REPORT

DATE: August 7, 2008

TO: Community, Economic and Human Development Committee

FROM: Regional Comprehensive Plan Task Force
Jacob Lieb, Program Manager, (213) 236-1921, lieb@scag.ca.gov

SUBJECT: Draft Regional Comprehensive Plan

EXECUTIVE DIRECTOR'S APPROVAL:

RECOMMENDED ACTION:
Recommend that the Regional Council approve a resolution adopting the Regional Comprehensive Plan. Close public comment on the Draft Regional Comprehensive Plan on August 11, 2008. Accept revisions as included on the Comment and Revisions Log (attached). Delegate to the Regional Comprehensive Plan Task Force on revisions to the Draft RCP based on comments received up to August 11. Hold one additional public workshop on August 11.

BACKGROUND:
At the direction of the Regional Council, SCAG staff began work on a draft Regional Comprehensive Plan (RCP) in 2004. The RCP was conceived as an extension of the 2% Strategy regional growth visioning exercise. The CEHD Committee, which has purview over the preparation of the plan, released a Draft RCP in December 2007. At that time, the committee also approved a schedule and outreach process in order to prepare the draft for adoption. To date, the RCP has been broadly circulated among stakeholders and the general public. Two public workshops, hosted by the CEHD Committee, have been held, and two additional workshops (on August 7 and August 11) will be held in advance of the anticipated adoption of the plan.

At its June 5 meeting, the Regional Council voted not to prepare a Program Environmental Impact Report for the RCP, and to bring the plan forward for adoption as soon as practicable. At that time, the RC deferred on all remaining procedural decisions (notably, the close of public comments) to the CEHD Committee.

The RCP Task Force met on June 9 and recommended several procedural steps to bring the process for developing the RCP to a close including those listed in the "Recommended Actions" above. Among these steps are recommending that the plan be adopted, closing public comments on August 11, 2008, and delegating to the RCP Task Force the task of reviewing any remaining comments not considered by the CEHD at its August 7 meeting.

BACKGROUND ON THE RCP

Purpose and Need
SCAG last adopted a Regional Comprehensive Plan and Guide in 1996. The RCP is not a mandated activity for SCAG. Rather, the plan is prepared voluntarily, and establishes advisory policies for SCAG and its members. The purpose of the RCP is to create a framework for the region to achieve a better quality of life than would be expected under extrapolated trends.

Process and Participation
The preparation of an RCP was directed by the Regional Council and the CEHD Committee and has been directly overseen by the RCP Task Force, composed of members of all three policy committees. Additionally, each policy committee has purview over individual chapters within their subject areas.

In addition to the standing committee and task forces structures, ad hoc groups were formed in order to advise on the development of individual RCP Chapters. These groups include the Open Space Working Group and the Energy Working Group. Additionally, the previously established Water Policy Task Force and Solid Waste Task Force have participated in crafting their respective chapters.

SCAG has endeavored to have additional broad and meaningful opportunities for public participation in the development of the RCP. One workshop was held prior to the release of the Draft. Two have been held to date during the draft review period, and an additional two are planned prior to the anticipated adoption. SCAG staff and officials have provided numerous presentations to various audiences including sub-regions and local governments on the RCP as a whole or various individual chapters. A record of all outreach activities will be included as an appendix in the final document.

The draft RCP has been widely disseminated with either hard or electronic copies being sent to the entire SCAG mailing list. Each city and county in the region has received a copy. Program information and documents have been available for the duration of the RCP process on the program website- www.scag.ca.gov/rcp.

Uses
The RCP is an advisory document for SCAG's member agencies. Upon adoption, SCAG will distribute the final RCP to local governments in the region for their information and use in preparing local plans. Post-adoption workshops will be held at the sub-regional level in order to build familiarity with the RCP and its potential uses.

The new RCP policies will be incorporated into the on-going Inter-Governmental Review process, which calls on SCAG to provide comments on plans and environmental documents of regional significance. Comments will discuss the consistency with regional policies, including not only those established in the RCP, but also in the Regional Transportation Plan and other major SCAG plans and policies.

The RCP is not intended to be used to distribute funds, prioritize funding for transportation projects in the RTP, or to implement any mandatory programs. Should the Regional Council wish to consider any such uses of the RCP in the future, it may do so only as a subsequent action, with ample time and opportunity for stakeholders around the region to comment.

The RCP does provide the region with a starting point for developing policies in response to AB 32 (the California Global Warming Solutions Act of 2006), in that many of the policies included would reduce greenhouse gas emissions. However, should the region proceed to develop a greenhouse gas emissions reduction plan, further work would be required to quantify the expected results of any

policy and to develop regional consensus on approaches to be used for that purpose.

Structure
The RCP includes nine chapters on individual planning and resource areas. It also includes one "special focus section" essay on education, which does not contain any proposed policies, but rather sets forth issues for further study. The RCP is intentionally structured similar to a local General Plan such that it may be familiar and useful for member agencies.

Within each chapter, there are goals, outcomes, and an action plan. The goals create a definition for sustainability, the outcomes establish what might be achieved by pursuing the action strategy, and the action plan proposes specific action steps that can be undertaken by SCAG, the State or Federal Government, local government, or other entities. The action plan section in each chapter is divided into "constrained policies" (e.g. those that can be reasonably achieved given current political will, funding, and other variables) and "strategic initiatives" (those actions that while not currently practicable, would be required to reach the chapter goals).

Additionally, each chapter contains an Existing Conditions section that sets forth pertinent information, and describes issue areas that the policy section seeks to address. Further, each chapter contains references for further information.

Summary of Policies
There 206 constrained and strategic policies in the RCP. Many policies are repeated in several chapters. An area of emphasis in developing the Draft RCP was to identify policies that achieve multiple benefits. Those that have the greatest likelihood of delivering measurable results across the range of RCP interest areas will become the priority policies for the plan. At this stage of draft review, the policies that merit mention are the following –
Implementation of Compass Blueprint – As identified in the Draft RCP Land Use and Housing Chapter, the region should continue to encourage maximizing development in strategic locations including centers and transit rich corridors.
Green Building – As identified in the Energy Chapter, and elsewhere, the region's municipalities should continue to adopt and refine building standards that minimize energy, water, and materials consumption, and achieve other efficiencies.
Open Space Preservation – As identified in the Open Space and Habitat Chapter, the region should maximize opportunities to mitigate the impacts of new development by protecting remaining natural open space resources and developing new community open space facilities.
Non-Combustion – As identified in the Air Quality Chapter, the region should accelerate the transition to non-combustion technologies for transportation and industry.
Reduce Fossil Fuel Usage – As identified in the Energy Chapter, the region should aggressively increase the penetration of renewable energy.
Green Economy – In relation to other air quality and energy policies, the region should seek to grow economic sectors that engender long term sustainability.

ATTACHMENTS
Draft Regional Comprehensive Plan
Comment and Revisions Log
Draft Adopting Resolution

FISCAL IMPACT:
Work on the development of Regional Comprehensive Plan was completed in FY 07-08, and included in the SCAG Overall Work Program (08-035.scgs1).

Reviewed by:

Division Manager

Reviewed by:

Department Director

Reviewed by:

Chief Financial Officer

Draft Regional Comprehensive Plan Comments and Revisions Log

Sorted by Topic
Comment Letters Attached

Category	Commentor	Comment	Recommended Response	Recommended RCP Edits
Land Use & Housing	LA County Dept. of Regional Planning	County Draft General Plan is consistent with Land Use & Housing and references Compass Blueprint as a "guide to facilitate the development and redevelopment of unincorporated County areas."	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP. SCAG will work with DRP to coordinate future Compass Blueprint and County planning efforts.	No revision recommended.
General Comment, Land Use & Housing	Ventura County LAFCO	RCP and LAFCO have similar mission and goals. RCP should contain additional policies to recognize LAFCOs' role in planning growth and encourage cooperation between SCAG and LAFCOs in achieving RCP goals.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP. SCAG certainly recognizes LAFCOs' important role in growth.	SCAG will add general language in the Executive Summary on use of the document that recognizes LAFCOs as an important public sector decision maker.
Open Space	LA County Dept. of Parks and Recreation	Include discussion of the social and economic benefits of parks and open space.	SCAG appreciates the information provided by the commentor. The comment will be forwarded to the decision-makers prior to adoption of the Final RCP.	No revision recommended.
Open Space	LA County Dept. of Parks and Recreation	The commentor makes specific recommendations on text changes. These include the following edits: 1) Edit text on page 38 as follows: Creating new community open space that is interconnected, accessible, equitably distributed, ~~and~~ provides public health	The text of the chapter is revised to reflect the comments.	Yes. Staff will incorporate the requested edits.

		benefits, and meets the changing and diverse needs of communities. 2) Changing the two references to "NPRA" standards on page 37 to "NRPA" standards.		
Open Space	LA County Dept. of Parks and Recreation	LA County Parks looks forward to working with SCAG to further develop the Level of Service concept included in the Open Space chapter	SCAG encourages participation from the County and looks forward to working together to further refine this concept.	No revision recommended.
Open Space	LA County Dept. of Regional Planning	The County would like to see the discussion of biofuels limited to the "husk" or other cellulosic biomass materials.	SCAG appreciates this comment. The discussion of biofuels in the open space chapter of the RCP is included only to make the reader aware of the general connection between agricultural lands and biofuels. The sentence is not intended to be an endorsement of any one material over another, nor is the general discussion contained in the open space chapter the appropriate place for such an endorsement.	No revision recommended.
Open Space	LA County Dept. of Regional Planning	The County is currently teaming up with the Department of Parks and Recreation to develop a Parks Master Plan. The County would also be interested in working with neighboring counties to identify and develop a regional conservation plan that	SCAG appreciates this comment and looks forward to working with the County on open space issues.	No revision recommended.

		would address the cross-jurisdictional boundaries of wildlife corridors and habitat.		
Water	Murray Rosenbluth	Letter suggesting a focus on desalination as a fresh water source for the future, needing support at all levels of government.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP.	No revision recommended.
Water	Los Angeles County Dept. of Public Works	Letter seeking clarification on several points, as well as suggesting grammatical and technical corrections. Letter also suggests amendments to RCP water policies.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP. Recommend technical corrections as appropriate and all grammatical corrections.	Recommend grammatical and some technical revisions, and addition of non-native/ invasive plant removal to goal WA-5S
Water	Los Angeles County Dept. of Regional Planning	Letter of support from Los Angeles County. Comments support policies in the Draft Water Chapter, noting relationship to LA County Draft General Plan. LA County places strong emphasis on water conservation as a priority over new supply, and on Low Impact Development for stormwater runoff.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP.	No revision recommended.
Energy	LA County Dept. of Regional Planning	Support increase energy efficiency and the reduced dependence of County residents on the automobile. The	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP.	No revision recommended.

		County is currently developing green building & drought tolerant landscaping ordinances for private developments.		
Energy	LA County Dept. of Regional Planning	The County's Draft General Plan cites the new, clean alternative of hydrogen-boron nuclear fusion for its energy generation potential	SCAG appreciates the information and looks forward to working with the County as they develop their understanding of nuclear energy. SCAG may consider nuclear energy in future updates of the Regional Comprehensive Plan.	No revision recommended.
Energy	Woody Clark	Add information on sustainable communities and the need for sustainable mass transportation (e.g. renewable powered electric rail systems) that connects our diverse region.	The Energy Chapter includes an extended discussion on green buildings and public transportation. In addition, Energy Policy EN-16 states that local governments and SCAG should "encourage investments in transit, including electrified light rail."	No revision recommended.
Energy	Murray Rosenbluth	Cogeneration and combined cycle technology should receive support by all levels of government	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP. The Energy Chapter includes policy EN-7 that states "SCAG shall encourage credits for clean post recycle conversion technologies to produce energy or for technologies that offset energy use or emissions."	No revision recommended.

Air Quality	Stephen Anderson	Any new pollutants in Mira Loma are considered a disservice.	The RCP is intended to promote more efficient land use /transportation interactions and includes other policies that would be expected to lead to reduced vehicle miles travelled and lower levels of air pollution everywhere in the region.	No revision recommended.
Air Quality	Los Angeles County Department of Regional Planning	Letter of support from Los Angeles County. Comments support policies in the Draft Air Quality Chapter, noting relationship to LA County Draft General Plan. LA County has created an Air Resources element in the Draft General Plan to address AB 32. Notes discrepancy between RTP focused on highway efficiency and RCP focused on transit. Also notes subsidy of US highway system.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP.	No revision recommended. Staff will revisit language for accuracy.
Solid Waste	County of Los Angeles – Dept. of Public Works Environmenta l Programs Division	Letter of support for policies and goals contained in solid waste chapter of the RCP.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP.	No revision recommended.
Solid Waste	Los Angeles County Dept. of Regional Planning	Letter of support from LA County Comments in support of policies in the Draft Solid Waste Chapter, and	Comment is noted, and a revision is recommended as suggested.	Recommend adding a constrained policy encouraging local agencies to promote waste reduction, reuse

		noting relationship to County Draft General Plan. SOLID WASTE - Need a reference to the desirability of a public education and outreach campaign to communities/individuals to emphasize importance of recycling and encourage good recycling behavior.		and recycling.
Transport-ation	LA County Dept. of Regional Planning	[Complete Streets and Green Streets] terms and ideologies should be introduced in the transportation chapter of the RCP	SCAG will add a paragraph describing Complete Streets and Green Streets in the "Beyond the RTP" section of the transportation chapter.	Minor editing to introduce the concepts
Transport-ation	LA County Dept. of Regional Planning	While the County supports the expansion of the HOV system, reducing SOV and moving cars off the roadways by providing logical alternatives would work to reduce traffic. Expanding the public transit system should be a higher priority.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP. The RCP looks at transit beyond the RTP, including it as part of the land use strategies such as "complete communities" designed to bring housing and jobs near transit.	No revision recommended.
Security and Emerg-ency Prepared-ness	LA County Dept. of Regional Planning	One key issue missing in the RCP was a discussion on forest fires.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP. While SCAG is now required to incorporate security into Transportation planning process, the subject of	Minor edit, stating that in the event wildfires damage transportation infrastructure, SCAG would work with State and Federal governments to fast track the programming of transportation

			wildfires was considered beyond the purview of SCAG's role as a MPO, with the exception of land use near danger areas.	infrastructure repairs.
Economy	LA County Dept. of Regional Planning	DRP generally agrees with the Economy Section of the 2008 RCP.	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP.	No revision recommended.
Economy	LA County Dept. of Regional Planning	RCP misses the discussion on the conversion of industrial land to other, predominantly residential and commercial, uses.	The current RCP does not have the benefit of sufficient information at the regional scale in order to propose a policy. SCAG would like to engage in discussion with the County on this issue, and would be amenable to further study leading to future updates of the RCP Economy Chapter.	No revision recommended.
General Comments	City of Rancho Santa Margarita	Concurs with comments developed by OCCOG TAC	The comment is noted and will be forwarded to the decision-makers prior to adoption of the Final RCP. Note that OCCOG comments have not been transmitted to SCAG to date.	No revision recommended.

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Bruce W. McClendon, FAICP
Director of Planning

June 18, 2008

Mr. Jacob Leib
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

RE: COUNTY OF LOS ANGELES DEPARTMETN OF REGIONAL PLANNING (DRP) RESPONSE TO THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) DRAFT 2008 REGIONAL COMPREHENSIVE PLAN (RCP)

Dear Mr. Leib,

Thank you for the opportunity to review and respond to the SCAG Draft 2008 Regional Comprehensive Plan, *Helping Communities Achieve a Sustainable Future*. As the regulating agency for land use in unincorporated Los Angeles County, DRP seeks solutions to our land use, housing, open space, environmental, water, energy, air quality, solid waste, transportation, emergency preparedness, and economic issues through proactive land use management strategies as well as consensus building and the development a unified vision of the County's future among the myriad County Departments and agencies through the General Plan update process.

The Los Angeles County Department of Regional Planning generally supports the goals and policies of the RCP. Most policies within the document complement the goals and policies of the existing Los Angeles County General Plan (adopted in 1980) as well as the 2008 Draft General Plan; *Planning Tomorrow's Great Places*. The General Plan is being comprehensively updated and is scheduled for adoption in late 2009. Through its land use planning, DRP strives for coordinated uses that balance local communities' quality of life, open space preservation, and region-wide mobility with commercial vitality and sustainable air quality.

The regulation of land use in unincorporated Los Angeles County is conducted by DRP with great care and consideration toward overall sustainability, and it recognizes the need for close cooperation with other local, regional, and state entities. The following comments reflect both the contrasts and unique similarities of the 2008 RCP and our current policy. The following comments have been ordered in accordance with the format of the 2008 Draft RCP for your convenience. We believe that this Plan and our Draft General Plan can work together to make the Southern California region a better place to live, work, play, and visit.

320 West Temple Street ▪ Los Angeles, CA 90012 ▪ 213-974-6411 ▪ Fax: 213-626-0434 ▪ TDD: 213-617-2292

Land Use and Housing

The Los Angeles County Draft General Plan uses the Compass Blueprint 2% Strategy as a guide to facilitate the development and redevelopment of unincorporated County areas. Within the Plan, the County cites the 2% Strategy as a driving force behind the shift from urban expansion and sprawl to in-fill development and urban revitalization. This new Plan is a significant shift from our current practice, and we would seek the help of SCAG to better educate not only our staff, but our constituents in the benefits of the Compass Blueprint 2% Strategy. The Draft General Plan puts a large emphasis on open space and rural land preservation, the intensification of development around transit corridors, the revitalization of older urban neighborhoods, and the clean up of brownfield sites as a means to promote infill development. The Plan has a special focus on the expansion and the retooling of our existing Transit Oriented Districts.

The County has moved ahead with the Draft Plan's recommendations on green building standards, and is currently working on three ordinances that address green building practices for private development, low impact development (LID) standards for on-site storm water management, and the use of drought tolerant landscaping. The County has already passed an ordinance that requires all new County buildings and major renovations over 10,000 square feet to meet or exceed Leadership in Energy and Environmental Design (LEED) Silver standards.

While the Housing Element is on a separate approval track from the rest of the General Plan Elements, it too addresses the concerns of affordability and homeownership in the County. A mixed-use ordinance has been approved, and the County is currently working on an affordable housing in-fill strategy, and a new farm worker housing ordinance. Program 49 from the Housing Element has several implementation strategies that will be initiated upon adoption of the Housing Element in latter 2008.

Open Space and Habitat

The Los Angeles County Draft General Plan seeks to conserve the remaining natural resources of the County and expand parks and recreation opportunities, especially within the urbanized areas. The majority of remaining open spaces and natural or rural land in Los Angeles County is under the jurisdiction of the County's Department of Regional Planning. Considering this, the County recognizes that it is the guardian of the County's last remaining open spaces. As such, the Plan seeks to invest in more in-fill development to both create a more efficient and livable land use pattern, but also to conserve the County's dwindling, unspoiled landscapes. There is a significant push to preserve these landscapes for their economic, scenic, environmental, social, and intrinsic value.

The Draft General Plan's goals and policies seek to preserve and promote agricultural uses in the County, especially organic and sustainable farming practices, triple the size of our Significant Ecological Areas (SEAs), protect the County's remaining wetlands, expand passive and active local and community parkland, protect the County's scenic hillsides and vistas, and promote inter-departmental collaboration to implement our vision. Regarding agricultural land, the County would like to see the discussion in the RCP regarding biofuels limited to the "husk", or other cellulosic biomass materials. It is prohibitively inefficient to raise crops for the sole use of biofuels, but all

other discarded natural materials from the harvesting process and even yard waste should be recycled for a secondary beneficial use.

The Department of Regional Planning is teaming up with the County's Department of Parks and Recreation to develop a Parks Master Plan to be included as its own Parks and Recreation Element in the Draft General Plan. This collaboration highlights both the beginning of a new era of collaboration and consensus building within County government. While the Department of Parks and Recreation has a sufficient amount of regional parkland for residents countywide, there has recently been a transition in the approach to the provision of parkland to address the need for more local and community parks specifically for residents of the County's unincorporated communities.

The Department of Regional Planning looks forward to collaborating with SCAG in the preservation and conservation of our remaining open space areas. In particular, the County would be interested in working with our neighbor Counties to identify and develop a regional conservation plan that would address the cross-jurisdictional boundaries of wildlife corridors and habitat.

Water

The Los Angeles County Draft General Plan puts a critical emphasis on increased water conservation as a means to reduce demand. The Department of Regional Planning believes that a reduction in demand through efficiency standards and practices would be the most efficient and effective approach.

The County is currently working on an ordinance to reduce water use for landscaping by requiring the use of California native or drought tolerant plants. An additional ordinance seeks to apply Low Impact Development (LID) standards to all new development, thereby managing stormwater run-off on-site. By treating stormwater on-site, we can increase the percolation of water into the groundwater system. The Department feels strongly about the sustainability of the region's aquifers, and encourages SCAG to work towards a regional consensus and collaborative process that fully restores the water table, and prevents over drafting (taking more water out than is recharged back into the ground) in the future.

Within the Draft General Plan, the goals and policies regarding water seek to increase permeable surfaces, enhance conservation and efficiency efforts, develop a community outreach and education program, set standards for water-wise building practices (proposed Green Building Ordinance), employ "Green Streets" infrastructure improvements, and expand the County's recycled water infrastructure. Additionally, the County has been working to update the areas Integrated Regional Water Management Plans (the Antelope Valley and Upper Santa Clara IRWMPs, as well as the Greater Los Angeles IRWMP) and Urban Water Management Plans (currently the East Los Angeles District UWMP).

Energy

The Los Angeles County General Plan and Draft General Plan both support increased energy efficiency and the reduced dependence of County residents on the automobile. The Draft General Plan moves beyond the existing General Plan to describe ways and means to increase energy

efficiency, reduce overall energy consumption and demand, and expand the use of renewable energy resources, especially on-site generation.

The Department of Regional Planning is currently developing green building and drought tolerant landscaping ordinances for private developments. The Department and the Draft General Plan have placed a priority on in-fill and mixed-use developments, building walkable and bikeable communities, implementing land use patterns that expand transit readership, and reducing vehicle miles traveled.

The Department of Regional Planning believes that to achieve increased energy reliability, primary attention must be focused on the reduction of demand through conservation measures. The Draft General Plan cites the new, clean alternative of hydrogen-boron nuclear fusion (www.focusfusion.org) for its energy generation potential as an interesting comparison point.

Air Quality

The Department of Regional Planning, in response to AB32, has created an Air Resources Element in the Draft General Plan. This Element consolidates all relevant goals and policies throughout the Plan that would have a direct impact on air quality and the reduction of global greenhouse emissions in our region. The Air Resources Element establishes policy that will ensure the reduction of air pollutants and global greenhouse emissions, reduce our dependence on the automobile, and increase the physical and mental health of County residents.

On page 84, the RCP mentions a "heavily-subsidized public transit system". There should be some reference to illustrate the cost of a roadway per mile versus the cost of a transit line per mile in relation to the amount of people who use each particular system. Clearly, transit is more efficient.

The policies in the RCP appear contradictory to those in SCAG's 2008 Regional Transportation Plan (RTP). While transit use is encouraged, most of the discussion in the RTP focuses on making our highway systems more efficient. To truly attain our air quality standards, we must work towards building and expanding our transit system, especially considering that 27% of all air pollutants come from mobile sources. We should capitalize on this, and other external pressures (e.g. high gas prices, growth in environmental awareness, and health concerns), that are reducing automobile use.

Solid Waste

The Department of Regional Planning and the Draft General Plan seek to expand recycling practices, reintroduce conversion technologies as a viable alternative in the future, encourage local and regional composting strategies, and as a structural change in understanding, reduce the waste created before it reaches the landfill. This emphasis on reducing the waste stream will ultimately lead to the most reductions in solid waste produced by the County. While the Department realizes that 100% recycling is nearly impossible, to set this goal is an important milestone to emphasize waste reduction by managing the County's consumption patterns, the way businesses package goods, and individual participation in recycling programs. What is needed in the SCAG RCP concerning solid waste is a reference to the desirability of a public education and outreach campaign to communities and individuals to emphasize the importance of recycling and encourage good recycling behavior.

