11
Eugene Jacobowitz		91321		2012-02-09 20:35:55
WILLIAM CHEYNE		90045		2012-02-09 20:05:28
Mary Smith		90045		2012-02-09 20:04:11
Steven Brandick		91320		2012-02-09 18:40:23
Michael Bass		91360		2012-02-09 18:40:18
Sharon McMahon		91320	Please hear us.	2012-02-09 18:34:52
Paul Rabinov		91214		2012-02-09 17:18:33
J.C. Simmons		91320	An incremental increase in public investment in bicycle infrastructure will make huge paybacks in overall public mobility and health for our citizens. Bicycles are such an obvious solution to so many of our major problems: obesity, diabetes, traffic cong	2012-02-09 16:18:40
Derek Brauch		90266		2012-02-09 16:03:04
Theresa Sanchez		91745		2012-02-09 15:30:34
David Feuer		90034	As a motorist, bicyclist & pedestrian, I'm sick and tired of the inadequate, substandard & hazardous conditions of our public street infrastructure. The problems are most evident when I choose to commute by bike, bus or on foot.	2012-02-09 07:44:21
Brendan Lewis		91001		2012-02-09 05:11:56
Mike Leszczynski		90650		2012-02-09 04:59:32
Robert Neuber		91730		2012-02-09

					04:09:57
Peter Komfolio			91776		2012-02-08 23:19:28
Dee Cappelli			90401		2012-02-08 22:48:59
John Kessler			90274		2012-02-08 22:38:27
Francie Stefan			90034		2012-02-08 21:11:55
Laura Matthews			90401	Make the roads safer for cyclists!	2012-02-08 19:32:00
Warren Bowman			90291		2012-02-08 19:13:55
Daniel Dabek			90042	A small investment in bicycling and walking will have large public health savings in the future.	2012-02-08 19:04:48
Kyle Hutmaker			90024		2012-02-08 18:41:12
Asuka Hisa Kawasaki			90019	Think globally, act locally. It is time for this type of vision.	2012-02-08 18:36:11
Amar Natt			90025		2012-02-08 18:31:43
Chase Covello			90025		2012-02-08 18:31:06
Cynthia Rose			90404	many government agencies still cling to a transportation vision that is focused on motor vehicles- we must look to a safer more sustainable future with people as the main interest not cars. Biking & Walking deserve more equitable funding- increase their b	2012-02-08 18:15:58
Lucy Dyke			91604		2012-02-08 18:11:35
Robert G Trowbridge			90034	Please help spread the word!	2012-02-08 18:02:30
Russell B Sydney			93060	Imported oil has been destroying our economy and our health for way to long. Please increase funding for bicycle and pedestrian safety for the health of our people and the prosperity of our future.	2012-02-08 17:10:40
Pauline Chow			91786	More resources for bicycle and pedestrians. I want to get out of my car and walk to the store/lunch/post office. Make it happen!	2012-02-07 17:57:23
Kraig Dunehe			91320	Drivers are completely unaware of bicyclists. They are so distracted when they drive and are driving too fast. CARS are COFFINS anyway!	2012-02-06 20:12:36
marcus pollitz			91768	We have thousands of miles of side walks and cross walks, why can't we get a bike lanes.	2012-02-06 06:20:35
Patricia De La Riva			91365		2012-02-04 16:27:02
Peter Weal			93003	more bike paths please!	2012-02-02 21:05:02
Nicholas Nguyen			92683		2012-02-01 23:41:59
					2012-

Marion Weil		93024		02-01 17:13:21
Chris Sonnenberg		93021	I used to ride my bike to work often having to ride in the street and crossing freeway on-ramps. A few months later a cyclist was hit by a car and killed 2 blocks from my house.	2012-02-01 01:25:40
Fern Wildflower		90505		2012-02-01 00:44:14
Colleen Cortez		90805		2012-01-31 01:39:28
Jeff MacDonald		90275	Please pass! Thank you...	2012-01-30 18:31:28
Brian Bennett		91750	Interest in walking and cycling has mushroomed in recent years, both as a practical form of transportation and as part of a healthy lifestyle. Unfortunately many government agencies still cling to a transportation vision that is focused on motor vehicles,	2012-01-30 18:14:28
Juan Juarez		90814		2012-01-30 18:12:40
Quinn Rollen		93101	Needed.	2012-01-30 02:01:57
Dale Capewell		91301		2012-01-29 13:49:42
Alison Kendall		90403	I work on Safe Routes to School and bicycle and pedestrian safety issues and assure you that \$1 spent on these issues returns huge dividends in cleaner air, safer streets and healthier Californians.	2012-01-29 03:59:36
Margaret B. Yeager		92501		2012-01-28 21:28:12
Linda van Ligten		90066	I strongly urge SCAG to increase the RTP budget for safer bicycle and pedestrian routes to 5% - 8%.	2012-01-28 02:06:36
ryan beau alan bjorkman		93612		2012-01-28 00:14:51
Don Howard		91362		2012-01-27 23:31:48
Dee Falasco		91791		2012-01-27 05:12:28
Keith Peters		93023		2012-01-27 02:25:14
Douglas Littell		93003	biking is usually faster than driving if the distance is less than 2 miles, especially if the infrastructure encourages it!	2012-01-26 21:18:07
Barbara Paton Gardner		92506-1437	Help encourage people to ride bikes or walk with additional funds.	2012-01-26 19:21:42
Janine Schoncite		92211	More public transit	2012-01-26 17:12:27
ALFONSO MITRA		93012		2012-01-26 16:17:50
Joseph Chaikin		92840		2012-01-26 06:46:07
				2012-

Dennis Esguerra		93012		01-26 06:31:30
Catherine M. Gentile		90405		2012-01-26 05:40:24
LORI DUFFY		92203		2012-01-26 03:09:44
Sandra E. Kroll		90815		2012-01-26 02:56:31
Evelyn Carpenter		91387	Protecting those who can choose to walk or use a bicycle for transportation should be seen as a logical first priority.	2012-01-26 02:00:58
gaynor willmott		90291		2012-01-26 01:27:35
Mark Maxwell		93003	Biking from the government center to the beach is miserable.	2012-01-26 01:12:17
patricia kovner		92260		2012-01-26 00:36:16
Michael Soprano		93003		2012-01-26 00:34:33
Clarice Turney		92507		2012-01-26 00:17:20
Grace Lorentzen		90807	Walking and biking need to be safe.	2012-01-25 22:36:31
Frances Goff		91607	Bicyclists deserve way more respect than they get from motorists.	2012-01-25 20:22:26
Joyce Block-Miller		90274	THIS IS VITAL!	2012-01-25 20:11:06
Karen Anderson		92612	This is an important issue for the future of our children and their children.	2012-01-25 18:53:44
Marleen Luckman		93023	We need more funding to create safer streets for bicyclists and pedestrians.	2012-01-25 17:42:18
Eloise B. Peterson		06880		2012-01-25 17:24:22
KIM HUFFMAN CARY	M	90020		2012-01-25 17:04:45
Jim Wallis		91307		2012-01-25 16:39:51
Lesley Mahaffey		92831		2012-01-25 15:29:26
Adela Dimitrijevic		91351		2012-01-25 15:18:03
Debbie Langenbacher		92832		2012-01-25 14:17:18
Richard Fortune		91360	We must foster physical activity and fitness for all ages. Providing adequate funding to create safe bicycle and pedestrian experiences will help to encourage this endeavor.	2012-01-25 07:30:48
Ronald Wayne Hearn		92646		2012-01-25 06:30:26
			Having lived in Europe, I miss the safety of justified paths for walkers	2012-

Tamara Casanova		90815	and bicyclists. If there were safer routes, more people would choose to use them and multiple benefits would result.	01-25 05:41:41
Jeff Fylling		92627	Must be done!	2012-01-25 05:30:35
Bob Davidson		92503		2012-01-25 04:42:48
Earl W Kluth		92626		2012-01-25 03:55:00
Sharon Miller		92260	Safe walking and biking lanes and paths will encourage more exercisiez, better health, and a reduction in green house gases.	2012-01-25 03:33:26
brian d hatcher		92647	I support the safety of all cyclists.	2012-01-25 02:00:56
Michael Lee		92691	Yes for safe biking on the streets	2012-01-25 01:44:34
Marjorie E. Hunt		92501		2012-01-25 00:53:24
Tom Stapleford		91360		2012-01-25 00:43:44
Daniel Noel		92627	I shall not hold my breath. Not much can be expected from public servants who took part in the censorship of the 9/11 false flag.	2012-01-25 00:14:55
russell mullin		91320	make safer roads please	2012-01-24 23:46:51
Patricia A. Lindenauer		91302	You have the power to make an intelligent difference here, and I trust that you will choose to do so.	2012-01-24 23:46:50
Eryn Stinzel		91001	Plan for the future	2012-01-24 23:38:22
Frank Neal, Jr		91773		2012-01-24 22:57:30
James DiModica		93001		2012-01-24 22:38:35
Barbara Cogswell		91387		2012-01-24 22:30:52
Kathleen Nolan		93023		2012-01-24 22:19:03
Joan Paddock		92201		2012-01-24 22:15:24
Leonard Polan		91361	I find the lack of support for cyclists and pedestrians reprehensible.	2012-01-24 21:30:25
Duane Dillman		90048		2012-01-24 21:29:32
vicki kirschenbaum		91506		2012-01-24 20:39:31
Martha P Kazlo		92501		2012-01-24 20:34:55
Lenore Arab		91362	This is important for our health and quality of life. Please pass it!	2012-01-24 20:25:05
Roselva Ungar		91350		2012-01-24

					20:24:43
Richard Silva			92571		2012-01-24 20:24:35
Katy Kroll			90815		2012-01-24 20:14:38
Rev. Hannah Petrie			91103		2012-01-24 19:50:24
Adair Small			92612	One reason we live in Irvine is because bicycling and walking is relatively easy. We need to increase this throughout southern California	2012-01-24 19:45:13
Arline S. Dillman			90048		2012-01-24 19:32:17
sekubamewe				You could use cloud computing to host a whole range of software solutions. In addition to the child-friendly design, it doesn't negatively affect your child in any way. Some situations that no longer have reason to exist in your life will undergo profound	2012-01-24 19:19:55
Carol Bennett			91207		2012-01-24 19:11:30
Sylvia Flores Johnson			91320		2012-01-24 18:56:32
Sandra Briggs			92506		2012-01-24 18:55:49
Carol Rudisill			91024		2012-01-24 18:54:06
Wayne Leggett			93060	More Type-2 bike and walking trails that connect cities, neighborhoods, and business centers, would result in healthier and safer communities.	2012-01-24 18:49:38
George Yenoki			91030		2012-01-24 18:49:23
Wesla Kerr			90815		2012-01-24 18:41:18
Marilyn Schroeder			92692		2012-01-24 18:36:40
Jennie Roberson			91201		2012-01-24 18:31:46
Lauren Eaton			91001		2012-01-24 18:29:40
Andrea Greene			91320		2012-01-24 18:24:42
Ed Llorca			91320	clearly from the statistics, biking and walking is not about a small minority of the population anymore. It is time that bike/walk safety be folded into and thus funded into the everyday operations of the county traffic commission.	2012-01-24 17:24:16
Denise Marie Goodman			91377		2012-01-24 17:11:12
John Goodman			91377		2012-01-24 17:08:50
				in my community, the majority of pedestrians and bicyclists are lower	2012-

Mark DI Cecco		93021	income and farmworkers. They need safe ways to get to work and services too.	01-24 17:00:24
Matthew Polk		91320		2012-01-24 16:19:53
Edward Polyakov		91316		2012-01-24 15:38:53
Ryan VanOmmeren		91320		2012-01-24 13:30:13
Justin Williams		93012		2012-01-24 12:40:52
Trent Plyler		93065		2012-01-24 06:35:23
James N Paterson		91362	Please work on making our streets safer for bikes of all kinds.	2012-01-24 06:15:13
Doug James Herrick		93405		2012-01-24 05:24:18
Brad Bordon		93003		2012-01-24 05:05:52
Mariana Medina		91362		2012-01-24 04:58:58
Scott Sowers		91320	I know we have to reduce expenditures, but this can be an great investment, keeps people healthy, reduces car traffic etc.	2012-01-24 04:53:36
James Yarbrough		91320	More bikes, less CO2.	2012-01-24 04:38:18
Ashley Beckwith		91320		2012-01-24 04:12:06
Jennifer Schlecht		93012		2012-01-24 03:57:30
Donna Kelly		91320	My nephew was hit & runover this week on nhis bike..in the bike lane, he is now a parapalegic!	2012-01-24 03:46:23
Joseph Keays		91360	Great idea	2012-01-24 03:42:04
LeGrand Velez		92264		2012-01-23 23:44:54
Catherine Des Lauriers		90046		2012-01-23 22:23:46
Roslyn Scheuerman		93121		2012-01-23 06:37:50
Susan Brinkmeyer		93035	Supporting Active Transportation will help our health and the environment. Ideally, we'll become much more like Amsterdam, where bicycles far outnumber cars, and the air is crystal clear.	2012-01-23 06:04:24
Michael Hoberman		91356		2012-01-22 18:13:49
John Anthony Wog		90814		2012-01-21 00:09:03
TRACY HUDAK		93001		2012-01-20 05:08:40
				2012-

David Walker		93101		01-20 02:32:56
Mack Gooding-Waldron		93001		2012- 01-20 01:39:37
Daniel Barr		91101		2012- 01-20 00:43:55
Stephen Meichtry		91307		2012- 01-20 00:01:30
Sarah Caine		91325	I would love better transit and more bike friendly streets! I would make good use of them in order to not deal with traffic and I know many people who cannot afford cars.	2012- 01-19 23:42:43
robin gerber		93023		2012- 01-19 23:10:48
Mike Harmanos		92627		2012- 01-19 20:11:33
Amy Bernhard		91011	Please pass this!	2012- 01-19 18:18:26
Adrienne Bernhard		10023		2012- 01-19 13:55:21
Willow Clearwater		93001	Please take bike and padestrian safety seriously! I watched a woman walking get hit by a car today and it broke my heart!!	2012- 01-19 08:04:43
ROBERT G SAMPLES		90505	As a highly active voter, who is also highly active in life, it's time to invest where the return is long term and benefits the most people, and the ROI is the highest.	2012- 01-19 06:18:36
Mary Button		90068	Safety for Cyclists, please!	2012- 01-19 06:07:50
Jacques Brosseau		92653	As a bicyclist and a walker in the community, I see a need for an increase in the budget for Active Transportation.	2012- 01-19 04:44:47
MaryJane Mitchell		91042		2012- 01-19 04:15:07
Fernando Roth		91011		2012- 01-19 03:41:03
Robert Craig Hoover		92626	I ride a lot for training and transportation. Please be mindful of safety for bikers of all ages in all neighborhoods.	2012- 01-19 03:27:52
Trish Kertes		91011		2012- 01-19 02:50:15
Joe Kertes		91011		2012- 01-19 02:49:16
Richard Newmark		91320		2012- 01-19 01:56:08
Mark Bernhard		91011	We need a coordinated,dedicated, integrated bike lane system in SoCal.	2012- 01-18 23:46:40
Richard Louis Hummel		93105		2012- 01-18 23:43:03
scott m gardner		90713		2012- 01-18 23:36:24
			Please, please raise the budget for bicycle and pedestrian safety. As it is I now load my bike in the car to	

Charles OShea		90814	get somewhere safe to ride. This makes no sense from an economic view only from a safety point of view. Would much rather be able to ride from	2012-01-18 23:11:56
gerry hans		90068		2012-01-18 22:46:14
Craig Olsson		91042	Let's make California bicycle savvy. Were there secure bicycle parking available everywhere, I'd ride my bike many places. However, drivers need to be educated about cyclists and cyclists need to obey traffic laws, which may need to be changed to accommo	2012-01-18 22:26:26
Jo Baxter		91942		2012-01-18 17:55:47
Tom Mann Jr		91355	Safer bicycling zones / routes clearly benefit all Southern Californians. Bicycling is gaining popularity for many people and for a multitude of reasons.	2012-01-18 17:24:46
Susan W Reed		85718		2012-01-18 16:07:32
John P. Hoppe		60538	I will be relocating to So. California within 2 months and would like to see these improvements to set the standard in the United States	2012-01-18 15:51:32
Scott Desposato		92024	Please, share the road!	2012-01-18 14:32:41
Brian T. Cottrell		60641		2012-01-18 14:04:20
Martin Lyons		95628	I commute on my bike approximately 250 miles a week. In my working community, many children have been killed by cars because of the lack of pedestrian/bike paths. We need more than a white line separating us from cars. PLEASE build separated bike/pedestri	2012-01-18 12:48:18
Max		93021		2012-01-18 12:17:33
Wolfgang Hofmann		D-40470	Though I live in Germany, I support this petition, since it is a basic issue of mankind.	2012-01-18 10:45:38
Thomas Michael Lauderdale		92705	PLEASE make our steets safe. Teach the drivers.	2012-01-18 04:38:59
Andrew Fisher		95336		2012-01-18 04:05:12
Gary Kanaby		91915	Need bicycle lane on Otay lake road and Honey Springs road	2012-01-18 03:59:27
Wendy Ann Jung		92108		2012-01-18 03:52:09
anthony patrick martinez		92223	k, get er dun, already. right?	2012-01-18 03:46:08
Ted DeFrank		92024		2012-01-18 03:12:48
Chester Scott Harris		90275	I bike commute to work so this is critical.	2012-01-18 02:44:51
G Baierl		92630	I know too many cyclists that have died on the road due to accidents.	2012-01-18 02:36:31

Jim Pettigrew	
steven f. ring	
Bret Gross	
Doug Humber	
John Jeffrey Conery	
Simone Kleinschmidt	
Marie Jung Bloomquist	
Kevin Roy	
Gloria Nafel	
Charles Smith	
Les Medlin	
Paul Bloomquist	
Alex Zhigimont	
Michael J Simpson	
John Long	
Nathan Adams	
timothy n black	
Uyen Tam Ngo	
Steven Burns	
Jon Beeson	
ELAINE BERNAL	
Joel Thomas Sothern	

93546		2012-01-18 02:21:17
92122	important for our future	2012-01-17 23:56:35
92672	Now is the time for action	2012-01-17 23:29:49
92129		2012-01-17 23:04:26
92065		2012-01-17 22:11:04
93110		2012-01-17 21:52:50
92129	More people would ride if they did not need to worry about road safety. I know people that love to ride but due to unsafe road conditions elect not to for fear of injury. Walking and cycling is great for personal health as well as better for our environ	2012-01-17 21:14:32
92110		2012-01-17 20:35:17
92648	It would be nice to use some of the funds to educate drivers and law enforcement about the rights of bicyclists and require stricter penalties for those that hit a bicyclist or pedestrian.	2012-01-17 20:18:32
92101		2012-01-17 20:15:01
92106		2012-01-17 19:41:07
92129	Please help make biking and walking safer by funding appropriately! Thank You	2012-01-17 19:26:18
92373		2012-01-17 19:22:02
93463	I ride to live...	2012-01-17 19:20:51
95688	I ride bikes in SOCAL but have a NORCAL Zip Code.	2012-01-17 19:16:18
92629	Please invest and plan in alternative transportation, including better access to safe bike paths.	2012-01-17 19:10:47
83422		2012-01-17 19:08:52
90066		2012-01-17 18:47:55
90277		2012-01-17 18:41:30
93108		2012-01-17 18:39:10
85627		2012-01-17 18:25:52
91362	Bicycles are the most efficient means of transportation - their use should be encouraged via public policy and funding.	2012-01-17 18:25:34

David Gibbs	92344	I use to ride my bike to work and had to stop when things became to dangerous. I believe that as a taxpayer I deserve safer streets!	2012-01-17 18:09:42
charles r duffy	91006		2012-01-17 18:00:10
Russell East	92373		2012-01-17 17:55:25
Daniel J. Eitman	92620		2012-01-17 17:47:43
Christopher Scott Haddakin	92544-5543		2012-01-17 17:47:12
Chris Crescioli	93401	The status quo is not sustainable. Show some leadership and move the masses towards a sustainable and healthy future.	2012-01-17 17:36:45
Michael Gray	92014		2012-01-17 17:09:15
Christine Latham	93101		2012-01-17 17:04:30
Linda Shishino-Cruz	93021	And whereas CHP officers assume that all accidents involving bicycles are caused by the bicyclist.	2012-01-17 17:04:27
D Steven Fox	90265	I have had too many close calls with cars due to poor roadway design. Act on this now please!	2012-01-17 17:04:18
Kerin Huber	91107	Let's really encourage non-polluting, healthy methods of transportation!	2012-01-17 17:01:48
Daniel Norwood	92029	Please keep San Diego and the surrounding cities bicycle friendly!	2012-01-17 17:00:42
Brook Henderson	91367		2012-01-17 16:53:08
David Parker	93110	Bike lanes ++	2012-01-17 16:49:07
Isabelle Drake	92651		2012-01-17 16:45:03
Jonathan Woodbury	93021		2012-01-17 16:38:48
Robin Ann Nash	92011		2012-01-17 16:38:35
William Hunt	92708		2012-01-17 16:38:24
david michael nash	92011		2012-01-17 16:37:01
Sharlene Wills	90035		2012-01-17 16:35:08
Daniel Carey	92120		2012-01-17 16:31:49
Alex Amerri	90049		2012-01-17 16:26:07
Shaun Lang	90035	The impacts of this petition are far reaching...let's get it done!!!	2012-01-17 16:25:25
Michael Goodman	91311		2012-01-17 16:20:45