Additionally, the County's proposed green building ordinance seeks to reduce construction and demolition waste through the use of recycled materials, and the deconstruction of buildings as opposed to the general destruction and removal of debris.

Transportation

The Los Angeles County Drat General Plan encourages the expansion of a multi-modal transportation system in the County. Two key elements of this Plan are the idea of "Complete Streets" and "Green Streets". Complete Streets is a strategy where during any new construction or reconstruction of a roadway, all users are considered (bike, pedestrian, car, and transit) and subsequently built into the infrastructure (e.g. bike lanes, sidewalks, curb cuts, and bus lanes). This runs contrary to traditional road projects that focus primarily on the efficient movement on the automobile, thereby reducing the availability and reliability of alternative modes of transportation (i.e. rounded corners make for faster turns in cars, but more dangerous intersections for pedestrians), and making it easier to drive your car. Green Streets is a strategy that seeks to reduce stormwater run-off into centralized management systems, and instead use the roadway as a means to filter and percolate stormwater into the groundwater basin. Additionally, Green Streets views our roadway system as the primary public open space in the region, where trees and plantings help induce alternative modes of transportation by making it both safer and more enjoyable to use County roadways. These two terms and ideologies should be introduced in the Transportation Section of the RCP.

The County supports the expansion of the High Occupancy Vehicle (HOV) system throughout the County. However, while it is important to expand highway efficiency, considering the increase in goods movement on our roadways, reducing single occupancy vehicles and moving cars off the roadways by providing logical alternatives (e.g. increased transit services and lines) would work to reduce traffic at its source as opposed to reacting to its effects. Expanding the public transit system in the County should be a higher priority. New transit lines would decrease dependence on the automobile, remove cars from our roadways, take additional capacity concerns off the roadways system, and reduce congestion, thereby allowing more capacity for goods movement on our existing system.

Security and Emergency Preparedness

The Draft General Plan seeks to develop a more equitable and financially sustainable fee structure for the provision of emergency services in new developments and redeveloped communities. The Plan also seeks to organize myriad County security and safety plans already in existence into a coherent structure for informational purposes.

One key issue that is missing in the RCP was a discussion on forest fires. In the Draft General Plan, the Department of Regional Planning suggests to prevent further loss of life in these events that the early warning system should go beyond the existing telephone warnings, and expand into actual sirens in communities adjacent to high fire hazard areas. Additionally, the Plan suggests a reassessment of the County's floodplain ordinance to further limit development in these areas, particularly in those floodplains that have not been altered or channelized (predominately in north Los Angeles County).

Economy

The Department of Regional Planning generally agrees with the Economy Section of the 2008 RCP. The draft General Plan for Los Angeles County does have an Economic Development Element that works to develop similar policies on economic development, including matching workforce training to jobs of the future, expanding the green economic sector, developing strategies to make existing businesses more competitive and more environmentally sustainable (a possible benefit to the "bottom line"), and updating our infrastructure to maintain our regional competitiveness in trade and manufacturing. What is missing in this Section of the RCP is a discussion on the conversion of industrial land to other, predominantly residential and commercial, uses. The preservation of our County's industrial land is a major goal of our planning process, and a discussion on the pros and cons of this effort should be discussed in the RCP.

Conclusion

By providing these comments to SCAG, the Department of Regional Planning believes that the RCP can become a stronger, more valuable planning tool for our Region, especially since the RCP and the Draft General Plan do reinforce each other's good planning practices and values. The Department of Regional Planning maintains a position of active collaboration with public and private stakeholders and land use and transportation planning agencies to establish and maintain land uses that balance development with open space protection.

DRP feels strongly that the full implementation of the RCP will best occur through the coordinated efforts of local land use, transportation, public works, parks and recreation, environmental, and planning agencies. The caveat to implementation is funding, and the Department is fully committed to collaborative efforts to secure sustainable revenue. A copy of the County's Draft General Plan will be mailed to SCAG later this summer (2008) for your review, and we look forward to your comments.

If you should have any questions, comments or require additional materials, please contact Gunnar Hand at (213) 974-6417 or ghand@planning.lacounty.gov.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING

Bruce W. McClendon, FAICP
Director of Planning

BWM:RH:MH:GHH

COUNTY OF LOS ANGELES

DEPARTMENT OF PARKS AND RECREATION

"Creating Community Through People, Parks and Programs"

Russ Guiney, Director

May 28, 2008

Jennifer Brost Sarnecki, AICP
Senior Regional Planner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Dear Ms. Sarnecki:

DRAFT 2008 REGIONAL COMPREHENSIVE PLAN (RCP)

The Department of Parks and Recreation has reviewed the Open Space and Habitat chapter of the Draft 2008 Regional Comprehensive Plan. Our comments are as follows:

1. The social benefits of parks and open space should also be included under the heading "How Open Space Policies Produce Multiple Benefits." In particular, parks and open space offer substantial social benefits by:

   - Helping to build social capital which represent subtle but important assets for a community;
   - Increasing the potential for social interaction among diverse members of a community;
   - Offering crucial, safe places in lower income neighborhoods where residents can experience a sense of community;
   - Serving as a place where people from diverse cultures can connect and interact with each other; and
   - Providing focal points or venues for town hall meetings to address community concerns.

2. In addition to enhancing economic productivity and minimizing public health costs, parks and open space also offer economic benefits by:

   - Enhancing neighboring residential property values and livability;
   - Providing employment opportunities for at-risk youth;
   - Motivating and attracting business relocation and expansion in a community;
   - Serving as a catalyst for tourism; and
   - Helping to revitalize adjacent commercial centers.

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These benefits should be included under the "Economy" sub-heading on page 37.

3. The Open Space and Habitat-Community Open Space goal on page 38 should be amended as follows:

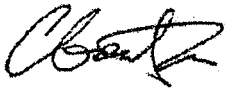
   Creating new community open space that is interconnected, accessible, equitably distributed, ~~and~~ provides public health benefits, <u>and meets the changing and diverse needs of communities</u>.

4. The two references to "N<u>PR</u>A" standards on page 37 should be changed to "N<u>RP</u>A" standards.

5. The Department of Parks and Recreation is very interested in working with SCAG and other groups to develop a Level of Service ranking and evaluation system for community open space in the region (SCAG Policy OSC-3, page 39).

Thank you for the opportunity to review the draft RCP. If we may be of further assistance, please contact me at (213) 351-5127 or clau@parks.lacounty.gov

Sincerely,



Clement Lau, AICP
Park Planner

Ventura
Local Agency Formation Commission

March 19, 2008

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

RE: Draft 2008 Regional Comprehensive Plan

Dear Mr. Ikhrata:

The Ventura Local Agency Formation Commission has reviewed the Draft 2008 Regional Comprehensive Plan (RCP) and offers the following comments.

Local Agency Formation Commissions (LAFCOs) are state-mandated, independent agencies which implement California's Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code § 56000 et seq). Each of California's counties has a LAFCO, including the six counties within the SCAG region.

LAFCOs oversee and must authorize all boundary changes for cities and most special districts, as well as the incorporation or formation of new cities and districts. LAFCOs also establish spheres of influence for all cities and special districts. In doing so, LAFCOs must: encourage the orderly growth of these government agencies; preserve agricultural lands and open space; discourage urban sprawl; and assure the provision of efficient local government services. The actions of LAFCOs have a profound effect on how and where a region grows and develops.

Many of the LAFCO mandates are consistent with several of the proposed goals and policies within the Draft RCP. For instance, the goals in the RCP to preserve open space and agricultural lands are very similar to LAFCOs' mandates to do the same. In addition, LAFCOs' decisions can have direct or indirect impacts to the provision of water and wastewater, air quality, and traffic, all of which are included in the RCP. The role of LAFCOs in achieving sustainable communities should not be overlooked, yet we found no mention of them in the RCP.

As the regional planning body that approves all expansions of city and district boundaries, LAFCOs are one of the primary agencies that guide regional development. In fact, the Board of the California Association of LAFCOs (CALAFCO) recently directed its staff to work with the author of Senate Bill SB 375, regarding regional transportation

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http://www.ventura.lafco.ca.gov

and planning issues, to recognize LAFCOs' part in regional development and advocate for a greater role for LAFCOs in the regional planning process. It is imperative that LAFCOs be an active member in any strategies to identity how and where a region develops.

To this end, the RCP should recognize the role that LAFCOs play in the region's growth. It should contain additional policies to encourage cooperation between SCAG and the LAFCOs in achieving the goals of the RCP. The RCP should encourage LAFCOs to embrace and support its goals, while containing policies supporting those of the LAFCOs. Such cooperation would be mutually beneficial as our collective agencies strive for regional and community sustainability.

Thank you for your consideration.

Sincerely,

Kim Uhlich

Kim Uhlich
Executive Officer

cc: Bill Chiat, CALAFCO Executive Director
Sandor Winger, LAFCO for Los Angeles County
Joyce Crosthwaite, Orange County LAFCO
Kathleen Rollings-McDonald, San Bernardino LAFCO
George Spiliotis, Riverside LAFCO
Jurg Heuberger, Imperial County LAFCO

Jennifer Sarnecki

From: Ludlow Brown
Sent: Thursday, April 03, 2008 9:43 AM
To: Jennifer Sarnecki
Cc: Daniel Griset
Subject: FW: Draft SCAG Regional Comprehensive Plan - Water Chapter

Good morning,

I'm forwarding this email I received through the webmaster account.

Ludlow

From: Bordas, Hector [mailto:HBORDAS@dpw.lacounty.gov]
Sent: Thursday, April 03, 2008 8:16 AM
To: Ludlow Brown
Subject: Draft SCAG Regional Comprehensive Plan - Water Chapter

Hello... following are comments from the Los Angeles County Department of Public Works on the Regional Comprehensive Plan – Water Chapter:

Page 39, Open Space & Habitat, Goal OSC-9: Revise to make sure that accessibility to natural areas is done with an eye to minimize the fire potential from increased numbers of people coming to those areas. Much of the natural areas in SCAG's territory consist of highly flammable vegetation. Many of the wildfires that have occurred over the last several years (the Corral Fire in Malibu area being the most recent example) were started by recreational users. Increasing accessibility to these areas may increase the potential for more fires.

Page 48, Heading, Water Supply: Revise "one-quarter" of the region's total supplies to "two-thirds".

Page 48, Heading, Local Supplies: Change the fourth line from "requirement" to "demand"

Page 49, Heading, Local Supplies, 1st paragraph: Clarify statement from where is the water diverted?

Page 49, Heading, Recycling: Clarify statement "followed by secondary treatment or advanced treatment"

Page 49, Heading, Recycling, 2nd paragraph: Change "barriers" to "opportunities and availability or change to obstacles".

Page 49, Heading, Surface Storage, 2nd paragraph: Revise "create negative economic impacts for the surrounding community"

Page 51, Colorado River: Clarify "Metropolitan" to Metropolitan Water District

Page 52, Heading, Los Angeles Aqueduct, 1st sentence: Change "than" to "that"

Page 53, Heading, Climate Change, fourth callout: Change from "Alternations" to "Alterations"

Page 53, Heading, Climate Change, 2nd to the last paragraph: Revise to "Water also contributes to the generation of greenhouse gases through its energy demands".

Page 53, Heading, Water Demand: Question: Whether approximately "three-quarters" of potable water is provided from imported sources?

Page 53, Heading, Water Quality, Non-Point Source Pollution, 2nd paragraph: Clarify statement "while the rivers convey the flow, they do not cause the pollution"

Page 54, Heading, Perchlorate: Change "Small amounts gave" to "Small amounts have"

Page 55, Heading, Methyl Tertiary Butyl Ether and Tertiary Butanol: Clarify the statement "who is to find ways to reduce the cost of treating groundwater wells " and "or risk the temptation to seek increased imports at lower costs".

Page 57, Heading, "Pollutants in Urban Runoff": Revise from "The State agency" to the State Water Resources Control Board". Sediment is listed as a pollutant. It should be noted that the San Gabriel Mountains are one of the most erosive mountain ranges in the world. Sediment is thus a natural component in the flows from the associated watersheds, so sediment may not necessarily be a pollutant in those flows.

Page 58, Heading, "SCAG Policies": Clarify statement so that SCAG's policies include encouragement to upgrade existing facilities to increase their water storage and groundwater recharge capacities. Such enhancements are needed to serve existing communities, not just new development.

Page 61, Heading, SCAG Initiatives", Goal WA-5S: Revise to encourage removal of non-native/invasive species, and provide "extra mitigation credit" for the long term benefits of the removal of these species. Many watershed areas in SCAG's region already contain non-native/invasive species, such as arundo donax (giant reed) and tamarisk (salt cedar), which are big water users and adversely impact habitat. However, removal efforts are hindered by a lack of enthusiasm from regulatory agencies to give credit for removal of these species during the course of projects for which these agencies issue permits, even though the removal has long-term benefits. Some regulatory agencies are actually attempting to require compensatory mitigation for removal of these non-native/invasive species. We recommend the goal be amended to also encourage removal of non-native/invasive species, and encourage regulatory agencies to forego requiring compensatory mitigation and instead provide "extra mitigation credit" for the long term benefits of the removal of these species.

Hector J. Bordas

Principal Engineer
Watershed Management Division
County of Los Angeles Department of Public Works

626/458-5947
626/260-2544 Cell

Jennifer Sarnecki

From: WClark13@aol.com

Sent: Saturday, November 24, 2007 10:03 AM

To: Jennifer Sarnecki; energymaven@gmail.com; mfeinstein@feinstein.org; darrclarke@gmail.com; clarkeeesc@yahoo.com

Subject: SCAG Energy Report

Follow Up Flag: Follow up

Flag Status: Red

Attachments: SCAG RCP DT EnergyCpt WWC (3).doc

Hi Jennifer and Debbie (everyone!!! and know that I forgot lots of people),
I read (finally) Michael and Darrell's edits of the Report. See attached. I agreed with almost everything and added some areas, especially about sustinable communities -- and the need for "sustainable" mass transportation (e.g. renewable powered electric rail systems) connecting our diverse region. There are other points too but these 2 were the basic ones.
Finally, I wanted to let everyone know too that I have been a bit difficult to reach and keep involved (see my web site below) in part because I found out that I was a co-winner of the Nobel Peace Prize with the other members of the IPCC team for the UN reports !!! Am still trying to digest that !!!
See you all soon.
Woody

Woodrow W. Clark II MA3, Ph.D
Clark Strategic Partners
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Web Site: www.clarkstrategicpartners.net
Skype: woodrow clark

****
Check out AOL's list of 2007's hottest products.
(http://money.aol.com/special/hot-products-2007?NCID=aoltop00030000000001)

This Energy Chapter, as presented, is preliminary and has not been subject to formal approval of the SCAG Regional Council or any Committee. The Energy and Environment Committee has approved release of the preliminary goals, outcomes and actions for public review, and is being made available at this time for information and for comments.

RCP Draft ENERGY CHAPTER

"We choose to go to the moon in this decade and do the other things, not because they are easy, but because they are hard, because that goal will serve to organize and measure the best of our energies and skills, because that challenge is one that we are willing to accept, one we are unwilling to postpone, and one which we intend to win."
—President John F. Kennedy, September 1962

1. Introduction

a. The Challenge

A clean, stable and sustainable source of energy for Southern California is critical to supporting a healthy and resilient region. In developing future plans, SCAG must fully weigh and consider energy supply, efficiency, consumption, and environmental impacts such as greenhouse gas emissions. California relies on petroleum-based fuels for 96 percent of its transportation needs.[1] The SCAG region consumes over 23 million gallons of petroleum per day, roughly half of California's oil consumption[2] and vehicle fuel consumption in the region has increased 20 percent over the last ten years.[3] Furthermore, only 15 percent of the electricity consumed in the region is generated from renewable sources.[4] At the same time, SCAG forecasts the region will add over 6 million people, 2 million households, and 3 million jobs between 2000 and 2030. These additional people, households, and jobs will place new demands on non-renewable energy production and increase the amount of greenhouse gas emissions generated in the region.

In the face of this growth, there is the growing realization that we are living in an energy constrained world. Both environmental and geopolitical factors are causing energy experts to question the long term viability of a fossil fuel-based energy future. Concerns about global climate change have motivated action at the federal, state and local levels to move away from fossil fuels, while continued oil price fluctuations and supply constraints have helped raise awareness about the unsustainability of our dependence on imported petroleum.

The U.S. represents 5 percent of the world's population, but consumes 25 percent of the world's oil.[5] In addition, the U.S. Department of Energy forecasts that world

[1] California Environmental Protection Agency (3 April 2006), Climate Action Team Report to Governor Schwarzenegger and the Legislature.
[2] California Department of Transportation, Division of Transportation System Information. (December 2006). California Motor Vehicle Stock, Travel and Fuel Forecast.
[3] California Energy Commission, (September 2005) California Energy Demand 2006-2016 Staff Energy Demand Forecast 2005, CEC-400-2005-034-SF-ED2.
[4] Southern California Association of Governments. State of the Region 2006.
[5] United States Census Bureau and United States Energy Information Agency, Basic Petroleum Statistics, (October 2006). Retrieved June 5, 2007 from http://www.eia.doe.gov/neic/quickfacts/quickoil.html.

energy consumption is projected to increase by 57 percent from 2004 to 2035[6] and that U.S. consumption of liquid fuels is projected to increase by 30 percent between 2005 and 2030, from 21 million barrels per day to 27 million barrels per day. Most of the U.S. increase is anticipated in the transportation sector, which is projected to account for 73 percent of total liquid fuels consumption in 2030, up from 67 percent in 2005.[7]

At the same time, the U.S. currently imports 58 percent of its petroleum and California imports approximately 40 percent of its petroleum. In California, oil production peaked in 1985. Since then, the share of oil from foreign imports has increased rapidly, from below 10 percent in 1995 to over 40 percent in 2006, as shown in the chart below.[8] In 2005, California received 35 percent of its foreign imports from Saudi Arabia, 24 percent from Ecuador, and 12 percent from Iraq.[9] Globally, increasing demand from the growing economies of India and China will further constrain world oil supplies. According the U.S. Energy Information Agency (EIA), India has become the fifth largest consumer of oil in the world during 2006.[10] China is the world's most populous country and the second largest energy consumer behind the United States.[11]

DRAFT

[6] United States Department of Energy, Energy Information Administration. International Energy Outlook 2007 (May 2007) 7 Retrieved June 5, 2007 from http://www.eia.doe.gov/oiaf/ieo/index.html

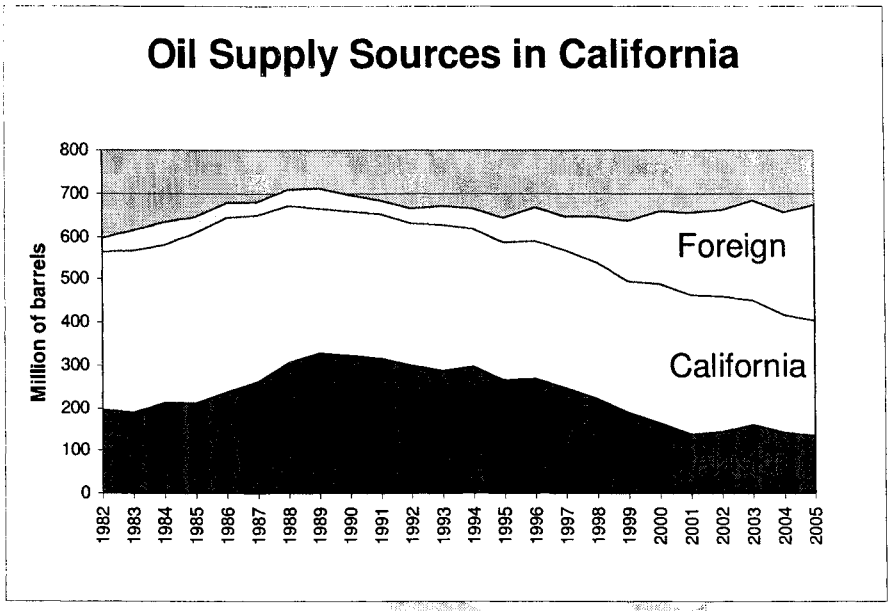
[7] United States Department of Energy. (February 2007). Annual Energy Outlook 2007 with Projections to 2030. Retrieved June 12, 2007 from http://www.eia.doe.gov/oiaf/aeo/index.html.

[8] California Energy Commission, Oil Supply Sources to California Refineries. Retrieved December 20, 2006 from http://www.energy.ca.gov/oil/statistics/crude_oil_receipts.html

[9] California Energy Commission, Foreign Sources of Crude Oil Imports to California 2005. Retrieved February 8, 2007 from http://www.energy.ca.gov/oil/statistics/2005_foreign_crude_sources.html

[10] United States Energy Information Agency, Country Analysis Briefs. Retrieved February 23, 2007 from http://www.eia.doe.gov/emeu/cabs/India/Background.html

[11] United States Energy Information Agency, Country Analysis Briefs. Retrieved February 23, 2007 from http://www.eia.doe.gov/emeu/cabs/China/Background.html



Source: California Energy Commission, Oil Supply Sources to California Refineries. Retrieved December 20, 2006 from http://www.energy.ca.gov/oil/statistics/crude_oil_receipts.html

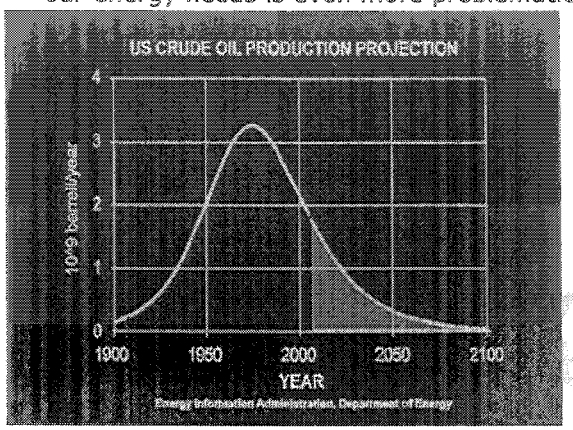
There are additional concerns that the nation's dependence on oil, especially from the Persian Gulf, requires a U.S. military presence, with all of its associated economic and social costs.[12] As identified by the United States Government Accountability Office, oil production could be shut down by wars, strikes, and other political events in many countries with proven oil reserves. For example, the countries of Iran, Iraq, Nigeria and Venezuela contain one-third of worldwide reserves but face high levels of political risk. Furthermore, countries defiend as having medium to high levels of political risk held 63 percent of proven worldwide oil reserves.[13]

Furthermore, much of the oil remaining in the ground can only be accessed by using complex and costly technologies that present greater environmental challenges than previous technologies used for most of the oil produced to date. Enhanced oil recovery (EOR) technologies are much costlier than conventional production methods and increase greenhouse gas emissions due to the additional energy required to perform the tasks.

[12] Council on Foreign Relations, National Security Consequences of U.S. Oil Dependency. Report of an Independent Task Force (2006). Retrieved March 20, 2007 from http://www.cfr.org/content/publications/attachments/EnergyTFR.pdf

[13] United States Government Accountability Office, Crude Oil: Uncertainty about Future Oil Supply Makes It Important to Develop a Strategy for Addressing a Peak and Decline in Oil Production. (February 2007) GAO-07-283.

Oil is a finite and non-renewable resource and it is highly unlikely that future energy consumption trends can be sustained with the current political, economic, environmental and technological constraints. Our nation's reliance on petroleum for our energy needs is even more problematic because of the global trend toward an inevitable turning point - "peak oil" - the peak and then decline of global oil production. Peak oil is the point of maximum oil production whether from a single well, a country, or the planet as a whole. The maximum point of production is expected to happen when about half or slightly more of the ultimately recoverable oil has been produced. To be clear, peaking does not mean "running out." Rather, it indicates the point where global production can no longer be maintained or increased. Production will begin to decline, year after year.



The analyses of geophysicist M. King Hubbert suggest that one new barrel of oil is being found for every four barrels being consumed. Hubbert correctly predicted the 1971 peak in U.S. production as shown in the graphic from the U.S. Energy Information Administration, and further predicted that sometime between 2005 and 2025, world oil production would reach a peak and begin a sharp decline.[14]

However, the projections of when worldwide oil will peak vary widely because there is disagreement over how much oil is left in the ground. One oil depletion model developed by Colin Campbell, projected a peak in all oil types in 2007. The U.S. Energy Information Administration stated that peaking of world oil production is not anticipated until after 2030.[15] . A fundamental problem in predicting oil peaking is the poor quality of and possible political biases in world oil reserves data. Most estimates are based on different geological assumptions and investments in expanded oil production. In addition, the reserves reported by the Organization of the Petroleum Exporting Countries (OPEC) lack transparency and independent verification.[16,17] This wide range of peak oil forecasts presents a very difficult dilemma for policy makers. On one hand, action could be delayed until there is a consensus from forecasters, however that is unlikely given the strongly held divergent views. On the other hand, waiting to take action could prove costly and result in severe consequences. Initiating a move to conservation, efficiency, demand reduction and renewables 20 years

[14] Udall, R. and Andrews, S. (1999, January). When will the joy ride end? A petroleum primer. Hubbert Center Newsletter, 99(1), 1-8.
[15] United States Department of Energy, Energy Information Administration. International Energy Outlook 2006 (June 2006) page 29. Retrieved February 23, 2007 from http://www.eia.doe.gov/oiaf/ieo/pdf/0484(2006).pdf
[16] Hirsch, Robert L., (2007, April). Peaking of World Oil Production: Recent Forecasts. World Oil Magazine, Vol 228 No 4.
[17] OPEC Members include Algeria, Angola, Indonesia, Iran, Iraq, Kuwait, SP Libyan AJ, Nigeria, Qatar, Saudi Arabia, United Arab Emirates, Venezuela

before peaking would offer the possibility of avoiding a world liquid fuels shortfall and significant economic hardship.[18]

The International Energy Agency reported in July 2007 that the world will face an oil supply "crunch" in the next five years. This is due to faster than expected falls in supply in mature areas such as the North Sea and Mexico and new prospects in Russia are experiencing long delays. As a result, oil supply will increase approximately 1 percent annually while demand will grow at an annual rate of 2.2 percent.[19]

The world supply crunch will impact California and the SCAG region. A fuel shortage will take a toll on California's economy as consumers are spending more of their household income on gasoline than ever before, especially with poor job/housing balance creating unavoidable commutes that miminize consumers' ability to avoid this cost. High fuel prices also reduce profit margins for the manufacturing and industrial sectors, which pass the higher cost of their goods and services to consumers. Since September of 2004, the monthly average price of gasoline has increased by more than 35 cents per gallon, costing consumers an additional $6.1 billion for gasoline.[20]

There is also growing demand for natural gas, which makes up 25 percent of the nation's energy use and by comparison, is a relatively clean source of electricity compared to sources such as coal. Natural gas follows a production curve similar to oil. Some research has shown a world peak in natural gas occurring a decade or two later than oil. However, the U.S. and California could experience the effects sooner than that. North American gas production appears to have peaked in the past few years and, unlike oil, it is more difficult and expensive to import replacement natural gas from overseas, as it has to be liquefied for transport and then re-gasified for distribution.[21]

The U.S. Energy Information Agency predicts that natural gas prices will remain high through 2030. Furthermore, the U.S. will lose its main source of natural gas imports by 2010. The decline of Canada's largest producing basin, the Western Sedimentary Basin, coupled with an approximately 2 percent projected average annual growth in Canada's domestic consumption, leaves less Canadian natural gas available for export to the United States and California.[22] In spite of this California, natural gas

[18] Robert L. Hirsch, Roger H. Bezdek, and Robert M. Wendling, Peaking of World Oil Production: Impacts, Mitigation and Risk Management, U.S. Department of Energy, National Energy Technology Laboratory. February 2005.
[19] International Energy Agency (July 2007). Medium Term Oil Market Report
[20] California Energy Commission. (November 2005). Integrated Energy Policy Report. CEC-100-2005-007CMF
[21] City of Portland Office of Sustainable Development, Bureau of Planning, and Department of Transportation. Peak Oil Task Force Briefing Book (July 25, 2006).
[22] United States Department of Energy, Energy Information Administration. International Energy Outlook 2006 (June 2006) pp. 37 – 49. Retrieved February 23, 2007 from http://www.eia.doe.gov/oiaf/ieo/pdf/0484(2006).pdf

has become the preferred source of electricity generation, supplying over 40 percent of California's power.[23] In addition, California imports 23 percent of its natural gas from Canada.[24]

In addition to the uncertainty regarding fossil fuels supplies, there is also uncertainty about how climate change will alter economies and ecosystems at the global, regional and local levelsTransportation is the largest source of greenhouse gas emissions in California, representing 41 percent of emissions. California is the second largest emitter of GHG emissions in the United States, next to Texas. Only nine nations have greater total emissions than the state of California. In 2004, California produced 492 million gross metric tons of carbon dioxide - equivalent GHG emissions, including imported electricity and excluding combustion of international fuels and carbon sinks or storage.[25] Climate change poses serious risks to our economy, water supply, biodiversity, and public health. These potentially catastrophic impacts have led to new local and state efforts to reduce the amount of greenhouse gas emissions released into the atmosphere.The landmark legislation, AB 32 or the Global Warming Solutions Act, requires reduction of the state's greenhouse gas (GHG) emissions to 1990 levels by 2020. This emissions target is equal to a 25% reduction from current levels. Longer term targets have also been set through Executive Order S-3-05, which calls for a reduction of GHG emissions to 80% below 1990 levels by 2050.

Options to Reduce Energy Consumption

This chapter lays out a strategy to reverse the current trends and diversify our energy supplies to create clean, stable, and sustainable sources of energy that address energy uncertainty and environmental health. This plan includes strategies that the region can take to reduce fossil fuel consumption and increase the use of clean, renewable technologies. SCAG will continue to work with stakeholders at the federal, state, regional and local levels to promote these policies and encourage their implementation. Leadership is needed to coordinate and provide an ongoing forum for local and regional programs to implement an energy savings program.

As stated in the 2006 State of the Region, we can prepare for these inevitable energy challenges by encouraging participation in the neighborhood community, reinvesting in public transportation, and revising land use, zoning and building codes to optimize the consumption of our energy resources. There are numerous strategies that the public sector can undertake to address our energy challenges. These make up the bulk of the proposed Action Plan to promote a more sustainable energy supply.

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[23] California Energy Commission, 2006 Gross System Electricity Production. (April 2007) CEC-300-2007-007. Retrieved June 5, 2007 from http://www.energy.ca.gov/electricity/gross_system_power.html

[24] California Gas Reports, FERC Form 2, QFER Form 6a and 10a, California Department of Conservations Division of Oil and Gas - Annual Report of the State Oil and Gas Supervisor. Retrieved June 5, 2007 from http://www.energy.ca.gov/naturalgas/statistics/gas_supply_by_source.html.

[25] California Energy Commission, Inventory of Greenhouse Gas Emissions and Sinks: 1990-2004 Final Staff Report. (December 2006) CEC-600-2006-013-SF. Retrieved March 26, 2007 from http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF

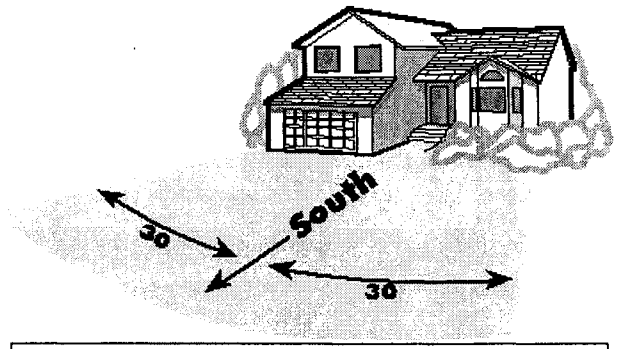
Land Use and Building Design

Strategies to reduce energy consumption include both where development occurs and how it is designed. Land use patterns have shaped energy use by increasing the amount of travel necessary to reach jobs and services. This growth pattern has resulted in an increase in vehicle miles traveled (VMT) at a rate of more than 3 percent a year between 1975 and 2004.[26] Increased VMT results in additional demand for petroleum and greenhouse gas emissions. As such, transportation accounts for 41 percent of the state's greenhouse gas emissions. Building design and housing types also have a strong relationship to energy use and are thus, a strong focus of this chapter. For example, residents of single family detached housing have been found to consume 22 percent more energy than those of multifamily housing and 9 percent more than those of single-family attached housing.[27] SCAG has commissioned research to identify effective strategies to reduce energy use, with an emphasis on land use. The discussion that follows is a summary of the findings.

Mixed land use (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation has been shown to save consumers up to 512 gallons of gasoline per year. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods.[28] With this reduction, there is less overall energy consumption and less greenhouse gas emissions from personal vehicles. Going hand-in-hand with mixed-use development, is the development of pedestrian corridors and bike trails that connect residents to work sites, shops, and recreational opportunities, communities, which can also realize a reduction of personal vehicle use and fuel consumption.

Neighborhood energy systems allow communities to generate their own electricity and offer potential advantages such as cost reductions and energy savings up to 40 percent. THIS MAY NEED AN ADDITIONAL SENTENCE OF EXPLATION TO PARARELL THE FORMAT OF THE OTHER PARAGRAPHS

Orienting streets and buildings for best solar access could significantly reduce energy requirements throughout the life of a building. Streets should be designed to take advantage of passive solar heating and most buildings should be oriented such that the long axis runs east/west. The southern most



The southern most face of the building should face within 30 degrees of south.
Source: Oikos: Green Building Source http://oikos.com/esd/42/solar.html

[26] California Department of Finance. (December 1998)
Federal Highway Authority, (2005) Highway Statistics
[27] Rong, Fang. (2006) Impact of Urban Sprawl on U.S. http://hdl.handle.net/1903/3848 on September 14, 2007.
[28] Transportation Demand Management Encyclopedia. "Transit Oriented Development." Victoria Transport Policy Institute.

face of the building should face within 30 degrees of south.

Interest in **green buildings** and now sustainable communities has been growing for some time, as the impacts of buildings on the environment have come into clearer focus and a broader concern has developed regarding environmental sustainability. **Green buildings** can significantly reduce local environmental impacts, regional air pollutant emissions, and global greenhouse gas emissions. Sustainable communities go even further to include water, waste, traffic and transportation along with wireless and telecommunications infrastructures. In short, entire communities like colleges, shopping malls, office buildings and residential areas (multi and single family homes, retirement complexes etc) need to be energy independent and the impact on the environment is neutral or non-polluting.

Green building standards is a start as it involves everything from energy efficiency, usage of renewable resources and reduced waste generation and water usage. Such standards can reduce local environmental impacts, regional air pollutant emissions, and global greenhouse gas emissions.

While interest in green buildings has been growing for some time, cost has been a main consideration as it may cost more up front to provide energy-efficient building components and systems. Initial costs can be a hurdle even when the installed systems will save money over the life of the building. Energy efficiency measures can reduce initial costs, for example, by reducing the need for over-sized air conditioners to keep buildings comfortable. Undertaking a more comprehensive design approach to building sustainability can also save initial costs through reuse of building materials and other means. The focus and construction of sustainable communities is crticial as different infrastructures are intermixed with one another. For example, over 20% of California's electricity is used for its water infrastructures.

A comprehensive and persuasive study of the value of green building savings is the 2003 report to California's Sustainable Building Task Force. In the words of the report:

> "While the environmental and human health benefits of green building have been widely recognized, this comprehensive report confirms that minimal increases in upfront costs of about 2% to support green design would, on average, result in life cycle savings of 20% of total construction costs -- more than ten times the initial investment. For example, an initial upfront investment of up to $100,000 to incorporate

green building features into a $5 million project would result in a savings of $1 million in today's dollars over the life of the building."[29]

Alternative Fuels are now Main Power Generation

Alternative fuel production and infrastructure will also be needed for the SCAG region to achieve the ambitious performance outcome of reducing fossil fuel use 25% below 1990 levels by 2020. The California Energy Commission (CEC) and California Air Resources Board are analyzing options to reduce the use of conventional transportation fuels through the use of alternative fuels. While this area holds much promise, the CEC's 2005 Integrated Energy Policy Report offers a glimpse into the challenges ahead for replacing fossil fuels with alternatives. For example, an increase in the amount of ethanol in gasoline would result in a loss of fuel economy, and require motorists to purchase more gasoline since E-85 contains almost 30 percent less energy than conventional gasoline. Expanded use of gas-to-liquid (GTL) as a diesel fuel option would require importing large quantities to California and would face similar facility constraints as natural gas imports at the ports of Long Beach and Los Angeles. Furthermore, the federal government has approved GTL as an alternative fuel only if it is produced domestically.[30]

Other constraints also exist such as the energy balance of alternative fuels. Careful consideration needs to be made with the use and public policy around alternative fuels. While some alternative fuels have benefits in some areas, they also have costs in others. The CEC has recently assessed the full life cycle energy inputs as mandated by Assembly Bill 1007, (Pavley) Alternative Transportation Fuels Plan. The most recent study assessed the energy inputs, greenhouse gas emissions, criteria pollutant emissions, and air toxics emissions for transportation fuels including biodiesel, conventional petroleum, electricity, ethanol, and hydrogen. For example, corn-based ethanol has higher emissions of NOx and PM10 (THAN WHAT?) and also use petroleum in the agricultural process to grow the corn in the first place. As this research continues, SCAG will monitor this research and forecasting methodologies. (THERE IS NO STATEMENT HERE ABOUT ALTERNATIVES LIKE SOLAR HYDROGREN OR THE POSSIBILITY OF CHARGING HYBRIDS AT HOME BY DISTRIBUTED GENERATION) AGREE

(I WOULD SWITCH THE ORDER BETWEEN RENEWABLE ENERGY AND ALTERNATIVE FUELS) TOTALLY AGREE and would even drop term Alternative. IT needs to be defined as it is usually mis-used.

[29] Greg Kats, Capital E, The Costs and Financial Benefits of Green Buildings, A Report to California's Sustainable Building Task Force, October 2003, http://www.ciwmb.ca.gov/greenbuilding/Design/CostBenefit/Report.pdf, last accessed September 17, 2007.

[30] Gas-to-liquid (GTL) is a synthetic diesel-like fuel that can be used in both conventional diesel engines and fueling systems. GTL fuel is made with a process that converts hydrocarbon gas to a liquid fuel (generally referred to as the "Fischer-Tropsch reaction").

Renewable Energy

Additional efforts will be needed to reach SCAG's performance goal outcome of 20% renewable energy supply by 2010 and its longer term goal of 30% by 2020.[31] Of the electricity consumed in the SCAG region in 2006, an average of only 7 percent was generated from eligible renewables. By comparison, 10 percent of the electricity produced in California was renewable.[32] However, increasing the use of certain renewable energy sources includes tradeoffs that could impact other areas. For example, significant transmission upgrades would be needed to take advantage of resources in the Tehachapi wind and the Imperial Valley geothermal resource areas to move that energy from its source to customers. (ITS NOT CLEAR WHAT THE NEGATIVE IMPACT OF THIS IS – COST?) In addition, wind turbines have been found to result in bird deaths. (YES, BUT IS THIS WHAT HAS REALLY SLOWED DOWN THE PROLIFERATION OF WIND ENERGY? THE CEC REPORT TALKS MORE ABOUT THE NEED TO UPDATE 'WIND REPOWERING CONTRACTS')

The CEC recommends various opportunities to expand the renewable energy mix for California's electricity generation needs, such as adopting clear and consistent policies for sustainable biomass development, developing "in-conduit" hydropower, taking advantage of California's abundant solar energy resources, and tapping into distributed generation and combined heat and power facilities.[33] SCAG will continue to monitor the development of these renewable resource opportunities as well as track their costs and benefits. THIS SECTION NEEDS MAJOR REWORK, TO EMPHASIZE DISTRIBUTED GENERATION COMPARED TO THE PROBLEMS WITH CENTRALIZED SOLUTIONS – AND IN ADDITION IT DOESN'T EVEN MENTION INCREASING COMMUNITY AGGREGATION OPTIONS FOR CITIES TO CHOOSE RENEWABLE SOURCES FOR THEIR CUSTOMERS

Public Transportation

PUBLIC TRANSPORTATION needs serious consideration. First the area needs to be define: Buses? Trains? Light Rail? Should be all of these. BUT the point MUST be to move away from buses that use any fossil fuels (natural gas in particular) to sustainable systems for all these which are electric and get their fuel/power from renewable energy sources.

As identified in the 2006 State of the Region, total transit boardings in the region in fiscal year 2005 increased by 16 percent from 617 million to a record high of 672 million. Nationally, transit boardings also increased at a faster rate than the population. This shift is good news since increases in public transit ridership can

[31] Renewable is defined as solar thermal, solar PV, wind, geothermal, biomass, and small hydro (less than 30 MW).
[32] California Energy Commission, 2005 Gross System Electricity Production. Retrieved on February 7, 2007 from http://www.energy.ca.gov/electricity/gross_system_power.html
[33] Distributed generation is electricity produced on site or close to load centers that is also connected to a utility's distribution system. The most efficient and cost-effective form of distributed generation is cogeneration or combined heat and power. By recycling waste heat, these systems are much more efficient than systems that separately serve thermal and electric loads.

proportionately reduce VMT, congestion, fuel consumption and improve air quality. A recent study on public transportation found that current public transit use reduces U.S. gasoline consumption by 1.4 billion gallons each year. In a "growth scenario," the study assumed that ridership would double over current levels due to expanded transit systems, new routes, and improved land use patterns. It concluded that the total national fuel savings from public transportation would double from current savings and would equal 2.8 billion gallons per year. [34]

HERE THERE NEEDS TO BE A STATEMENT ABOUT THE FUNDING CONSTAINTS FOR REGIONAL MASS TRANSIT AND THE CHALLENGES ABOUT CEQA REFORM THAT WOULD LEAD TO BETTER REGIONAL *TOD* PLANNING ALONG TRANSIT CORRIDORS.

b. The Proposed Plan

(THIS NEXT PARAGRAPH IS STILL ABOUT STATING THE PROBLEM, NOT TALKING ABOUT THE PLAN; IT REALLY BELONGS EARLY IN PART a. OF THE INTRODUCTION, OR ELSE I WOULD JUST DROP THE a. and b. FORMAT AND JUST CLOSE THE SECTION WITH SOMETHING CALLED 'SCAG's Role' AS I HAD SUGGESTED BELOW) AGREE

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The demand for oil must decline at a similar or faster rate than the rate of decline in production in order to minimize the enormous economic and social consequences of increased prices and competition for scarce resources. The U.S. depends on fossil fuels for approximately 85 percent of its energy. Oil and natural gas account for approximately two-thirds of U.S. energy use, with oil accounting for 40 percent and natural gas another 23 percent. Coal, which emits more heat-trapping carbon dioxide (CO2) than oil or natural gas per unit of energy, accounts for another 22 percent. Fossil fuel use supports our current economic system including personal transportation and goods movement. Oil and natural gas are used for industrial processes, including use as feedstock, for thousands of products such as asphalt, fertilizers, pesticides, plastics, chemicals, paints, medical products, vinyl, and shoes and clothing. If oil and gas become scarce and expensive, it will have profound implications for our economy and way of life.[35] A recent study funded by the U.S. Department of Energy determined that viable mitigation options exist but must be initiated more than a decade in advance to avoid severe economic disruptions.[36] The graphic below shows the dramatic changes needed to reach the goals set forth in this plan and avert the potential economic disruptions.

SCAG's Role

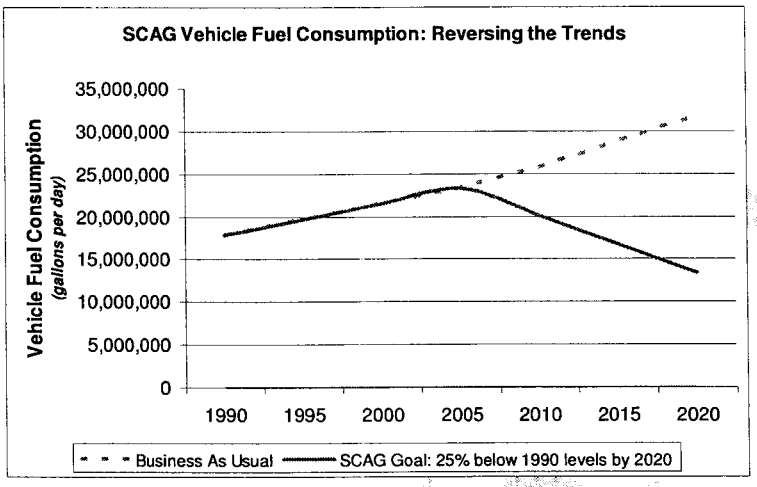
Leadership is needed to coordinate and provide an ongoing forum for local and regional programs to address our energy challenges. The RCP can lead the way by

[34] ICF International. (January 2007). Public Transportation and Petroleum Savings in the U.S.: Reducing Dependence on Oil," http://www.icfi.com/Markets/Transportation/doc_files/public-transportation.pdf

[35] City of Portland Office of Sustainable Development, Bureau of Planning, and Department of Transportation. Peak Oil Task Force Briefing Book (July 25, 2006).

[36] Robert L. Hirsch, Roger H. Bezdek, and Robert M. Wendling, Peaking of World Oil Production: Impacts, Mitigation and Risk Management, U.S. Department of Energy, National Energy Technology Laboratory. February 2005.

establishing an action that the region can take to reduce fossil fuel consumption and increase the use of clean, renewable technologies. SCAG will continue to work with stakeholders at the federal, state, regional and local levels to promote these policies and encourage their implementation. The remainder of this chapter will identify how to reverse the current trends and become less dependent on fossil fuels.



Source: California Department of Transportation, Division of Transportation System Information. (December 2006, November 2003). California Motor Vehicle Stock, Travel and Fuel Forecast. 1990 consumption levels are estimated based on trends.

2. Goals: Defining Sustainability

a. ***Reduce our region's consumption of non-renewable energy by:***

- Supplying the energy needs of the region today in a way that reduces the negative environmental impacts, social inequities, and economic hardship on future generations;
- Developing the infrastructure and social capital or making profits as long as it also benefits the general public and communities to adapt to a future energy economy with a constrained supply.

b. ***Increase the share of renewable energy in the region by:***

- Ensuring the resiliency of the region's economy by encouraging and supporting renewable energy infrastructure; and
- Developing renewable energy sources that reduce the amount of air emissions emitted through the combustion of fossil fuels.