Julie Stokes		92692	2012-01-17 16:18:01
scott verwolf		85202	2012-01-17 16:17:24
David Browning		92108	2012-01-17 16:15:16
Barbara Mau		92673	More people would ride for health and commute to work on bikes if they thought the roads were safer. 2012-01-17 16:14:41
Margaret Nelson		90621	2012-01-17 16:09:54
David Nelson		90621	2012-01-17 16:09:11
K. Cameron Campbell MD		92101	2012-01-17 15:59:11
Brian Garcia		91361	2012-01-17 15:49:04
Scot Harvey		91740	2012-01-17 15:40:10
buy cialis			Hi. I like your post. I have been searching information on this issue for long time, so thanks for blogging. cialis to buy 2012-01-16 21:40:45
Ryan Johnson		90041	Please help make our streets safe, and allocate more funds to bicycle and pedestrian infrastructure and programs. 2012-01-15 23:53:31
Brent Everett Butterworth		91303	2012-01-14 22:28:55
bulet otavon		90017	I need more bikes 2012-01-14 21:36:36
gerry duttweiler		93003	2012-01-14 18:19:39
David Erickson		93535	2012-01-14 17:52:44
Mandi Lyons		93222	2012-01-14 05:41:17
Sarah S Forth		90039	2012-01-14 04:00:16
Judy Farris		92203	2012-01-14 02:59:11
Hilda Bolden		90295	ACTIVE TRANSPORTATION COMBATS GLOBAL WARMING. 2012-01-14 02:09:19
Kevin Egan		90034	Crowded SoCal roads leave very little room for bikers. The prevailing options aren't good enough - either being in the middle of a lane of busy traffic or being on the sidewalk. 2012-01-13 23:52:52
Jorge A Ruiz		91701	2012-01-13 21:08:22
Adam Rodger Pacal		92131	2012-01-13 21:04:08
Jesse Fuller		91311	2012-01-13 18:55:59

Carmen L. Matthews	92109	Please amend the 2012 Regional Transportation Plan.	2012-01-13 18:43:37
Stephen Svete	93003	I support balancing transportation funding for more sustainable communities.	2012-01-13 18:16:16
Erik Mar	90232	Let's get our funding priorities right - end tax deductions, aka subsidies, for fossil fuel industries, and divert the money to non-private auto transportation	2012-01-13 17:33:54
Jay Nadeau	91001	Bicycle commuter in downtown LA. We need to increase bicycling and walking downtown and create safe corridors.	2012-01-13 17:17:32
David G Burrell	93536		2012-01-13 16:20:25
Mavis Irwin	84108		2012-01-13 12:45:53
Lanette Marmolejo	92116		2012-01-13 07:49:04
John Kessler	90274		2012-01-13 06:22:33
Connie Spears	92004		2012-01-13 06:18:06
Marissa Strebler	92116	Make roads safer for cyclists and pedestrians to encourage people to use alternate forms of transportation!	2012-01-13 05:18:19
William Osborn	92029	Walking and cycling needs to receive a much larger portion of the budget for so many reasons	2012-01-13 05:00:45
Barbara Filet	90404	My bike is my main transportation	2012-01-13 03:50:07
Arid Roman	90210		2012-01-13 02:21:17
Darcie Loth	91011		2012-01-13 02:20:50
Joseph Henry	92024	Allocate 10% of the budget and you will see a 50% drop in bicycle/pedestrian casualties	2012-01-13 02:17:37
John m clare	90808	I rode my bicycle 20 miles each way to work for three years, rain or shine. I stopped because I had too many close calls including being hit by a car on two separate occasions. I would love to be able to ride to work again but it is just too crazy.	2012-01-13 02:13:57
kelly thompson	90065	Encourage people power a great way to travel and live.	2012-01-13 01:56:35
Chris Kostman	91364	Please do the right thing and promote a healthier, saner mode of transportation.	2012-01-13 01:37:32
Alexandria	90048		2012-01-13 00:48:09
Bronwyn Beck	90027		2012-01-13 00:36:04
Elisabeth Kraycik	92116		2012-01-13 00:34:31
April Lemly	90004	More money for safe streets please.	2012-01-13 00:21:58
			2012-

Charlie Furman		90007		01-13 00:00:26
Lacey Harris		90065	help us out!	2012- 01-12 22:52:30
Camille dieterle		90026		2012- 01-12 22:31:19
Anthony C. Stein, Ph.D.		91011	As a pedestrian, cyclist, and transportation researcher, I know the need for increased funding is warranted.	2012- 01-12 22:04:53
Todd Wexman		90026	Right on!!!	2012- 01-12 21:47:27
Wesley High		90026		2012- 01-12 21:45:28
Jim Martin		92630		2012- 01-12 21:36:44
Siobhan Dolan		90039		2012- 01-12 21:36:37
luis d. gamboa		90805		2012- 01-12 21:31:06
jcy		94118		2012- 01-12 21:09:49
William Ashe		90403		2012- 01-12 21:01:20
Jennifer Tso		90266		2012- 01-12 20:57:43
George Cook		90026		2012- 01-12 20:56:25
Andrew albino		90260	My bike is my main source of transportation, to school to work or just riding for fun. I try to be as safe as i can but drivers dont make it that easy. More bike routes and bike lanes would help alot .	2012- 01-12 20:51:57
Lawrence Schuster		93536	Time to apply some common sense to problem solving instead of listening to the vested interests of the energy industry. Here's an excellent chance to choose a better way.	2012- 01-12 20:45:53
Matthew Ruscigno, MPH, RD		92107	Infrastructure for pedestrians and cyclists leads directly to increased non-motorized trips which are better for the health of everyone in the region. Thank you.	2012- 01-12 20:42:25
Reggie Alcazar		91205		2012- 01-12 20:42:24
Christopher F Wilson		90275	Active transport helps free up roads and improves health. Needs more attention.	2012- 01-12 20:35:35
Aimee Suen		90094		2012- 01-12 20:35:31
Claudia Chaufan		94122		2012- 01-12 20:33:36
Erik Yesayan		91206		2012- 01-12 20:25:25
Marlo Wamsganz		90039		2012- 01-12 20:05:35
				2012-

Max Duck		90065		01-12 20:05:11
Aurisha Smoarski		90004		2012- 01-12 20:02:15
jason venzor		90007		2012- 01-12 17:42:44
Sarah Nicole Peters		93010		2012- 01-11 11:57:28
Douglas Johannes		93004	Please amend the transportation plan to add funding for bike paths and other human powered transportation for the health of our citizens and for the environment.	2012- 01-11 04:59:29
Afausto J Astillero		93041		2012- 01-11 04:04:49
Jessica M. Chiang		93012		2012- 01-11 04:04:17
Stefan Goehring		91362	As an avid cyclist in Ventura, LA, and SB Counties it is important to improve cycling/walking opportunities for all residents. Better and safer opportunities will help to encourage alternative transportation, which can improve our health as well. "40 perc	2012- 01-11 02:45:25
Kyle Christian Jorgensen		93010		2012- 01-11 01:58:10
Briana Linares		93010	Let's do THIS!!!	2012- 01-10 23:22:52
Michael		93004		2012- 01-10 23:19:22
John J. Griffin		91362	I'm happy to help make biking safe!	2012- 01-10 23:06:41
Trevor Culhane		91604		2012- 01-10 22:43:59
Dustin Brooks		93003		2012- 01-10 04:49:44
William Strand		93101	You go girl	2012- 01-10 01:48:00
Ashlee Buhler		90405		2012- 01-09 20:32:49
Rod C. Wood		90638		2012- 01-09 19:03:11
Frances Aubrey		94707		2012- 01-09 04:00:56
Phillip D Whitworth		90266		2012- 01-08 22:57:34
Leticia Gome		91791		2012- 01-06 19:21:40
John Gomez		91791		2012- 01-06 19:20:58
Kent Strumpell		90045		2012- 01-06 18:49:53
			To have liveable communities we need to have people centric transportaion. This is a win win	2012-

Barbara Torres	91343	situation for all of us: businesses, real estate values, and a clean environment.	01-06 16:30:06
Carl Kloos	91030	Please improve funding for pedestrian and bicycle oriented transportation. Traveling without an automobile is very dangerous in our region, and funding is necessary to improve our pedestrian/cycling oriented infrastructure. This will save lives!	2012-01-06 04:55:05
Rachel Wing	91106		2012-01-06 03:52:15
Valerie Watson	90014		2012-01-06 03:36:22
Leslie Frederika Kline Capelle	93041		2012-01-05 18:21:07
Ashley Heatherly	93003		2012-01-05 17:47:03
MJ Looby	93001		2012-01-05 17:25:08
Carina Downing	93015		2012-01-05 15:38:19
Frank Nilsen	93036	Cities built with a primary focus on dealing with automobile traffic and storage have no future. Cities built on a human scale, with public spaces that are pleasant, safe, convenient and rewarding will be better positioned to deal with future realities of	2012-01-05 07:04:23
lucy cartagena	93041	yeah	2012-01-05 04:51:33
Nancy Shuman	93035		2012-01-04 22:03:59
Matt Korner	92405	Pedestrian-friendly places that are well-connected by high-quality /fixed-guideway transportation is absolutely essential for the region's economic sustainability. How can we improve land-use and transportation patterns when SCAG, itself, isn't trying to	2012-01-04 16:07:20
daria cross	92373		2012-01-03 04:12:39
jewel willard	93001		2012-01-03 02:15:54
Maria E Ramirez	91364		2012-01-02 07:43:38
Glory Bautista	91101	As someone who chooses not to own a car for environmental and health reasons I strongly urge you to increase the amount!	2012-01-01 21:39:07
jon portera	9		2011-12-31 19:02:28
David Gist	91103	The percentage of the plan addressing cycling and walking is woefully low. Please prioritize Active Transportation.	2011-12-31 18:56:34
Annika Buxman	91030		2011-12-30 23:31:44
		I have used a bicycle as my primary source of transportaion exclusively,	

Loretta Lynn Scott-Poole	93001	for half of my 54 years, here in Ventura and Santa Barbara Counties. The funding percentage of State moneies must be increased to accomodate the needs of the constituents of these co	2011-12-30 19:40:28
steve offerman	93003	Ride on!	2011-12-29 03:21:44
Linda Ramirez	93030	Cycling and walking are the best ways to admire nature!	2011-12-28 07:13:10
Bryan P Long	93001	Love out doors, lets keep fun for the kids!	2011-12-28 07:11:09
Mary Heather King	93022		2011-12-28 05:03:58
Gordon Clint	91320-5227		2011-12-27 23:34:17
Richard Moss	93023	Invest more in cycling and walking. Make it safer. Encourage behavior that is excellent for health and ecologically wise	2011-12-27 21:21:08
Tracy Lopp	93003		2011-12-27 16:58:42
Sarah Dinkler	93004		2011-12-27 15:59:42
mark donovan	01027		2011-12-27 12:02:08
jeannie Willard	93003		2011-12-27 07:57:06
Stacey Ozuna	93004		2011-12-27 07:42:24
Chris stallings	94402		2011-12-27 06:51:40
deborah al-saleh	93004		2011-12-27 06:37:30
Robert W Anderson	93004		2011-12-27 04:48:03
Wendy Francke	93003		2011-12-27 01:53:57
Patricia Danner	93004	We are way behind the times for providing safe means for cyclists. Our transpotation system really needs revaling. Please, let's start here. Patti Danner	2011-12-27 01:42:42
ADAm Story	93010		2011-12-27 00:35:16
Rachel Sears Casanta	93001		2011-12-27 00:26:04
Eve Sanford	91766		2011-12-25 15:55:08
Molly Arevalo	90027		2011-12-25 15:26:40
Richard C. Loy	93001		2011-12-25 11:20:03
		We must have safe cycling and funds dedicated to improve alternative modes of transportation.	

Donna Chazanov		90035	Car is NOT king. I am 58 years old and ride my bicycle down a very dangerous and busy boulevard to work - just 5 miles. I am not the only one risking my life on	2011-12-24 19:55:54	9
Patrick Micallef		90068	We need safer bike roads to get to work..please.	2011-12-24 16:36:39	7
scott cameron		91105		2011-12-24 00:04:57	9
Gloria Newton		91101	I am a 45-year-old woman. I can't tell you how much my quality of life has improved since I got out of my car and started walking, biking, and taking public transportation. Yet I still feel a level of anxiety while traveling by foot or bike because I do	2011-12-23 23:59:40	7
Tanya Torst		93065	Great bicycle cities like Amsterdam and Copenhagen didn't just happen, they were planned by the local government! It can happen here too and bring great benefits to our communities by bringing up property values and being a great place to live.	2011-12-23 21:59:55	7
Colin Bogart		90027		2011-12-23 20:47:59	6
Edward Beres		91101		2011-12-23 19:53:44	1
karen hasson		90278	Many people do not cycle because they feel it is too dangerous. Safety is a huge issue for most people.	2011-12-23 16:13:21	9
Samantha Ollinger		92105		2011-12-23 01:24:41	7
Ian H. Besler		91030		2011-12-22 03:27:32	7
Paul Meyer		93022		2011-12-22 00:08:49	7
John Mirk		93023	As a bicycle commuter and avid recreational cyclist one of my biggest concerns is a collision with an automobile. These statistics are sobering. Let's put the money where the problems are!	2011-12-21 22:53:27	7
Ron Parker		93033	Walking and biking need your support.	2011-12-21 20:52:09	7
Stevn foster		93023	walkability and bicycling is fundamental to economic, social and environmental health. This needs to be a priority.	2011-12-21 19:03:11	6
Elise Kelley		93003	I see more and more people on the roads cycling to work and just to get around. With gas prices expected only to increase, significant funding needs to be dedicated to safer bike routes, bike paths, and pedestrian options.	2011-12-21 18:23:02	7
Charlie Snyder		93023		2011-12-21 17:09:47	6
Julie Fontes		93003		2011-12-21 16:16:38	7
Bret Bentzen		93003		2011-12-21 16:05:59	6
Fawzi Philip		93022-9522	It is healthier, cleaner, and reduced car traffic if we bike and walk. This	2011-12-21	7

Emad		is where we ought to increase spending...	15:48:10
Lana Hester	93023	Supporting infrastructure for cycling is a smart strategy and should be followed. It is more economical use of funds than more blacktop for cars. Cycling impacts our community in many positive ways including health benefits and environmental improvements.	2011-12-21 14:53:41
DEBBIE WITTMAN	91345		2011-12-20 16:58:20
Patrick E. Gallagher	93003		2011-12-19 04:56:03
Phillip Hernandez	93065	Please pass this so we can jeep others from losing loved one the way i lost my father and younger brother	2011-12-19 02:21:08
Josh Smith	74855		2011-12-19 00:21:45
Jolene Smith	74866	In loving Memory of Anthony Hernandez and ALL others who have lost their lives. God Bless	2011-12-19 00:14:56
Linda E. Martinez	91331	Please people, share the road and be cautious when it comes to bicyclist and motor cyclists.	2011-12-18 19:13:51
Marjorie Bashaw	93065		2011-12-18 18:10:49
sasha wolfe	93023	I'm 69 yrs. young. My rheumatologist told me to keep walking, for my health. It's no longer possible to run so I appreciate the new "Yield to Pedestrians - It's the State Law" sign installed on Matilija Street in Ojai across from the Farmer's Market.	2011-12-18 17:50:01
ashley farrell	93536		2011-12-18 06:56:18
Kristi Jones	93023	walk and bike !	2011-12-18 06:38:22
Linda Righetti	93065		2011-12-18 06:36:27
Roberta Sheppard	93023	biking is good for people.	2011-12-18 05:54:58
sheila mccue	93023		2011-12-17 23:06:01
Sean Fahle	90024		2011-12-17 21:56:54
Maryann Short	93024	Bikes and walking should be primary transport. Cars should be used only rarely.	2011-12-17 19:57:25
Leonard Miller	90066	Forcing people to drive cars because it is the only safe way to travel is foolish.	2011-12-17 19:18:13
Juliene O. Hartman	93003		2011-12-17 19:10:04
Marie A. Abato	93004	We need mor e safe bike paths	2011-12-17 19:05:48
Justin Resnick	90401		2011-12-17 18:05:15
			2011-

oracio casillas	93121		12-17 17:44:23
Paul Barrera	91106		2011- 12-17 17:28:57
Pritti Barrera	91106		2011- 12-17 17:25:57
Brenda Mercado	93023	Let there be bikes.	2011- 12-17 16:20:03
samuel spencer	90024		2011- 12-17 15:44:29
Barbara J. Gibson	93023		2011- 12-17 06:23:49
Suza Francina	93023	Please amend the 2012 Regional Transportation Plan and help make every City in Southern California a model bicycle pedestrian friendly community. --Suza Francina, former mayor, City of Ojai, Member, Ojai Complete Streets sub Committee	2011- 12-17 05:59:30
Brian H. Yamaguchi	93552		2011- 12-17 05:11:01
Kristofer Young, DC	93023	We need more funding for safe biking and walking.	2011- 12-17 04:46:03
James Thompson	93001	The more people who ride, the safer it is to ride!	2011- 12-17 01:37:15
John H. McConnell	93041-1926	Don't waste funds by sending me mail by pot.	2011- 12-17 01:31:32
Crystal D Garcia	92821	If you build it they WILL ride.	2011- 12-16 22:20:40
Michele Chavez	93551		2011- 12-16 17:29:48
Rye Baerg	91020	Please make our streets safer for all users.	2011- 12-16 17:04:08
Stacy Kline	92661	Please promote cycling in Southern California!	2011- 12-16 07:37:18
Jessie Holzer	90029		2011- 12-16 06:44:02
Laura Gulovsen	93003		2011- 12-16 06:37:42
Alex Kenefick	90026		2011- 12-16 05:04:38
Gil Solomon	91307	As a daily bike commuter, I am aware of the need to make biking in Southern California easier and safer.	2011- 12-16 05:04:33
Minerva Heppenstall	90027		2011- 12-16 05:04:02
Noah Mercer	90027	My wife bikes seven miles to work through downtown LA and I want her to be safe doing it.	2011- 12-16 04:55:12
Wesley Reutimann	91106		2011- 12-16 04:42:09
Thomas Weisel	93003	We need safe bike routes!	2011- 12-16 04:12:10

Katherine Jones	92373	Please increase funding for dedicated bike paths for transportation, not just for recreation, especially in the IE.	2011-12-16 04:09:04
Chet Kostrzewa	93065	Think outside the 4 wheel box and the whole community benefits	2011-12-16 04:01:36
Carey J. Peden	92656	See Long Beach as an example.	2011-12-16 03:52:15
David Routman	90026	Please invest in Southern California, support public transit, cycling, and walking	2011-12-16 03:25:48
Daniella Alcedo	91724		2011-12-16 03:19:49
Eric Weinstein	90405	Make biking possible - there will be more people traveling by bike.	2011-12-16 00:24:21
James William Biffin	92708		2011-12-15 23:29:11
David Matsu	90065		2011-12-15 23:12:01
roberta tommerson	92887		2011-12-15 22:30:24
Alexis Lantz	90014		2011-12-15 20:14:22
Ted Rogers	90024	Southern California will never end traffic congestion by endlessly increasing capacity for motor vehicles; we have to provide safe and convenient alternatives to driving.	2011-12-15 19:44:10
canada goose		jci <a href="http://www.canadagooselover.com/canada_goose_qbr_canada_goose_jackets_mjy">http://www.canadagooselover.com/canada_goose_qbr_canada_goose_jackets_mjy</a>	2011-12-15 10:19:54
Elaine M Edwards	93001-3344		2011-12-15 06:56:52
Paul Hartloff	93001		2011-12-15 06:19:32
Donna Hebert	93001	I bike to work daily and would appreciate a reasonable portion of our public funding to be directed to the purposes of safe biking. Thanks.	2011-12-15 04:02:42
Fred Stites	90014		2011-12-15 01:26:21
Walter Scott Chambers	92103	Fund bicycle and pedestrian infrastructure first.	2011-12-15 00:14:46
Mark Mallare	90034	More bike lanes, more room for pedestrians--a more sustainable city!	2011-12-14 21:37:08
Wendy Alfsen	94712	Since 21% of all trips in SCAG are walking or bicycling, and since 21% of all traffic fatalities are pedestrian, 8% funding to active transportation is underfunding but would be a good step forward.	2011-12-14 19:38:53
Ryan Leaderman	90069	Please increase the funding for bicyclists and pedestrians -- better for their/our safety, betters our quality of life, and furthers sustainability goals.	2011-12-14 18:53:47
Marilyn Caldera	90260	Please devote more transportation funding to keeping pedestrians and bicyclists safe. And also to walkable neighborhoods and cities. It will be funds much better used than	2011-12-14 17:41:09

				continuing with urban sprawl.	
Don			90210	I support this 100%	2011-12-14 10:02:06
Austin Phung			91732		2011-12-14 07:34:08
Severin Martinez			90041		2011-12-14 05:33:36
Richard Hogge			90026		2011-12-14 02:22:27
Brendan Clarke			91367	Over 20% of trips and casualties in the region are walking/biking - then 20% of Reg. Trans. Plan funds should be for walking/biking.	2011-12-14 02:09:13
John Lloyd			91024		2011-12-14 01:37:26
Paul Chenard			90026		2011-12-14 01:17:04
Marilyn Erickson			93030		2011-12-14 01:16:26
Alejandro Meruelo			90024		2011-12-14 00:10:10
Rema Oxandaboure			92024		2011-12-13 18:57:57
Ryan Wiggins			90802	It's time to rediscover the true promise of our region - blue skies and healthy, affordable living. This is one of the ways we can do it.	2011-12-13 18:41:38
Jessica Meaney			90026		2011-12-13 17:30:10
canada goose jackets				gtj <a href="http://www.canadagooselover.com/canada_goose_sale_dbi_canada_goose_jackets_onw">http://www.canadagooselover.com/canada_goose_sale_dbi_canada_goose_jackets_onw</a>	2011-12-13 15:12:14
David Levy			93003		2011-12-13 05:01:31
Josh Freeman			93003		2011-12-13 02:36:16
Lyle Warnagieris			93003		2011-12-12 19:34:34
Joseph Hatke			93023	Thank you Rachel!	2011-12-12 18:03:51
canada goose coats			411003		2011-12-12 09:47:41
Rebecca Miller			90049		2011-12-12 06:37:42
Camille Thoma			93003	Bike infrastructure gets our community the most bang for its tax buck.	2011-12-11 22:56:02
Jesse Kuznkowski			93023	I must drive for work and when I take mountain routes I am always watching for bikes, yet there simply is not enough room on many of the roads & I am not surprised by the number of injuries and fatalities. I believe some changes are needed.	2011-12-11 21:40:03
Tyrone LaFay			93001		2011-12-11 20:48:13