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3. Outcomes

a. *Decrease the region's consumption of fossil fuels 25% from 1990 levels by 2020*

b. *Increase the share of renewable energy generation in the region to 20% by 2010, with additional increases to reach 30% by 2020*

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Energy Action Plan

IGR	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits									Other Benefits		
				Land Use and Housing	Transportation	Air Quality	Water	Energy	Open Space	Economy	Security and Emergency Preparedness	Solid Waste	Public Heath	Environmental Justice	Climate Change
SCAG Policies															
		♦	EN1. SCAG shall continue to work with the state to develop approaches for evaluating environmental impacts within the Compass Blueprint program, particularly energy, air quality, water, and open space and habitat. (1)	√	√	√	√	√	√				√	√	√
▲			EN2. SCAG shall continue to develop energy efficiency and green building guidance after the RCP is adopted to provide direction on specific approaches and models and to specify levels of performance for regionally significant projects to be consistent with regional plans.	√	√	√	√	√	√	√		√	√		√
		♦	EN3. SCAG shall continue to pursue partnerships with Southern California Edison and the California Public Utilities Commission to promote energy efficiency and reduce greenhouse gas emissions in the region.			√		√		√					√
		♦	EN4. SCAG shall continue to convene key decision makers to discuss energy issues and make recommendations to SCAG's Energy and Environment Committee, where appropriate.	√	√	√		√					√	√	√
		♦	EN5. SCAG shall convene key stakeholders to evaluate and where feasible, recommend transportation measures such as congestion pricing, a refined regional goods movement system and an environmental mitigation strategy that reduces fossil fuel consumption.	√	√	√		√		√					√
	●		EN6. SCAG shall monitor and provide input towards development of state energy projections and tools, including the Integrated Energy Policy Report and similar policy documents as well as future efforts to determine the implications of energy generation and consumption for the built environment	√	√	√		√							√

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	●		EN7. SCAG shall encourage credits for clean post recycle conversion technologies to produce energy.			√		√		√		√	√		√
Local Government Policies															
▲			EN8. Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips (2)	√	√	√	√	√	√	√		√	√	√	√
▲			EN9. Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include: • Using energy efficient materials in building design, construction, rehabilitation, and retrofit • Encouraging new development to exceed Title 24 energy efficiency requirements • Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to	√	√	√	√	√	√	√		√	√	√	√

			traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity • Orienting streets and buildings for best solar access • Encouraging buildings to obtain at least 20% of their electric load from renewable energy (3)												
▲			EN10. Local governments should include energy analyses in environmental documentation and general plans with the goal of conserving energy through the wise and efficient use of energy. For any identified energy impacts, appropriate mitigation measures should be developed and monitored. SCAG recommends the use of Appendix F, Energy Conservation, of the California Environmental Quality Act.	√	√	√		√					√		√
▲			EN11. Local governments should consider various best practices and technological improvements that can reduce the consumption of fossil fuels such as: • SCAG shall encourage investment in transit • Expanding light-duty vehicle retirement programs • Increasing commercial vehicle fleet modernization • Implementing driver training module on fuel consumption • Replacing gasoline powered mowers with electric mowers • Reducing idling from construction equipment • Incentivizing alternative fuel vehicles and equipment • Developing infrastructure for alternative fueled vehicles • Increasing use and mileage of High Occupancy Vehicle (HOV), High Occupancy Toll (HOT) and dedicated Bus Rapid Transit (BRT) lanes • Implementing truck idling rule, devices, and truck-stop electrification • Requiring electric truck refrigerator units • Reducing locomotives fuel use • Modernizing older off-road engines and equipment • Implementing cold ironing at ports • Encouraging freight mode shift • Limit use and develop fleet rules for construction equipment • Requiring zero-emission forklifts • Developing landside port strategy: alternative fuels,	√	√	√		√		√					√

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			clean engines, electrification												
▲			EN12. Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction shall be completed according to the specifications of the energy provider.	√		√		√							√
▲			EN13. Developers and local governments should assure that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	√		√		√		√					√
▲			EN14. Local governments should support only the use of the best available technology including monitoring, air, and water impacts for locating any nuclear waste facility.			√	√	√					√		
▲			EN15. Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.		√	√		√		√					√
▲			EN16. Utilities and local governments should consider the most cost-effective alternative and renewable energy generation facilities. [Potential call out box – refer to the Solid Waste Chapter and description of conversion technologies.]	√		√		√		√		√			√
▲			EN17. The project implementation agency should consider increasing capacity of existing transmission lines, where feasible.	√		√		√	√			√			
▲			EN18. The project implementation agency should install and maintain California Best Available Control Technologies on all power plants at the US-Mexico border.			√	√	√						√	√
		♦	EN19. Subregional and local governments should explore participation in energy efficiency programs provided by their local utility such as the Ventura Regional Energy Office, South Bay Energy Savings Center, and the San Gabriel Valley Energy Wise program. These programs can offer customized incentives and public awareness campaigns to reduce energy consumption.			√		√		√					√

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IGR	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits									Other Benefits		
				Land Use and Housing	Transportation	Air Quality	Water	Energy	Open Space	Economy	Security and Emergency Preparedness	Solid Waste	Public Heath	Environmental Justice	Climate Change
SCAG Strategies															
		♦	EN INITIATIVE 1: SCAG shall consider energy uncertainty into its future planning and programming, including the Regional Transportation Plan and the Regional Transportation Improvement Program.	√	√	√		√		√	√				√
		♦	EN INITIATIVE 2: SCAG shall continue to develop, in coordination with the California Air Resources Board, a data and information collection and analysis system that provides an understanding of the energy demand and greenhouse gas emissions in the SCAG Region.	√	√	√	√	√							√
Federal and State Government Strategies															
	●		EN INITIATIVE 3: The Secretary of Energy, in coordination with other relevant federal agencies, should establish a peak oil strategy to better prepare the United States for a peak and decline in oil production. Such a strategy should include efforts to reduce uncertainty about the timing of a peak in oil production and provide timely advice to Congress about cost-effective measures to mitigate the potential consequences of a peak.			√		√		√	√		√	√	√
	●		EN INITIATIVE 4: The Federal Government should increase Corporate Average Fuel Economy (CAFE) to a level that will reduce our dependence on foreign oil and reduce greenhouse gas emissions	√	√	√		√		√			√		√
	●		EN INITIATIVE 5: The Federal Government should develop a national consensus on alternative fuel research and development		√	√		√		√			√		√
	●		EN INITIATIVE 6: As recommended by the California Energy Commission, the state should continue to fund the Blueprint Planning Grant program and Blueprint Learning Network to assist regional agencies and local governments in developing regional growth plans. The	√	√	√	√	√	√	√			√	√	√

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			grant program should include energy consumption and greenhouse gas emission reduction as primary outcomes of the blueprints developed within the program.												
	●		EN INITIATIVE 7: The Federal and State Government should promote clean, cost-effective, reliable, domestic renewable energy generation, such as solar power and wind turbines		√	√	√	√	√	√			√		√
	●		EN INITIATIVE 8: State and federal lawmakers and regulatory agencies should pursue the design of programs to either require or incentivize the expanded availability and use of alternative-fuel vehicles to reduce the impact of shifts in petroleum fuel supply and price.	√	√	√	√	√	√	√			√		√
	●		EN INITIATIVE 9: The State and Federal governments should encourage mileage-based vehicle insurance as a voluntary program. [Potential call-out box: When using a mileage-based insurance program, a vehicle's insurance premiums would be based directly mileage during the policy term. The more you drive the more you pay and the less you drive the more you save. For example, a $375 annual premium becomes 3¢ per mile, and a $1,250 annual premium becomes 10¢ per mile. An average U.S. motorist would pay about 6¢ per mile.]		√	√		√		√				√	
Local Government Strategies															
▲			EN INITIATIVE 10: Local governments should alter zoning to improve jobs/housing balance and creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel. (4)	√	√	√	√	√	√	√		√	√	√	√

(1) Multiple Benefits: The understanding of land use impacts on energy demand, energy generation and transmission, and on greenhouse gas emissions are in the early stages of exploration. Further research is necessary to understand how land use patterns can help reduce future vehicle miles traveled, carbon dioxide, particulate matter and parkland and habitat loss.

(2) Multiple Benefits: There are various land use practices and building techniques that have been shown to reduce energy consumption and greenhouse gas emissions. For example, mixed land uses (i.e. residential developments near work places, restaurants, and shopping centers) with access to transportation have been shown to save consumers up to 512 gallons of gasoline per year. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods. With this reduction, there is less overall energy consumption and less greenhouse gas emissions from personal vehicles. Encouraging the development of pedestrian corridors and bike trails that connect residents to work sites, shops, and recreational opportunities, communities can reduce personal vehicle use, fuel consumption and consequently improve air quality. Furthermore, land use patterns use resources more efficiently and reduce parkland and habitat loss.

(3) There are various programs that promote green building such as the U.S. Green Building Council's Leadership in Energy and Environmental

Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Green building standards go well beyond energy efficiency, involving usage of renewable resources and reduced waste generation and water usage. Such standards can reduce local environmental impacts, regional air pollutant emissions, and global greenhouse gas emissions.

(4) Infill development encourages use of land in already developed areas as opposed to building new buildings on the outskirts. Infill involves the transformation of existing infrastructure to maximize their use potential. Infill development encourages building upwards instead of outwards. It takes advantages of unused areas and transforms them into, most typically, mixed use development. Most infill designs incorporate residential and commercial establishments in the same building. By using infill techniques, communities can save on the cost of new infrastructures and new roads. Infill projects give communities opportunities to expand while integrating new energy efficient standards. Multiple Benefits: Successful infill development can offer these rewards for communities:

- provide housing (both affordable and market rate) near job centers and transit;
- increase the property-tax base;
- preserve open space at the edge of regions;
- provide new residents to support shopping districts and services;
- capitalize on community assets such as parks, infrastructure, and transit; and
- create new community assets such as child-care centers, arts districts, and shopping areas.

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Resources:

- Go Solar California: http://www.gosolarcalifornia.ca.gov
- Southern California Edison, Energy Efficiency Incentives: http://www.sce.com/RebatesandSavings
- Southern California Gas Company, Energy Efficiency Incentives: http://www.socalgas.com/energyefficiency/
- Federal Tax Incentives for Energy Efficiency: http://www.energystar.gov/

DRAFT

Christine Fernandez

From: Agu, Chuk [CAGU@dpw.lacounty.gov]
Sent: Thursday, June 19, 2008 4:15 PM
To: Christine Fernandez
Cc: Doudar, Phil; Alva, Paul
Subject: FW: SCAG-REVIEW OF DRAFT RCP-DPW Environmental Program.doc
Attachments: SCAG-REVIEW OF DRAFT RCP-DPW Environmental Program.doc

Hi Christine,

On behalf of Environmental Programs Division of Los Angeles County Department of Public Works, attached are the comments on the solid waste chapter of SCAG's Regional Comprehensive Plan. If you have additional questions, please call or email me. Thank you.

<<SCAG-REVIEW OF DRAFT RCP-DPW Environmental Program.doc>>

Chuk Agu, M.S., P.E.

Associate Civil Engineer

Environmental Programs Division

Los Angeles County Department of Public Works

Phone: (626) 458-3556

Fax: (626) 458-3593

REVIEW OF DRAFT REGIONAL COMPREHENSIVE PLAN SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENT COMMENTS ON THE SOLID WASTE CHAPTER

Environmental Programs Division

We commend the Southern California Association of Government's (SCAG) effort in developing the Regional Comprehensive Plan (RCP) to guide sustainable development and promote environmental policies that would help "green" the region, and also address solid waste management issues facing the region. We also appreciate the opportunity to review and comment on the Draft RCP and look forward to continue providing expertise and assistance to SCAG in developing the Solid Waste Chapter.

The County of Los Angeles Department of Public Works is, among other things, responsible for preparation and administration of the Los Angeles County Countywide Siting Element (Siting Element) and the Countywide Integrated Waste Management Summary Plan (Summary Plan). The Siting Element is a planning document which provides for the County's long-term solid waste management disposal needs. The Summary Plan is a planning document which describes how all 89 of the jurisdictions Countywide, acting independently and collaboratively, are complying with the State's waste reduction mandate.

We recognize that lack of realistic and proper solid waste management planning in the region could have serious health and safety, economic, and environmental consequences. We also recognize that the development of solid waste management facilities (e.g., transfer/processing and composting facilities, etc.) and siting of disposal facilities (e.g., landfills) are becoming much more complex and costly. As a result, consistent with the Siting Element and Summary Plan, we support the Solid Waste Chapter's strategy to (1) achieve maximum diversion, (2) utilize a combination of local and remote landfills for disposal of the residual solid waste in the short-term, and (3) in the long-term, move to a system of waste prevention and minimization of landfill disposal through a variety of waste management strategies, including conversion technologies with diversion credit.

Furthermore, the County of Los Angeles Department of Public Works supports the RCP's adoption of a paradigm shift in the solid waste management hierarchy to a new paradigm that relies more heavily on reducing first, then reuse, recycling, conversion technologies and finally disposal to landfill.

Moreover, because Los Angeles County's solid waste management infrastructure is the most complicated in the nation and the County of Los Angeles Department of Public Works is the lead agency in preparing and administering Los Angeles County countywide solid waste planning documents, we respectfully request SCAG to continue consulting with Public Works (specifically, Environmental Programs Division) in developing the RCP, to ensure consistency with the Los Angeles County countywide solid waste management system.

If you have any questions on the comments to the Solid Waste Chapter of the Draft RCP, please contact Paul Alva of this office at (626) 458-3573.

CITY OF RANCHO SANTA MARGARITA

Mayor
Neil C. Blais

Mayor Pro Tempore
Gary Thompson

Council Members
L. Anthony Beall
Jerry Holloway
James M. Thor

City Manager
Steven E. Hayman

July 7, 2008

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

Subject: Comments on the Draft Regional Comprehensive Plan

Dear Mr. Lieb:

The City of Rancho Santa Margarita appreciates the opportunity to review and provide comments on the draft 2008 Regional Comprehensive Plan (RCP). The City has been providing comments through the Orange County Council of Governments Technical Advisory Committee (OCCOG TAC) and concurs with the comments that have been provided. The City plans to continue its active participation in the RCP 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,

Nate Farnsworth
Planner, AICP

cc: Kathleen Haton, Development Services Director
Tracy Sato, OCCOG TAC

22112 El Paseo • Rancho Santa Margarita • California 92688-2824
Phone 949.635.1800 • Fax 949.635.1840 • www.cityofrsm.org

RESOLUTION No. 08-501-1

RESOLUTION OF THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS APPROVING THE 2008 REGIONAL COMPREHENSIVE PLAN FOR THE SCAG REGION

WHEREAS, members of the Southern California Association of Governments (SCAG) have the common power under the Joint Powers Agreement "to study, discuss and recommend policies and procedures for the solution of area-wide problems";

WHEREAS, the SCAG region stands at critical crossroads where serious area-wide problems or challenges exist in the areas of growth management, land use and housing, transportation and traffic, air quality, water, energy, economy, and waste management. A new direction for addressing these challenges is essential in order to maintain a sustainable future;

WHEREAS, in 2004, SCAG's Regional Council directed the preparation of a "Regional Comprehensive Plan" ("RCP" or "Plan" herein) as part of SCAG's Ten-Year Strategic Plan. Specifically, the Regional Council established the agency's goal to create a RCP to guide regional development, with the RCP representing "a comprehensive overview of the region's economic, social and environmental future with special attention being given to housing and transportation". Similar to the "Regional Comprehensive Plan and Guide" adopted by the Regional Council in 1996, the updated 2008 RCP is a long-term comprehensive plan which addresses the SCAG region's many challenges, and provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental and overall quality of life needs;

WHEREAS, work related to the RCP involved four years of intensive public discussion. Building off of SCAG's 2% Compass Strategy and principles (mobility, livability, sustainability and prosperity), the RCP is founded upon the ideas of hundreds of individuals, including members of the public, residents, business persons, and elected officials. The RCP was directed by the Regional Council with the Community, Economic and Human Development (CEHD) committee serving as the lead policy committee over the Plan. Overseen by the RCP Task Force, comprising members of each of SCAG's main Policy Committees, the public participation process for the RCP included numerous public presentations and workshops throughout the region, monthly meetings of the RCP Task Force and related topic-specific subcommittees (such as the Open Space Working Group, the Energy Working Group, the Water Polity Task Force and the Solid Waste Task Force), information on the SCAG website, periodic updates to the Regional Council and Policy Committees, and substantial input from the Regional Council on the approach and structure for the RCP during the four-year period;

WHEREAS, the purpose of the RCP is to collect and disseminate regional policies. The various chapters in the RCP address each of the major elements of planning for the region: Air Quality; Economy; Energy; Finance; Land Use and Housing; Open Space and Habitat; Security and Emergency Preparedness; Solid Waste; Transportation; and Water. The RCP also includes one "special focus section" essay on Education, which does not contain any proposed policies, but rather sets forth issues for further study;

WHEREAS, each chapter of the RCP contains goals, outcomes and an action plan. The goals create a definition for sustainability, the outcomes establish what might be achieved by pursuing the action strategy, and the action plan proposes specific action steps that could be undertaken by SCAG, the State or Federal government, local government, or other entities. The action plan section in each chapter is divided into "constrained policies" or policies that can be reasonably achieved given current political will, funding and other variables, as well as "strategic initiatives" or actions that while not currently practicable, would be required to reach the chapter goals;

WHEREAS, in total, the RCP contains 206 constrained and strategic regional policies. The Plan also identifies policies which have multiple benefits, noting the inter-connections amongst resource areas and therefore producing the greatest results;

WHEREAS, the draft of the RCP was released in December 2007, with copies provided to each city and county in the SCAG region, as well as other numerous interested parties and stakeholders. Any comments received during the public comment period have been reviewed, addressed and incorporated in the final version of the RCP;

WHEREAS, the RCP is an advisory document for local agencies in the SCAG region. Upon adoption by the Regional Council, the RCP will be distributed to local governments in the region for their information and voluntary use when preparing local plans and handling local issues of regional significance;

WHEREAS, the policies in the RCP will also be incorporated as part of SCAG's required Inter-Governmental Review (IGR) process, whereby SCAG provides comments on plans and environmental documents of regional significance. Comments will discuss the consistency with regional policies, including those set forth in the RCP, the Regional Transportation Plan (RTP) and other major SCAG plans and policies; and

WHEREAS, the RCP is not intended to be used to distribute funds, prioritize funding for transportation projects in the RTP, or to implement mandatory programs or any future purpose not specifically authorized herein, without subsequent action of the Regional Council. Subject to future budget processes and approval by the Regional Council, the RCP may be used for future SCAG planning activities.

NOW, THEREFORE BE IT RESOLVED, by the Regional Council of the Southern California Association of Governments as follows:

1. The Regional Council approves and adopts the 2008 Regional Comprehensive Plan (RCP) for the SCAG region. In adopting the 2008 RCP, the Regional Council approves and incorporates all of the foregoing recitals.

2. SCAG's Executive Director or his designee is authorized to disseminate the 2008 RCP to all local jurisdictions in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance.

3. SCAG staff is also authorized to schedule and conduct post-adoption workshops to be held at the subregional level in order to build familiarity with the RCP and its regional policies.

APPROVED AND ADOPTED by the Regional Council of the Southern California Association of Governments at a regular meeting this 4th day of September 2008.

_____

Richard Dixon
President
Councilman, City of Lake Forest

Attested by:

_____

Hasan Ikhrata
Executive Director

Approved as to Form:

_____

Joe Burton
Chief Counsel

COMMUNITY, ECONOMIC & HUMAN DEVELOPMENT COMMITTEE
of the
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Supplemental Information

Item 5.1 Draft Regional Comprehensive Plan

a. Comments received since agenda distribution:
California Department of Transportation
Ventura County Regional Energy Alliance
Ventura County Integrated Waste Management
California Office of Emergency Services (verbal comment)
Orange County Council of Governments

b. Responses to comments received since agenda distribution
California Department of Transportation
Ventura County Regional Energy Alliance
Ventura County Integrated Waste Management
California Office of Emergency Services
Orange County Council of Governments

Jennifer Sarnecki

From: Dianna Watson [dianna_watson@dot.ca.gov]
Sent: Tuesday, August 05, 2008 7:05 AM
To: Jennifer Sarnecki
Subject: RE: Out of Office AutoReply: Draft RCP

Good morning,
Yes, you can consider these comments official, however, I do expect comments from one more person. If I receive those by the deadline I will forward them to you.

Thanks,
DiAnna

"Jennifer Sarnecki" <SARNECKI@scag.ca .gov>
08/04/2008 02:31 PM

To: "Dianna Watson" <dianna_watson@dot.ca.gov>
cc:
Subject: RE: Out of Office AutoReply: Draft RCP

Hi Dianna,
Thank you for the comments. The deadline for RCP comments in August 11 at 5:00 pm. Can we consider these official comments from Caltrans at this time? Please advise.

Thank you,
Jennifer Brost Sarnecki, AICP
Senior Regional Planner
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017
Phone: (213) 236-1829
Fax: (213) 236-1963
sarnecki@scag.ca.gov

-----Original Message-----
From: Dianna Watson [mailto:dianna_watson@dot.ca.gov]
Sent: Monday, August 04, 2008 2:10 PM
To: Jennifer Sarnecki
Cc: Jacob Lieb
Subject: Fw: Out of Office AutoReply: Draft RCP

Hi Jennifer,
Attached is a copy of Caltrans comments on the Draft RCP. I'm not sure when the deadline is but I do have someone here who would like to comment after they attend the workshop.

Please let me know if that's ok.

Thank you,
DiAnna Watson
Caltrans District 7 - Regional Planning
(213) 897-9140

(See attached file: RCP Comments 2008.xls)
----- Forwarded by Dianna Watson/D07/Caltrans/CAGov on 08/04/2008 02:06 PM

"Jacob Lieb"

<LIEB@scag.ca.gov

>

To

"Dianna Watson"

08/04/2008 01:56

<dianna_watson@dot.ca.gov>

PM

cc

Subject

Out of Office AutoReply: Draft RCP

I will be out of the office from Monday July 28 returning Monday August 11.
During the week of July 28, Joe Carreras (carreras@scag.ca.gov) will be Acting Manager of Assessment, Housing, and EIR. During the week of August 4, Ma'Ayn Johnson (johnson@scag.ca.gov) will be Acting Manager.

Any items related to the Regional Comprehensive Plan should be referred to Jennifer Sarnecki (sarnecki@scag.ca.gov).

I will reply to e-mails when I return on the 11th.

Thank You.

The RCP policies appear to be consistent with the policies outlined in the Southern California Association of Government (SCAG) Regional Transportation Plan (RTP.)	General Comment
While a tremendous effort was deployed in producing the broad and comprehensive RCP, I found it difficult to identify any one specific approach or strategy that stood out as different, i.e. new. There is a good deal of information to digest in reading the RCP, however, there is no definitive "take-away" under any of the chapters and that is unfortunate. The document is well prepared, overall, however it does not create any kind of anticipation or excitement as to what the region is doing or might be doing short-term, near-term or long-term.	General Comment
SCAG's RCP is based on the fact that we need to make profound changes in the way we travel and alter the way we plan tomorrow's transportation system. As a broad conceptual document, the RCP exemplifies the continuous, cooperative, and comprehensive metropolitan planning process described in CFR 450.306. The document considers projects, strategies, and services that address planning factors such as: economic vitality, safety, security, accessibility, mobility, energy conservation, connectivity, and efficiency. The challenge will be refining these broad strategic initiatives and ideas into a financially constrained Business Plan.	General Comment
Assessing our Challenges: *A major challenge that should not be overlooked* is regional coordination and decision-making. Gregory Freeman, of the Los Angeles Economic Development Corporation wrote the "60-Mile Circle" in which he noted that the "region operates at the scale of states and even countries, yet lacks the central institutions that characterizes these larger entities." The very size of the regions' stakeholders makes it extremely difficult in bringing resolution to the challenges identified in the RCP. Yes, regional coordination and decision-making is a major challenge, that along with	Page 4
Paragraph 2: The 2008 RTP is no longer pending, but is adopted and federally approved	Page 10
Compass Blueprint -The RCP makes numerous references to the SCAG Compass Blueprint and that the outcomes, goals and strategies are part of the integrated process. It might be prudent to include the fact that blueprints are primarily developed to provide local accountability and that full implementation relies on local general plans.	Page 16

Page 18, Paragraph 2 – Land Use and Housing: Often land use decisions are reactive rather than proactive and often times are based on revenue-generation concerns. Both revenue and VMT have severe implications on land use patterns. As long as the tax structure of local government remains unchanged, there can be little support from local government on energy efficiency and climate friendly growth patterns. There may need to be an entirely new way or dynamic approach in terms of how land use is regulated. Is there any dialogue or anything on the political horizon that would give us reason to believe that this could change?	Land Use and Housing, Page 18
Bullets 1 and 2: Housing "availability" appears to be the focus rather, than housing "affordability". Given the regions extremely high need for housing affordability, and high foreclosure rates, it might have been well for the RCP to expand the discussion on these issues.	Land Use and Housing, Page 18
A city in Imperial County should be added to this table, i.e. El Centro, Calexico, or Brawley.	Open Space & Habitat chapter, Page 37, figure 33
Page 52 – Water: While this section provides a comprehensive discussion of water issues in the region, why is there no discussion of the California Water Plan which is the State's strategic plan for managing water resources statewide? The plan is updated every 5 years by the California DRW and is a key element in the Governor's Strategic Growth Plan (2005)	Water, Page 52
Page 67 – Energy: It is *important to recognize* that population growth is outpacing the rate at which land use options alone can reduce VMT. Therefore, enhanced engine efficiencies and cleaner fuels are also a critical component in reaching the GHG reduction targets for absolute reductions back to 1990 levels that are needed in ordered to meet 2020 emissions reductions goals Further, infrastructure funding policies and project choices at the local, state or federal level can determine the long-term energy and climate impacts of a region's infrastructure for years into the future. For example, policies that support dense communities, transit-oriented development and mixed –use can reduce energy use, GHG emissions and commute time while having a positive effect on transit ridership.	Energy, Page 67
Green Buildings - The RCP does not address the possibility that there may ultimately be a fee or price placed on $C0_2$. If this should occur, what are the implications for new buildings if any?	Page 69

Alternative Fuels / GHG - There is no discussion of Zero Emission Vehicles under this heading. Why so? There is, however a reference to zero emission forklifts in the Constrained Polices Matrix. A tremendous reduction in GHGs per year could be avoided if all vehicles in the State were replaced with ZEVs in the year 2010 which would result in approximately 35 million tons/year from LDVs by the year 2030. This level of reduction would provide substantial progress toward the State's Alternative Fuels Plan which lays out a 2050 vision calling for 40 percent of transportation fuels coming from electricity/hydrogen and 30 percent coming from other alternative fuel sources. Is it realistic to expect that the California vehicle fleet would be 100 percent electric? Probably not. If significant support in favor of Evs materialized, what would the impact be on GHG emissions?	Page 70
The Challenge (Air Quality) - Paragraph 3: How realistic is it for the region to expect that since about half of the emission reductions needed are expected to come from yet unidentified long-term measures in the "black box"? In effect, these are unspecified, unidentified unpredictable technologies that must be identified, tested, vetted and are often limited by the constraints of their design. Such strategies such (e.g. oxygenated fuel, I&M program, reformulated gas) have had a measure of success; however these have not proven to be the panacea in transportation-related pollution reductions. It is however, fair to note that such strategies have added value as part of an integrated strategy. Some in the environmental community and environmental justice advocates see the "black box" as something that is adverse to communities in non attainment areas. On the one hand waiting until technology is developed to help resolve the issue is not necessarily a bad thing; however, what relief is there for communities in non attainment areas (still breathing the bad air) while waiting for long-term measures to be developed? The paragraph assumes that the public in general accepts the "black box" but shouldn't there be a measure of sensitivity addressed here as to the burden on communities due to the fact that the region has no solution for the problem at this time. Must communities wait and wait for solutions to come? Where is the balance?	Air Quality Chapter, Page 80
This chapter should include a mention of air quality issues in Imperial County. In particular, unregulated burning and other uncontained emissions generated from stationery and mobile sources in Mexicali, Mexico which are the prime contributors of air quality problems in Imperial County, especially in regards to excessive particulates. It is suggested to include a policy or goal such as the following: "Cooperate and coordinate with Baja California to reduce emissions of critical pollutants in the Mexicali-Imperial Valley region as soon as practicable."	Air Quality Chapter, Page 80

Air Quality: The Plan - Last sentence in this paragraph sites the example, "the RCP's energy policies will help accelerate turnover of older, more polluting combustion engines". The RCP constrained Policies (Page 76) notes that expanding light duty retirement programs as a policy that will help in reducing the consumption of fossil, but this alone will do little to help accelerate turnover of older more polluting engines. The Alternative Fuels and Renewable Energy sections (Page 70 of document), do not identify how the RCP will help in this effort, neither is an explanation noted in the Constrained or Strategic Matrices.	Page 83
Operational Strategies: Getting the Most Out of Our Transportation System: More information is needed in this section to locate these operation strategies in the recently adopted RTP.	Transportation Chapter, Page 111

From: Nancy Settle [Nancy.Settle@ventura.org]
Sent: Monday, August 04, 2008 5:19 PM
To: Jennifer Sarnecki
Cc: Debra Varnado
Subject: Fwd: Comments on SCAG 2008 Regional Comp Plan

Hi Jennifer,
Debra requested that I forward any comments I've received on the RCP.

This one is from the Ventura County Regional Energy Alliance, Executive Director, Cheryl Collart.

Cheryl sent these comments via email.

One more is yet to come.

Nancy

Nancy Settle, Manager
Regional Programs/Grants
County of Ventura RMA/Planning Division
800 S. Victoria Ave.
Ventura, CA 93009
(805) 654-2465
FAX(805) 654-2509
Nancy.Settle@ventura.org

>>> Cheryl Collart 03/06/2008 9:17 AM >>>
Nancy:

General Comments on the Energy Chapter for consideration:

1. As a planning agency, SCAG plan could place more emphasis on useful coordination of existing energy plans, such as the Statewide Strategic Plan for Energy Efficiency as required by the California Public Utilities Commission. This document includes emphasis on local government actions, but does not readily identify a consistent funding mechanism for local governments to support the plan/utilities efforts to advance energy efficiency over fossil fuel.

2. Discussion of neighborhood systems and mixed uses seems to imply that permits (conditional or otherwise) would acknowledge that one property could provide heat/power to an adjacent property; the concept is useful, but current regulations do not allow for this ---this issue is power generation. The concept of shared/distributed energy districts is useful, but requires more coordination with California Energy Commission.

3. The plan should emphasize the value of energy investments that have a lifecycle benefit--not just the short term/first costs consideration.

4. Energy should be connected to security/prepardness planning for the region; particularly benenficial to identify self-generators that can stay on-line in the event of earthquake, terrorism, etc., and how these are positioned/encouraged regionally to maintain adequate supply to meet health/safety for such facilities as wastewater/water systems, hospitals, etc..

5. Energy finance is not addressed; suggest that it be generally addressed as component of planning; topics might include comments on how to finance, return on investment in high/super efficient/new technologies; as well as opportunities for CEC loans; green credit banking, tax incentives/rebates that may be useful, etc...

6. Energy regulation in the state is not clearly understood by many at the local or

regional government planners, commissioners, or electeds; the ideas/plans presented may need to be reviewed with eye to current regulatory constraints/opportunities and recommended actions that will advance the region to meet the shared goals. There is a "disconnect" between the goals (shareholder profit/rate structures/regulations) of investor owned utilities and the goals (reliability/reasonable costs for all constituents) of local government that could derail planning efforts. SCAG should play a regional role, along with other regional energy offices/organizations to assure coordination of effort.

I had opportunity to attend a couple of the subcommittee meetings and maintain connection with a few of the participants, so appreciate the efforts that went into the document, and look forward to implementation.

Cheryl

Cheryl Collart, Executive Director
Ventura County Regional Energy Alliance
1000 South Hill Road, Suite 230
Ventura, California 93003
805-289-3335 office
805-289-3111 fax
visit our website: www.vcenergy.org
e-mail: cheryl.collart@ventura.org

County of Ventura
Public Works Agency
Water & Sanitation Department
Integrated Waste Management Division

MEMORANDUM

DATE: February 28, 2008

TO: Nancy Settle, Manager
Regional Plans and Programs Section
Planning Division

FROM: Bruce Belluschi, Manager
Integrated Waste Management Division (IWMD)

SUBJECT: Comments re: Solid Waste Section of SCAG RCP

Thank you for the opportunity to provide you with IWMD's comments relating to the Solid Waste section of SCAG's draft Regional Comprehensive Plan (RCP). As I am still somewhat unsure as to the extent the RCP speaks for all southern California jurisdictions, I believe the opportunity to submit these comments is important for the County of Ventura.

COMMENT 1:

Page: 90
Paragraph: 1
Current wording: "…existing landfills will not be enough to accommodate our ever growing population..."
Suggested wording: "…existing landfills, *and potentially future landfills, may* not be enough to accommodate our ever growing population..."

COMMENT 2:

Page: 90
Paragraph: 2
Current wording: "Traditional solid waste management strategies have relied heavily on creating high capacity, regional landfills (megafills) and, to a lesser extent in California, incineration technologies (such as direct combustion or combustion with energy recovery) to address disposal issues."
Suggested wording: "Traditional solid waste management strategies have relied heavily on ~~creating~~ high capacity, ~~regional~~ *relatively local* landfills (megafills) and, to a lesser extent in California, incineration technologies (such as direct combustion or combustion with energy recovery) to address disposal issues."

COMMENT 3:

Page: 90
Paragraph: 2
Current wording: "In addition, local public opinion plays a big role when landfills are being sited."
Suggested wording: "In addition, local public opinion plays a big role when landfills are being sited. *Local public opinion will play an even bigger role in landfill siting discussions as the region moves from a relatively local landfill network to a higher reliance on outlying facilities designed to accept volumes of waste far in excess of that which will be generated by the local population. As local populations come to understand the implications of waste importation, one can expect even greater difficulty in siting such facilities.*"

COMMENT 4:

Page: 90
Current wording: **"**Dwindling landfill capacity and increasing health and environmental concerns have forced both the region and the state to make concerted efforts at developing other waste management methods including reducing the amount of waste that goes into landfills. "
Suggested amendment(s): "*Dwindling landfill capacity near urban centers, increasing health and environmental concerns and public policy goals promoting conservation of resources*, have forced both the region and the state …"

COMMENT 5:

Page: 90
Paragraph: 3
Current wording: "The costs for landfilling our garbage will continue to increase as landfill space decreases."
Suggested amendment(s): **"**The costs for landfilling our garbage will continue to increase as *local* landfill space decreases *near urban centers*."

COMMENT 6:

Page: 90
Current wording: "…conspicuous impacts to public health and the environment."
Suggested amendment(s): As written, this is a subjective opinion and is not supported by factual content. Including a credible source for such a statement would be advisable. Suggest rewriting as: "These costs will ultimately be passed on to residents and businesses in the form of higher disposal fees."

COMMENT 7:

Page: 90
Current wording: "…mismanagement of our natural resources."
Suggested amendment(s): As written, this is a subjective opinion and is not supported by factual content. Including credible sources for such a statement would be advisable.

COMMENT 8:

Page: 90
Paragraph: 3
Comments: If we rely on landfill capacity as a scare tactic to justify recycling, there may be a loss of support for recycling efforts when safe, large, and distant landfills are served by rail-haul options or when existing landfills near urban areas may be expanded. This argument fails to highlight the major reasons to recycle such as: conservation of resources, reduction of energy and pollution within the manufacturing process, increased local economic activity and job creation.

COMMENT 9:

Page: 91
Current wording: "…concerns have been raised about post-closure operations and whether landfill operators are capable of maintaining landfill facilities…"
Suggested amendment(s): As currently written, this is unfounded opinion and is not supported by factual content. Including a credible source for such a statement would be advisable. Does the CIWMB agree with this statement, as a regulator of state landfills? Perhaps the concerns may more appropriately pertain to the availability of post-closure funding and potential liabilities.

COMMENT 10:

Page: 91
Current wording: First paragraph
Suggested amendment(s): I do not see the attempted connection, as currently written, between solid waste in landfills and mining destruction. Materials collected from mining efforts (metals, diamonds, etc.) are not typically entering landfills as solid waste.

COMMENT 11:

Page: 91
Current wording: "Our current rate of natural resource extraction has already *created health and environmental impacts that will last long into future generations*."
Suggested amendment(s): As written, this is merely subjective opinion and is not supported by factual content. Including a credible source for such a statement would be advisable.

COMMENT 12:

Page: 91
Current wording: "In the short term, we will still need to rely heavily on landfills and, when local facilities have filled to capacity, exporting our waste to other areas, leading to higher trash rates and added traffic congestion and air pollution."
Comment: As written, this statement is merely subjective opinion and is not supported by factual content. Including a credible source for such a statement would be advisable. Indeed, utilization of remote, high-capacity landfills via a rail infrastructure may actually reduce air impacts by thoughtful siting of transfer stations, which will reduce travel distance of collection vehicles and the related emissions.

COMMENT 13:

Page: 91
Current wording: "…including the development of conversion technology facilities…"
Suggested amendment(s): "…*and may include* development of conversion technology facilities…"

COMMENT 14:

Page: 91
Current wording: "Our goal is to achieve maximum diversion from landfills through emerging technologies with diversion credit."
Suggested amendment(s) : Rewrite sentence as: "Our goal is to achieve maximum *waste prevention and* diversion *of waste* from landfills, *with corresponding diversion credit, utilizing all technologically feasible and fiscally prudent means*."

COMMENT 15:

Page: 91
Current wording: "In turn, landfill operations in Southern California have methane capture technologies that turn methane emissions into energy."
Suggested amendment: "In turn, *some* landfill operations in Southern California have methane capture technologies that turn methane emissions into energy." Although energy recovery is becoming more common, it is certainly not uniformly implemented at all landfills as implied in the text.

COMMENT 16:

Page: 92
Current wording: "Many of today's health and environmental concerns will become less of a problem as we reduce our garbage volume and become more selective about what we consider trash."
Suggested amendment(s): As currently written, this is unfounded opinion and is not supported by factual content.

COMMENT 17:

Page: 92
Current wording: **"**Our current infrastructure to manage waste focuses on disposal first, followed by recycling, reducing, and reusing."
Suggested amendment(s): This statement is historical and no longer accurate within California. It should be rewritten as: "Our *past* infrastructure to manage waste *focused upon* disposal first, followed by recycling, reducing, and reusing."

COMMENT 18:

Page: 92
Current wording: **"**The waste hierarchy envisioned for the future focuses on reducing first, then reuse, recycling, conversion technologies and finally disposal to land fill (see Figure 7.1)."
Suggested amendment(s): "The waste hierarchy envisioned *in 1989 focused* on reducing first, then reuse, recycling, conversion technologies and finally disposal to land fill (see Figure 7.1)."

COMMENT 19:

Page: 92
Figure 7.1: Figure 1
Current wording: "Current Waste Hierarchy"
Suggested amendment(s): **"**Past Waste Hierarchy"

COMMENT 20:

Page: 92
Figure 7.1: Figure 2
Current wording: "New Waste Management Paradigm"
Suggested amendment(s): "*Waste Management Paradigm Since 1989*"

COMMENT 21:

Page: 93
Current wording: "Many forward thinking communities…are adopting policies…"
Suggested amendment(s): Change "many" to "*some*" since, as currently written, only three cities are provided as credible examples (the other 16 are only agreeing to provide education, which is insignificant since all jurisdictions are already supposed to be providing education with the passage of AB 939 in 1990).

COMMENT 22:

Page: 93
Current wording: "Although not all individual jurisdictions have managed to achieve the 50 percent diversion rate, all jurisdictions are making good-faith efforts to comply with the unfunded mandate by implementing quality programs.
Suggested amendment(s): "Although not all individual jurisdictions have managed to achieve the 50 percent diversion rate, jurisdictions are making good-faith efforts to comply with the unfunded mandate by implementing quality programs." Remove the word "all" since not all jurisdictions receive good-faith rulings from the CIWMB.

COMMENT 23:

Page: 94
Current wording: "Diversion also helps communities save money by avoiding payment of tipping fees on each ton of waste disposed."
Suggested amendment(s): What is the definition of "communities"? *Jurisdictions* generate significant revenue from fees for waste delivered to their landfills. For example, the County of Ventura derived almost $ 2.5 million in revenues from the solid waste entering just one of our County's landfills in 2007.

COMMENT 24:

Page: 94
Current wording: "California's recycling market is still on shaky ground, especially because of competition from foreign recycling markets."
Suggested amendment(s): This statement is completely inaccurate and indicates a fundamental lack of understanding as to how recycling markets works. It is highly unlikely local markets could

COMMENT 24: (Continued from page 4)

ever utilize all secondary materials (recyclables) generated within California. With no export markets, our local landfills would undoubtedly fill up at a significantly quicker rate with unmarketable, recyclable waste.

Furthermore, recyclables are commodities and, as such, bring significant revenue to the United States and our state. In fact, years ago, the CIWMB determined that California alone had export sales of $1 billion, not to mention the benefit derived from thousands of recycling jobs relying upon the export marketplace, local and state tax revenues, etc. Recyclables have always been one of the largest exported U.S. products.

Suggested rewording may include: "Local markets for recyclables not only increase the local economic benefit of recycling, but can enhance market stability. While vital, and necessary, for sustaining the value and marketability for most types of secondary materials, foreign markets are also more vulnerable to import restrictions (especially for dirty plastic), tariffs, political changes, currency fluctuations and labor and environmental concerns."

COMMENT 25:

Page: 95
Side Column: Paragraph 1
Current wording: **"**As the need for new landfill capacity diminishes…"
Comments: Regarding "diminishing landfill capacity needs", this is subjective opinion, not a factual statement, as economic and population growth projections for our state make this a seeming impossibility.

This bullet also seems to suggest misguidedly that Land Use issues only exist with landfill operations. Siting and operation of the alternative solutions proposed within this document, some of which will require large parcels of land and have an appearance similar to an oil refinery or power plant, may very well experience the same or similar land use challenges as a landfill.

COMMENT 26:

Page: 95
Side Column: Paragraph 3
Current wording: "The siting or new…"
Suggested amendment(s): Typo. I believe the author(s) meant to write "of."

COMMENT 27:

Page: 95
Side Column: Side bar, paragraph 3
Comment: Litter is not related, in any meaningful way, to the rate of diversion from landfill disposal. Further, litter does not impact ground water quality in any significant way.

COMMENT 28:

Page: 95
Current wording: "The program provides loans, technical assistance, and free product marketing to businesses that us materials from the waste stream to manufacture their products."
Comments: The term "technical" should be more specific, to include "*permit assistance, site selection assistance, and help identifying and acquiring materials for manufacturing*"...

COMMENT 29:

Page: 95
Current wording: "They help conserve natural resources (timber, water, minerals);"
Suggested amendment(s): I suggest removing the word "timber" as this is, generally, not an accurate statement and furthers a popular misconception about the cutting of trees within the United States. In the U.S., trees harvested for lumber and paper are located primarily on privately owned forest lands and are viewed as a "crop", planted for the specific purpose of being cut down for timber and paper. Once cut, the trees will be replanted for the same purpose indefinitely. Further, fibers in paper can only be recycled a finite number of times owing to the natural breakdown of the fibers, thus necessitating the use of virgin pulp obtained only from trees.

COMMENT 30:

Page: 95
Paragraph: 2
Current wording: "protect**s**, and expand**s** U.S. manufacturing jobs: and increase**s** U.S. competitiveness."
Suggested amendment(s): Text erroneously switches in mid-paragraph from plural to singular. Should be rewritten as "…protect, and expand U.S. manufacturing jobs: and increase U.S. competitiveness."

COMMENT 31:

Page: 96
Current wording: **"**Construction and demolition (C&) debris comprises 21.7 percent of California's overall waste disposed waste stream."
Suggested amendment(s): "*As of 2004, c*onstruction and demolition (C&) debris comprise~~s~~d 21.7 percent…" This figure is now 4 years old, per the chart on page 95, and it is unlikely C&D waste debris now comprises such a high percentage of the state's waste stream, especially with so many C&D debris diversion programs and ordinances in effect throughout the state.

COMMENT 32:

Page: 96
Figure 7.3: Figure 2
Current wording: "REMANUFACTURING"
Suggested amendment(s): Use the term "MANUFACTURING." A virgin product cannot be remanufactured prior to use.

COMMENT 33:

Page: 96
Current wording: Third full paragraph; "*Cities* are starting to institute…" and "Currently, each *city* develops its own…"
Suggested amendment(s): Change the words "Cities" and "city" to "*jurisdictions*" or to "cities *and counties*…" as currently written, positive actions of *counties*, especially unincorporated areas, are excluded. The County of Ventura, for example, has had a C&D debris diversion ordinance in effect since early 2007.

COMMENT 34:

Page: 97
Current wording: **"**Green material collection programs have been implemented in many cities and counties, but not until recently has collection of food scraps been considered."
Suggested amendment(s): "Green material collection programs have been implemented in many cities and counties, many of which include food scraps." Food scrap recycling really is not a recent phenomenon.

COMMENT 35:

Page: 97
Current wording: Second full paragraph
Suggested amendment(s): Within this paragraph, I would encourage adding text which states the need for changes in California legislation to allow more organic material to be treated as compost material, either by broadening what type of food items can be treated as such or by restricting the types of materials now considered to be "food" and not allowed for processing at compost facilities. Ideally, both actions could occur legislatively in the very near future.

COMMENT 36:

Page: 97
Current wording: "Organic waste comprises 30 percent of waste disposed to landfills. That figure includes food scraps, textiles, composite organics, and green material like landscape and tree trimmings, grass clippings, and agricultural residues."
Comment: The data here appears suspect. What time period is this information referencing (when was the study conducted yielding this result)? What is the source of this information (i.e., is it credible)? With the near universal implementation of green waste diversion in our region, the organic component of landfilled refuse is no where near the 30% level. Therefore, the suggested reduction in methane production will not be realized. Further, landfill gas is produced by the decomposition of all organic materials within the landfill, which include food and green waste as well as plastic, paper, wood, carpet, etc.

COMMENT 37:

Page: 97
Current wording: Last paragraph; "…feedstock."
Suggested amendment(s): Change the word "feedstock" to "*source of raw material*", which is both more accurate terminology within the recycling industry as well as being more readily understood by the average reader.

COMMENT 38:

Page: 97
Current wording: Last paragraph; "Many CT proponents feel…"
Suggested amendment(s): For a more balanced and accurate assessment of CT, which is not currently being utilized (or perhaps currently feasible) in North America, there should be some mention of the currently impractical cost of CT and the potential negative effect upon state businesses and residents burdened (i.e., economic hardship) with the escalated, projected costs of CT processing versus more cost effective means of solid waste disposal.

Furthermore, CT proponents are eager to claim CT will not compete with recycling, but there is nothing preventing it from doing so. For example, an acid hydrolysis plant seeking cellulose could draw paper from mills or bioconversion technologies could draw green waste from composters.

COMMENT 39:

Page: 98
Current wording: "However, the environmental benefits of conversion technology scenarios are highly dependent on their ability to achieve high conversion efficiencies and high materials recycling rates."
Suggested amendment(s): "However, the environmental benefits of conversion technology scenarios are highly dependent on their ability to achieve high conversion efficiencies, high materials recycling rates*, operate reliably, and provide a cost effective solution*." There should also be mention of the currently impractical cost of CT, particularly given the projected costs of CT processing versus more cost effective means of solid waste disposal.

COMMENT 40:

Page: 98
Current wording: "At this time, the successful development and use of CTs is occurring throughout Europe and Japan."
Comment: It would be useful to have some examples of these referenced CT activities in Europe and Japan and how those activities *may* apply to waste streams of SCAG members.

COMMENT 41:

Page: 98
Paragraph: Bulleted items – Thermal, Biological, and Chemical
Comment: For each of these listed technologies, it would be appropriate to detail the potential problems/technical challenges, the products as well as the by-products/end wastes, and the health/environmental impacts (i.e. air pollution, noise, odor, etc.) of these type of facilities.

COMMENT 42:

Page: 99
Current wording: Section under "Climate Change:" "Reducing the amount of waste deposited…"
Suggested amendment(s): Add text such as "*While capturing methane gas at landfills is increasingly common for conversion into valuable energy*, reducing the amount of waste…"

COMMENT 43:

Page: 99
Current wording: First paragraph, "The 2004 Growth Vision…"
Suggested amendment(s): Add "SCAG's 2004 Growth Vision…" to clarify for a reader.

COMMENT 44:

Page: 99
Current wording: Second paragraph, "…by addressing waste elimination…"
Suggested amendment(s): "*By encouraging legislation requiring manufacturers to reduce waste*…" Neither consumers nor residents can control waste "at the source," so legislation must be introduced, or strengthened to achieve this result.

COMMENT 45:

Page: 99
Current wording: "…'we can get darn close.'"
Suggested amendment(s): The use of these five words as a specific and potentially unrelated quote is awkward and should be, instead, used in the sentence's entirety as a paraphrase, such as "We 'may never achieve 100 percent materials efficiency but we can get darn close.'"

COMMENT 46:

Page: 100
Current wording: First paragraph, "…production feedstock."
Suggested amendment(s): Change these words to "*source of raw material in their manufacturing process*," which is both more accurate terminology within the recycling industry as well as being more readily understood by the average reader.