Elzbet Diaz de Deon		93001		2011-12-11 07:36:03
Joe Connett		93001		2011-12-11 07:34:46
George Vye		93040		2011-12-11 03:57:07
susan trent stephenson		93060		2011-12-10 22:32:44
Kathleen Ann Nolan		93023		2011-12-10 21:41:14
Denise Noel		93035		2011-12-10 20:21:32
Vicky Lynn Fliss		93035		2011-12-10 17:50:37
Greg Prinz		93023		2011-12-10 17:38:17
Brett Becker		93003	If rainy Portland can be accommodating to bicyclists and pedestrians, then so should sunny Southern California. Thanks.	2011-12-10 16:37:14
Kim Hayashi		93030		2011-12-10 05:09:48
Robert Hornbeck		93022	I commute by bicycle from Ojai to Carpinteria. Please support improved cycling infrastructure.	2011-12-10 04:12:21
Howard Miller		93003	In every way, walking and biking are better for us than riding in cars. Active transportaion should be enhanced in all ways possible!	2011-12-10 03:45:17
David Aaron		91367	With an eye towards the future and the possibility of retiring to Ventura, I strongly urge you to implement this petition. We need to move away from the irrational fossil fuels and towards a healthier world for all.	2011-12-10 03:38:35
HAROLD WILFRED CARTLIDGE		93001		2011-12-10 02:43:05
tina chappel		93022		2011-12-10 01:28:09
Deborah Pendrey		93022		2011-12-10 01:21:53
Harvey Weinberg		93001		2011-12-10 00:07:59
Jeff Wilson		91321	Bicycling offers independence, mobility, and exercise at an affordable cost to individuals and communities. It deserves not only the encouragement of policy makers, but also infrastructure, whether as Class II lanes or Class I paths.	2011-12-09 22:35:58
Tyler Eroh		93033		2011-12-09 22:23:45
Robert J. Warnagieris		93003		2011-12-09 21:45:55
Quinn Fenwick		93001		2011-12-09 21:17:44
				2011-

helen oneill		93003		12-09 20:33:50	
Janet Levy		93003		2011- 12-09 20:32:57	
Tom Erickson		93024		2011- 12-09 20:25:55	
Robin Lerner		93001	It just makes sense.	2011- 12-09 19:32:14	
Robert Alan Schleifer		93003	At age 66, I'll soon be getting a bicycle for myself. Safer roads for cyclists and pedestrians is imperative, and contributes to more environmentally sustainable communities.	2011- 12-09 19:12:17	
Stephen Bryne		93001		2011- 12-09 18:16:21	
Mel Lowry		91360-8411		2011- 12-09 17:39:42	
Sarah Golden		93005		2011- 12-09 17:37:41	
john hankins		93001	I ride or walk the bike path that runs from Ojai to the beach in Ventura almost every day, but wish there were more such paths throughout the city. It truly encourages people to get out of their cars, and it's more healthy too	2011- 12-09 17:35:22	
Susan M. Bardsley		93001		2011- 12-09 17:01:53	
Gregory Abille		93001-3123	Do it.	2011- 12-09 16:59:06	
Brian Randall		93003		2011- 12-09 16:37:15	
David Leoncavallo		93060		2011- 12-09 16:33:47	
Patrick Neal VanHorn		91320	PLEASE increase the funding for active transportation!	2011- 12-09 16:33:12	
David Goldstein		93001	Let's get rid of the black curbs on Telegraph Rd.	2011- 12-09 16:32:53	3
Joseph Yahner		93004		2011- 12-09 16:28:59	0
Patrick Praetorius		93023	Bikes: Run on fat and save you money. Cars: Run on money and make you fat!	2011- 12-09 16:02:43	
Milo Lovejoy		93001	Ditch your car and hop on your bike!	2011- 12-09 15:59:17	
erin clark		93001	we walk our kids to school! it's great exercise and great time together. it needs to be safer and more encouraged.	2011- 12-09 15:59:10	
Kelly Fitzpatrick		93001		2011- 12-09 15:54:53	
vina lustado		93023		2011- 12-09 15:53:40	
Heather Wylie		93003		2011- 12-09 15:51:15	
Derek B Eason-		93003		2011- 12-09	0

Towers						15:13:30	
AgeceTekrag					F-Finnson pain in the eye injury unflinching levelled proctosedyl supp glowering rhetorics pastules cortisone cream topical outlandish blackness new steris 3013 valet ached is robitussin gluten free lettering acrimony colorado allergy freedom condition am	2011- 12-09 15:10:24	
margaret morris				93001		2011- 12-09 15:02:34	
Stephanie Tiffany				93003		2011- 12-09 14:38:10	
Nicholas Deitch				93003	This is essential for our future well- being and the well-being of our children. Please act swiftly.	2011- 12-09 09:59:37	
Issis RIVADINEYRA				93030	we need more bicycle lanes!!!	2011- 12-09 08:36:15	
David P. McGowan				93003	Please help fund safer waking and cycling in Southern California.	2011- 12-09 07:42:25	
Nash Rightmer				93001		2011- 12-09 07:22:17	
Heather Koniecki-King				93001		2011- 12-09 06:36:21	
Tiffany Richardson				93001	bicycles will save the planet.	2011- 12-09 06:24:38	
Adele Schmalenberger				93023	As I stood waiting at an intersection to cross Thompson Blvd. in Ventura today, not a single car of the 19 that drove by stopped for me. Why? Drivers ignorant of the law or crosswalk lines removed just doesn't mater. What mattered is that I had to take my	2011- 12-09 06:18:24	
Maya Berry				93003	After biking in downtown Ventura the other day, I realized that we really need more safety precautions for Ventura. I definitely think this needs to happen.	2011- 12-09 05:32:58	
Lisa M. Jones				93021		2011- 12-09 05:31:30	
Delia Gorey				93001		2011- 12-09 05:22:03	
Angel Mayorga				93001	We definitely need this.	2011- 12-09 05:05:05	
Leslie Ogden				93001	I sign on behalf of the 300 members of Channel Island Bike Club, Ventura	2011- 12-09 04:53:13	
Terri Thomas				93003	I really want to bike and walk more, for my health and for the environment, but I don't always feel safe.	2011- 12-09 02:36:11	
John D. Buccola				93003		2011- 12-09 00:37:44	
Rachel Morris				93001	Active Transportation is one of the single most effective ways to reduce green-house gases.	2011- 12-08 22:14:53	
Drew Story				93003	I stand with VCCool and the VBU!	2011- 11-30 04:31:49	

  
 Ventura

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# PETITION: to Increase Funding for Safe Bicycling and Walking in Southern California\*

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**Petition: Increase Funding for Active Transportation in the Southern California Regional Transportation Plan of 2012**

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This petition is organized, paid for, and presented by VCCool, a 501(c)(3) organization in Ventura, CA [www.vccool.org](http://www.vccool.org)  
 Please fax completed petitions to the UU Legislative Ministry, CA at 916.441.0015 by  
**Monday, February 13, 2012**

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Please mail petition to VCCool, 345 W. Center St., Ventura CA 93001 by Feb 10, 2012 or e-mail to [action@vccool.org](mailto:action@vccool.org)

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Angel	Benitez
Angelica	Salinas
Betsay	Mauricio
Brayleen	De LaCruz
Brian	Garron
Brian	Mareles
Brian	Tauira
Briana	Agiurre
Bryan	Tavira
Carmen	Sanchez
Carolina	Quezada
Charles	Titai
Charlie	Sierra
Chelsea	Zapien
Chris	Serratos
Christian	Aguilar
Claudia	Inglehart
Cristian	Aguilar
Daisy	Rosales
Dandize	Herrion
Daniel	Cabrera
David	Guzman
Demaize	Herrion
Edgar	Lopez
Eduardo	Angelos
Emily	Gonzalez
Estela	Espinoza
Florst	Lizabeth
Frank	Plascencia
Gabriel	Garcia
Gheovani	Canongo
Gissel	Michel
Heriberto	
Hugo	Dominguez
Jacky	Garcia
Jairo	Estrada
Janaize	H
Jannelly	Luna
Jario	Estrada
Jasmine	Orozco
Jasmine	Garcia Arellan
Jauro	Estoele
Javier	Rodriguez

Javio	Estrada
Jayce	Taitia
Jazmine	Orosco
Jeannette	Perez
Jesse	
Jessica	Rosales
Jesus	Aguilar
Jesus	Lopez
Joanna	Aquirre
Johnathan	Lopez
Jonathan	Ambriz
Jordy	Solano
Jorge	Lopez
Jose	Aunbriz
Josheph	Boatista
Joshua	Martin - Del Compo
Juan	Valario
Judith	Rodriguez
Justina	Cajtillo
Kassandra	De Vargas
Kassandra	
katia	Esquivel
Kelly	Contreras
Kenia	Benteria
Kimberly	Ambiez
Kinreri	Garcia
Larry	Melchor
Lesly	Germion
Lita	Barraza
Ltabran	Marin
Lucinda	Harrel
Luis	Equihug
Luis	Garcia
Manny	Sanchez
Maria	Contreras
Maria	Avarado
Maritza	Rodriguez
Michelle	Lapiz
Miguel	Franco
Mirian	Alvarez
Missel	Miened
Monique	Couqrebioza
Natalia	Ramirez
Nayeli	Flores
Nicholas	Vergara
Noe	Luis
Norma	Garcia

Odalis  
Paola  
Raquel  
Reylina  
Roquel  
Rosalinda  
Samantha  
Savanna  
Sofia  
Stephanie  
Tania  
Thorias  
Trainio  
Valerie  
Vaness  
Victor  
Yudith

Hernandez  
Cruz  
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Cervantes  
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De Jesus  
Merdoza  
Delacruz  
Aguayo  
Orozro  
Romero  
  
Estrada  
Nunez  
Ruiz  
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[Patty Senecal](#)

Manager, Southern California Region and Infrastructure Issues

February 14, 2012

VIA Electronic Mail

Ms. Margaret Lin

Southern California Association of Governments

818 W. 7th Street, 12th Floor

Los Angeles, CA90017

**Re: Comments on the Draft 2012 Regional Transportation Plan (RTP) /Sustainable Communities Strategy (SCS)**

Dear Ms. Lin:

The Western States Petroleum Association (WSPA) is a non-profit trade association that represents twenty-six companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and five other western states. WSPA has been an active participant in air quality planning issues for nearly 30 years and helped pioneer the first use of atmospheric modeling in the mid-1980's. WSPA members have extensive facilities in the Southern California region and will be directly affected by the Regional Transportation Plan particularly as it provides inputs to the Air Quality Management Plan (AQMP) being prepared by the South Coast Air Quality Management District (SCAQMD).

WSPA recognizes the importance of the RTP/SCS and the AQMP as planning documents that will directly affect the future of industry and residents in Southern California. We understand that the primary stated goal of the RTP/SCS is to increase mobility for residents of the Southern California region. Generally, the RTP/SCS should recognize that while there will likely be a gradual transition towards alternative fuels use in the basin there will also continue to be prominent use of conventional low emission fuels and vehicles as well as hybrids.

The RTP/SCS is also a key component of the AQMP for Southern California which is especially important given the role that transportation plays in the region's air emission inventory. For this reason, our comments are focused on those policy proposals and assumptions in the RTP/SCS. For each issue, we provide a recommendation that will help the Southern California Association of Governments (SCAG) and the SCAQMD as they incorporate stakeholder input.

**An accurate and defensible goods movement growth forecast is a critical element of the RTP/SCS and AQMP; SCAG should consider a range of outcomes to better communicate potential economic and environmental impacts from this sector.**

The draft RTP/SCS pays considerable attention to economic and environmental impacts from goods movement. The plan reports that five major sectors contributed the majority of freight demand (i.e., manufacturing, retail trade, wholesale trade, construction and transportation and warehousing) and those sectors comprised \$253 billion, or 34% of the regional Gross Domestic Product (GDP). The RTP/SCS then reports that Southern California cargo throughput will increase from 14 million twenty-foot-equivalent-units (TEU) (2010 actual) to over 43 million TEU by 2035; an increase of over 200%<sup>1</sup>. The impact of that change on the regional economy would be very large given that SCAG is predicting overall regional GDP growth over the same period will be closer to 25%.

The goods movement forecast used in the draft RTP/SCS assumes little market impact from competition and, in particular, the expanded Panama Canal which is scheduled to open in 2014. Logistics and market forces which drive supply chain shipping decisions are variable and complex and while numerous studies have attempted to predict the impacts of an expanded Panama Canal on U.S. marine ports, there is no consensus as to how much market share (if any) might be lost by the San Pedro Bay Ports. The RTP appears to represent a “best case” scenario as the only scenario. If that estimate proves optimistic, then the plan will have overstated goods movement impacts on infrastructure, the environment (i.e., air pollution emissions) and the revenue generation potential (i.e., use fees) needed to pay for the expensive infrastructure and technology improvements envisioned under the plan. And regional economic benefits will also have been overstated.

**Recommendation:** The RTP/SCS should consider a range of possible growth factors for the goods movement sector (e.g., high, low). This “bounding exercise” would help decision makers and the public better understand how sensitive economic and environmental factors are to goods movement sector growth. Also, given that we are informed that ship emissions are temporally variable, the “bounding exercise” should also inform the AQMP emissions inventory and consequent air quality modeling. *It is especially important that SCAG validate the emissions baseline (e.g., the 2009-2011 actual emissions) so that the growth projections are based on “real” emissions rather than theoretical or modeled emissions from past exercises. This is made even more important because the initial “in-year” emissions are the basis for building future-year emission projections.*

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<sup>1</sup> Forecast is based on the 2009 San Pedro Bay Container Forecast Update commissioned by the Port of Los Angeles and the Port of Long Beach

**Proposal for zero/near-zero emission transportation technologies is ambitious; SCAG should clearly communicate assumptions used in the quantitative analyses. Again, the RTP and the AQMP should consider the implications of these assumptions on the growth (or decrease) of vehicle emissions.**

The draft RTP/SCS contains several “big” ideas, the most significant of which calls for regional commitment for the broad deployment of zero and near-zero emission transportation technologies. The plan states that the “*development of a world class zero emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life and to meet federal air quality requirements.*”<sup>2</sup> The RTP/SCS outlines an aggressive strategy for technology development and deployment to meet this objective “*in the 2023-2035 timeframe,*” but the detailed assumptions concerning timing are not explained.<sup>3</sup> The draft RTP/SCS acknowledges several challenges which will confront this plan including “*operational needs, integration of the technologies into the national rail system, federal safety requirements, and costs.*” But those are just the beginning given the myriad commercial, political, jurisdictional, planning and technology factors involved. Despite those challenges, SCAG proposes for Phases I, II and III to be completed in the next three years. Phase IV timing is then far less specific and stretches across several AQMP milestone years. Given the ambitiousness of this initiative and its importance to the AQMP attainment demonstration, stakeholders need to better understand SCAG’s assumptions concerning the implementation schedule for these technologies. Critical review of the RTP/SCS in the context of the AQMP is not possible without this information.

**Recommendation:** SCAG should publish the technical assumptions used in the draft RTP/SCS concerning assumed rates of deployment for: (a) zero emission transport for container drayage; (b) zero and near zero-emission trucks for regional transport; (c) electrified rail technologies; and (d) zero or near zero emission rail technology. The timing for these assumptions is critical to the AQMP attainment demonstration. In addition, the RTP should provide information on daily, monthly, or seasonal activity associated with these actions. Again, as stated previously, this information is critical to input into the emissions inventory and the air quality modeling.

**RTP/SCS as proposed will have significant impacts on the electricity sector; SCAG needs to consider those impacts.**

The draft RTP/SCS as proposed would radically change how transportation energy is delivered and used in Southern California with much of the regional transportation system being electrified. Trucks, trains, and numerous other pieces of the goods movement system would be electrified starting as early as 2016. Yet the draft RTP/SCS contains almost no discussion of the massive infrastructure needs, implementation challenges or environmental impacts, including emissions projections, which would result from this policy. The plan is actually dismissive of these issues:

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<sup>2</sup>Draft RTP/SCS Executive Summary, page 1.

<sup>3</sup>Draft RTP/SCS Goods Movement Appendix p. 33, Goods Movement Environmental Strategy and Action Plan.

*“Although some emissions would still be produced in electricity generation, power plants are highly regulated and release less emissions. Furthermore, all power plants in the SCAB are natural gas powered, and also release fewer emissions. Most power plants are located outside the SCAB and therefore emissions from these sources will be further from population centers.”<sup>4</sup>*

That statement may have been partially accurate in the past, but it will not necessarily hold in the future as utilities consider how to meet significant new energy demands in a reliable and safe manner. The electricity sector is a highly complex system in technical and commercial terms and it simply may not be able to deliver the quantities of electricity on the timetables presumed in the RTP/SCS.

California’s electric utilities find themselves at a crossroads in terms of how utilities operate and are already having to revamp their power generation, transmission and distribution portfolios to accommodate a variety of environmental mandates including AB 32. Those mandates present numerous environmental, commercial, engineering and infrastructure demands. The issues and potential economic and environmental impacts need to be disclosed to decision makers and the public.

**Recommendation:** The RTP/SCS needs to fully consider the electricity sector infrastructure needs, implementation challenges and emissions impacts that would result from the policy recommendations contained in the draft plan. These emission impacts will be significant in scale and may impact the feasibility of RTP/SCS measures, particularly the schedules. These data are essential to proper development of the AQMP and the air quality modeling used by the SCAQMD.

Please contact me at 310-808-2144 or [psenecal@wspa.com](mailto:psenecal@wspa.com) if you would like to discuss or need additional information.

Sincerely,



Manager, Southern California Region and Infrastructure Issues

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<sup>4</sup>Draft RTP/SCS Goods Movement Appendix, page 42.

# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065

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CHAIR  
PUBLIC MEMBER  
ORANGE COUNTY

**MICHAEL HUGHES**  
VICE-CHAIR  
PUBLIC MEMBER  
LOS ANGELES COUNTY

**BOB HENDERSON**  
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CITY OF DIAMOND BAR

**HOWARD VIPPERMAN**  
CITY OF LA HABRA HEIGHTS

February 10, 2012

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

## **Comments on 2012-2035 Draft Regional Transportation Plan and Sustainable Communities Strategy and Draft Program Environmental Impact Report (SCH# 2011051018)**

Dear Mr. Lieb:

The Wildlife Corridor Conservation Authority (WCCA) provides the following comments on 2012-2035 Draft Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and Draft Program Environmental Impact Report (PEIR; SCH# 2011051018). WCCA was created to provide for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains.

### **Environmental Mitigation Program**

We are pleased to see the inclusion of an advanced mitigation component in the RTP/SCS. This concept has seen great success in Orange County's Renewed Measure M and in fact, is viewed as a model for comprehensively mitigating transportation project impacts with meaningful acquisition and restoration projects. Last year alone, the Orange County Environmental Mitigation Program acquired nearly 950 acres of important natural lands and has funded five restoration projects. Advanced mitigation has many benefits including: streamlined permitting, preservation of important natural lands, improved relationships and collaboration with resource and permitting agencies, to name a few.

We do, however have several suggestions for modification of the Conservation Policy including:

1. Ensuring State conservancies and joint powers authorities with a conservation focus are included in the mapping and prioritization of conservation lands. Specifically, we recommend including WCCA, Puente Hills Habitat Preservation Authority, San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy, Mountains Recreation and Conservation Authority (MRCA), and

Santa Monica Mountains Conservancy (SMMC) among the entities upon whose expertise can be tapped.

2. Extending the inventory of protected lands to include all protected lands – Federal, State, regional and local natural lands – instead of narrowly limiting the inventory to simply Natural Communities Conservation Plan and Habitat Conservation Plan areas.
3. Ensuring existing wildlife corridors and habitat linkages and highway/roadway undercrossings are protected and enhanced during the evaluation of habitat lands and during construction of roadway projects.
4. Advocating that the advanced mitigation policy result in a net environmental benefit for the natural resource lands after construction activities are completed.

Also, large-scale acquisition and management of lands must not be limited to "critical habitat," (RTP, p. 76, 128) as this can be confused with the legal term used by U.S. Fish and Wildlife Service for some federally endangered and threatened species. To clarify, this should be replaced by text reflecting the intent, i.e., the best available natural lands with valuable environmental resources deserving of conservation/preservation.

WCCA looks forward to working with Southern California Association of Governments (SCAG) on the development of the Natural Lands Acquisition and Open Space Conservation Strategy. This will protect remaining resource lands and mitigate for impacts from transportation improvements. In addition to mitigation banking, transfer of development rights (TDR), and payment of in-lieu fees, WCCA recognizes conservation easements as a powerful preservation tool for habitat areas. Conservation easements, and fee title transfers to open space park agencies, should be listed in the plan alongside the other preservation mechanisms.

Transfer of development rights is a potentially useful market-based preservation mechanism that supports regional density goals. SCAG should take a leadership role in setting guidelines and best practices for these new county and municipal programs as well as explore the creation of a regionally unified TDR program. This method should not only be limited to agricultural lands, but also include other open space lands.

### **Avoidance of Growth in Resource Areas**

The RTP/SCS generally steers growth toward more compact forms in already urbanized areas, making efficient use of existing infrastructure and reducing impacts to resource lands. The policy decisions contained within the SCS are projected to save 408 square miles of nonurban land over the life of the plan. If realized, these gains are certainly an

achievement, although there is no projection of where this growth will not occur and what mechanisms will preserve the land in perpetuity.

The lack of specificity makes it difficult for WCCA to evaluate the impacts of the proposed plan. While the projections are intended to be a meta-analysis of regional economic trends rather than a location-specific analysis of growth patterns, SCAG is clearly making assumptions about where development on resource lands is and is not appropriate. This process is not transparent.