COMMENT 47:

Page: 100
Current wording: First paragraph re: LCA
Suggested amendment(s): There should be a mentioning here of CALMAX, the state's material exchange program that shares these same goals, while assisting both residents and businesses alike. Go to www.ciwmb.ca.gov/CalMAX/

COMMENT 48:

Pages: 100-101
Current wording: Section under "Product Stewardship and Extended Producer Responsibility."
Suggested amendment(s): Add some text referencing the need for either the introduction, or strengthening, of legislation requiring manufacturers to reduce waste, preferably at the federal level.

Furthermore, while the idea of EPR is environmentally attractive, for a more balanced and accurate assessment of this policy, there should be, at the very least, reference to a common perception within the U.S. that EPR is expensive and thus, financially (economically) detrimental. See http://pubs.acs.org/hotartcl/est/00/apr/hanis.html, for example. I suggest stating text such as that

COMMENT 49: (Continued from page 4)

"*EPR represents another example of the economic cost for positive environmental stewardship*." (A sentiment also suggested within the previously discussed subject of conversion technology).

COMMENT 50:

Page: 101
Current wording: Second paragraph; "Some, of which require changing how our whole region thinks about solid waste management issues."
Suggested amendment(s): This is not a sentence but a sentence fragment, thereby being grammatically incorrect.

COMMENT 51:

Page: 101
Current wording: "Recycling, composting, conversion technologies, and landfills all play a part in moving towards maximizing diversion."
Suggested amendment(s): **"**Recycling, composting, conversion technologies, and landfills *may* all *one day* play a part in moving towards maximizing diversion." Conversion technology really does not currently play any significant part in this process so this is not an accurate statement.

COMMENT 52:

Page: 101
Current wording: "We will need to employ…resource management."
Suggested amendment(s): As written, this sentence comes across largely as a one-sided opinion. I suggest rewriting this sentence as: "*Future success in effective resource management will require a creative mix of proven, cost-effective strategies to satisfy anticipated waste disposal needs*."

COMMENT 53:

Page: 101
Current wording: "…waste that will need to be disposed at landfills or managed with conversion technology."
Suggested amendment(s): "...*waste requiring disposal at landfills or, if economically feasible and technologically practical, conversion technology*."

COMMENT 54:

Page: 101
Current wording: Sentence under "Solid Waste Goals"
Suggested amendment(s): Rewrite as "…in the most environmentally responsible *and cost efficient* manner possible." Jurisdictions must ensure that fiscal responsibility remains a priority as guardians of rate payers' tax dollars. To readily accept any/all technologies at any costs is neither responsible nor prudent.

COMMENT 55:

Page: 101
Current wording: Sentence under "Solid Waste Outcomes"
Suggested amendment(s): First, this is a "run-on" sentence. I suggest rewriting as two (or even three) sentences to reduce this confusing text.

Secondly, focusing just on a numerical diversion or disposal reduction goal forces jurisdictions to focus on high tonnage materials such as asphalt and concrete, rather than focusing on high value material (i.e. cans) or material with the most environmental impact (i.e. food waste). It also removes the focus from the integrated waste management hierarchy. "Reduce" and "Re-use" strategies handle fewer tons than "Recycle" strategies. Additionally, diversion and disposal rates are often influenced by factors beyond the control of jurisdictions (i.e., inherent accuracy problems of the system of jurisdictional tonnage allocation, etc.). A focus on quality of programs with "good faith" determinations will likely yield a more effective environmental impact.

COMMENT 56:

Page: 102
Current wording: Item #6
Suggested amendment(s): Need to define "coordinate" or expound upon. This is a vague term.

COMMENT 57:

Page: 103
Current wording: Item #1; "Local governments should discourage the exporting of locally generated waste outside of the SCAG region."
Suggested amendment(s): As written, this policy is not advisable for at least two reasons. First, it conflicts with current practices for most California jurisdictions' method of biosolids management, particularly with respect to Ventura County Publicly Owned Treatment Works (POTWs). The transport of biosolids to locales currently outside of the SCAG region is legal and permissible by both EPA regulations and state statutes. While the County believes local markets for generated waste can frequently be beneficial and should be encouraged, it should not be supported as an only option.

Secondly, as already submitted with respect to comments for page 94, there is no way local markets could ever utilize all recyclable waste generated within the SCAG region; export markets are an absolute necessity to ensure the ongoing health of the recycling industry and the extending of the life spans of our local landfills. Recyclables are commodities and have always been one of the largest exported U.S. products; as such, recyclable waste products generate billions of dollars to the United States and our state. An unhindered recyclables marketplace must be encouraged.

Lastly, what is the SCAG's definition of "waste", as used within this item?

COMMENT 58:

Page: 103
Current wording: Item 6; "Local governments should support environmentally friendly alternative waste management strategies such as composting, recycling, and conversion technologies."
Suggested amendment(s): "Local governments should support environmentally friendly *and fiscally prudent* alternative waste management strategies such as composting, recycling, and conversion technologies." There must not be a support of technologies without maintaining a balanced focus upon local governments' fiscal responsibilities to tax payers.

COMMENT 59:

Page: 103
Current wording: "Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimal environmental and health impacts."
Suggested amendment(s): "Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly, ~~and~~ have minimal environmental and health impacts *and are fiscally prudent*." There should not be support for any technology without maintaining a balanced focus upon local governments' fiscal responsibilities to tax payers.

COMMENT 60:

Page: 104
Current wording: Item #9 on page; "…and (c) facilitate state and local government coordination of consumer awareness programs to minimize unnecessary duplication of effort in solid waste outreach programs carried out by local government."
Suggested amendment(s): In reading this item (c), it appears to me that a likely and detrimental resulting effect upon local governments could be: 1) reduced outreach efforts at the state level about important solid waste diversion/education programs, or (2) increased funding requirements thrust upon local, and often fiscally-challenged, local governments for education/outreach efforts. Of course, neither of these outcomes is desirable.

Further, what is meant by the word "facilitate"? Need to expound upon.

Again, thank you for the opportunity to submit comments for this RCP. Should you have any questions, please feel free to contact me directly at 658-4311.

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August 5, 2008

The Honorable Larry McCallon, Chair
Community, Economic and Human Development Committee
Southern California Association of Governments
818 West Seventh Street
Los Angeles, California 90017-3435

RE: Comments on the SCAG draft 2008 Regional Comprehensive Plan

Chair McCallon:

At its meeting of July 24, 2008, the Board of Directors of the Orange County Council of Governments (OCCOG) discussed the draft 2008 Regional Comprehensive Plan (RCP) that was released for public comment in January 2008 by the Southern California Association of Governments (SCAG). The OCCOG Board noted that the Regional Comprehensive Plan has been under preparation for several years and has been presented to the OCCOG and at various SCAG committee and Regional Council meetings. At these meetings, the RCP has been portrayed as an entirely voluntary document that includes a variety of policies and programs that could be undertaken by local governments or project proponents should they so choose. However, the OCCOG Board continues to express concern that, in light of legislative proposals under consideration by State legislators and the anticipated use of the RCP by the SCAG as a policy guidance document to be used in intergovernmental review, the voluntary guiding measures and action items that are proposed in the RCP could take on a much more significant role. For example, the proposed Senate Bill 375 (SB 375) and proposed implementation of Assembly Bill 32 (AB 32) both identify an increased emphasis on regional planning efforts. Such emphasis places much more significance on local government implementation of the RCP because these bills speak to the issue of consistency between general plans and the SCAG region's Compass Blueprint, which is embodied in RCP. Perhaps most significantly, future funding allocations could be tied to meeting the consistency requirements mandated by these bills.

While the OCCOG Board has a strong desire to work towards the regional solutions needed to address the goals of such legislation, the RCP was never portrayed by the SCAG as a potential implementation tool of these significant pieces of legislation. As such, the OCCOG Board recommends that the RCP should clearly identify that the document is intended solely as a voluntary menu of optional measures and action items available to local governments and project proponents, and that it is not intended as the vehicle to implement requirements or mandates that may result from these pieces of legislation.

The OCCOG Board also recognizes the public outreach SCAG has undertaken on the Regional Comprehensive Plan. In fact, the OCCOG undertook outreach to Orange County jurisdictions, transportation agencies, special districts, resource agencies, the private sector, and public interest groups, in order to secure their input and recommendations on the proposed Plan policies as the OCCOG Board had previously pledged in a letter to the CEHD dated August 29, 2007 (Attachment 1).

Further, it was recognized that the planning and public outreach process on the RCP is likely to result in many comments and recommendations from throughout the region that are valid, but may offer differing perspectives, and thus will warrant careful consideration and deliberation. The timeline recommended by the RCP Task Force that identifies the close of the public comment period thus will warrant careful consideration and deliberation. The timeline recommended by the RCP Task Force that identifies the close of the public comment period on August 11, 2008 and consideration of adoption by the Regional Council on September 4, 2008 does not appear to provide adequate time to allow for thoughtful consideration and meaningful discussion of the comments that SCAG may receive on the draft RCP.

Based upon these considerations and concerns, the OCCOG Board unanimously offers the following regarding the draft 2008 Regional Comprehensive Plan:

1) Technical comments and recommendations on the draft 2008 Regional Comprehensive Plan, as detailed in Attachment 2, identifying overall comments on the draft RCP and each of its chapters; and in Attachment 3, identifying specific technical comments;

2) Recommends that the draft 2008 Regional Comprehensive Plan be revised and reviewed through a re-activated SCAG Plans and Programs Technical Advisory Committee before being re-distributed;

3) Recommends that the SCAG RCP Task Force-recommended timeline for the draft 2008 Regional Comprehensive Plan be extended to address public comments and recommendations; and,

4) Recommends that the draft 2008 Regional Comprehensive Plan be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor should it be used in any SCAG mandated program, including intergovernmental review.

The OCCOG is committed to the continued discussion of the Regional Comprehensive Plan and to working with SCAG throughout completion of the document.

Respectfully and on behalf of the OCCOG Board of Directors,

Dennis R. Wilberg
OCCOG Interim Executive Director

cc: The Honorable Richard Dixon, SCAG Regional Council President
The Honorable Pam O'Conner, Chair, SCAG Regional Comprehensive Plan Task Force
Mr. Hasan Ikhrata, Executive Director, SCAG
Council Member Cheryl Brothers, Chair, OCCOG Board of Directors
Council Member Mark Waldman, Vice-Chair, OCCOG Board of Directors
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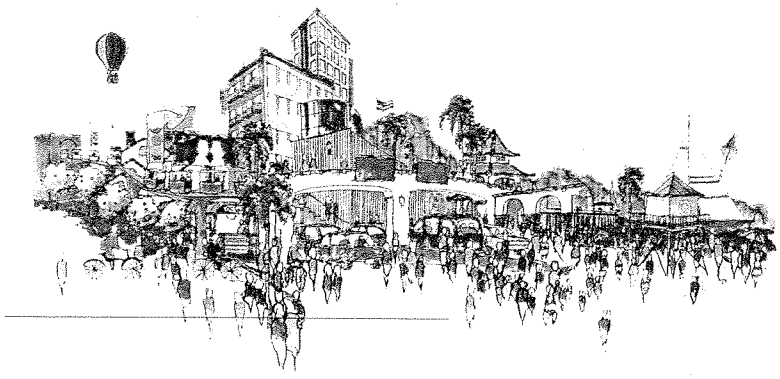
Mr. Art Leahy, Chief Executive Officer, OCTA
Mr. Jacob Lieb, SCAG
Mr. Darin Chidsey, SCAG
Mr. Ty Schuiling, Chair, SCAG Subregional Coordinators Group
Mr. Kia Mortazavi, OCTA
Mr. Kurt Brotcke, OCTA
Mr. David Simpson, OCTA
Mr. Michael Litschi, OCTA
Ms. Karen Hamman, OCCOG Interim Clerk of the Board

Attachment 1



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August 29, 2007

The Honorable Jon Edney, Chair
Community, Economic and Human Development Committee
Southern California Association of Governments
818 West Seventh Street
Los Angeles, California 90017-3435

Chair Edney:

RE: SCAG Program EIR for the 2008 Regional Transportation Plan Update and Regional Comprehensive Plan

At its meeting of August 23, 2007, the Board of Directors of the Orange County Council of Governments (OCCOG) discussed three major work efforts underway at the Southern California Association of Governments (SCAG):

- the federal and state mandated 2008 update to the Regional Transportation Plan (RTP);
- the comprehensive update to SCAG's Regional Comprehensive Plan (RCP); and,
- SCAG's proposal to prepare one Program Environmental Impact Report (PEIR) that would environmentally clear both the 2008 RTP Update and the RCP.

The OCCOG Board expresses concern with the pursuit of a combined EIR that would environmentally clear both the Regional Transportation Plan and the Regional Comprehensive Plan, and respectfully urges SCAG to consider a separation of the environmental processes and environmental documents for each Plan. The OCCOG Board's recommendation is based upon the following considerations:

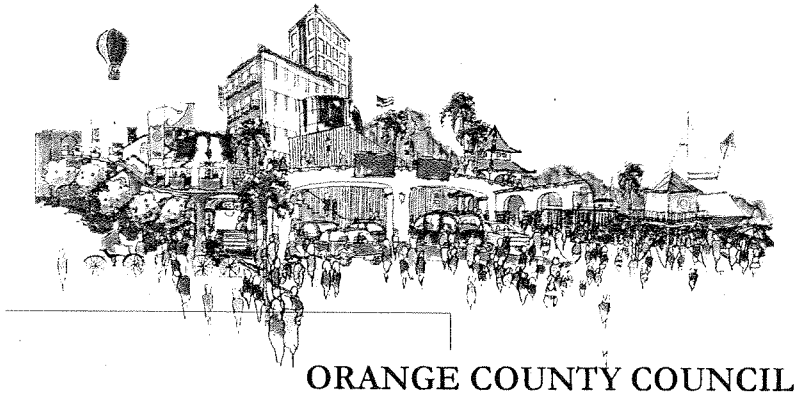
1) Both the Regional Transportation Plan and the Regional Comprehensive Plan are significant undertakings that require extensive consultation and outreach to achieve consensus.

   One undertaking, the 2008 Regional Transportation Plan update, is mandated and must be adopted by early 2008 to be forwarded to state and federal agencies for approval.

   The other undertaking, the Regional Comprehensive Plan, is a voluntary effort not governed by statute or deadline.

   As outlined in SCAG's major issues and framework for the next Regional Transportation Plan, there are significant RTP issues need to be vetted with stakeholders, including the subregions, the county transportation commissions, the private sector, and our air quality agencies in order to achieve an RTP that can meet air quality conformity and address mobility.

   The OCCOG Board shares with SCAG's policy committees and its Regional Council its belief that at this point in time, the Regional Transportation Plan is an urgent regional priority, and that we must focus our efforts to address the full plate of RTP challenges and deliver an RTP update and an attendant EIR on time to address federal and state mandates and enable critical transportation projects to move forward.



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2) The Regional Comprehensive Plan is akin to a local jurisdiction's General Plan, setting forth policies and action statements on nine subject areas for the six-county SCAG region. It is our understanding that the last Regional Comprehensive Plan was adopted many years ago. Thus, the RCP under development would essentially constitute a new framework of policies for local jurisdictions, special districts and other agencies to consider, in conjunction with new development or re-development proposals.

   The OCCOG Board recognizes that public outreach and public comment on the Regional Comprehensive Plan is essential. However, the OCCOG Board also recognizes that the planning and public outreach process on the Regional Comprehensive Plan could and should result in many comments and recommendations that are all valid, but with differing perspectives, which will warrant careful consideration and deliberation.

   It is the OCCOG Board's concern that the necessary discussion and deliberations on the Regional Comprehensive Plan could endanger the compressed timeline and deadlines of the mandated Regional Transportation Plan; and that the construct of a single EIR for both the RTP and RCP could pose an unnecessary, but avoidable constraint, to timely RTP adoption.

3) In light of legislative proposals under consideration by State legislators, the guiding measures and action items that are proposed in the Regional Comprehensive Plan could take on a much more significant role than we currently understand. The Regional Comprehensive Plan must receive full public and local review in consideration of the possibility that proposed state legislation could place much more significance on local government implementation of the plan through the linking of transportation funding to consistency between general plans and the RCP. Separating the environmental review for the Regional Transportation Plan and the Regional Comprehensive Plan will allow for a full discussion and disclosure of the ramifications of any state law changes that affect compliance with the proposed RCP.

   Further, the OCCOG Board pledges its commitment to undertake its subregional responsibilities and outreach to Orange County jurisdictions, transportation agencies, special districts, resource agencies, the private sector, and public interest groups, to request their review of the Regional Comprehensive Plan and to secure their input and recommendations on the proposed Plan policies.

Based upon these considerations and concerns, it is the OCCOG Board's recommendation that the environmental processes and environmental documents for the Regional Transportation Plan and the Regional Comprehensive Plan be separated now, to allow both Plans to move forward, yet independently, in their respective discussions, deliberations, environmental clearance and adoption.

Respectfully and on behalf of the OCCOG Board of Directors,

Dennis R. Wilberg
OCCOG Interim Executive Director

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cc: The Honorable Gary Ovitt, SCAG Regional Council President
The Honorable Alan D. Wapner, Chair, SCAG Transportation and Communications Committee
The Honorable Debbie Cook, Chair, SCAG Energy and Environment Committee
Mr. Mark Pisano, Executive Director, SCAG
Council Member Art Brown, Chair, OCCOG Board of Directors
Council Member Cheryl Brothers, Vice-Chair, OCCOG Board of Directors
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Mr. Darin Chidsey, SCAG
Mr. Miles Mitchell, Chair, SCAG Subregional Coordinators Group
Mr. Kia Mortazavi, OCTA
Mr. Kurt Brotcke, OCTA
Mr. David Simpson, OCTA
Mr. Michael Litschi, OCTA
Ms. Karen Hamman, OCCOG Interim Clerk of the Board

Attachment 2

Orange County Council of Governments

Comments on the
Draft 2008 Regional Comprehensive Plan

Orange County Council of Governments Technical Advisory Committee
Comments on the
SCAG Regional Comprehensive Plan
(Revised per July 1, 2008 OCCOG TAC Action)

DRAFT General Comments on the RCP

(Note: All General Comments apply to all RCP chapters)

Reference	OCCOG TAC Revised General Comments and Questions
General Comment #1	SCAG is not required to prepare a Regional Comprehensive Plan (RCP). To provide context for the document and indicate how the document should or could be used in the region and by SCAG, please add a section to the document explaining why SCAG is undertaking the development of the RCP and why it is in their purview to do so. For example, please explain why SCAG can or could use an RCP containing recommended and voluntary actions and policies that are not under its purview in it's mandated intergovernmental review process.
General Comment #2	Each chapter of the Regional Comprehensive Plan identifies a series of goals, outcomes and actions plans that contain a series of policies. Please clarify how these goals, outcomes and action plan policies are to be applied and measured. For example, are they applied to the total region, or are they applied down to the jurisdictional level? In particular, if development projects and transportation projects are to be reviewed through the Intergovernmental Review process against these RCP policies, are the RCP outcomes and policies to be applied at a site-specific level? Additionally, please clarify which of the goals, outcomes and policies are under SCAG's purview, which are already existing adopted or approved policies, and which are recommendations that would be entirely voluntary. If the RCP is to be used in IGR, policies from mandatory programs or programs that are currently adopted SCAG policies versus those that are voluntary should be clearly identified.
General Comment #3	All the RCP policies would represent a significant commitment of resources and expenditures by local jurisdictions that would need to be considered against available revenues and jurisdiction priorities. Further, the RCP commits SCAG to a significant number of actions, including some that SCAG does not currently have authority to undertake. Does SCAG have the resources to commit to these actions? If not, how will SCAG address identifying which actions it will undertake, which it will not, and how they will be prioritized? Please also identify, similar to the General Comment #2, the legal authority under which SCAG could undertake all of these actions? Again, this information will help to clarify the context of the document and how it will or can be used.
General Comment #4	There is concern that even if the RCP is voluntary, non-binding and represents good principles and policies, legislative proposals such as AB 32 and SB 375 can change the non-binding nature of goals and policies. Please explain how the RCP may be used by SCAG in the development of any mandatory regional plans or programs.

Reference	OCCOG TAC Revised General Comments and Questions
General Comment #5	Each chapter's action plan identifies three categories of action policies: 1) Intergovernmental Review/Best Practices 2) Legislation 3) Coordination To provide a clear understanding of how the many policies will be applied, it would be helpful if the listing of policies under Intergovernmental Review/Best Practices were separated into two categories to prevent confusion. One category would be the listing of Intergovernmental Review Policies that SCAG would apply to regionally significant projects as they undergo IGR review (external to SCAG process), and another category: Best Practices, that would relate to best management practices that SCAG as an agency would implement (internal SCAG process) or that could be considered as voluntary actions. For developers, local jurisdictions, special districts and agencies submitting projects that would undergo SCAG IGR review, the distinction and separation would simplify the document. The separation would make clear those policies that could be expected to be raised during the IGR process, and not be confused with a set of policies that represent SCAG work efforts and are not yet appropriate to be raised during the IGR process until SCAG's work effort is completed: Example: Open Space and Habitat: Agricultural Lands Action Plan, page 45, OSA-3, which is listed as an IGR/Best Practices policy and should be separated out as a SCAG Best Practices policy: "OSA-3: SCAG shall work with its member agencies and the region's farmland interests to develop regional guidelines for buffering farmland from urban encroachment, resolving conflicts that present farming on hillsides and other designated areas, and closing loopholes that allow conversion to non-farm uses without a grading permit."
General Comment #6	Each chapter presents data and information regarding the challenges faced by the topic addressed by the chapter (e.g. the land use chapter addresses land use challenges). A desired future and outcomes are then identified within a plan for the region to reach that desired future. However, it is not clear in all of the chapters how the goals, outcomes, and actions reflect the discussion of the challenges or the future plan. For example, the Transportation Chapter engages in a lengthy discussion of goods movement within the region but does not contain any goals, outcomes, or policies addressing it. It is recommended that there be a clear and logical linkage between the discussion presented in each chapter and the goals, outcomes, and policies/programs identified.

Reference	OCCOG TAC Revised General Comments and Questions
General Comment #7	Each chapter's action plan identifies a number of policies and programs recommended to be undertaken by different stakeholders in the region, including SCAG, local governments, public utilities, etc… It is appropriate for the RCP to include direction to those entities that may be responsible in the SCAG region for the implementation of the plan. However, it is recommended that the RCP not direct entities, such as the state and federal government and not under the purview of SCAG. It is recommended that all policies and programs directing actions for the state and federal government and other entities be directed towards actions that can be undertaken by entities in the region. For example, policy WA-33 from the Water Chapter states: "State and regional agencies should develop fair and consistent safety guidelines for use of reclaimed and recycled wastewater for nonpotable uses, in order to facilitate more widespread acceptance and use." The policy could be reworded to read: "SCAG should encourage the State and regional agencies to develop fair and consistent safety guidelines for use of reclaimed and recycled wastewater for non-potable uses to facilitate more widespread acceptance and use."
General Comment #8	It is recommended that the language used in the document be more neutral and present the facts, analysis and recommendations without bias. The document is currently written using a persuasive tone of voice that often attempts to convince the reader of the severity of a given challenge. This implies a bias in the interpretation of the facts. A persuasive tone may also dissuade readers from trusting the validity of the information and recommendations because it begs the question of what the other side of the argument may be.
General Comment #9	Each chapter in the document presents a significant amount of data and detail on the topic area. Some of the data in the document does not appear to be accurately referenced. For example, the Air Quality Chapter, page 81, states: "Driving a motor vehicle is the single most polluting thing that most of us do each day." It is cited as being from the National Safety Council. However, it is from research completed by the Environmental Protection Agency and is only referenced by the National Safety Council. It is recommended that citations and other sources of data should be reviewed for accuracy, particularly since the RCP is intended to serve as a resource document for various entities in the region.
General Comment #10	Data presented in each chapter should be current data relevant to the discussion. For example, the Air Quality Chapter, on page 81 quotes a study completed in 1995 addressing mobile source emissions. It is recommended that either a more current source for the information be identified or, if it is still valid, that the sentence add a statement acknowledging that the information being presented, while older, is still accurate.

Reference	OCCOG TAC Revised General Comments and Questions
General Comment #11	Many chapters in the RCP indicate that SCAG will use the RCP to guide decisions regarding funding. Please clarify how SCAG would use the RCP in making funding decisions and which funds would be subject to this guidance. Further, if funding is tied to the implementation of the RCP, which is currently a voluntary guidance document, it is recommended that the document should clarify that the funding come from new funding sources and should not be a redirection of existing funding sources. Also, please clarify if it is an RCP objective to establish a SCAG position that states that infrastructure bond funding be tied to consistency with the implementation of the visions of the Regional Comprehensive Plan and Compass Blueprint, as indicated in the Land Use Chapter in measure LU-2.1 which states, "All stakeholders should leverage state infrastructure bond financing, including the Department of Housing and Community Development's Transit Oriented Development program and should support legislation that will target infrastructure bond funds for regions with adopted growth visions such as the Compass Blueprint and for projects consistent with these visions. ?
General Comment #12	A theme of the RCP is the concept of "induced" growth due to roadway construction; however, there is no discussion of what this means relative to the RCP. Because the meaning of the word "induced" implies that the one thing causes another – roadway construction causes growth – it is confusing to the reader. As defined in ULI's book, "Growing Cooler", induced growth refers to growth that would have occurred somewhere else in the region in the absence of the investment in the infrastructure at one specific location. This is fundamentally different than one causing the other and really implies planning for growth through infrastructure investment. It is recommended that the RCP clearly define what is meant by "induced" growth as it is used throughout the document.

Reference	OCCOG TAC Revised General Comments and Questions
General Comment #13	Throughout the document, cause and effect statements are made that could be considered inaccurate, misleading, or contradictory to other goals of the RCP. It is recommended that these statements be clarified and corrected in order to not confuse the reader or contradict the goals of other chapters. For example, in the Water Chapter on page 40 in the sidebar, "How Water Policies Produce Multiple Benefits", the statement on Land Use and Housing begins: "Minimizing impervious surfaces reduces greenfield development, growth inducing road projects, and the siting of large lot commercial development in outlying areas." It is recognized that the minimization of impervious surfaces could result in these actions, but the sentence should also recognize that it may not. In fact, depending on how such a policy is applied, it could result in significant large lot development further exacerbating inefficient development of infrastructure as development reorients to include large undeveloped land area on each individual parcel. Another example from page 108 in the Transportation Chapter states: "Traffic congestion is largely a symptom of the growth patterns and population density of our region." The OCCOG recognizes that the growth pattern in the region is contributing to traffic congestion. However, it is a goal of the RCP to increase population density in specific, planned locations. Without recognition that increasing density strategically to maximize transportation investments, this statement says that the increases in density will result in increases in congestion. Chapter specific comments identify many of these statements and it is recommended that each be reviewed for consistency with the goals of the document as well as for accuracy
General Comment #14	The RCP references a variety of documents and programs that are not defined in the document, such as the Blueprint, the Regional Transportation Plan, and the Regional Aviation Strategy. If the audience for this document is broader than those agencies directly involved with SCAG, a discussion of what these documents are is recommended to be included. Further, it is recommended that a glossary, acronym definitions and list of resources be developed for the RCP. Because the RCP is intended as a resource document, each of the resources should also be readily available for review and reference.

Overall Comments on Each Chapter

(Please note that comments regarding specific text in each chapter will be provided in a supplemental handout.)

Executive Summary

Reference	OCCOG TAC Revised Comments: Executive Summary
1	Throughout the chapter, the text identifies that transportation planning is calling forth more requirements for integrated resource planning. Please clarify and cite the specific transportation planning references that call forth these requirements. Also, please define the term "integrated resource planning." It is a term that is used throughout the RCP and warrants an overview and description in the Executive Summary. For example, it would be helpful to understand if it includes air quality, open space, solid waste considerations?
2	It is recommended that the Executive Summary clearly identify all the purposes of the RCP. If prioritizing federal and state funds is one of the desired outcomes of the RCP, as indicated by some of the actions in various chapters, this statement should be identified as a bullet point as to why the RCP is being developed. Also, what are the procedures and guidelines by which such funds would be allocated? Does this mean that the RCP would give greater weight or priority to those projects that support the RCP vision? And would the funds for programs only be given to cities and counties that are member agencies of SCAG, which is the current SCAG Regional Council policy in granting the Compass Demonstration Project funds?
3	The text indicates that the RCP would be updated concurrent with the RTP, every four years. Please clarify what the update process for the RCP would be. Please clarify why the RCP should be updated every four years.
4	Throughout the Chapter, the text indicates that the SCAG Compass Blueprint serves as the basis for the RCP. The OCCOG and its member agencies: 1) Have yet to see the Compass Blueprint databases and maps; 2) Awaits receipt of the Compass Blueprint databases and maps; and 3) Finds it difficult to understand the scope of implications that would result from a policy to implement the Compass Blueprint due to the lack of clear information regarding the Compass Blueprint. Please provide the Compass Blueprint information to the OCCOG. In the absence of seeing how SCAG has incorporated Orange County jurisdictions' input to the draft Compass Blueprint maps that were reviewed and extensively commented on at SCAG's November 2006 workshop, OCCOG cannot determine a level of support or concern for identifying consistency with the Compass Blueprint as a primary goal of the RCP.

Land Use and Housing Chapter

Reference	OCCOG TAC Revised Comments: Land Use and Housing
1	There is a single goal in the Land Use and Housing Chapter of the RCP: "Successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and the 2% Strategy." The OCCOG has identified a series of questions and comments relating to SCAG's Compass Blueprint Strategy. They are as follows: • OCCOG does not know what the adopted SCAG Compass Blueprint Plan represents, and whether or not any of the Orange County jurisdictions are consistent with and are implementing Compass Blueprint. At the November 2006 SCAG workshop with Orange County jurisdictions, the preliminary Compass Blueprint maps developed by SCAG's consultants did not accurately illustrate where growth would be occurring; Orange County jurisdictions presented specific comments and corrections on where growth would occur and emphasized the need for consistency with the Orange County Projections. SCAG has not provided a revised set of maps that incorporate or respond to Orange County's feedback on the initial set of Compass Blueprint maps. The OCCOG seeks clarification and response on the status of receiving the adopted Compass Blueprint maps and database, so that Orange County jurisdictions can initiate a review of data and confirm if and how the adopted map and database reflects local input/OCP-2006. • The Regional Comprehensive Plan document identifies that the RCP is proposed to be updated every four years, concurrent with the 4-year update of the Regional Transportation Plan. Please clarify if the four-year update of the RCP correspondingly means that SCAG's Compass Blueprint plan and database is proposed to be updated with each RTP/RCP cycle. The OCCOG also seeks clarification on the SCAG process for updating and approving the Compass Blueprint plan, and how local jurisdictions would participate in the update of the Compass Blueprint Plan to ensure that the Plan and General Plans are consistent. • The OCCOG seeks clarification on how SCAG will outreach to all the jurisdictions in the SCAG region on the proposed Compass Blueprint plan, specifically, whether SCAG will conduct a series of technical workshops on the proposed Plan and whether Compass Blueprint maps will be available for local jurisdictions to review. • SCAG has identified that the re-distribution of land uses represented in the Compass Blueprint Plan would be implemented as a voluntary initiative, and through the development of demonstration pilot projects that would be measured and produce empirical data. However, there is not much funding for Compass. How will the demonstration pilot projects be funded? • The OCCOG seeks clarification if SCAG is to re-examine its policy that funds for Compass demonstration projects can only be made available to those jurisdictions that are SCAG member cities, if Compass Blueprint is to succeed as a voluntary initiative.

Reference	OCCOG TAC Revised Comments: Land Use and Housing
2	The OCCOG would appreciate review of the technical data that supports the assumption that air quality improvement will be achieved through the land use pattern proposed through Compass Blueprint. Please clarify the degree of "on-the-ground" testing has been conducted to validate this assumption, and identify how the actual benefits of Compass Blueprint land use patterns will be measured and monitored.
3	Please define "important open space" as it is used in the chapter. Also, is the reference to "agriculture" referencing prime agricultural lands? Because these terms are defined in state legislation, it is recommended that the RCP be clear and specific in the use of the terms in order to prevent any misunderstanding of the application of the RCP goals by local jurisdictions, particularly if it is to be used in SCAG intergovernmental review process.
4	The RCP identifies that one of the Land Use and Housing Outcomes is to have 100 percent of City and County General Plans consistent with Compass Blueprint by 2012. Given the concerns raised in Comment #1 above, the OCCOG observes that it would be unlikely that 100% of all City and County General Plans would be consistent with the Compass Blueprint by 2012, and inquires if the outcome should be revised to reflect a more achievable and realistic outcome.
5	It is recommended that any proposed outcome identifying a jobs to housing ratio should take into consideration the jobs and housing already in any Compass 2% areas. Thus, the reference should be revised to apply to "housing units <u>and/or</u> jobs created," to take into consideration the amount of housing and employment already planned or existing in each Compass 2% Strategy Opportunity Areas when trying to establish a jobs to housing balance. Further, any jobs to housing ratio should take into consideration whether the job is a full-time or part-time position as these have different implications to housing than they do to transportation.
6	The OCCOG expresses concern that the proposed fourth outcome in the Chapter regarding a jobs/housing balance would, as worded, potentially double count housing need. As currently worded, the outcome would identify a need for a housing unit for every 1.5 jobs **and** a housing unit for every 3 persons of population growth, irregardless of consideration of the population growth also filling the new job. Further, the jobs are not identified as full-time equivalency jobs. Therefore, the jobs identified would include part-time jobs as well as full time jobs – again, potentially generating a greater housing need than what is actually necessary for the employment.
7	Should the RCP's reference to any regional housing vacancy rate factor be discussed in reference to the region's adopted Regional Housing Needs Assessment Allocation Plan, versus the Compass Blueprint?

Open Space and Habitat Chapter

Reference	OCCOG TAC Revised Comments: Open Space and Habitat
1	The chapter discusses how SCAG evaluated "community open space availability" in 16 cities based upon a National Recreation and Parks Association standard of 6.25 to 10 acres per 1,000 people, and also presents a Figure 3.3 of this evaluation. Please provide a definition of "community open space" as used in this evaluation.
2	With respect to Comment #1 above, the section cited is followed by a Levels of Service section that states that the National Recreation and Parks Association standards cited in Comment #1 above, "were developed in the 1930s and fail to reflect the dynamic environment and variety of today's communities." The reader is confused with the presentation of this information and why the National Recreation and Parks Association standards were cited and analyzed, if deemed to be outdated. It is requested that this be addressed. Further, SCAG is proposing a Level of Service approach for requiring parkland. In reviewing the proposed list of seven factors to measure park needs, it is highly recommended that the chapter provide explanation as to how each of the proposed factors equates to an amount of parkland that must be provided in jurisdictions, and whether this proposed requirement applies to new development, or for all existing and proposed development within a community. Also, please clarify the Level of Service factor that all parklands have access to multi-modal transportation within ½ mile of the parkland, and the implications for transit service delivery and cost if such a factor is implemented, particularly if residents can access the parkland by walking or biking. Also, please clarify how Compass Blueprint areas would be a factor in measuring park needs and in determining Levels of Service for park needs in a community.
3	Maps in this chapter were difficult to read due to the size and scale of the map. It is recommended that figures such as Figure 3.1: Regional Open Space Infrastructure; Figure 3.2: Potential Conservation Opportunity Areas, and Figure 3.3: Prime Farmland Grazing should be made available at a larger scale to allow local jurisdictions, county transportation commissions, project sponsors and special districts to identify if any areas would be affected or impacted by future transportation or land use proposals.

Water Chapter

Reference	OCCOG TAC Revised Comments: Water
1	The OCCOG TAC sought and received comments from the Metropolitan Water District of Southern California on the Water Chapter of the RCP. MWD provided comments stating the following: "Metropolitan strongly endorses SCAG's premise that future regional development must be built on a foundation of sustainability, water use efficiency and the creative use and development of water management strategies. Uncertainties introduced by the current drought, climate change, and the fragile condition of the Sacramento-Bay Delta, underscore the importance of prudent planning by water agencies and watershed districts within Southern California. Metropolitan supports SCAG's continuing role as a regional resource and information facilitator. In this way, SCAG assists Metropolitan in its efforts to assure a reliable, high quality and well-managed future of water for the Southern California region." As such, the OCCOG TAC recognizes that SCAG could function in the capacity of being a resource for regional information and a facilitator for distributing that information, and recommends that the coordination with regional water agencies be continued. However, because the chapter recommends the expansion of the Compass Blueprint to facilitate a regional discussion of water issues and to serve as a basis for regional watershed planning, the OCCOG requests that SCAG address the significant concerns and issues that have been expressed about the Blueprint in previous comments prior to linking or recommending that any regional water planning efforts be based on it.
2	It is requested that the discussion of the challenges faced in the region regarding water better recognize the current efforts already undertaken by water and wastewater agencies in the region. For example, the chapter discusses specific pollutants found in groundwater and the health impacts each pose. However, there is limited discussion regarding the current legislation, monitoring or work efforts already undertaken by various agencies throughout the region to address these pollutants.
3	The chapter includes various discussions identifying a need to "eliminate" pollution in stormwater runoff. It is generally agreed that the elimination of pollution in stormwater runoff is not possible; however, it can be reduced to the maximum extent feasible and practicable and remaining pollution mitigated and its impacts minimized. It is recommended that the text throughout the chapter reflect this situation.
4	Significant policy statements are made in the "Plan" portion of the Chapter and are identified in the Goals, Outcomes, and Policies. However, there is minimal or no discussion or linkage of these items to the text in the chapter. For example, the Plan's Land Use and Transportation Strategies section states: "Concentrated development protects the watershed by leaving a larger percentage of it in its natural condition." This statement is made with only minimal context and does not indicate that for this to occur, the concentrated development would also have to be accompanied by a plan for the permanent preservation of the natural land.

Energy Chapter

Reference	OCCOG TAC Revised Comments: Energy
1	This chapter included a significant amount of useful and quality information. Comments are primarily focused on clarifying information in the chapter or requesting additional information.
2	The terms oil, liquid fuel, etc... are used interchangeably throughout the chapter. Please define the terms and use consistent terminology throughout the document. Further, it is noted that perhaps a glossary would be beneficial.
3	The links between the text of the chapter and the policies are weak and do not clearly follow the discussion from the text. It is recommended that the goals, outcomes and policies address points made in the chapter or clearly identify the challenges they are addressing.
4	There does not seem to be a difference between the initiatives or the policies listed in the chapter. Please clarify or combine the two lists.

Air Quality Chapter

Reference	OCCOG TAC Revised Comments: Air Quality
1	This chapter included a significant amount of useful and quality information. Comments are primarily focused on clarifying information in the chapter or requesting additional information.
2	The link between the text of the chapter and the policies does not clearly follow the discussion from the text. The goals, outcomes and policies should address points made in the chapter or clearly identify the challenges they are addressing.
3	Many of the goals and policies restate the goals established in state law, such as identifying that SCAG or the region should reduce greenhouse gas emissions to 1990 levels by 2020, which is directly drawn from the State's AB 32 legislation. It is recommended that references to actions simply state "to be consistent with state law." This will allow the RCP to remain consistent with state law in the event the laws are changed in the years between updates of the document.
4	This chapter would expand SCAG's current role in addressing air quality and specifically identify roles in the reduction of greenhouse gases. Relative to Comment #3 above, the role that SCAG plays should be consistent with State law.

Solid Waste Chapter

Reference	OCCOG TAC Revised Comments: Solid Waste
1	The chapter contains good and useful information for local governments. Comments on the chapter are primarily questions regarding requests for clarification of information.
2	Numerous acronyms are used throughout the chapter. Because of the broad audience that is anticipated to use the RCP, it is recommended that these acronyms be clearly defined. For example, “MMbtu” is used but not defined.
3	The language used in this chapter specifically tends to be a bit inflammatory and may misrepresent the information being presented. The OCCOG observes that it may better serve the intent of the chapter if the information and data were presented in a more neutral tone. For example, the first statement under “The Plan” section on page 91 states, “We will need a combination of both short and long term solutions to effectively address our overwhelming waste problem.” The OCCOG recognizes that the disposition of waste in the region is a very significant task that must be undertaken; however, the use of the term “overwhelming,” which is defined as something that is overpowering, implies that there really is no solution.

Transportation Chapter

Reference	OCCOG TAC Revised Comments: Transportation
1	This chapter is very vague and does not clearly link the narrative of the chapter with the goals, outcomes, or policies. For example, goods movement comprises as significant portion of the text in the chapter and has been extensively discussed at SCAG, yet there are no goals, outcomes, or policies addressing it. Other topics that are addressed in the chapter but that have no goals, outcomes, or policies include freight and cargo, diesel-fueled vehicles, or airports.
2	It is recommended that the Transportation Chapter should specifically illustrate strong ties to the RTP, which is one of SCAG's most significant programs and is directly linked to transportation planning. As such, it is recommended that the text of the chapter be updated to reflect the adopted RTP's goals and policies. Additionally, if the RCP's Transportation Chapter is intended to identify goals, outcomes, and policies that go beyond those included in the RTP, it should be clearly identified in what ways and why that would be the case.
3	Are there any goals about safety that should be included in this chapter that would address general safety, not just larger safety issues that have been raised since 9/11 and identified in the chapter? Also, please clarify how the discussion of safety in this chapter relates to the Safety and Emergency Preparedness Chapter in the document?
4	As stated above, there is not a clear link between the text of the chapter and the goals and outcomes listed. Please explain the purpose for and the reasoning behind the outcomes listed in the chapter. Reducing VMT and reducing fuel consumption to 1990 levels appears to be an application of the target formula for greenhouse gas emissions but applied to VMT and fuel consumption without consideration or explanation of how they relate to the transportation systems VMT and emissions. Is it realistic in this region to apply these reductions to these specific emissions sources in light of expected growth increases in population growth during the same time frame? Even holding both constant at today's levels seems extraordinary.
5	References throughout the Chapter to the "anticipated RTP" should reflect the adopted or completed 2008 RTP.

Security and Emergency Preparedness Chapter

Reference	OCCOG TAC Revised Comments: Security and Emergency Preparedness
1	The Security and Emergency Preparedness Chapter does not reflect the extensive amount of regional coordination that is already undertaken and in place in the region and state. The chapter implies a coordination role for SCAG in regional security and emergency preparedness that would require changes in state and federal law. Further, the chapter text does not identify how SCAG would coordinate with the existing efforts already undertaken and legislatively tasked to other agencies such as first responders and emergency operations centers. Because of the significant amount of work that is already undertaken in the region in this arena, it is recommended that the chapter focus its scope on SCAG's mandated SAFETEA-LU requirements, as reflected in the RTP.
2	It is recognized that SCAG can play a significant role in providing regional information, specifically geographic information and data (e.g. data from the regional geographic information system that could be used to identify emergency evacuation routes). It is recommended that SCAG's role be focused on acting in the capacity of data provider and as may be specified in SAFETEA-LU. Further, it is recommended that the focus of the goals, outcomes, and policies reflect ensuring accurate and current data be developed, maintained, and made available for these purposes.
3	The sidebars in this chapter identify ways in which planning for security and emergency preparedness result in benefits to other topical areas discussed in the chapters of the RCP. However, the examples given do not relate to the security and emergency preparedness text, discussion, or the goals, outcomes, or policies. While the benefits identified may be linked to the safety measures listed in the sidebars, it is recommended that it would be more appropriate to focus the benefits to be realized by other areas, such as land use, on the safety and security actions identified and discussed in the chapter.
4	Intelligent transportation systems are identified in the goals, outcomes, and policies as action items for the region and SCAG but are not discussed in the chapter. Please add a discussion of these systems and identify why they are important.

Economy Chapter

Reference	OCCOG TAC Revised Comments: Economy
1	The Economy Chapter presents a limited discussion of SCAG regions economy and identifies only limited recommendations for the future actions. The text focuses on quality of life issues such as air quality, education, and social justice issues at the exclusion of in-depth discussions of other measures such as new business starts and successes, gross production of the region, competitiveness in the attraction of businesses, etc… Goods movement is overemphasized as an employment and business sector and other sectors are not examined. It is recommended that the Economy Chapter include more information on the regions economy and identify a variety of opportunities for addressing its challenges or indicate that the chapter will be limited to a discussion of the goods movement sector.
2	This chapter specifically relies on numerous buzzwords and statements that are repetitive throughout the text. It is recommended that the chapter be refocused and clearly identify factual statistics on economic factors such as incomes, education levels, training levels, etc. Additionally, a more fully developed analysis of the condition of the economy, incomes, educational challenges, etc... would help to support the numerous goals, outcomes, and strategies included. This approach would strengthen the discussion and provide a sound foundation for the goals, policies and strategies identified in the chapter.
3	The text and outcomes identify a desire to increase the number of jobs in the region by 3 million but do not explain why this is a desirable or positive outcome. Please provide an explanation for these projected outcomes and discuss in the chapter as to why it is positive.

Attachment 3

Orange County Council of Governments

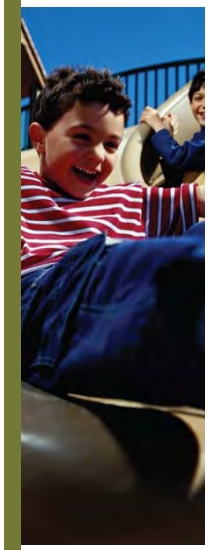
Specific Technical Comments on the Draft 2008 Regional Comprehensive Plan

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Executive Summary

This page contains no comments

This page contains no comments

Executive Summary



REGIONAL COMPREHENSIVE PLAN: CHARTING A PATH FOR SOUTHERN CALIFORNIA'S FUTURE

The Regional Comprehensive Plan (RCP) is a problem-solving guidance document that directly responds to what we've learned about Southern California's challenges through the annual State of the Region report card. It responds to SCAG's Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving our inter-related housing, traffic, water, air quality, and other regional challenges. Through extensive outreach and input from the RCP Task Force, SCAG's policy committees, subregions, local governments and other key stakeholders, the RCP is a collaborative effort to address our region's challenges and set a path forward.

The RCP sets a path forward in two key ways. First, it ties together SCAG's role in transportation, land use, and air quality planning and demonstrates why we need to do more than we're doing today. For example, while the RCP is based on the growth management framework of the Compass Blueprint, it further promotes environmental policies that help to "green" the region and lay the groundwork for a more robust 2012 update of the Regional Transportation Plan. Second, it recommends key roles and responsibilities for public and private sector stakeholders and invites them to implement reasonable policies that are within their control.

The result is a proactive, unconstrained, big-picture advisory plan that envisions what a livable, sustainable, successful region could look like and challenges us to tackle difficult issues. The RCP describes what could happen if current trends continue, defines a vision for a healthier region, and recommends an Action Plan that could get us there by 2035. By balancing resource conservation, economic vitality, and quality of life, it lays out a long-term planning framework that shows how we can respond to growth and infrastructure challenges in a comprehensive way.

Of course, there are many ways to address the region's challenges. As such, while the RCP recommends more integrated resource planning, *it does not mandate it*. Rather, local governments are asked to consider this Plan's recommendations in General Plan updates, municipal code amendments, design guidelines, incentive programs and other actions. The key is to begin talking about what the challenges are, define success, and implement solutions.

EXECUTIVE SUMMARY

RCP CHAPTERS

The RCP features nine chapters that focus on specific areas of planning or resource management:

- Land Use and Housing
- Open Space and Habitat
- Water
- Energy
- Air Quality
- Solid Waste
- Transportation
- Security and Emergency Preparedness
- Economy

The RCP is a problem-solving guidance document that

The RCP is being developed to:

- Respond to the SCAG Regional Council's direction to develop a comprehensive plan that addresses the region's economic, social and environmental future and emphasizes the interdependence of nine resource areas (see sidebar).
- Inform local, subregional, and county economic and resource plans that are often limited by geography or scope. For example, a county-wide resource plan for open space may fail to recognize the habitat value of linking to adjacent county open space plans.
- Help meet federal transportation planning requirements that call for more integrated resource planning, particularly more integration of environmental concerns into transportation plans through expanded consultation.
- Offer recommendations to local governments from a regional, comprehensive perspective for consideration into the development of local General Plans and the design and review of major development through the region's Intergovernmental Review process.
- Provide a regional response and strategy for meeting climate change mandates that call for reductions in greenhouse gases.
- Offer a comprehensive, integrated policy plan that helps position Southern California to get its fair share of revenue from federal and state funding programs, such as the traffic, housing, water, and park infrastructure bonds approved in 2006.
- Help stakeholders make the most of their limited resources by highlighting priority policies for future implementation that maximize benefits both locally and regionally.