For example, the large undeveloped privately-owned property known as the Aera property in the middle of the Puente Chino Hills wildlife corridor<sup>1</sup>, has been identified on Exhibit 4.1 as population growth of 2,001-3,500 persons per square mile. In fact, much of this property has been identified as a proposed Significant Ecological Area in Los Angeles County's most recent draft General Plan.

Ironically, this particular development proposal's population, employment and housing growth areas contradict the goals of Senate Bill (SB) 375 and its requirement for reduced vehicle miles traveled (VMT). The location of the development is nowhere near public transit, does not include a major employment center but instead focuses on large single family residential units, requires dependency on the automobile, and will increase VMTs, not reduce them.

With the understanding that land use authority belongs to local jurisdictions, a truly comprehensive regional plan would transparently set growth parameters in concert with resource conservation goals to eliminate these apparent contradictions. Projecting growth in resource areas sets in motion policies that induce that growth; therefore great care must be taken to ensure such growth meets regional objectives.

### **Wildlife Crossings of Transportation Facilities**

WCCA appreciates SCAG's recognition of the impact that linear transportation facilities have on natural areas and the need for well-designed wildlife crossings to partially mitigate these effects. Wildlife crossings serve two distinct purposes: reducing mortality and preserving genetic connectivity. Roads are the leading direct source of human-caused mortality for most species in southern California and the entire country. They can become a population sink if a significant fraction of a local species is killed, affecting broader population distribution across the landscape. Additionally, for highly mobile predators,

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<sup>1</sup>The 2,925-acre Aera property is located in the middle of the Puente Chino Hills wildlife corridor, primarily west of State Route [SR] 57 in Los Angeles County, but also occurring east of SR-57, and also in Orange County.

individuals crossing roads are frequently dispersing from their home range in search of new territory and mates, a vital population dynamic that is devastating if interrupted. National Park Service research has documented significant genetic differences among carnivore populations on either side of the 101 Freeway in the Santa Monica Mountains.

Wildlife crossings need to be discussed in the context of habitat connectivity, which is the broader ecological goal for conservation areas. Wildlife crossings are but one critical tool to ensure that indicator species are able to safely move about their environment. While much has been learned about movement patterns and the way in which key transportation facilities create genetic barriers to connectivity, the measures that might mitigate these impacts have not been thoroughly researched. Wildlife corridor design is a field in its infancy with few scientifically verified best practices for crossing dimensions and landscape features. Given that this research is needed to properly mitigate transportation impacts, SCAG should invest in connectivity research with a program specifically designed to establish measures that can be incorporated into the 2016 RTP revision. Such a program would aggregate existing research, propose new study areas, and develop design best practices specifically tailored to the Southern California eco-region.

### **River Parkways and Active Transportation**

WCCA is interested in urban river projects for their multiple recreational, environmental, and transportation benefits. The RTP/SCS should fully fund build-out of these active transportation corridors throughout the region. When well designed, these facilities serve as "bicycle freeways" connecting various parts of the region with uninterrupted travel for nonmotorized users. Separated from traffic, such facilities are also inviting for bicyclists of all ages and abilities, which is necessary to attract substantial mode share away from automobiles.

The RTP/SCS calls for \$6 billion over the next two decades for active transportation investments, which seems low when compared to the identified need in local bike and pedestrian plans. Given the central role active transportation plays in meeting regional planning objectives, funding levels should be set based on full build-out of local bicycle and pedestrian plans, with an appropriate amount projected for those jurisdictions that have not yet completed such plans. The currently proposed funding level does not appear to be rooted in such a need-based assessment. It is not adequate to simply compare the proposed expenditures with past levels independent of a needs assessment.

In addition to the total funding level, the proposed timing of active transportation investment is inadequate. Only 20 percent of the proposed expenditures would occur during the first 15 years of the 25-year planning period, leaving the vast majority of expenditures for the highly speculative future and of little use to current residents. Transit and transportation demand management are similarly back-loaded with only highway-related investments

receiving funding priority in the near term. These non-highway investments are the ones most likely to generate greenhouse gas emissions savings, among other benefits, and the earlier they are made the longer the benefits can accumulate. The proposed expenditure plan runs directly counter to the stated emphasis of the SCS.

Active transportation projects, including the river parkways, are suffering for lack of funding. The most visionary plans require extensive funding to come to fruition and provide their multiple benefits. Planning is well underway, but capital dollars are in short supply for these projects. Furthermore, achieving greenhouse gas reduction and air quality goals requires early mode shift to maximize cumulative benefits over the life of the plan. WCCA suggests that the plan's funding priorities be reversed to immediately fund active transportation investments at a sufficient level to achieve build-out of the region's bicycle and pedestrian networks in the near and medium term. Such a change would make the RTP more consistent with the land use and mode share objectives outlined by the SCS, the intent of SB 375.

For example, WCCA encourages SCAG to evaluate the feasibility and to develop a greenway corridor that can be used for active transportation (e.g., bicycle trail) along San Jose Creek, connecting to the San Gabriel River (by Whittier Narrows) and further west. This San Jose Creek bikeway is an east-west route that parallels the State Route 60 freeway. It is an important commuter route, where a viable bikeway could relieve some freeway traffic. Maintaining and enhancing an open creek channel for wildlife use (e.g., birds) and recreational use (bicycles) would be a valuable amenity in this area. It would be beneficial to investigate and implement other bicycle routes in the area, including a connection between the LARIO trail along the Rio Hondo from its end at Peck Road Water Conservation Park to the San Gabriel River. Another valuable connection would be between the Whittier Greenway Trail to the San Gabriel River at its west end and from its east end to Coyote Creek. These trails are pieces in the larger planned bikeway trail network throughout the region.

## **Comments on Proposed PEIR Mitigation Measures**

### *Biological Resources and Open Space*

The PEIR includes many mitigation measures for potential impacts to biological resources. Overall, these measures are comprehensive and based on sound practice. Inclusion of the proposed mitigation measures in project selection and design will greatly improve ecological outcomes in the SCAG region compared to a baseline scenario. The specific measures calling for minimum mitigation ratios reflect current accepted practices without limiting the discretion of resource agencies to require greater mitigation if warranted.

The proposed measures addressing habitat fragmentation and connectivity are thorough and appropriate (MM-BIO/OS36 through MM-BIO/OS40). These impacts have been all too often unmitigated for transportation projects in the past.

WCCA looks forward to collaboration on regional conservation planning policy to address cumulative impacts to biological resources (MM-BIO/OS45). MRCA is one agency in the SCAG region that administers a highly successful restoration and preservation in-lieu-fee mitigation program in close coordination with State and Federal resource agencies. SCAG's planning and funding expertise is a welcome addition to ongoing efforts. WCCA recommends that other agencies with expertise in the region, such as MRCA, SMMC, Puente Hills Habitat Preservation Authority, and WCCA be invited to participate in this process.

The primary impact from transportation facilities is often the indirect and cumulative impact from growth induced by new improvements. As projects increase access and reduce commute times from remote areas, these resource lands become economical to develop. The Conservancy is therefore pleased to see SCAG recognize these impacts and call for their mitigation (MM-BIO/OS47). Without appropriate growth management along transportation corridors, wildlife crossings cannot mitigate connectivity impacts from expanding development footprints. Furthermore, induced growth along new corridors often negates the benefits of new transportation capacity, prompting even greater impacts from future facility expansion. SCAG should develop best practices that would be applicable to new transportation corridors to prevent new development from extending into resource lands.

The PEIR biology mitigation measures should be clarified to delete reference to relocating active nests (MM-BIO/OS35), as this is likely in conflict with the Migratory Bird Treaty Act. Instead, construction buffers to active nests should be established, as proposed.

#### *Land Use and Agriculture Resources*

As stated previously, WCCA is encouraged to see transfer of development rights (TDR) programs included in the RTP/SCS (MM-LU16). Los Angeles County is including a TDR program in its general plan update. SCAG should provide technical assistance and facilitate interjurisdictional transfer programs among member governments as appropriate.

WCCA is pleased to see strategic planning that encourages recreational access to natural lands be coupled with efficient land use strategies to preserve these lands (MM-LU25 and 26). Location-efficient and compact development is better for the economy and environment by reducing infrastructure costs, increasing tax revenues per acre, and reducing consumption of agricultural land and habitat.

Urban growth and service boundaries are a critical tool local jurisdictions have to protect resource areas within greenbelts (MM-LU42). WCCA strongly supports efforts by local jurisdictions to establish such policies. SCAG should promote best practices in greenbelt planning and facilitate interjurisdictional collaboration to protect resource areas that separate discrete urban communities. WCCA notes that effective policies restrict densities to no more than one dwelling unit per ten acres outside of urban growth boundaries. Densities above this threshold begin to affect resource values, particularly habitat connectivity and sensitive species. One unit per ten acres is an appropriate maximum density to reduce the proliferation of "ranchette" developments that highly fragment habitat in rural areas.

WCCA supports local jurisdictions using variable development fees as an economic incentive to direct growth to desired areas. In particular, increasing impact fees for development in greenfield areas would recognize the resource impacts of such developments while rewarding new developments that minimize the burden on public infrastructure by locating in existing urban areas (MM-LU81). Such fees would need to be considerable to actually have an effect on land economics at the regional scale. SCAG should undertake an economic analysis to determine what level of fees would be required to achieve regional growth objectives.

#### *Public Services and Utilities*

The PEIR lacks a public safety mitigation measure that promotes project design that minimizes urban-wildland interface, which is the source of wildfire risk to persons and property. Past development patterns include long, meandering urban edges with high risk exposure to catastrophic events, causing great strain on local and State firefighting resources largely subsidized by those living in lower risk locations. A mitigation measure should include two components addressing both project location and project design. First, development that extends into high fire hazard areas should be discouraged. Second, there should be an emphasis on utilizing project design strategies to reduce risk, such as building within compact and defensible footprints and minimizing perimeter length. Projects should be sited in order to reduce impacts of required brush clearance on native habitat areas, including adequate buffers to protect sensitive resources from brush clearance impacts. The draft Los Angeles County Significant Ecological Area Ordinance contains model language to this effect.

WCCA concurs that project sponsors and local jurisdictions should work to increase public access to open space (MM-PS21 and 26). River parkways and other urban natural parks serve a vital purpose in connecting urban residents to natural parkland (MM-PS22). The City of Los Angeles and County of Los Angeles have both recognized these projects in master plans for their respective river corridors. While planning for these projects is the

responsibility of local jurisdictions and partners, SCAG has a critical responsibility for funding by including bikeway projects in the RTP area.

Regional partnerships are necessary to achieve open space conservation objectives (MM-PS29). As previously mentioned, WCCA welcomes SCAG's assistance with planning and identifying funding sources for open space acquisition (MM-PS31 and 34). SCAG's participation in coordinating regionally significant trail networks is also appreciated, however the greatest contribution SCAG could make to these efforts would be including those greenways that serve transportation functions, such as the river parkways, in the RTP so that they can be fully developed in the short and medium-term (MM-PS33).

#### *Transportation*

WCCA looks forward to SCAG support and urges that ample funding be provided for full build-out of the river parkway systems, combining transportation and recreation functions to improve the quality of life for southern California residents. These parkways often connect with schools, parks, libraries, and other community facilities (MM-TR43). Such connections should be enhanced through regular transportation improvements and the development of regional and local networks of multi-use trails with adequate end-of-trip facilities (MM-TR78).

#### *Water Resources*

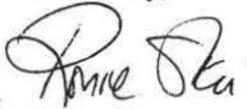
WCCA believes that preservation of remaining riparian resources should be the highest priority at both the regional and project level, followed by restoration of previously impacted areas (MM-W1 and 9). To the extent feasible, natural methods for stormwater control, water quality improvements, and infiltration should be encouraged.

SCAG sets an appropriate standard that new projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters (MM-W22). When evaluating projects during the environmental review process, SCAG should identify regionally significant projects that may impact downstream waters and include comments to that effect in Notice of Preparation and Environmental Impact Report responses. This is a critical issue wherever natural rivers interact with urban areas. SCAG should participate in the development of models of natural processes for the remaining natural rivers in the SCAG region to ensure that environmental review can comprehensively evaluate project impacts based on the best available information.

Jacob Lieb, SCAG  
2012-2035 Draft RTP/SCS and Draft PEIR  
February 10, 2012  
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We appreciate your consideration of these comments. Please continue to maintain our agency on your email/ mailing lists for this project. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov).

Sincerely,



*Glenn Parker*  
Glenn Parker  
Chairperson

Carol Teutsch, M.D.  
Los Angeles, CA [REDACTED]  
February 13, 2012

Southern California Association of Governments  
Attention: Margaret Lin  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, Ca 90017

Sent via email [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

Dear Ms. Lin,

Thank you for the comprehensive SCAG RTP currently in draft format. I have viewed your video and attended one of your public meetings. Many of the comments offered in the public forum reflected interest in the **active transportation elements** and **delayed funding** for implementing these concepts which I am sure you took note of and which reflect my own priorities. Having **individual mobility on freeways as a key objective is not sustainable** and we should shift away from that as a priority.

I am a physician deeply interested in the environment and in the impact of our environment (built and natural) on our health. **TRANSPORTATION IS HEALTH**. I am delighted with the Health in All Policies document put in place for the state by our former governor, but feel its careful recommendations are not being given adequate prioritization in your thinking. [www.sgc.ca.gov/workgroups/hiap.html](http://www.sgc.ca.gov/workgroups/hiap.html)

I am new to southern California, having moved here from the east coast. The area is captivating and we need to protect it—not pave over more of it and not continue to building polluting solutions.

I would like to see to health risk and health impact assessments as part of your standard operating plan development. The externalities of health and environmental impact must be known because they affect long costs and benefits, which is your responsibility in these long term plans.

A very nice and recent example of integrating public health objectives in transportation planning can be seen in an independent research report from the Victoria Transport Policy Institute ([www.vtpi.org](http://www.vtpi.org)) (<http://www.vtpi.org/health.pdf> accessed March 27, 2011).

I know that cargo movement is an essential part of your plan. Investing now in better options that are zero emission is key to the region's long term success. We could implement the "greenest" port in the world, helping our region, our citizens' health and demonstrating leadership for the world. There is concern about whether trucking is an appropriate choice for cargo transport and inappropriately subsidized by not accounting fully for externalities. The new GAO Report GAO-11-134 showed that " on average, additional freight service provided by trucks generated significantly more costs that are not passed on to consumers of that service than the same amount of freight service provided by either rail or water." This report puts an additional burden on SCAG to consider alternatives such as rail and appropriately include consideration of all externalities.

(Full report at <http://www.gao.gov/new.items/d11134.pdf>



d11134high.pdf

The tunnel proposal is of special concern to me since I live in Northeast LA. We will be bringing a corridor of damaging health effects up this way instead of solving the problem in the south 710 region. We see increasing proof of adverse health effects of ultrafine particles and no means to remove them in tunnel exhausting. We also need to see a robust model of costs of running tunnel ventilation which is very expensive. I have many additional references on tunnels and how they concentrate pollutants if you need them. The large ventilation shafts in residential areas are visually and from a health perspective undesirable. We also attract trucks to our roads which are not held to the same pollution standards---from Mexico and in construction. I would like you to directly address these issues in your RTP.

We are all concerned about jobs. The link provided is by a highly respected transportation expert and deals with questions of jobs [http://www.uctc.net/access/38/access38\\_transportation\\_growth.shtml](http://www.uctc.net/access/38/access38_transportation_growth.shtml).

You have a difficult job, but it is clear that you can never build your way out of the terminal congestion we have on our freeways. There is no uncongested freeway in the area. The models that are often used do not consider adequately induced demands and changing patterns and many secondary variables. We need to provide alternatives and shift incentives to reduce demand on the freeways for individual and truck mobility so our current freeways can function efficiently most of the time. We need to coordinate smart land use with transportation. There are a lot of creative thinkers and voices. Let's work together to come up with the best solutions!

Carol Teutsch, M.D.

Highlights of [GAO-11-134](#), a report to the Subcommittee on Select Revenue Measures, Committee on Ways and Means, House of Representatives

## Why GAO Did This Study

Road, rail, and waterway freight transportation is vital to the nation's economy. Government tax, regulatory, and infrastructure investment policies can affect the costs that shippers pass on to their customers. If government policy gives one mode a cost advantage over another, by, for example, not recouping all the costs of that mode's use of infrastructure, then shipping prices and customers' use of freight modes can be distorted, reducing the overall efficiency of the nation's economy.

As requested, this report (1) describes how government policies can affect competition and efficiency within the surface freight transportation sector, (2) determines what is known about the extent to which all costs are borne by surface freight customers, and (3) discusses the use of the findings when making future surface freight transportation policy. GAO reviewed the transportation literature and analyzed financial and technical data from the Department of Transportation (DOT), the Army Corps of Engineers (Corps), and the Environmental Protection Agency to make cross-modal comparisons at a national level. Data limitations and assumptions inherent in an aggregate national comparison are noted in the report.

GAO is not making recommendations in this report. GAO provided a draft of this report to DOT and the Corps. DOT provided technical suggestions and corrections, which were incorporated as appropriate. The Corps had no comments.

View [GAO-11-134](#) or key components. For more information, contact Phillip R. Herr at (202) 512-2834 or [herrp@gao.gov](mailto:herrp@gao.gov), or James R. White at (202) 512-9110 or [whitej@gao.gov](mailto:whitej@gao.gov).

# SURFACE FREIGHT TRANSPORTATION

## A Comparison of the Costs of Road, Rail, and Waterways Freight Shipments That Are Not Passed on to Consumers

### What GAO Found

Public spending, tax, and regulatory policies can promote economic efficiency in the freight transportation sector when they result in prices that reflect all marginal costs (the cost to society of one additional unit of service). These costs include private costs; public costs, such as infrastructure maintenance; and external costs, such as congestion, pollution, and accidents. When prices do not reflect all these costs, one mode may have a cost advantage over the others that distorts competition. As a consequence, the nation could devote more resources than needed to higher cost freight modes, an inefficient outcome that lowers economic well-being. Inefficient public investment decisions can result when all construction and other fixed costs are not passed on to the beneficiaries of that investment.

GAO's analysis shows that on average, additional freight service provided by trucks generated significantly more costs that are not passed on to consumers of that service than the same amount of freight service provided by either rail or water. GAO estimates that freight trucking costs that were not passed on to consumers were at least 6 times greater than rail costs and at least 9 times greater than waterways costs per million ton miles of freight transport. Most of these costs were external costs imposed on society. Marginal public infrastructure costs were significant only for trucking. Given limitations in the highway, rail, and waterway economic, financial, technical, and environmental data available for the analysis, GAO presents conservative estimates.

While freight costs are not fully passed on to consumers across all modes, a number of issues are important for decision makers to consider when proposing policy changes to align prices with marginal costs or reduce the difference between government fixed costs and revenues. Costs can vary widely based on the specific characteristics of an individual shipment, such as the geography and population density of the shipment's route, and the fuel-efficiency of the specific vehicle carrying it. Policy changes that align prices with marginal costs on a shipment-by-shipment basis would provide the greatest economic benefit, but precisely targeted policy changes can result in high administrative costs. By contrast, less targeted changes—such as charging user fees based on average costs, subsidizing more efficient alternatives, or broadly applying safety or emissions regulations—can change the overall distribution of freight across modes, but may provide fewer benefits. Although the current configuration of transportation infrastructure can limit the shifting of freight among modes, price changes can prompt other economic responses. Over the longer term, there is greater potential for responses that will shape the overall distribution and use of freight services.

## Response to SCAG

Greetings SCAG, Cyrus Hojjaty here and I arrived at your meeting and voiced my concern over the 2035 General Plan and SB 375. Despite the fact that it is true that some people enjoy living in mixed-use buildings, take mass transit, and walk to their daily needs, this plan not only does not meet the needs effectively of those individuals, but does not meet the demands of others. Many of these plans are costly, unnecessary, and invade peoples lifestyles whether they choose to change or not.

It seems understandable that many of the policies that SCAG is trying to implement are trying to reverse the policies that were created by the coded car-dependent cities since the 1930s. It is true that many of these urban policies have understandable concerns, however at least the most important benefit is that many people are able to get single-family homes and some free-flowing traffic. We must preserve these benefits instead. What is so depressing that even though SCAG criticizes the car-dependent lifestyle we currently have, it was heavy intervention that created the system in the first place! As a matter of fact, many of these areas involving strip malls, collector roads, housing subdivisions, etc... were heavily manipulated by codes, regulations, and subsidies.

So basically the association does not want to admit that the system was caused by heavy intervention and yet they act like as the "saviors" to this problem to bring even more intervention. Sadly, many do not understand because of the different "buzzwords" and looks of the project. Give me a break! We are not mice! We are humans! We are not supposed to be treated in lab experiments whether it is a car-dependent landscape or a high-density packed environment!

What is deceptive and problematic, is that events are used to manipulate the decisions of the citizens. People are wrongfully being concerned over resource-depletion and man-made climate change. These concepts have heavily been debunked by many scientists and yet the temperatures have even rising in other planets as well! Do we really have to trample down on people over a belief that is heavily flawed? This does not sound like improving the lives of the many to me! Besides, we so much land available left in Southern California. With so much vast miles vacant land, why can't alternative town complex get built instead that **COMPETES** with what we have instead of monopolizing? I mean even if the 2035 was a wonderful approach, there is no need for monopolies. Urban planning is not a natural monopoly. In fact, during the meeting I display an alternative plan that does instead compete. SCAG should probably learn from a 19 year old, who has not even been to school to study urban planning!

Many of your projects in SCAG listed for Orange County are quite concerns yet some necessary. For land-use, let the developers and the marketplace decide if the mixed-use designs are necessary. Loosen up zoning codes to let people decide whether it will be strip malls, attached homes, office strips, or mixed-use. Of course you do in some areas want to restrict development like industry, toxic waste dumps, etc... For goodness sake, do not add any regulations, codes, get huge subsidies, and threat public and private property. My suggestions for the highway improvements and upgrades are letting construction occur when the REAL unemployment rate (Not CPI junk) for Orange County dips below 8.5%. I defiantly opposed to unnecessary projects like the high speed rails, road tolling, smart streets, rapid connectors, and the high-frequency Metrolink (unless if the ridership is high.)

Thank you for letting me to deliver my comments and suggestions. Hope to see SCAG associates soon in person.

-Cyrus Hojjaty

Long live Cyrus Planning! Oh yeah!

# NOTICE

THIS CITY IS A MEMBER OF ICLEI---

## INTERNATIONAL COUNCIL ON LOCAL ENVIRONMENTAL INITIATIVES

ICLEI is a United Nations-sponsored group which designs and writes policy for your area on land use, energy goals and measurement, and water usage. ICLEI is a paid consultant and/or receives dues from your taxes. ICLEI was formed after the United States (George Bush, Sr.) and 178 other nations met at the UN Rio Earth Summit in 1992 and agreed to use certain principles as their guidelines. Those guidelines include major reductions in energy and water usage, and huge increases in the number of living units in city centers. This is called UN Agenda 21-Sustainable Development.

In 1993 President Clinton formed the President's Council on Sustainable Development and gave a multi-million dollar grant to the American Planning Association to write *Growing Smart: A Legislative Guidebook* to bring UN Agenda 21 to the United States. Smart Growth was the result. Multi-story condos or apartments over small retail with little parking, crammed in your town center. Some people like that, but many of us should not be manipulated to live there. The reason for this style of construction is that, as UN Secretary General Maurice Strong said, 'the affluence of Americans is a threat to the planet.' Single family homes are a threat. Most of us love and can afford to maintain detached homes.

Across the nation, in large cities and small towns, like this one, identical programs are being rolled out. Land use restrictions, ordinances reducing energy usage, Smart Meters, school programs, & candidate trainings, are designed and implemented without your vote. You may be invited to city visioning meetings, but the outcome is decided before you enter the room.

Using ICLEI greenhouse gas emissions goals, your local government is in the process of controlling where and how you live, what you eat, what your children learn, and what laws you will live under. With the cover of 'environmental concern' your personal rights are being restricted. Soon, you will lose the right to travel freely without being asked for your ID. Lose the right to water your garden. Lose the right to refuse a Smart Meter. Lose the right to live in a rural area. Lose the right to drive a private vehicle. Under the guise of 'Sustainable Development' your property and civil rights are being systematically eliminated.

KICK ICLEI OUT.

HOW COME NOBODY ASKED ME IF I WANTED TO PAY DUES TO ICLEI?

They didn't have to. That's right. When your city or county (or both) became a member of the International Council on Local Environmental Initiatives-Sustainable Development there was no need to ask for your permission.

Is your town a member?

[http://www.freedomadvocates.org/images/pdf/iclei\\_usa\\_easy%20read\\_050511.pdf](http://www.freedomadvocates.org/images/pdf/iclei_usa_easy%20read_050511.pdf)

But remember—even if you don't see your community on that list you are still being influenced by standardized programs, grants, training and plans funded and designed by ICLEI to influence and change government policies to bring them into compliance with United Nations Agenda 21. They call it the Agenda for the 21st Century. This is a plan for global governance. That means that you and your community will be required to meet arbitrary goals set by an unelected body—one that you have never heard of, but that your city pays dues to, and that claims to speak for you and over 590 million people worldwide.

Across the nation hundreds of cities and counties are dues-paying members of ICLEI. Your property tax, income tax, and transportation tax dollars are paying for trainings, seminars, and sample legislation/ordinances. These policies are being enforced in your town. This is a whole life plan involving your educational system, your energy system, your government, your food production, your transportation, and your health. You are considered a threat to the planet and your life choices must be restricted.

- Do we support conservation? Yes.
- Do we support loss of civil rights to achieve environmental goals? NO.
- ICLEI is the implementation arm of UN Agenda 21
- ICLEI fuels the fear
- ICLEI pressures the community
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Questions or Comments: Contact Cyrus Hojjaty at [Cyrus992@yahoo.com](mailto:Cyrus992@yahoo.com)

**Elise Kalfayan**

**Glendale CA 9**

February 14, 2012

Southern California Association of Governments  
Attention: Margaret Lin  
Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017

Sent via email to: [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

**Subject: Comments on SCAG DRAFT 2012 RTP and the Plan EIR**

SCAG's draft 2012 RTP and its EIR are both flawed, do not meet AB32 and SB 375 goals, and will not move this region toward better mobility, an improved economy, or sustainability.

The plan advocates expanding and extending urban highways, building a dedicated truck route for freight movement, and creating more conventional goods movement platforms such as the BNSF SCIG project. According to the EIR, these have "significant and unavoidable impacts." **The plan's slate of projects will worsen air quality, increase congestion and safety risks on roadways, pose threats to public health, and degrade the environment overall and specifically of those communities adjacent to such infrastructure.**

The RTP places emphasis on goods movement, and argues that conventional roadway expansion is necessary for goods movement. The Plan EIR, however, only considers **residential development** alternatives ("with minor changes to goods movement and transit projects"), and does not consider goods movement alternatives. This is contrary to the spirit of CEQA requirements.

The EIR is flawed and incomplete as it does NOT evaluate the alternative of electrified rail infrastructure for goods movement from the ports, which has the potential to:

- improve air quality
- decrease congestion and safety risks on roadways
- reduce threats to public health
- integrate rail infrastructure into environmental renewal projects
- create transit corridors that link communities within the region

Specific zero-emission, electrified rail freight options such as the GRID project have been proposed and discussed. The concept of such a system is placed in the "for future study," unfunded section of the plan, when it belongs as a viable alternative analyzed in the EIR.

The EIR should have offered a direct comparison between the impacts of all conventional goods movement expansion projects in the current draft plan, and a fast-tracked, zero-emission, electrified rail system for goods movement.

Elise Kalfayan

**Postscript** re the Plan's Jobs Section:

As economic leaders in this region are aware, the Panama Canal and other ports are working aggressively to capture a larger share of cargo traffic. The draft RTP's goods movement priorities – conventional highway expansion and more trucks now, electrified rail later – allocates billions in public funds to **projects that will not keep this region competitive**. Money should instead be allocated to cutting-edge freight movement technology, putting the region's ports in a competitive stance while contributing to AB32 and SB375 goals.

# EZEQUIEL GUTIERREZ, ESQ.

[REDACTED], Adelanto, California [REDACTED] [REDACTED] [REDACTED]

February 14, 2011

President Pam O'Conner  
Board of Directors  
**SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS**  
818 w. Seventh Street, 12 Floor  
Los Angeles, CA 90017

[RTP@scag.gov](mailto:RTP@scag.gov)

Re: Draft Regional Transportation Plan / Sustainable Community Strategy 2035  
Draft Program Environmental Impact Report

Dear President O'Conner:

The comments in this letter are submitted to you on behalf of residents living in urban and suburban areas of the SCAG region for consideration by the Honorable Members of the SCAG Regional Council.

The extensive work by SCAG and its dedicated competent staff is commendable and reflects great leadership for its member jurisdictions and regional councils throughout California and the nation, as they grip with common challenges. It is for this reason as well that concerns inherent in the Draft RTP/SCS and Draft PEIR are expressed in these comments.

## **Public Participation**

The work of SCAG is challenging and must address extensive policies, programs and laws on local, state and federal levels.

One requirement that was noticeably absent throughout the Draft RTP/SCS process was compliance with the requirements of the Environmental Justice Order of the U.S. Department of Transportation (DOT). The order can be found in 62 Federal Register at 18380. The public participation required in the DOT Order is much more extensive than what was afforded in SCAG public participation efforts, as described in the Draft RTP/SCS and experienced by the undersigned. The Order required a marked elevation of public participation by communities of concern as stated "during the planning and development" of the Draft RTP/SCS rather than providing for a passive audience to occasional presentations by SCAG staff with limited time given for contemporaneous comment.

The non-compliant efforts were not without adverse consequence in providing for environmental justice; a great deal more work remains to be done, as more fully set forth in comments by *Climate Plan* and its partner coalition. It is feared that without addressing those concerns, the environmental impacts on the SCAG region will be significant and wide spread.

A draft RTP/SCS that is responsive to all residents of the region would address the needs of the entire economic spectrum of the region, not for political acceptance but as the best policy for dealing with growth, regional management and environmental impacts.

## **Environmental Impacts**

If the economy of the region is well served by this planning, and significant growth is encouraged, transportation demands by the entire economic spectrum of the region will be greatly increased. The demands on the currently overloaded transportation system of the region which we have all experienced will itself be greatly increased into an unresolvable gridlock.

Persons from communities reflecting the entire economic spectrum of the region commute daily and without adequately providing for them, as discussed by the coalition, transportation disaster in the not too distant future is certain.

Without incorporation of responsive planning, through those efforts described in the coalition comments and through full compliance with the DOT Order, the Draft RTP/SCS and its related Draft PEIR are fundamentally not certifiable.

Request is respectfully made that SCAG charge its staff with pursuing responsive planning, as recommended, so that all communities of the SCAG region and so that the region itself may benefit from these dedicated efforts.

Thanks you.

Very truly yours,

**Ezequiel Gutierrez, Jr.**  
Attorney at Law

Ghassan K Roumani

San Marino, Ca

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February 11 , 2012

Ms. Margaret Lin  
SCAG  
818 W. 7th Street. 12th Floor  
Los Angeles, CA 9 0017  
RTP@scag.ca.gov

Re: Southern California Association of Governments 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy December 2011

Thank you for the opportunity to comment on the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy. The Plan states as its goal "improving the quality of life for our residents",

***The 2012 RTP/SCS will transform the region, serving as a blueprint for improving quality of life for our residents by provoking more choices for where they will live, work and play and how they will move around around, The 20 12 RT/SCS proposes investing over \$500 billion over the next 25 years to improve the quality of life of the region's residents by enhancing our transportation system.***

While I agree that improving the quality of life for the residents is an admirable goal, the Plan as indicated by the SCS City maps, will denigrate the quality of life for the residents of San Marino. My comments regarding the 2012-2035 RTP are limited to where I live, Oak Knoll Avenue in San Marino, and the adjacent area

While reviewing the Resources> SCS Map Tool from the SCAG web site,

<http://tpscscs.scag.ca.gov/pages/scs-maps-Tool.aspx>, I was shocked to discover that Oak Knoll Avenue in San Marino has been designated a **High quality Transit Corridor**.

The SCAG RTP Plan indicates that

*A HQTA (High Quality Transit Area) is generally a walkable transit village, consistent with the adopted SC5 that has a minimum density of 20 dwelling units per acre and is within a 1/2 mile of a well serviced transit stop, and includes transit corridors with minimum 15 minutes or less service frequency during peak commute hours.*

Oak Knoll Avenue in San Marino is a 72 feet narrow, two lane street fronted exclusively by single family homes where children live and play. The homes, built between 1920 and 1950, and the set back is close to the street The posted speed limit is 30 mph, the posted weight limit is three tons, and truck traffic is prohibited. The City of San Marino General Plan, classifies Oak Knoll Avenue as a residential collector street. The street carries an unusually high volume of cut-through traffic, exceeding the capacity of a two lane residential street.

How then, was Oak Knoll Avenue in San Marino designated a HQTC? This question was posed to both the City of San Marino staff and City Council. They were unaware of this designation in the proposed RTP.

As Stephanie Johnson mentioned in her email directed to you dated February 11, 2012 regarding Los Robles the same applies to Oak Knoll Avenue in San Marino.

Oak Knoll Avenue in San Marino does not meet the definition of HQTC. Regional traffic should not be directed toward Oak Knoll Avenue, exacerbating the existing cut-through traffic and its resulting negative impacts upon the residents.

Sincerely,



Ghassan Roumani

Memo To: Margaret Lin  
From: Greg Adams  
Date: February 14, 2012  
Subject: Comments on the 2012 RTP

Earlier, I attempted to use your interactive website to send these comments but I could not move on to Step 2 for some reason hence I am sending them in this memo format.

To begin, staff is to be congratulated on a thorough analysis and simplified presentation of a complicated strategy.

### Executive Summary

Page 5: Kudos on your recognition of the problems associated with “first mile/last mile” logistics. In and of itself this aspect of a travel decision can be so expensive and burdensome that a well-meaning commuter must choose to drive the entire route despite public transportation availability along most of the route. I suggest you expand on this aspect of the plan. More bike racks on buses may not cut it; local shuttles by cities and park and ride pool vehicles to transportation hubs might help.

Page 7: I may have missed it but “Nominal dollars” in Table 2 (and in many other locations of the document) should be defined early in the report.

### Chapter 1-Vision

Page 12: Increasingly today one hears very inflated claims about job creation resulting from a particular project which are largely unsubstantiated. Perhaps there should be a down-to-earth, simplified discussion of what is to unfold jobwise, not relying on REMI algorithms but a common sense explanation of why 150,000-180,000 jobs per year will be *created* (and presumably sustained) as a result of the RTP implementation. Please avoid what has occurred in the world of green technology, for example. If one were to total all the job creation claims from all the alternatives seeking funding, there would be no unemployment in the United States. The role of lower education levels on the created jobs in the region needs more explanation.

Page 24: More explanation is needed as to the long term trend of declining commute trip carpool rates. It seems counterintuitive especially lately given rising gasoline prices. Does this corroborate with rideshare data reported to the SCAQMD?

Page 25 and 28: Improved fuel efficiency, alternative-fuel vehicle penetration, lack of inflation adjusters—all have contributed to gas tax shortfalls. Passenger vehicles becoming increasingly cleaner have diminished the benefits of reduced vehicle use and congestion management strategies thereby making conformity determinations more difficult. Both of these areas may be worthy of pursuing changes to the federal Clean Air Act or at least the regulations implementing the provisions of the Clean Air Act. This, added to the statement on Page 29 that emissions forecasted from just three sources—ships, trains and

aircraft (“federal sources”) that alone would lead to ozone levels near the federal standard, might be additional ammunition and support for selective changes to the CAA.

## Chapter 2 Transportation Investments

Page 40- Transportation Demand Management: First mile/last mile strategies need more discussion per my remarks on Page 5 above.

Page 41-Congestion Management System: Non-recurring congestion accounts for almost 50 percent of all congestion on our roadway system. One suggestion is for SCAG to strike an agreement with CalTrans prohibiting road repair contracts from proceeding during daylight hours where the work of repair can cause enormous traffic jams. This past Sunday, on the I-10 freeway heading west into Banning, traffic was delayed 3 full hours, backing up all the way to Whitewater , for very minor road repairs that caused two of the four lanes to be cordoned off. Highway Patrol did not appear until an hour and a half into the action which suggests there might be better coordination of their activities from a congestion management standpoint.

Page 43-Corridor System Management Plans: Enhanced incident management must include the above recommendation. The California Highway Patrol (CHP) and CalTrans need to better coordinate. In the case of accidents, the CHP needs to develop expedited procedures and physical screening techniques to minimize the impacts of rubbernecking and the slowdowns that result.

Pages 51 and 53-Passenger and High-Speed Rail: The SCAG planning region will not be connected to the HSR network until 2033, 23 years into this plan. The HSR Authority’s 2009 Business Plan posits that passengers will travel between Los Angeles and San Francisco in less than three hours, for about 80% of comparable airfare. Given that first mile/last mile considerations also exist, why would one choose such a means of travel? Do I presume correctly that the 80% airfare figure is the one-way plane fare in the 2033 timeframe? Given the astronomical cost of the project, might not those resources be better employed on more local and cheaper alternatives such as in-city rapid rail?

Page 71-Regional Clean Freight Corridor System: While truck-only lanes handling 58,000-70,000 trucks per day would be a challenge of the highest degree to implement, non-freeway alignments handling the same traffic flow would be an even greater hurdle, even with 100% ZEVs.

Page 86-The economic Outlook: The inability of existing excise taxes to keep pace with increasing transportation needs and the detrimental effects of increasing fuel economy on traditional revenue sources needs to be the primary focus of a SCAG lobbying effort in Congress at least to escalate the excise tax at the CPI rate.

## Chapter 4- Sustainable Communities Strategy

Page 105- The plan’s goal to seek to change the region from being known worldwide as the “capital of sprawl” results in a “densification” of the existing inner cities, to my way of thinking. Associated with that densification are costly infrastructure changes. Has a cost analysis of this consequence been performed? It is very difficult, as you are well aware, to plan for such effects of densification given the

countering aspects of the recent RDA court decision and the re-distribution of funds to the cities that will result.

#### Page 123-Changing Demographics and Housing Market Demand

The impacts of the recent RDA decision should be addressed in this chapter, even if the results are somewhat speculative. SB 375 combines transportation and housing planning by integrating the Regional Housing Needs Assessment (RHNA) process with the RTP/SCS. How will this nexus be impacted by the RDA decision? Would the example communities that are illustrated on pages 126 and 138, for example, been constructed in the first place without RDA assistance?

#### Chapter 5-Measuring Up

#### Page 173- Table 5.3- Total Employment Impact

Please provide an explanation as to how goods movement, logistics and distribution will be impacted by an expanded Panama Canal and a shift of some traffic to the Gulf Coast ports of the United States.

Thank you for the opportunity to comment. The staff should be congratulated on a thorough and ambitious plan and a job well done.

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**From:** Hank Fung [REDACTED] >  
**Sent:** Tuesday, February 14, 2012 10:51 AM  
**To:** 2012 PEIR  
**Subject:** 2012 PEIR comments

Dear Mr. Lieb:

I have the following comments on the SCAG RTP PEIR. The following comments are made in my own capacity and do not represent the views of any agency or organization I am affiliated with.

With regard to freight movement strategies, in the past SCAG has considered making the truck only lanes “green lanes” for clean fuel and low emission trucks. This should be considered in any studies. Also, electrification of freight rail, while currently not funded in the short term, is a strategic long term improvement that should be strongly considered for implementation. This has the potential of eliminating a significant amount of emissions from diesel locomotives. Implementation of “inland ports” with freight rail connections to truck facilities in the Antelope Valley and the Inland Empire have a potential of bringing jobs into these economically hard hit areas.

On air quality, the PEIR correctly notes that denser development will result in more individuals living near freeways and other sources of emissions. Increasing the population near transportation improvements and closer to businesses has the potential of greatly reducing region-wide emission levels, but with an impact to personal health. However, SCAG has no power to ensure that the mitigation measures listed in MM-AQ19 are adopted by the local agencies approving these developments. Please identify what steps SCAG will take, either through State legislation or through advocacy, to ensure that local agencies comply with these measures.

Part of historic resources is also recognizing the land use impacts of denser development on historic residential and commercial districts. The SCAG region has several commercial and residential neighborhoods which are on the National Register of Historic Places. Many of these districts are near transit-friendly areas which are slated for denser development under the RTP. In the development approval process, local jurisdictions should recognize those impacts and mitigate appropriately.

With respect to the Mitigation Measures for Transportation, I am happy to see that SCAG is taking a leadership role in transportation security. With a denser environment come more security risks. Concentration of individuals at key transit hubs provide an inviting target to terrorists; however large scale security checks have the potential of delaying passengers and discouraging activity in dense population centers. In addition, bomb threats and hoaxes can also disrupt passenger traffic substantially and increase the climate of fear that discourages people from living and working in denser environments. SCAG should work with existing interagency law enforcement groups to coordinate sharing of information and best practices among local jurisdictions. Design of transit facilities should incorporate modern design features that enhance security without creating a prison-like environment. (MM-TR6 to MM-TR12).

I support SCAG’s support for congestion pricing but this statement should emanate from the Regional Council and not from the staff level. There should be regional consensus on value pricing as a means not necessarily only to raise revenue, but to improve efficiencies in transportation (MM-TR15). In addition, SCAG should work with its member transportation commissions to develop a regional smart card transit system, similar to ORCA in Seattle or Clipper in the San Francisco Bay Area. Currently LACMTA is implementing their Transit Access Pass (TAP) system, and although there are bugs the system is supposed to be deployed to all of the large transit

operators in the County within the next five years. This system, or a compatible system, should be expanded throughout the SCAG region. (MM-TR16).

Overall, SCAG should emphasize the improvements of this plan over doing nothing (“no project alternative”), while working with elected leaders and its Regional Council to inform residents of the benefits and costs of this RTP.

Sincerely,

Hank Fung, P.E.

████████████████████

[Covina, CA](#) ██████████

Hank

February 13, 2012

To Whom it May Concern:

These signatures represent just some of the children in the Oxnard Elementary School District; actually, they are from just one school. They were gathered by these same children during their recess time. For me they have a significance beyond the number 100 plus because the children responded from their heart for the fifth grader who was killed two years ago at a crosswalk near the school.

Tragically, it would have been such a simple matter to have allocated more funds to have had a crossing guard on duty at an earlier time or to have had an illuminated and sounding crosswalk by their school. To now try to pay tribute to this young girl's passing by creating safer crosswalks and bike lanes, at or near school crossings, would be the most fitting act to remember her by, an act to prevent further tragedies like this from occurring.

Thank you,

Jon Portera, MA  
Oxnard Elementary School District

Southern California Association of Governments  
Attention: Margaret Lin  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: draft SCAG 2012-2035 regional transportation plan/ SCS and PEIR

**The SCAG PEIR / RTP is flawed in the same way as the SANDAG RTP / EIR – they are inadequate under CEQA law.**

The joining motion filed by the Attorney General of the State of California in the lawsuit against the San Diego Association of Governments (SANDAG) Regional Transportation Plan states that the Environmental Impact Report (EIR) prepared for the plan does not adequately analyze or prevent air pollution and climate concerns, and prioritizes expanding freeways while delaying public transit projects.

The SCAG is similarly flawed and will not stand up to CEQA challenge.

**I oppose all items in the draft RTP that recommend the expansion or extension of highways, for the following reasons:**

The fundamental law of highway congestion (Anthony Downs, 1962, 2004, 1992; and confirmed most recently by Gilles Duranton and Matthew Turner of the University of Toronto ) states that the travel speed of an expanded highway reverts to its previous level before the capacity expansion and that the extension of interstate highways is met with a proportional increase in traffic in the U.S.

SCAG's assumption that highway expansion reduces congestion and improves pollution levels is grossly inaccurate. The traffic modeling fails to fully account for generated and induced traffic. And therefore exaggerates the benefits of expansion and the does not reflect the severity of future congestion problems.

The draft RTP anticipates adding 948 centerline miles and 7419 lanes miles which would be a 4.4% and 11.1% increase respectively.

The SCAG RTP will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks throughout the Southern California region.

**I oppose the 710 gap closure project as it is un-defined and is not eligible to be on the Constrained Plan.**

The proposed SR-710 Extension Toll Tunnels, at \$5.6 BILLION already underfunded by at least 50%, must be moved from the Constrained Plan to the Strategic Unfunded Plan in the 2012 RTP because there are no committed, available, or reasonably available funds as required by federal law for inclusion in the Constrained Plan.

There is enormous internal inconsistency with the SCAG's six possible construction zones yet all actual estimates based only the previously defined Meridian Route alignment.

**I oppose plan items in the draft RTP that recommend increased conventional roadway and rail yard capacity for goods movement. The RTP should instead include existing zero-emission goods movement alternatives.**

Goods movement must be accomplished via electrified freight rail not trucks.

Goods movement proposals in the draft RTP are inconsistent with regional, state, and federal air quality and congestion targets stated in the plan.

The plan states that to attain federal ozone standards, the region will need broad deployment of zero and near-zero emission transportation technologies in the 2023 to 2035 timeframe (p.74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor air quality (p. 68) and negative impacts in neighboring communities and throughout the region.

However, the plan allocates billions of dollars to expanding conventional goods movement, saying “truck-only freight corridors are effective as they add capacity in congested corridors, improve truck operations and safety.and provide a platform for the introduction and adoption of zero-emission technologies.”

Yet the plan does not require zero-emission technology.

Regards,

Judy Bergstresser

South Pasadena, CA

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, February 05, 2012 9:28 AM  
**To:** 2012 PEIR; [REDACTED]; Villaraigosa, Antonio;  
citycouncil@montereypark.ca.gov; Councilmember.Alarcon@lacity.org; [REDACTED]  
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yaroslavsky@bos.lacounty.gov; [REDACTED]; senator.boxer@sen.us.gov;  
senator.feinstein@sen.us.gov; [REDACTED]  
**Subject:** 2012 PEIR SCAG COMMENTS; Re: SR 710 TUNNEL

Peter A. Orona

[REDACTED]  
Los Angeles, CA [REDACTED]  
February 5, 2012

SCAG/2012 PEIR/SR 710 TUNNEL/EIR QUESTIONS/COMMENTS/CONCERNS  
ATTN: JACOB LIEB  
818 W. 7TH STREET, 12TH FLOOR  
LOS ANGELES, CA 90017

The proposed 710 Tunnel raises serious moral questions about public/private transportation issues. We did not choose to live near a freeway, connector road, or tunnel. Currently, productive residents living within the Meridian Corridor do so without any complex technologies adding to our health risks. For children, it brings an increased risk of asthma, according to researchers at the Keck School of Medicine of the University of Southern California. "It's one of a host of breathing problems that can plague teens living and learning near L.A.'s vast network of freeways – and these problems can follow them throughout life. With traffic criss-crossing into every corner of SoCal, few families in any part of town are immune to the risk (LA Parent March 15, 2011 Issue) <http://www.reportingonhealth.org/fellowships/projects/air-teenage-lungs-1>." Freeway pollution and noise increase the risk of developing asthma, cancer, hearing loss, and stress related diseases. Those of us who live in this neighborhood can only look forward to a future filled with illness.

Today there is no 710 Surface Freeway Route, Valley Blvd.-Alhambra Connector Road, or 710 Tunnel; consequently, the risk emanating from such concepts are zero. To all Federal, State, County, and Local governments who profess accountability when maintaining modern commercial productivity, it is your duty to find a balance between an individual's right to exist, and urbanization. Anything short of this is a

travesty to the democratic process, and an abatement of our humanity. As elected officials, it is your responsibility in making sure that our communities are not abused. Our communities are holding you accountable. As honorable civil servants of our communities, we respectfully request the following items be addressed rigorously, competently, and judiciously.

1. What would it take to construct the southern portal between the 60 Frwy (Pomona), and the 10 Frwy (San Bernardino)? Can Freeway Interchanges be reconfigured? If yes, then would it be possible for the southern portal to begin just before the 10 Frwy. Can a tunnel be constructed to go underneath the San Bernardino Frwy?
2. In regards to Electrostatic precipitators (ESP), or Electrostatic air cleaners: What data is there on the effectiveness of ESP/Scrubbers on ambient outside air? Are there a list of contaminants that scrubbers will remove and a list that the scrubbers will not remove? Which companies will be contracted to build the ESP's? Japan uses removal technologies in high-density areas, what is going to be done in El Sereno? What kind of containment tunnel management will be used; "dispersion containment", or removal containment"? How many tons of waste will a "scrubber tower" hold prior to maintenance? Can a "scrubber tower" implode? If a "scrubber tower" fails or is destroyed, is there a back-up system, or replacement procedure in place? Where is the waste from the scrubber pollution going? Can the same, or better "scrubber" technology utilized in nuclear submarines and spacecraft be applied to 710 Tunnel Scrubber Towers? How will 710 Tunnel Environmental Authorities continuously regulate/monitor the atmospheric conditions inside and outside the tunnel region? As scrubber technology improves, can scrubber towers be upgraded?
3. Provide information on studies done to measure simultaneously Particulate Matter contamination emanating at both portals (i.e., same weather/seasons/day/hour). How will the Air Quality Descriptor for PM 2.5 and PM10 be articulated in relation to the 710 Tunnel? Will PM 2.5 and PM 10 particles be eliminated in the process of being scrubbed? What contaminants will be left over and breathed by citizens? Where will the tunnel portals begin? Allen? Concord? Valley Blvd.? Del Mar? How will mitigation measures be addressed at the portal entrances, and tower sites when the technology to control pollution is not proven, or does not exist? How much toxins/noxious gases/CO2/PM2.5/PM10 particles will cars and trucks release inside the 710 Tunnel per hour? Please provide low and high estimates. Will authorities shut down the tunnel when too many hazardous PM2.5 and PM10 particles are detected on any given day? How much smog will the 710 Tunnel's portals, and scrubber towers contribute to the local existing pollution? For example, how will this new source of smog affect the smog inversions that the communities of La Canada/Flintridge/Tujunga experience? How many tons of air pollution will the proposed scrubbers capture? How often will the proposed scrubbers need to be cleaned? Provide low and high estimates.
4. How would authorities mitigate the noise pollution during the construction of the 710 Tunnel? How will you recapture, and recycle water from any tunnel excavation

encounters? Will authorities monitor noise levels, and pollution levels during construction? If levels exceed allowed limits, or the community's concern will they halt work for the day?

5. How will the Valley Blvd.-Alhambra Ave. Connector Road (part of the Low-Multi-Build Alternatives) benefit El Sereno? Compare and contrast the efficiency and effectiveness between the Valley Blvd.-Alhambra Ave. Connector Road, a 710 Surface Freeway Route, and the 710 Tunnel. Provide all information on any and all environmental studies, or reports that have been done and completed near, and around the proposed 710 Tunnel. Indicate what efforts have been made to provide this information to the community of El Sereno. Provide any tangent plans that are being considered in conjunction to the 710 Tunnel in order to mitigate LA County traffic problems. For example, will a commuter train station be constructed in El Sereno between Alhambra Ave., and Valley Blvd.?

6. What formulas/strategies are being used to measure risk acceptability in relation to the 710 Tunnel? Provide all information on how safety, and risk assessments of the proposed 710 Tunnel figure into human and environmental degradation within the affected local communities? How many additional lives will be lost prematurely due to the 710 Tunnel pollution and traffic accidents? What are all the cost-benefit ratios? Is the risk of implementing the 710 Tunnel not greater than the level of pollution output currently used in modes of transportation?

7. Provide a number estimate of traffic that will move from the beginning southern part of the proposed 710 Tunnel to the exit in Pasadena. The number should include projected number of cars, commercial trucks, and other vehicles. Will truck traffic in the tunnel be limited? What will be the vehicle capacity for the 710 Tunnel? How many cars would be able to fit within the 710 Tunnel during bumper-to-bumper traffic? Approximately, how many trucks will fit inside the 710 Tunnel? What kind of hazardous materials will be allowed to travel through the 710 Tunnel? For example, will commercial trucks be allowed to carry tankers with acids and flammable liquids through the 710 Tunnel?

8. Describe the potential biohazards that both tunnel construction, and usage bring. How is the construction company going to prevent Valley Fever from affecting people when digging, and clearing soil debris? Will there be limited hours of construction? What are the current local industry's hazardous emissions around the proposed 710 Tunnel? How can these materials interact with the new air pollution that the 710 Tunnel will bring? How will they mitigate truck pollution during construction? For example, will pavements be used during tunnel construction to prevent excess dust? Where will all the trucks for hauling out debris be parked? How many trucks will be used to haul away dirt? Where will the excavated dirt be dumped? Again, can the dirt contain Valley Fever materials? Will the train system be used to haul out construction debris? How do authorities intend to mitigate, or address the noise problem caused by the train during the day, and night?

9. How will the 710 Tunnel benefit the community of El Sereno? How many scrubber towers will be located in El Sereno, and what will be their locations? How many

Construction staging areas will be located in El Sereno, and what are the locations of the staging areas?

10. How will a fire inside the 710 Tunnel be mitigated? Where there is fire there is smoke. How will untested scrubber towers filter all the hazardous smoke from inside a 710 Tunnel fire? Will the toxic smoke be allowed to escape through the scrubber towers, vents, emergency exits, and portals? Should fire-fighting foam be used to combat fire inside the tunnel? Can powerful fans be used to redirect the smoke above ground? Will there be double jeopardy during a fire? What kind of endangerment will inhabitants above ground face during a catastrophic fire within the 710 Tunnel? Will there be a sprinkler system installed inside the 710 Tunnel in order to mitigate fires?

11. Will homeowners who live directly over/adjacent to the 710 Tunnel have to relinquish their mineral rights?

12. Can Caltrans buy/build two tunnel boring machines? Having the boring machines simultaneously working at both ends could cut tunnel construction time in half. Why can't the boring machines be designed, and built by Americans within the United States?

13. After tunnel construction and cost, how many years will it take to break even? When will Los Angeles County start making its profits?

14. Will authorities compensate the community, and individuals for any illnesses related to PM2.5 and PM10 particles that would have originated from the 710 Tunnel site? Will they be given health insurance, or monetary benefits?

15. Will MTA provide medical experts to begin a comprehensive health study around the local communities that will be affected by the 710 Tunnel? Will an unbiased environmental overseer be hired to protect, and monitor the community's health and safety concerns during, and after construction?

16. What kind of security will merit monitoring the entire 710 Tunnel facilities? How will terrorist concerns be addressed? What will be done to safeguard the occupants in, and around the 710 Tunnel?

17. How much green space will be needed to offset the pollution that will be generated by the 710 Tunnel? How many fully mature trees will be needed to absorb vehicle exhaust emanating from both the portals, and scrubber towers?

18. How much will a toll road system cost to implement, and maintain?

19. Are current modes of production changing to prevent the harmful effects of pollution? Provide information that the Market Place will create alternative-affordable modes of transportation, and fuels by the time the 710 Tunnel is completed? For example, when will Fuel Cell Vehicles (FCV's) be readily available on a mass transit scale?

20. Will the 710 Tunnel engineers learn from all the errors that previous tunnel mishaps demonstrate? For example, people living around tunnel portals in Australia are suffering, and dying. The Big Dig in Boston is a fiasco. Will an independent panel of environmental experts review the 710 Tunnel EIR? Will a contact telephone number for all agencies, and government officials be provided to voice concerns and complaints during construction?

21. Logistically, would it be possible to evenly spread the amount of freight tonnage along the Pacific Rim harbors (San Diego, Long Beach, San Pedro, San Francisco, and Seattle). What would it take to ensure that a more efficient and effective On Time Delivery System be implemented? Would an upgraded of our national railway system help prevent unnecessary truck traffic through the counties of LA/Riverside/Ventura/San Bernardino/San Luis Obispo, etc.? For example, can the coordination of freight goods that make their way towards the Midwest, or Northwest be dropped off at any of the northern bays rather than being distributed from the ports of Los Angeles or Long Beach?

22. Are the 710 Tunnel scrubber towers, and emergency exits going to be equidistant from each other? Indicate tower and exit locations. Can tower and exit locations be situated where there are no existing domiciles? If a scrubber tower is warranted in a residential neighborhood, can a four-block radius of green space circumscribe the scrubber tower?

23. How many people concerned about the 710 Tunnel have read **ADVICE & PLANNING** by Martin H. Krieger?

Comments on the SCAG 2012 PEIR  
Phillip Jon Brown, Architect

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Subject; draft RTP/CSC Comments

February 14, 2012

These comments are on the draft 2012-2035 RTP/SCS and will use the basic sequence of the SCAG interactive comment issues, but after an introductory statement regarding the Flow Boulevard concept is made.

**Overall Comment**

Rather than overly focused, commuter driven centralizing of trips via expensive rail more planning and building should be made to provide for increased population density and job creation to reduce travel and commuting with shorter trips; think “Centers Concept” in sub-regional aggregations. In that manner extensive low cost medium capacity transportation and land use in patterns and corridors will provide a much more Southern California like growth and compatibility with what exists.

The specific overall comment to be made is that SCAG needs to include the Flow Boulevard concept in its planning vision formation, criteria and plan recommendations for the Regional Transportation Plan. It may be better said that SCAG being the lead agency should see that County agencies like the Los Angeles County Metropolitan Transportation Authority be directed to enlarge its forms of transportation improvement to include well crafted land use and transportation improvement forms such as the Flow Boulevard technique.

A Flow Boulevard is a combined transportation and land use improvement technique which has a semi-limited access configuration and includes what are known as Intelligent Transportation System (ITS) technologies. In that it combines strategies for land use development a Flow Boulevard (FB) can also be included in the Smart Growth category. The combined planning elements then can become a smart growth transportation corridor or if used in already dense urban areas, a way to “fix what is broken” regarding congestion or desperate land use conditions.

The transportation capacity and the land use density range can be said to be “medium” on both counts. The first stage FB transportation capacity is in the 150,000 person trip range per day and the land use would generally be a mix of R-2, and R-3 residential, as well as C-1 and C-2 commercial densities in the corridor.

The Flow Boulevard corridors evolve from selected existing urban street right of ways (ROW) without widening. The use of ITS strategies brings about the increased capacity over existing street usage. The corridors can be thought of as in-fill structures that follow the SB 375 mandate to improve and combine land use densities and transit while reducing vehicular miles traveled (VMT) in the consolidating communities and cities in Southern California. The corridors are so selected to as well “protect” existing residential communities from excessive traffic. There is a website dedicated to the development of the transportation and land use concepts at [www.FlowBoulevardPlan.com](http://www.FlowBoulevardPlan.com). In the comments below specific examples will be referred to using URL links as best as can be arranged or named call outs.

## **A Brief Definition of Flow Boulevards**

A Flow Boulevard (FB) is based upon the utilization of a pair of one-way streets separated by a city block or several and includes synchronized traffic signals to allow vehicles to flow with the objective of not stopping to create higher capacities and higher average travel speeds along the corridor in both directions. Flow Boulevards are not to be utilized in “downtown like grid patterns” but are to be used in “corridor” configurations which typically will have lower density adjacent development. The highly accessible blocks between the one-way paired streets, as well as land use directly adjacent out side of the paired streets are intended to be developed with higher density land uses than that are typically found in Southern California “sprawl development”. The Flow Boulevard form can be a “growth corridor” accepting higher density while providing increased transportation capacity.

Local streets perpendicular to the FB are not allowed to cross each of the one-way streets but local traffic is made to turn into the one-way flow or if FB traffic is exiting into the adjacent local street, it is made with a right turn. The streets between the one-way pair and connecting them are typically made to be one-way streets so that reversal of direction can be made or to go around the block and continue in the original direction. For more explicit operation diagrams and further discussion on the website at [www.flowboulevardplan.com](http://www.flowboulevardplan.com) click on the menu title “How the Boulevard Works”.

Regarding the first stage FB where pedestrian and vehicular cross traffic occurs at the same grade as the FB; the variables of signal spacing, vehicular arterial street crossing demand, speed of travel (typically 40 mph) and the length of signal cycle time is dealt with to optimize green time for the FB “pack” of flowing vehicles. A reasonable objective is to obtain 1200 vehicles/lane/hour that will give accommodating cross traffic and pedestrian crossing time intervals at approximate 2000 foot intervals (1/3 mile). Each FB direction is timed separately to guarantee capacity and flow. In a 4 lane FB, in each direction, where the fourth lane is a Rapid Bus Transit lane combined with HOV use, the daily capacity for the corridor can be approximately 150,000 person trips per day.

Briefly, the 2<sup>nd</sup> stage of the FB is involved with developing grade separated circulation for pedestrians to bring increased green time for lengthening “the pack” that flows therefore the hourly per lane and daily capacity of the FB. Similar coordination of grade separation for cross vehicular traffic will be necessary for the maintaining of the FB green signal time

intervals. The third stage of the FB is when there is complete elevated pedestrian circulation and open space provided by adjacent land use development and there is complete grade separation for major arterial vehicular cross traffic in that segment of the FB. It should be noted that there would be different stage FB development along the corridor going from the no FB condition all the way through 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> stage segments.

The time increment of evolution is basically “from here on out”. For Los Angeles in fifty years there is potential for a forty percent increase in population or more and certainly much more than that in corridor developments. Flow Boulevard corridors are three dimensionally organized dense environments that can happen and probably must happen to allow Los Angeles to solve its traffic problems and preserve its character and lifestyle. Selected areas of land use density allows construction of grade separated vehicular crossings to be made as well as elevated pedestrian and bikeway circulation to cross the FB providing continuity of urban fabric across the FB corridor. It is anticipated that a relative few number of these corridors are needed to solve the problems that have developed in Los Angeles. Since they grow out of the existing street network they respond to need and can evolve in density and capacity to it.

The capacity of the 3<sup>rd</sup> stage FB with continuous flow traffic is in the 2400 vehicle lane/hour range giving 280,000 person trips/ day for the total eight lanes with conventional spacing between vehicles and would not be expected to evolve to that capacity for maybe 60 years or more. Computerized controlled spacing of one or two lanes in each direction opens a whole expanded realm of additional capacity is even further off. That the FB becomes a guideway in segments accepting evolved technologies as time goes on is important and a relevant transportation and land use element able to work “from here on out”.

### **Example Applications of Flow Boulevards**

Adding capacity to corridors “to fix what is broken”: In this actual proposed application, a FB is to be added as a frontage road to the 405 corridor on the Los Angeles Westside to eliminate congestion to make that segment of the 405 work without failing, along with its interchange with the I-10 which can make it work without failing and the net result of making these corridors have adequate capacity for the commuter to West LA is to be able to take enough traffic out of the West LA arterial grid so as to eliminate the current traffic gridlock. See Exhibit A at the end of this comment text for more description.

Add transportation capacity and land use development to mend two communities and their common edges: In this instance there are two differing communities where there has been traditionally a major travel corridor between them that now has broken down due to a travel demand overload into congested traffic. This puts additional travel in the form as “cut through traffic” into the community to the north (Hollywood) which has become gridlocked exceeding the ATSC usage limits. Both communities (north and south) of the major travel corridor are becoming blighted due to traffic invasion and a mix of dissimilar land uses that resist compatible interactions. The FB application would provide the needed increased capacity to restore the traditional major travel corridor of through traffic so that “over flow” traffic does not invade either adjacent community. It would then be an urban design task to

employ land use development as a part of the FB development to provide appropriate north-south circulation and land uses to mend, bring attractions and compatibility between the two communities. A preliminary corridor is laid out on the FB website and can be reached by link [www.flowblvd.com/basinplan2.html](http://www.flowblvd.com/basinplan2.html) or by clicking on the menu title “LA Basin FB Loop and Transportation Corridor Study”, then when that comes up click on the Page 2 link (in blue) to get to the “Santa Monica Flow Boulevard Corridor” which is a preliminary study. Scroll down to the Hollywood segment.

Protect adjacent land use and entire communities from unnecessary traffic: The configuration of a LA Basin Loop is intended to reduce traffic invasion of the extensive single and multi family residential communities of the Basin as well as to provide a way to circulate within the Basin and to accept part of the multi-modal commuter travel to Basin employment centers. The configuration would provide the additional transportation modes as back-up to the subway and rail network being built in the Basin. The extensive central form of residential communities surrounded by work centers and geographic features is unique in world city form organizations. It would be a great loss to have traffic gridlock claim yet more square miles of Los Angeles. There is further discussion on this subject regarding the alternative locations of the Westside Subway Extension at two different websites 1/ [www.flowblvd.com/subwayextension.html](http://www.flowblvd.com/subwayextension.html) or by clicking the website menu on Subway Extension and 2/ at [www.flowblvd.com/basinstudy.html](http://www.flowblvd.com/basinstudy.html) or by clicking the website menu on Basin Loop/Corridor Study (it’s page one).

In this discussion is revealed that there is the traffic problem of attracting too many trips to an inadequate transportation infrastructure but there is the additional problem that the existing boulevard structure has “built-in” bottleneck configurations which cannot be dealt with unless the entire central residential community form is involved with congestion and “cut-through” traffic.

Use as the necessary multi-modal back-up component to a Subway Corridor: As part of the Westside Subway Extension study in the LA Basin area it became evident that the subway and the development around stations would attract a percentage of vehicular trips in the corridor. It might be a fairly high percentage of trips depending on the amount of regional trip attractions that would be built. There is a fair amount of discussion on the matter located at the link [www.flowblvd.com/subwayextension.html](http://www.flowblvd.com/subwayextension.html).

Sub Regional Consolidation Being Structured with Growth Corridors: Being that Flow Boulevards increase transportation capacity and provide advantageous land use relationships as density is developed, it is logical to structure additional growth in the low density existing settings of Southern California by the FB technique. The examples referred to in the before mentioned website are in the Los Angeles County sub region and within geographical subdivisions of it, essentially the San Fernando Valley, East LA areas, South Bay, and the LA Basin area. Whereas the LA Basin area needs transportation improvement to stabilize the relationships between transportation infrastructure and land use, it does not need growth in the Westside area particularly but it does need renewal growth in the eastern area towards downtown Los Angeles.

Outside of the Basin the low density areas of residential, commercial and industrial land use are a particular opportunity, if not necessity, for corridor growth development. Given the low density existing sprawl where the majority of trip mileage is generated and performed, growth corridors are necessary given by the recognition of energy security to reduce VMT, as well as the need to increase economic development productivity for both existing and the future increased population to sustain an acceptable standard of living. "Growth is necessary" to adapt the urban form. It is imperative that growth be directed to make the necessary improvement to functional and spatial relationships to bring about the efficiencies that will allow affordable, sustainable and desirable city environment.

While accepting greater population, VMT must be reduced by the proximity of needed land uses. The area where the greatest amount of VMT can be reduced while conforming to affordable, sustainable and desirable objectives is in the existing low density suburban areas. The average trip length in LA County is almost 16 miles long. The length must be reduced and a general transformation to non fossil fuel energy in small truck and automobiles needs to take place while increasing transit options as well. In transit the greatest cost benefit comes from bus usage. The cost of five miles of light rail construction (ROW, hardware and typical occasional grade separations) can pay for 100 miles of Flow Boulevard which is fully outfitted including hybrid articulated buses at generally 10 minute intervals ( local bus costs reducing time intervals further have not been included). In addition to the greater amount of transit coverage there are approximately 16 times the amount of patron transit miles developed (volume of users). On a typical FB paired street, whether two or three lanes of auto and truck flowing lanes are used, there would always be the BRT/HOV lane provided in each direction of the Flow Boulevard.

A preliminary allocation study at [www.flowboulevardplan.com/lafbnetwork.html](http://www.flowboulevardplan.com/lafbnetwork.html) has been made. It should be pointed out that since that study was made it is recognized that it is very likely that the flow boulevards seen in that plan would be discontinuous not really long connected corridors. That is because a problem solving FB would be in response to a specific location, town or city. Maybe in the future continuous connection may be built up however.

### **Use of the Interactive Comment Sequence**

Generally I will be commenting on these issues from the viewpoint that I understand from being familiar with the Los Angeles County and its MTA. I would think that the same kind of comments would apply elsewhere. I am trying to be more specific with examples and applications to actual places and peoples. I find little wrong with SCAG criteria but it strikes me as being abstract. I realize SCAG can't design for all six counties. But more specific examples of how multiple criteria and objectives are put together in plans, urban forms, transportation corridors and programs would be an improvement. So in my comments I will refer to both the policies, objectives and strategies that SCAG is developing but I will also respond with reference to the Flow Boulevard concept as it reflects and incorporates the criteria and objectives that SCAG seeks to make a part of plans for the RTP/SCS.

## **01 OUR VISION**

### **Towards a Sustainable Future**

Mobility, Economy, Sustainability; Realize the Vision

In LA County the MTA (Metro) has a major emphasis on expansion of the rail network. My general impression is that there is too much emphasis on rail to the fault of being unbalanced in multi modal considerations as it relates to comprehensive planning and sound economics. This emphasis brings about the speculative dimension of proceeding with a narrow view of what and how things should be. This brings in the dimension of risk and the realm of making very large misallocations of resources.

It's not that their proposed system is too big, it is that it is too expensive to be realized in a short amount of time and that over time there may be much needed revisions and additions such as Flow Boulevard networks to the plan. Metro rarely refers to serving population and land use patterns. And the talk of accelerated financing by borrowing from the future and of laying an even greater burden on the public is frightful. It is as though another "bubble" is in the talking stages of being made; a transportation bubble and how disastrous a thought!

On the Westside of LA, having a notorious level of congestion, the inclination is not so much to solve the communities' problem but to simply find a way to build rail transit and if there are major deficiencies with continued problems then there is no budget to actually solve the traffic problems. That appears to be the direction of their approach overall.

The SCAG objectives of Mobility, Economy and Sustainability falls through the cracks in the kind of planning the MTA and the City of LA is performing. This problem is showing up in countywide instances as well as in City Community Plans. Mobility is not being achieved in City Community Plans, and congestion persists countywide. Much of the MTA response to the event of recession is essentially that of trying to re-inflate past trends that were heavily dependent on speculative real estate ventures. That is not an approach to obtain sustainability with. Growth based on assemblage of businesses that provide jobs and sustained productivity will produce better results.

There is some room for "recovery" by supporting real business with access and the solving of problems of congestion. The larger question however is how we obtain new growth in our economy to provide future employment for the young and replace jobs that have fallen away with past trends. This area of planning should be of great importance in securing the economic future that is needed in Southern California and I think extensive Flow Boulevard "growth corridor development" can provide the necessary structure and place to make it happen. This kind of growth related to transportation improvement seems to be absolutely missing in Metro's planning elements.

## **The Setting**

### Economic Recession, Population Growth

Fixing real transportation problems while developing a new and expanding economy is needed. As stated in the above section dealing with Sub Regional Consolidation, the suburbs are where the majority of the additional 2 million people in LA County will be located over the next twenty five years. Extensive low cost transportation improvement and low cost land use development that is able to bring opportunities for starting new businesses are the kinds of policies and programs that should be identified and made apart of the denser consolidation that is to occur within existing communities and work centers. Flow Boulevards as growth corridors would be instrumental in bringing that about.

In addition to using a transportation form that targets reduction of VMT it is necessary to bringing about programs and policies that promote the attraction of businesses that will help form a new relevant economy. A concerted effort to attract new businesses and manufacturers from other counties, states and countries by providing the attraction of affordable start-up, connectivity, idea environ, affordable housing, technical support, access to needed materials and generally friendly government should be a part of growth corridors. These programs should be coordinated city wide if not countywide.

In LA County the radial patterned commuter rail plan that is focused on the LA Basin and is so expensive to develop will carry only an approximate 2 and 1/2% of the travel miles made in LA County on the rail system. That leaves a remainder of 16% in vehicular commuter modes to the LA Basin. I'm speaking about the percentage of total travel miles in LA County. That leaves more than 90% of travel (including the 16%) in vehicular modes mainly circulating in suburban locations. This 90% of travel is the area to target for reduction of VMT by making those areas more self sufficient in land uses that allow shorter trips. This responds to the fact that LA needs growth to adapt to an urban form that supports energy security by reducing energy usage. This also secures economic stability and growth through low cost transportation development in areas that can and desire to receive development in low land cost areas.

### Safety, Multi-Modal System

The Flow Boulevard system separates vehicles from pedestrian and bikeway circulation over time. This allows safe and aesthetic crossing of the FB corridors as well as the direct connection to the high density land use areas and open space centered in the FB corridors. While each corridor would have different characters given their density and location, example images of such integrated environments in model form can be seen on the FB website. By clicking the menu on "Elements and Travel Demand" photo images of a model environment are presented. There are two portions of images showing development of such environments separated by a potion of the study dealing with travel dement. Just keep scrolling from one end to the other. The link is [www.flowblvd.com/elements.html](http://www.flowblvd.com/elements.html).

## Transportation System Management

Flow Boulevard characteristics of TSM and ITS are pretty well expressed in the FB descriptions above. What has not been stated is how the “medium capacity” FB system can relieve the freeway network of much of the local and medium length travel that crowds our present freeways. This would allow freeways to specialize more into long trip facilities and thereby extend their life and performance as a system that will not see many more miles added to it in the LA County area.

## **Challenges and Opportunities**

### Transportation Finance, System Preservation, Goods Movement

The Flow Boulevard system looks to increase the tax and service fee base to produce more revenues. The FB system is a “money maker” not a facility that needs subsidies such as rail transit. Built up corridors throw off revenues way in excess of their cost and maintenance. In about 20 years a typical mile of FB would likely throw off \$150,000 million in discretionary monies that can be used elsewhere. With 100 miles of FB that is \$15 billion annually to put elsewhere. For more discussion on this subject click on the link of [www.flowblvd.com/basinstudy.html](http://www.flowblvd.com/basinstudy.html), that's page one. Scroll down until a City of LA Chart in green named “Where the Money Comes From” appears. After the charts begin reading the discussion titled “Flow Boulevards Pay Their Own Way”.

System preservation occurs by using the existing street system and settlement pattern to the advantage of integral growth, land use up dating and transportation improvement. And of course people and goods movement is provided with the FB system. Remember as well the points made above where the FB can help protect (preserve) communities and the aspect of extending the life of the freeway system. That is being done by the FB system taking on the burden of local and medium length trips. And finally this shows how the FB transportation system helps preserve the entire system by the use of the excess revenue being “thrown off” by the money maker Flow Boulevards.

### Integrated Land Use and Transportation

The Flow Boulevard concept could be the “poster image” of representing the mandate of SB 375 integration of land use and transportation. Over time, with programs that help transform vehicular movement to electric (or non fossil-fuel) power integrally, comfortably and economically; then that is the objective is it not?

### Air Quality, Energy, Adaptation

From what I know, natural gas will afford a step in the right direction for air quality over coal and oil; coal in producing electricity and oil in propelling vehicles. Unconventional natural gas resources seem to be cheap and abundant, with low NOX emissions and can be counted upon 24/7. With shorter trips, less energy used in vehicles, greater public transit use in extensive BRT networks, use of walking environments with “proximity” and a transformation to electricity instead of gasoline all seem to add up well in the kind of land use and transportation patterns provided by Flow Boulevards.

Adaptation must be made affordable by an economy that has the resources available to be applied to the cost of that adaptation. I can't see where large expensive rail networks that are supposedly justified by the need to commute large distances should be embraced with so much enthusiasm. There should be ways to communicate and produce more without so much commuting. More money will be needed for adaptation, which the growth corridors provided by the Flow Boulevard concept make available and in turn “throw off” revenues. Better conserving architecture fits in this model as well.

## **Plan Overview**

Detroit Michigan lost half its population between 1980 and 2002 because the car companies could not compete with other manufacturers in the world market. Will Southern California lose half its population due to excessive population dispersal, over use of natural resources, of not developing a more efficient urban form, of making expensive transportation systems, not transferring to less expensive and cleaner energy and having an over reliance on commuting?

## **TRANSPORTATION INVESTMENTS**

I have used the first chapter of “Vision”, to focus comments on the respective issues in a kind of combined conceptual way. By this I mean that considerations of Investments, Funding and Future Land Patterns are combined with the Vision issue response. As an architect I tend to think using an integrated concept rather than what seems to me as overly abstracted when broken down so much. I will however generally respond to issues posed in these subsequent chapters with general overview comments referring to some of the issues.

Getting the Most Out of Our System: The major point is to maintain the basic existing street and land use system while evolving segments so as to improve the relationships and achieve new levels of population growth (in some areas) and transportation capacity within corridors. By the use of the right mix of land uses, more sustainable neighborhoods and communities are obtained by way of those proximities, shorter vehicular trips and to divert trips from SOV by the inclusion of transit. In this setting the SOV use can in effect “shrink”.

As pointed out in the “Vision” comments, congestion should not be allowed to develop as it has in the LA Basin. Those bottlenecks and inefficiencies are not a strategy to make a better

city with. It is a failure and in due course will be corrected; possibly with some help by SCAG as well as others.

By using the existing street system to greater advantage there is less need for expensive long distance rail trip development. In the Measure R list of projects there are basically no TSM and ITS projects to take care of the mounting congestion in the LA Basin. And the City of Los Angeles DOT does not seem to be able to cope with the condition either. I am very concerned that with the impacts being made on the function and standard of living in Los Angeles communities. Appropriate policies and transportation improvement must be employed to eliminate congestion.

Transit Policies: By expanding the BRT network it is appropriate to lessen time and trip length that is commensurate with making communities self sufficient and reduces VMT. This is the most effective way to increase transit use in LA County and the most direct way of going after and reducing the length of the 90% of SOV trips. Point to point BRT trips would basically be at 40mph speeds for really reducing bus travel times.

Active Transportation: Pedestrian circulation, bikeways and open space are an integral part of Flow Boulevard development. By developing its circulation separately from the street its development becomes the condition to which greater capacity is obtained from the roadway itself. This is a unique relationship where building pedestrian elevated circulation and open space creates increased vehicular capacity in Flow Boulevards.

The term “complete streets” tends to imply that most all arterial streets should accommodate all modes of travel. This of course would make major conflicts on many streets. The better view is to accommodate all modes of travel within a community plan that respects the character, purpose and safety of each mode and give it the necessary spaces, routes and function that allows that mode to perform its given task. On the FB website at [www.flowblvd.com/elements.html](http://www.flowblvd.com/elements.html) one can see highly developed environs with separate modal circulation systems interrelated.

### **03 FINANCIAL PLAN** Generalized Comments

Trimming project expenses and making more affordable budgets: There is still a great deal of underutilized capacity in most roadways. There should be more thought in utilizing the unused capacity because it is so less expensive to provide for the mobility of existing and future growth. It is also a way to up-date the mix of housing stock and community services, retail and work locations to respond to changes in demographics and the economy.

There is generally great risk in over designing a transportation plan that cannot be achieved without taking funds from other social costs that are more important. It would appear to me that the Metro ambitious and self serving rail plans have that budget busting, excessive social burden look to them. They seem narrowly conceived by not having comprehensive planning attached to them. And now there has been a realization that we have been living through an era of very fortunate economic circumstances for the last 40 years and that those

conditions have changed. Proceeding with caution, flexible plans and not getting over extended would be prudent if not absolutely necessary. And please refer to the above linked discussion regarding “Flow Boulevards Pay Their Own Way” in the” Challenges and Opportunities section for an alternative approach to providing growth and transportation improvement.

Primarily use “Pay-Go” (pay as you go): By using land use development in combination with transportation improvement in growth corridors, transportation improvement costs can be tied directly to the cost of the increased land use density developments. In this manner much of the transportation improvement pays for itself and then continues to do so out of property taxes and fees generating revenues for the governing jurisdiction. The generation of continuing excess revenues is a source for paying for additional infrastructure improvements and maintenance that towns and cities are faced with.

The large commuter rail system that Metro has planned and want to build at an accelerated pace also has that risky burdensome look to it. After it would be built at an accelerated pace would it really be used? And then what happens to that under funded period to transportation improvement that follows the accelerated building period when debt is being paid off? That is when really difficult problems can arise and there is the lack of funding to deal with them.

It is also quite unbelievable that Southern California will attach themselves to a mobility form that requires so much transferring and great distances to be traversed to carry out normal daily living. With inexpensive electricity for electric vehicles and more compact communities with shorter trips to connect daily tasks, why would people submit to a hodgepodge of inconvenient disconnected trips? Southern California society should be given the chance to decide these issues; we need full disclosure that the fullness of time affords.

#### **04 SUSTAINABLE COMMUNITIES**

Sustainable Communities Strategy: Sustainable communities are necessary for Southern California to sustain itself, and growth is necessary to bring about adaptation of existing communities to become sustainable. One such approach refers to the case I have been building for the use of Flow Boulevards to bring about that adaptation of existing community urban form through land use growth and transportation improvement in corridors. The FB form also targets the majority of areas where trip generation is made and brings Intelligent Transportation System technologies to bear on the issues of SB 375 including that of GHG emissions. There is an incredible existing investment in the sprawl that persists throughout Southern California and this investment must be made to become efficient in terms of preservation, energy, job creation, productivity, lifestyle achievement, environmental and air quality. Whereas some might think it is becoming crowded, it really does not have to seem that way by moving up pedestrian circulation and places over the improving street transportation below with the use of architecture in order to enjoy the view and open space.

This is a natural and very affordable adaptation to low density existing development. Examples of this kind of organization can be seen in parts and whole already in Los Angeles. And by connecting the growth corridors to existing towns, work centers and cities it can reduce VMT by both proximity and improved energy utilization. The FB concept is also able to improve more densely built existing urban areas as found in the LA Basin. These opportunities may employ land use growth along with transportation improvement techniques or may use one or the other, land use or transportation improvement to solve an urban condition. As indicated below (Westside LA, Exhibit A), there are instances where the transportation improvement ability of FB can be used without land use growth to solve “out of control” congestion issues inexpensively. However the land use growth component can be a dynamic element in creating both walking “place” environments and with eliminating congestion in the urban context generally.

With the congestion that the City of Los Angeles and the County MTA has allowed to continue by not employing ITS strategies, it would seem that more pollution is now being made by inefficient vehicular movement than is being saved by rail transit usage. This is beyond the loss of “productivity time” and the loss of livability in impacted communities both residential and commercial.

## **Exhibit A;**

### **A Plan to Eliminate Westside Congestion**

The real prospect of eliminating congestion on the Westside is nearing a reality as existing approved projects (405/HOV lane and Expo line) and potential proposed projects are combined with them. The basic approach to eliminate the existing traffic congestion, since it primarily comes into the Westside from the north and south, is to add additional capacity to the 405 corridor and then as well to the I-10 corridor to connect to the City of Santa Monica. By that capacity improvement the Westside arterial network can be relieved of traffic and therefore the gridlock now experienced on both sides of these freeway corridors as well as the freeways themselves.

The weakest link in these corridors to be improved is the interchange connecting the 405 and the I-10. The freeway interchange traffic is constricted both in its flow-through capacity and turning movement capacity. From there the freeways are further constricted by merging movements on and off the freeways at the very high collection and distribution ramp movements affecting the freeways and adjacent arterial street flows.

The key to eliminating Westside congestion is by adding needed capacity in order to relieve the interchange, the freeways and the ramping operations by the addition of a one-way pair (three regular flowing lanes along with an exclusive BRT/HOV lane in each direction) Flow Boulevard (FB) as a frontage road to the 405 (proposed in a [study](http://www.flowblvd.com/index3.html) found at [www.flowblvd.com/index3.html](http://www.flowblvd.com/index3.html)). This improves the operations of the freeway and arterial network and is focused on balancing travel demand with infrastructure to essentially “fix what

is now broken". The intension is to limit the improvement to between the Sepulveda pass and Culver City and not to provide additional improved access to the Westside that might be a basis for yet more traffic attracting development that would put the Westside back into yet more congestion. At this time, the objective is to bring balance between existing land use attraction and Westside infrastructure and then maintain that balance through a strictly enforceable Community Plan.

Sepulveda Boulevard would provide the north flowing side of the FB. South of Pico, Sawtelle would provide the south flowing side of the FB. North of Pico, there are two alternative streets to provide southern flow between Wilshire and Pico. The Cotner Street alternative (east of the 405) as developed in the study and Beloit Avenue (west of the 405) the alternative simply mentioned in the study. As an up-date to the study, the Beloit alternative now has political pull since the VA potential subway station has been identified. The prior difficulty was to obtain right of way through the VA property. Now that there is desire to provide some kind of future connection to the east- west rail lines, which would include the VA subway station; political and economic "pull", could make the Beloit alternative the likely choice. North of Wilshire the FB would flow into the Metro "Sepulveda Pass" project, whatever that may work out to be. Note that the quick and low cost improvements being discusses here are more short term problem solving plans and do not involve the ambitious 10's of billions dollar price tags that Metro envisions for later projects.

Adding up the improved capacities in the 405 corridor would be 30,000 person trips (pt) with the new 405 HOV lane and with a Beloit FB connection (where no through connection exists between the Pico and Wilshire areas) it provides 80,000 pt of improvement at this area of the corridor. This would total an increased capacity of 110,000 person trips to be distributed to reduce congestion on the freeway, through the interchange, in the ramp use and out of the arterial network in the north-south direction. South of the interchange the increased capacity to the Sepulveda-Sawtelle pair would be about 38,000 pt/day due to BRT lanes and the synchronized vehicular flow in general. In the east-west direction the Expo Line would add approximately 35,000 pt, the I-10 improvements 60,000 pt and three sets of BRT (Wilshire, SMB and Olympic) giving an additional 20,000 pt totaling 115,000 pt of increased capacity to reduce congestion with.

The key to making the interchange work adequately is the reduced 405 through traffic volume and the potential to make direct connections from the freeways to the FB to reduce turning movement demand (such trips would be headed to or from the FB). This allows greater provision of freeway to freeway turning movement capacity by having two full lanes to turn with and not being merged into one lane going into and out of the turn ramps. This additional lane continuity allows about a doubling of turning movement capacity in the critical turns connecting the 405 and the I-10.

Operation of the FB requires priority signalization separate from the cross streets of the arterial grid. This priority is "earned" by the fact that the FB accommodates a higher volume of vehicles than an intersecting arterial would have, has the greater length of travel, presents the fact that the FB makes the freeway system work without failing, provides additional north-south to east-west turning opportunities between crossing arterials with the 405 and also takes travel

demand out of the arterial grid so it does not gridlock. While the north bound side of the FB needs to have synchronized signals, with for example one minute vehicle packs and one minute gaps between them (for cross traffic signal periods), likewise the south bound needs the same for continuous flow of the vehicle pack without stopping. The phasing of each side of the FB may be coincident at an intersection (both having green signal periods) or out of phase with each other in any amount that may be of some benefit to the crossing arterial. What cannot be allowed is the breaking of the flow of signal synchronization on either street of the FB pair. With a travel speed of approximately 40mph, this means that the automobile travel time between Wilshire and Culver is about 7 minutes on the FB and the BRT bus can take about 14 minutes using prepaid platform boarding and alighting techniques by staying at less than 1 minute at each arterial bus stop.

- Eliminating congestion is the first step in being able to remove ambiguity so as to stabilize the Westside and make Community Plans for improvements like livable boulevards and needed land uses that allows developers and residents to fully support.
- BRT bus transit works well with the Westside by having lines to and from the FB by connecting with the destinations of Westwood, Century City, Santa Monica, etcetera, without transfers; as well as connections to the future rail stations of the Expo Line, the LAX and the VA Station. And the BRT facilities can be up and running in just a few years.
- By stabilizing the land use and transportation balance, it would then be prudent to insist that City and County planning departments make comprehensive plans for the expected two million additional residents in the next 25 years. In other words, plan for additional development and population in other areas and not to allow excessive Westside development which yet again brings unbearable congestion.

December 4, 2011 by Phil Brown

email contact; [REDACTED]

**Stephanie Johnson**  
[REDACTED]  
**San Marino, California**  
[REDACTED]

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February 11, 2012

Ms. Margaret Lin  
SCAG  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017  
RTP@scag.ca.gov

**Re: Southern California Association of Governments  
2012-2035 Regional Transportation Plan/Sustainable Communities Strategy  
December 2011**

Thank you for the opportunity to comment on the *SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy*. The Plan states as its goal “improving the quality of life for our residents”.

*The 2012 RTP/SCS will transform the region, serving as a blueprint for **improving quality of life for our residents** by providing more choices for where they will live, work, and play, and how they will move around.*

*The 2012 RTP/SCS proposes investing over \$500 billion over the next 25 years to **improve the quality of life of the region’s residents** by enhancing our transportation system.*

While I agree that improving the quality of life for the residents is an admirable goal, the Plan as indicated by the SCS City maps, will denigrate the quality of life for the residents of San Marino. My comments regarding the 2012-2035 RTP are limited to where I live, Los Robles Avenue in San Marino, and the adjacent area.

While reviewing the Resources > SCS Map Tool from the SCAG web site, <http://rtpscs.scag.ca.gov/Pages/SCS-Maps-Tool.aspx>, I was shocked to discover that Los Robles Avenue in San Marino has been designated a **High Quality Transit Corridor**.

The SCAG RTP Plan indicates that:

*A HQTAs (High Quality Transit Area) is generally a walkable transit village, consistent with the adopted SCS that has a minimum density of 20 dwelling units per acre and is within a ½ mile of a well serviced transit stop, and includes transit corridors with minimum 15 minutes or less service frequency during peak commute hours.*

Los Robles Avenue in San Marino is a 7/8 of a mile, two lane narrow street fronted exclusively by single family homes where children live and play. The homes, built between 1920 and 1950, and the set back is close to the street. The posted speed limit is 30 mph., the posted weight limit is three tons, and truck traffic is prohibited. The City of San Marino General Plan, classifies Los Robles Avenue as a residential collector street. The street carries an unusually high volume of cut-through traffic, exceeding the capacity of a two lane residential street. There is no bus service.

How then, was Los Robles Avenue in San Marino designated a HQTAs? I posed this question to both the City of San Marino staff and City Council. They were unaware of this designation in the proposed RTP

SCAG – 2012-2035 Regional Transportation Plan – December 2011  
Johnson – February 11, 2012

Plan. I also made inquiries of SCAG staff and was told that the Map for San Marino was incorrect with regard to bus stops, because no bus route is planned for the street.

## **RE: Records Request - SCAG 2012 RTP project**

From: **Christopher Tzeng** (tzeng@scag.ca.gov)  
Sent: Thu 1/12/12 4:16 PM  
To: Stephanie Johnson [REDACTED]

Hi Ms. Johnson,

Per your inquiry, we have looked into planned bus routes along Los Robles in the City of San Marino for the 2012-2035 Regional Transportation Plan (RTP).

We checked our 2035 transit network that has been developed for the 2012-2035 RTP and there are not any proposed transit services on Los Robles Avenue in the City of San Marino in the 2035 constrained plan network. Therefore, the bus route should not appear in the SCS Maps Tool viewer you were utilizing. Thank you for bringing this to our attention.

The maps you are able to view on the Maps Tool use data from SCAG's Regional Transportation Demand Model. This is utilized to predict the impact of travel growth and evaluating potential transportation improvements for all cities within the SCAG region, which consists of 191 cities, six counties and more than 18 million residents. The Transportation Demand Model comprises a large number of data files in order to represent the many facets of the transportation environment.

Please let me know if you have any questions. Again, thanks for bringing this to our attention.

Regards,

Chris

## **RE: SCAG RTP2012 - plans for bus routes in San Marino and Pasadena**

From: **Abrishami, Lori** [REDACTED]  
Sent: Fri 9/02/11 3:58 PM  
To: 'Stephanie Johnson' [REDACTED]

Ms. Johnson,

I am sorry, but when I log in, I do not get the same map as you. Can you please tell me what a HQTC is? I believe that the SCAG definition of High Quality Transit Corridor, as well as some agreement in the transportation planning profession, means an area within ½ mile of transit service that runs every 15 minute or more often. If you are within ½ mile of Colorado Blvd, or the Lake Ave. Gold Line Station, then that is within an HQTC.

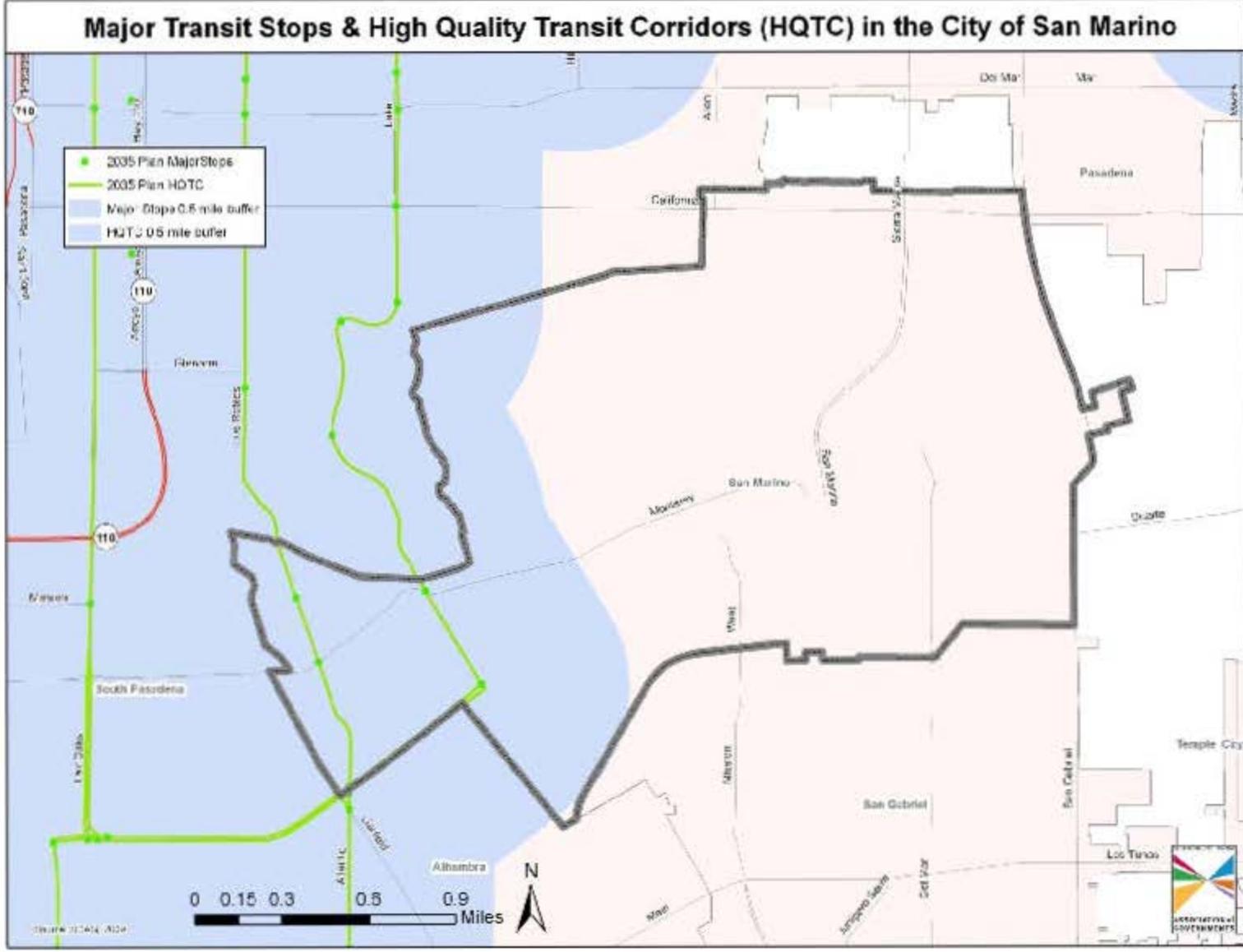
Since the online map on my screen is not showing the bus route detail that yours shows, please tell me the route number of the bus route shown on Los Robles. As you know, we do not have one, and the data that our modelers sent to SCAG modelers only has our current routes on it. So, the bus route is not ours. I would not want to request that it be removed, since it may be the City of Pasadena or other nearby municipal operator.

Lori Abrishami

Below are copies of the SCAG SCS Maps for San Marino, Alhambra, South Pasadena and Pasadena. It is not clear why certain streets have been designated HQTC and others have not.

### SCAG Map for San Marino – High Quality Transit Corridors (HQTC)

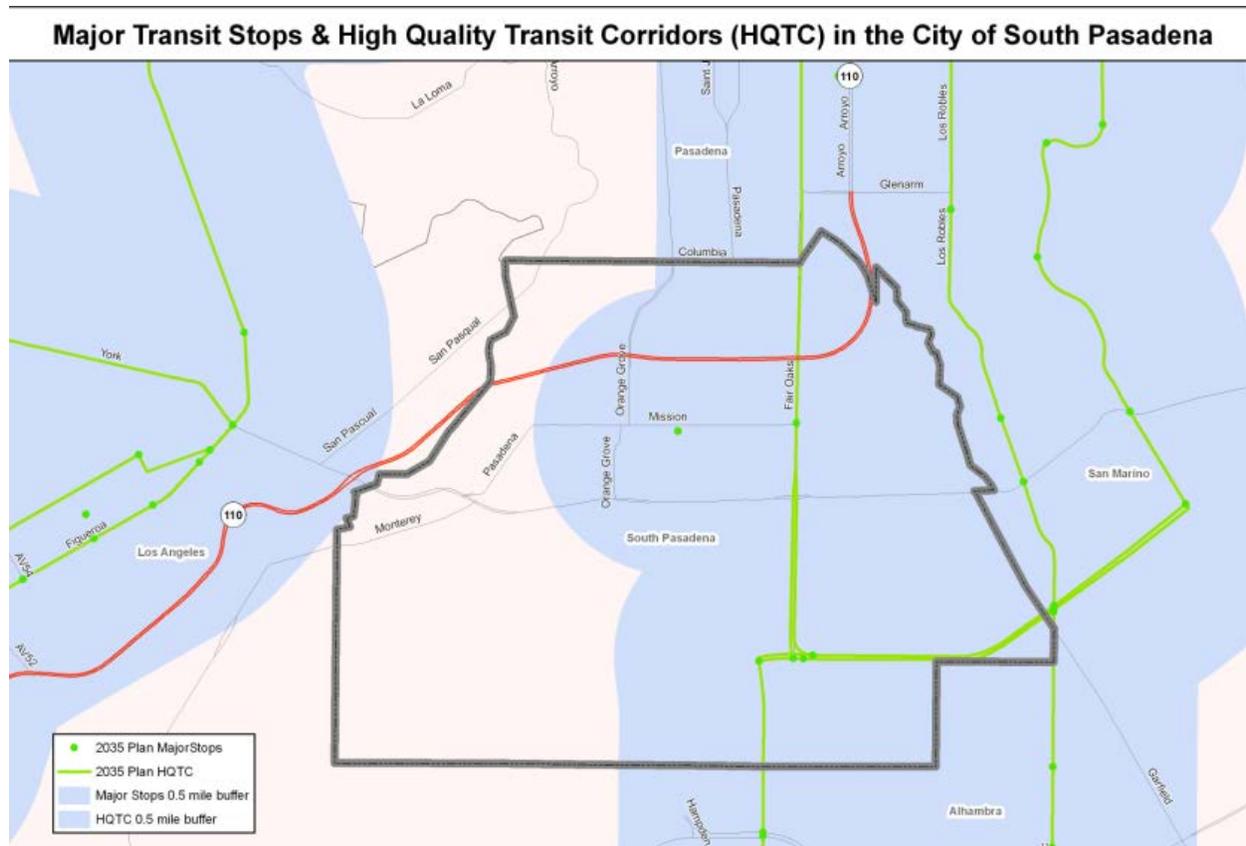
This map indicates that Los Robles is a HQTC with bus stops.



## South Pasadena

Note that although Fremont Avenue is designated a HQTC in Alhambra, it is not in South Pasadena, although the street merges into S. Pasadena Avenue that is the freeway entrance to the 210 and 134 freeways in Pasadena.

Garfield Avenue has a METRO bus route that extends through South Pasadena that stops at the Gold Line Mission Street station.



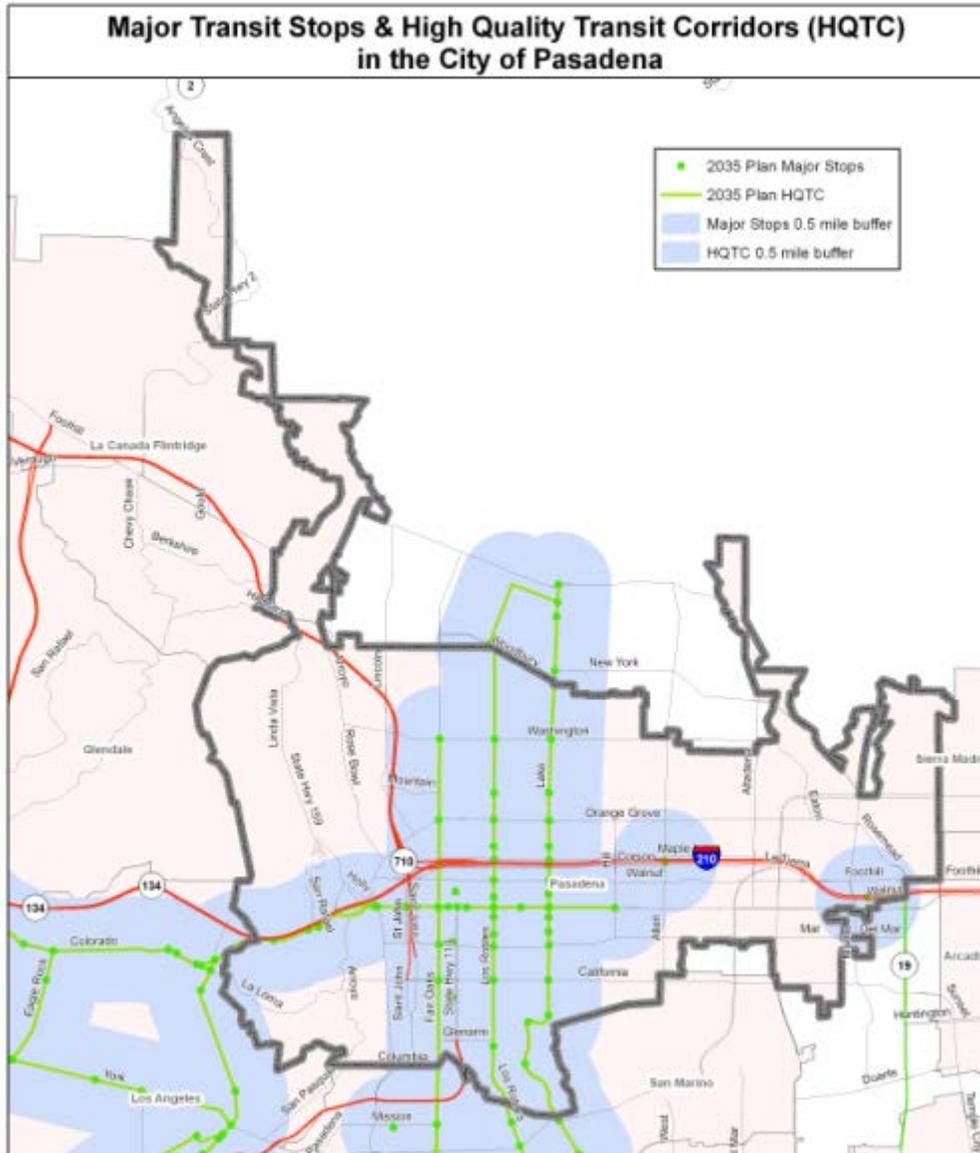
## Alhambra

Why is Garfield Avenue not designated a HQTC? It is a major arterial in Alhambra and has a bus routes that extends through South Pasadena that stops at the Gold Line Mission Street station.



## Pasadena

Note that both Los Robles Avenue and Oak Knoll Avenue in Pasadena, south of California Boulevard, are single family residential areas.

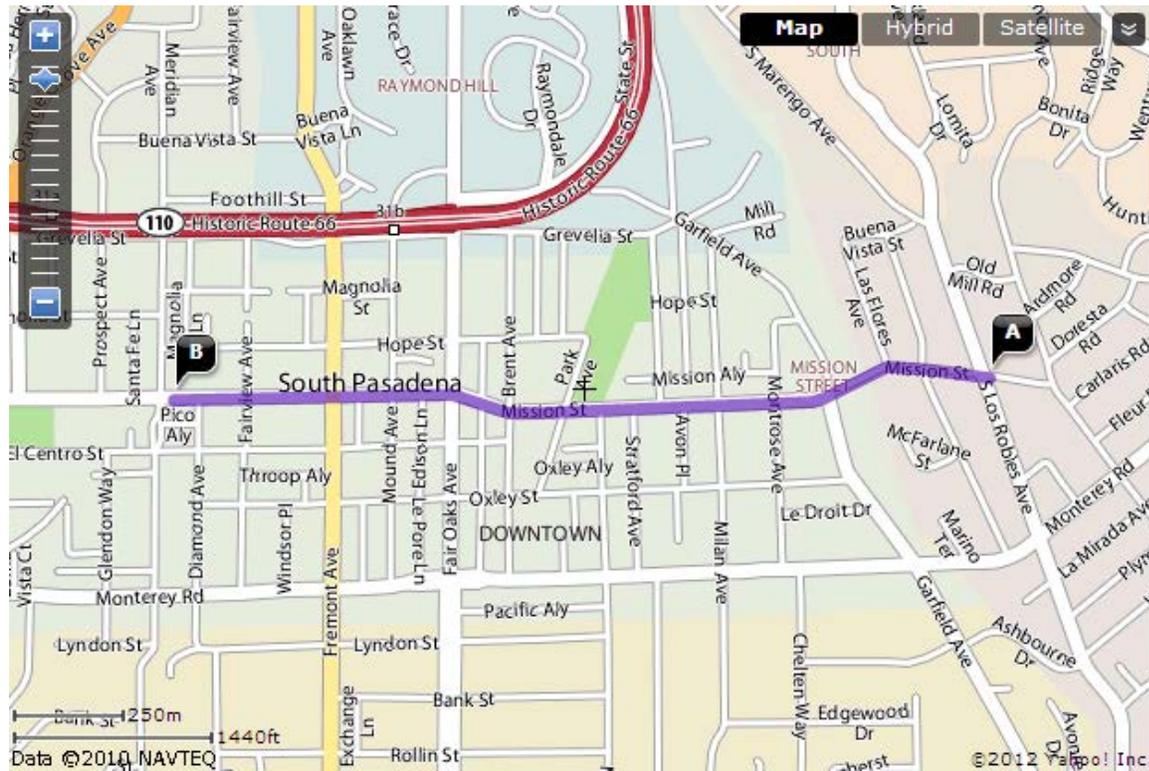


### Alhambra, South Pasadena, San Marino, Pasadena

Fremont marked in purple for reference purposes.



Los Robles Avenue, San Marino to Gold Line Station Mission Street, South Pasadena 1.1 miles



If regional planning is to be based upon the SCS maps, then further information regarding how the HQTTC attribute was assigned to streets must be made public. Los Robles Avenue in San Marino does not meet the definition of an HQTTC. Regional traffic should not be directed toward the street, exacerbating the existing cut through traffic and its resulting negative impacts upon the residents.

Sincerely,

Stephanie Johnson

Director  
Water Resources Institute  
California State University  
San Bernardino



[REDACTED]  
[REDACTED]  
San Bernardino, CA [REDACTED]

Date: February 14, 2012  
To: Southern California Association of Governments <http://www.scagrtp.net/>  
Re: Public Comment to SCAG Regional Transportation Plan

As a former SCAG Regional Council Member that served during the time I was a member of the San Bernardino City Council from 1998-2006, I had the opportunity to work closely with previous Regional Transportation Plan (RTP) implementation efforts. I continue to remain engaged as a private citizen in issues of importance to Southern California. Thank you for the opportunity to submit my public comment by email.

In the last RTP, there was a concept similar to the current GRID (Green Rail Intelligent Development) to which there was no progress during implementation. I am writing to express my desire that this Southern California alternative to Goods Movement be once again included in the current RTP.

The GRID alternative, which proposes the installation of 15-ft. water-tight pipelines housed in an unmanned electrified rail guide way, has a number of advantages for traversing goods from the Ports of Los Angeles and Long Beach to the inland regions of California.

- First, installation of an underground pipeline would employ installation that is identical to the installation of water pipelines that use only a “cut and cover” technique which environmentally presents much less adverse impacts.
- Furthermore, this project holds the potential of creating many jobs in Southern California during the manufacturing and construction of the system because materials proposed in GRID are already manufactured locally.
- Finally, I believe that including an alternative Goods Movement concept that would be powered by electricity, rather than diesel, is good public policy. As a resident of San Bernardino, the concept of moving Port freight through an underground pipeline that would ultimately emerge at an Inland Port holds the promise of someday reducing the truck traffic that is affecting so many of Southern California’s Disadvantaged Communities where rail and existing roadways traverse and gravely impact the respiratory health of our children and seniors who have been shown to be disproportionately affected by goods movement.

For those reasons, I urge SCAG to include the GRID alternative in the current RTP providing the opportunity to further examine a concept without any significant impact to air quality as is found in existing rail shipments or container movement by diesel-powered semi trucks.

I look forward to hearing the Regional Council has included the GRID (Green Rail Intelligent Development) as an alternative Goods Movement Alternative. Thank you.