Ultimately, the RCP sets the stage for regional dialogue and begins a process to measure our performance. Success depends on the region's ability to agree on our challenges, evaluate policy options, and seek consensus. As the council of governments for Southern California, SCAG is uniquely positioned to work with its subregions and local governments membership to take a leadership role in sustainability planning to meet our needs of today without undermining our ability to do so in the future. As the region's metropolitan planning organization, SCAG can help prioritize federal and state funds for programs that support the RCP's vision and outcomes.

To that end, SCAG proposes to update the RCP on a regular basis in concert with the Regional Transportation Plan to reflect changes in legislation, technology, policy, and other variables.

ASSESSING OUR CHALLENGES

Southern California is witnessing historic change at the global, national, and regional level. As our world continues to change

Page: 3

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:00:17 AM

Please identify the programs, whether under SCAG, the State, or other agencies, being considered under this umbrella statement? Additionally, please clarify if this RCP objective is establishing a SCAG position stating that State of California infrastructure bond funding be tied towards consistency to the implementation of the visions of the Regional Comprehensive Plan and to Compass Blueprint.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:00:37 AM

The OCCOG notes, that if this document is to be used as a policy guidance document for SCAG it would be helpful to member agencies as well as the public if the various specific federal transportation planning requirements referenced in this objective were clearly identified and cited. Also, please define the term "integrated resource planning." It is a term that is used throughout the Regional Comprehensive Plan and warrants an overview and description in the Executive Summary. In the definition, please identify if it includes, for example, air quality, open space, solid waste considerations along with transportation and land use?

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:00:57 AM

The OCCOG recommends that the Executive Summary clearly identify all the purposes of the Regional Comprehensive Plan. If prioritizing federal and state funds is one of the desired outcomes of the RCP as is implied by this statement, it should be identified as a bullet point as to why the RCP is being developed.

Regarding this statement, what are the procedures and guidelines by which such funds would be allocated? Does this mean that the RCP would give greater weight or priority for those projects that support the RCP vision? And, further, would the funds for programs only be given to cities and counties that are member agencies of SCAG, which is the current SCAG Regional Council policy in granting the Compass Demonstration Project funds?

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:01:20 AM

Please clarify the meaning of the RCP being updated with each RTP to reflect changes in legislation, technology, policy and other variables. Does the Regional Comprehensive Plan need to be updated every four years and how would the land use component be addressed every 4 years?

responds to our region's challenges.

in sometimes dramatic ways, Southern California is increasingly faced with tougher policy choices that will shape our region for generations to come:

- As we add over seven million more residents to our region by 2035, our ability to coordinate growth and infrastructure will determine how we consume our finite resources, whether it's open space, water, or even roadway capacity. Furthermore, policy initiatives like the Southwest Alliance can be used to coordinate growth and infrastructure planning with our partners in Kern County, San Diego County, and even Mexico.
- Making a real dent in traffic congestion is getting tougher and more expensive. Our region must explore new initiatives that can reverse decades of worsening mobility and make tomorrow's commute better than today. If we don't develop new initiatives to address how people and freight move, average freeway speeds will slow to 28 mph while the economic, environmental, and public health costs of congestion will continue to rise.
- After decades of steady progress, our air quality improvements have leveled off as growth has begun to offset the technological advancements that have served us well until now. Today, we face an air quality crisis, with more than 5,000 premature deaths from fine particulate matter. We must respond to more stringent air quality standards for $PM_{2.5}$ (particulate matter smaller than 2.5 microns in diameter) and even unregulated smaller pollutants called nanoparticles by reducing our reliance on diesel and other petroleum-based, combustion engines.
- The future of our energy supply is becoming uncertain. We are increasingly dependent on imported petroleum, natural gas, and coal, which account for 85 percent of our energy use. As we question the long term viability of a petroleum-based energy future, we must explore non-combustion-based energy sources.
- Our water supplies are increasingly threatened by pollution, and growth is often limited by whether there's adequate supply. The quality of our surface and groundwater supplies is equally important and must be protected through better management practices.
- Our economy continues to become more service- and technology oriented, with manufacturing outsourced to other regions and other countries. Today, the freight movement and logistics industries fuel much of our local economy. Over time, our region needs to find a balance that promotes regional economic sustainability through promotion of local industries while recognizing its important link to the global economy.
- We have to rethink our current waste management approaches and realize that waste is the result of the inefficient use of our limited, natural resources. Our region generates over 80 million tons of trash each year. Burying the problem in landfills does not make it go

Page: 4

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:01:40 AM

According to an air quality consultant on the OCCOG TAC, this statement is not universally accepted in inferring that growth is the key factor to air quality improvements leveling off or slowing down. As such, it would be helpful for the statement to be cited or discussed with more detail.

THE CONSEQUENCES OF INACTION

If projected regional, national, and international changes continue to unfold, our region will go through profound changes. There are potentially troubling consequences if we fail to act now:

Land Use and Housing: Lack of new housing in existing neighborhoods could result in increased land consumption in fringe areas.

Transportation: As roadways get more congested, traffic speeds could drop to an average of 28 miles per hour during rush hour.

Solid Waste: Exporting waste to desert areas and beyond increases the economic and environmental costs of waste management.

The RCP is a structured policy framework that links broad

away. We need to address this issue by reducing waste, reusing materials, recycling, and developing alternative technologies.

In addition, forces on the national and international scale are impacting our region:

- **Climate change.** The body of scientific evidence shows that our global climate is heating up at unprecedented rates that threaten life as we know it. The vast Southern California region has contributed to the highest CO_2 emissions levels in recorded history. This threatens to impact all aspects of our communities, whether it's reduced water supplies, habitat loss, increased air pollution, or public health impacts. The secondary effects of climate change are almost as troubling; for example, hotter cities need more cooling, which increases power plant usage that contributes further to the vicious cycle of greenhouse gases.
- **Energy uncertainty.** As the peak of the world's petroleum production rate is reached, there could be profound consequences to our region's economy. Southern California's transportation, agricultural and industrial systems are highly dependent on inexpensive oil. Any production decline and resulting price increases will have negative implications for the global and regional economy; the severity will depend on the rate of production decline and the linked increases in prices and our ability to find alternatives for petroleum.
- **Global economy.** If Southern California were a country, we'd be the 17th largest economy in the world. In this globalized economy, our region is increasingly susceptible to outside influences like international economic downturns that pose further challenges.

These challenges call for action, because the consequences of inaction are potentially devastating (see the "The Consequences of Inaction" sidebar). This need for action is all the more urgent because all of these issues are tightly linked. For example, failure to address land use and housing issues have direct and indirect impacts on air quality and public health.

FORMING A VISION AND IMPLEMENTING AN ACTION PLAN

The RCP is a structured policy framework that links broad principles to an action plan that moves the region towards balanced goals. The following vision statement and guiding principles are based on the region's adopted Compass Growth Vision Principles for Sustaining a Livable Region. These statements further articulate how the RCP can promote and sustain the region's mobility, livability, and prosperity for future generations.

Page: 5

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:03:11 AM
Please see note regarding recommended text changes in the replacement text comment.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 9:02:39 AM
It is recommended that the word "the" with the word "a": The OCCOG TAC noted that the reference to "***the*** **body of evidence shows that our global climate is heating up…" should be changed to "*a* body of evidence….". There is information that is contrary to this identified impact, and the narrative should so recognize.**

This page contains no comments

principles to an action plan that moves us forward.

2008

RCP Vision

To foster a Southern California region that addresses future needs while recognizing the interrelationship between economic prosperity, natural resource sustainability, and quality of life. Through measured performance and tangible outcomes, the RCP serves as both an action plan for implementation of short-term strategies and a call to action for strategic, long-term initiatives that are guided by the following Guiding Principles for sustaining a livable region.

RCP Guiding Principles

Improve mobility for all residents. Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

Foster livability in all communities. Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.

Enable prosperity for all people. Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.

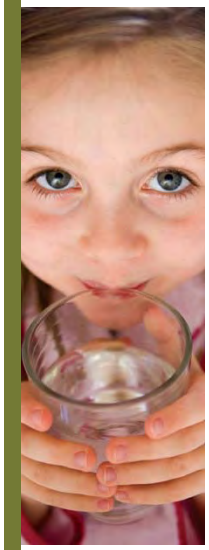
Promote sustainability for future generations. Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

The RCP looks at nine key areas of public policy that are linked closely to these guiding principles. Goals, Outcomes, and Action Plans for each chapter are identified that are consistent with the RCP's Vision and Guiding Principles (see "How to Use This Document" on page 10 for more information).

SETTING PRIORITIES

Everything is connected. Our region functions as a complex interconnection of environmental, social, cultural, economic, and other systems. Ignoring problems in one area can have ripple effects in another. For example, a warming planet can have profound implications for water supply, energy, and other resource areas that depend on a stable climate. Further, problems in one city can spill over onto adjoining cities, reminding us that we are connected in visible and not-so-visible ways.

The RCP promotes policies that are win-win propositions and produce direct and indirect benefits in multiple policy areas. To that end, this document lays out what other benefits could be realized if each chapter's goals are met. Policies could provide benefits in any of the nine resource areas of the Plan, as well as address other policy objectives, like promoting environmental justice principles, improving public health, and addressing climate change.



THE CONSEQUENCES OF INACTION

Energy: Estimates indicate up to 100 more days per year with temperatures above 90 degrees Fahrenheit in Los Angeles

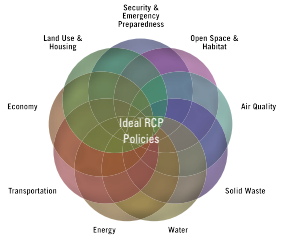
Higher temperatures and lower snow pack due to global warming could reduce hydropower generation, reducing California's in-state power production by 5 percent.

Air Quality: With a potential 3 to 10.5 degree rise in temperature due to climate change, extremely hot days could double to 72 per year.

Higher temperatures could hinder our air quality goals resulting in 85 percent more days conducive to ozone formation in the Los Angeles area.

The RCP's priority policies will have the greatest

FIGURE 1.1
RCP Promotes Multiple Benefits



Because there is no single approach that can solve our region's array of challenges, our region is faced with many policy options that should be evaluated before decisions are made. However, identifying priority policies that should be the focus of the region's short-term game plan is critical.

There are a variety of performance measures that can be used to rank policy options, such as cost-effectiveness, cost-benefit ratio, and environmental benefits. The RCP looks at the body of recommended policies and highlights those that can produce the most benefits across resource areas. In doing so, the RCP provides a framework for local decision-making that helps advance those policies that provide multiple benefits "for the price of one."

Based on the input from the public outreach on the Draft Plan, the RCP's priority policies will be those that have the greatest potential for direct and indirect benefits over multiple resource areas. In addition, priorities will also have the potential to address other policy objectives, including public health and climate change concerns.

ROLES AND RESPONSIBILITIES

As an advisory document, the RCP identifies potential policies that the public and private sector should consider in its planning and daily operations. The RCP reaffirms the institutional roles that SCAG, local governments, resource organizations, and the private sector have in resource planning and programs. To that end, the RCP recommends the following roles and responsibilities for key stakeholders:

- **SCAG.** As a council of governments, SCAG can take a leadership role by working with its member jurisdictions to promote sound planning policies through guidance, financial incentives, and other means. The RCP continues an ongoing dialogue with 187 local governments to develop consensus about how Southern California thinks globally and regionally and acts locally. In its role as a metropolitan planning organization, SCAG can

Page: 7

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:07:25 AM
It is recommended that this statement be revised to reflect that the RCP identifies a menu of options that could be considered by local jurisdictions, as has been stated at various policy and Regional Council meetings at SCAG. It is further recommended that the paragraph be revised to state that the RCP is also open to consideration of additional and new policies and programs that have been or may be developed by local jurisdictions but which may not be expressly stated in the RCP, yet which are consistent with and promote the goals of the RCP. This would clarify that the role of the RCP is to be used as a voluntary guidance document that offers a compilation of options and measures which local governments and other entities could use as a "menu."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:08:02 AM
Please clarify the financial incentives that SCAG anticipates using to promote sound planning principles.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:12:56 AM
It is recommended that the stakeholders also include special districts such as water, sewer and solid waste agencies because, relative to many chapters in the RCP, they are the primary entities with purview over the specific area in which a measure is identified (i.e. many water measures will primarily need to be addressed by water agencies.) Further, it is recommended that all of these agencies be outreached to for their review and comment on this document because the RCP and its draft policies also affect these agencies.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:09:57 AM
Please clarify how SCAG would use the RCP in making funding decisions.

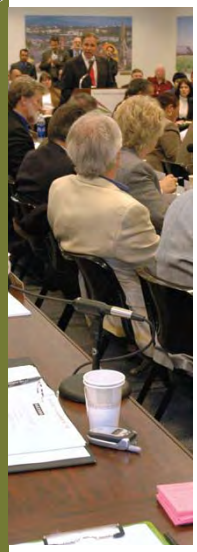
potential for benefits over multiple resource areas.

also help advance integrated policies through its funding decisions.

- **Local governments.** Local jurisdictions have the land use authority to promote balanced growth and other local initiatives that promote holistic planning. In their capacity as major employers, cities also can set an example in their communities by adopting proactive policies that reduce waste, promote energy efficiency, and address other goals.
- **Transportation commissions.** With their role in planning and programming transportation projects, commissions can modify their criteria to help promote integrated planning objectives. For example, linking local land use decisions with transportation funding priorities is a key opportunity to increase transit ridership. Commissions can also look at other environmental and economic criteria to provide a more balanced view of the benefits of their plans, programs, and projects.
- **Resource agencies and conservation groups.** These organizations work every day to promote better resource management, economic development, and other social and environmental policies and programs. The RCP offers these organizations the opportunity to discuss challenges and opportunities through a more regional approach.
- **Private sector.** Through voluntary changes in their practices, businesses can take a proactive role in addressing the goals of the region. Whether it's reducing consumer waste associated with product packaging or promoting greener building practices in new development, the private sector has a key role in promoting programs that are consistent with the RCP.
- **The public.** The long-term well-being of our region ultimately serves the needs of all of us, our children, and future generations. Our decision-makers need to know that solving our environmental, economic, and quality of life problems is something worth working for. The public can play a key role in addressing the goals of the region through their votes and consumer habits.

RELATIONSHIP OF RCP TO COMPASS BLUEPRINT AND THE REGIONAL TRANSPORTATION PLAN

This integrated Plan is closely tied to both SCAG's Compass Blueprint and the Regional Transportation Plan (RTP). On one hand, the RCP complements the Compass Blueprint and the 2008 RTP. For example, it expands on federal SAFETEA-LU requirements that call for improved coordination and mitigation of transportation plans that reinforce mitigation measures needed to address the RTP's environmental impacts.



Page: 8

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:13:22 AM
Please see comment related to this sentence on the previous page.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:24:36 AM
The OCCOG identifies a concern with the RCP statement recommending that county transportation commissions modify their criteria for planning and promoting transportation projects to promote integrated planning objectives identified in the RCP. Orange County voters have approved existing and Renewed Measure M projects for which there is no leeway in changing these projects.

This page contains no comments

THE CONSEQUENCES OF INACTION

Open Space and Habitat: Invasive plants and weeds compete with native plants, potentially wiping out a number of endangered species.

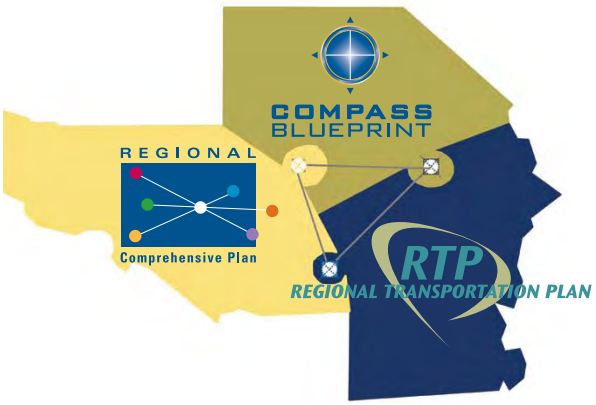
60 to 80 percent of existing plant populations could be phased out, resulting in less biodiversity.

Economy: Transportation, agricultural and industrial systems depend on inexpensive oil; decline in petroleum production without alternative energy sources will result in severe price increases and impacts to our economy.

Global warming will reduce the quality and quantity of certain agricultural products that help drive the California economy.

The RCP builds on the Compass Blueprint framework

FIGURE 1.2
Three Interrelated Plans



and promotes policies that help "green" the region.

However, the RCP further advocates for even bolder policies that attempt to achieve a healthier, more sustainable region.

On the other hand, the RCP sets the direction for how both programs can evolve in the future. For example, while the RCP builds on the growth management framework of the Compass Blueprint, it promotes natural resource policies that help "green" the region as we move toward more sustainable development. It also calls for improved integration of the Compass Blueprint into the RTP by suggesting that future transportation plans better promote transit projects that can serve the Compass Blueprint focus areas that have or are anticipated to see population and job growth. Similarly, the RCP incorporates the recommendations from the pending 2008 RTP and also clarifies the need for further action in the future to achieve this Plan's goals.

HOW TO USE THIS DOCUMENT

The RCP is laid out much like a General Plan and organizes recommended policies into nine chapters. The highlight of each chapter is the regional strategy that addresses the RCP's vision for that resource area. As such, each chapter includes three levels of recommendations for the region:

- **Goals.** Each goal will help define how sustainability is defined for that resource area.
- **Outcomes.** These focus on quantitative targets that define progress toward meeting the RCP's Goals. Where possible, they are clearly defined (e.g., a 20 percent reduction in greenhouse gas emissions from 2007 levels), capable of being monitored with existing or reasonably foreseeable resources, and have a strong link to sustainability goals.
- **Action Plan.** This critical part of the RCP lays out a comprehensive implementation strategy that recommends how the region can systematically move to meet the RCP's quantitative Outcomes and achieve its Goals, Guiding Principles, and Vision. Each Action Plan contains:
  - **Constrained Policies.** This includes a series of recommended near-term, feasible policies that stakeholders should consider for implementation. For example, the RCP calls on SCAG to adopt policies that reflect its role as a planning agency, council of governments, and metropolitan planning organization.

  The RCP also recommends potential policies for consideration by local governments and other key stakeholders. Clear policies will improve the Intergovernmental Review (IGR) process and help SCAG and local governments assess the consistency of local projects to the RCP. SCAG uses the IGR process to offer comments to local governments on how regional issues and concerns should be addressed by both local projects and citywide policies.

Page: 10

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:27:11 AM

It is requested that SCAG clarify if the RCP outcomes – the quantitative targets – are proposed to be measured at the regional level, or if these targets are to be applied down to the city or project level, particularly if the RCP policies are to be used for Intergovernmental Review (IGR)?

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:34:56 AM

Please note that the OCCOG and its member agencies have yet to see the Compass Blueprint database and maps, await receipt of the Compass Blueprint database and maps, and find it difficult to understand the scope of implications or the degree of concern with policies identifying a desire for consistency with Compass Blueprint in absence of seeing how SCAG has incorporated Orange County jurisdictions' input to the draft Compass Blueprint maps that were reviewed and extensively commented on at SCAG's November 2006 workshop in Orange County.

This page contains no comments

THE CONSEQUENCES OF INACTION

Water: Increased temperatures would result in earlier annual snow melt and increased rainfall in the mountains, leading to increased flood risks along major streams and rivers throughout the region.

Sierra Nevada spring snow pack could reduce by as much as 30 percent—a primary source of water for Southern California.

Sea levels could rise from 1 to 3 feet by 2100. The resulting influx of saltwater could threaten the quality and reliability of major fresh water supplies.

- **Strategic Initiatives.** This encompasses longer-term strategies that require significant effort to implement but are necessary to achieve the RCP's desired Goals and Outcomes. For example, identifying technological breakthroughs that can reduce air pollution from the transportation sector requires both commitment and time. Most of these initiatives are not constrained and will require political will, enabling legislation, new funding sources, and other key developments to become a reality. In most cases, this tier of strategies is the key to achieving the region's sustainability Goals and Outcomes.

As shown in the following figure, each Action Plan is presented in a tabular format that provides several pieces of information. Each table outlines policies and initiatives that are sorted by the potential implementing entity and describes:

- **Type of Policy or Initiative.** The tables organize policies and initiatives into three categories:
  - ***IGR/Best Practices*** refer to good ideas that should be considered for both General Plan updates and for inclusion in development projects. SCAG would rely on these measures to evaluate and comment on local projects and plans through its Intergovernmental Review (IGR) process.
  - ***Legislation*** refers to areas that require legislative or regulatory reform.
  - ***Coordination*** involves two or more entities working together to move ideas into action. In such cases, SCAG is often considering taking a leadership role to promote partnerships that break through historical barriers and move initiatives forward.
- **Potential for Direct and Indirect Benefits**. This summarizes whether a policy could provide direct and indirect benefits for other resources areas. For example, a policy calling for congestion pricing of roadways could produce air quality benefits as well. To reinforce the theme of multiple benefits, each chapter highlights some key ways in which its policies can benefit other resource areas. The **Appendix** to the RCP includes more discussion of these multiple benefits.
- **Potential for Other Benefits.** The potential for benefits to public health and climate change.

This page contains no comments

FIGURE 1.3
Action Plan Layout

Identifies potential to address other policy objectives

Implementing this policy could directly or indirectly improve open space

Identifies potential benefits in the other eight resource chapters of the RCP

Indicates whether the table identifies Constrained Policies or Strategic Initiatives

ENERGY ACTION PLAN

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits: Land Use	Transportation	Air Quality	Water	Open Space	Economy	Security	Solid Waste	Other Benefits: Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	EN-1. SCAG shall continue to work with the State to develop approaches for evaluating environmental impacts within the Compass Blueprint program, particularly energy, air quality, water, and open space and habitat.	X	X	X	X	X	X			X	X
X			EN-2. 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.	X	X	X	X	X	X		X	X	X
	X		EN-3. SCAG shall encourage credits for clean post recycle conversion technologies to produce energy or for technologies that offset energy use or emissions.		X	X			X		X	X	X
Local Government Policies													
X			EN-4. Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips.	X	X	X	X	X	X		X	X	X

Through the Intergovernmental Review (IGR) process, SCAG will use these Policies as the basis for its comments on regionally-significant projects.

These policies or initiatives rely on changes to existing legislation or regulation.

These potential areas for SCAG leadership that rely on partnerships with public and/or private sector stakeholders.

EN-1 stands for Energy Constrained Policy 1. EN-1S stands for Energy Strategic Initiative 1.

RCP policies and initiatives are sorted by potential implementing entity (e.g., SCAG, local governments and/or developers, State of federal government)

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Land Use

This page contains no comments

This page contains no comments

Land Use and Housing

THE CHALLENGE

The region's challenges related to traffic congestion, air quality, housing availability and affordability and nearly all of the other issues identified in this Plan can be traced, at least in part, to the intersection of land use decisions, transportation planning and the growth of our population and economy. In a region where outward expansion has been the norm, there is now a perception that we are "built out," with little available land left to accommodate growth. Complaints that new development is overburdening transportation infrastructure are becoming commonplace as traffic congestion and delay worsen. Commutes in many parts of the region are long and getting longer - indicative of a jobs-housing imbalance as people live far from where they work.

California's system of municipal finance has forced local governments to make land use decisions based on revenue-generation concerns rather than sound planning practice. Housing costs have skyrocketed as the supply of housing has failed to keep pace with a growing demand (see **Figure 2.1**).

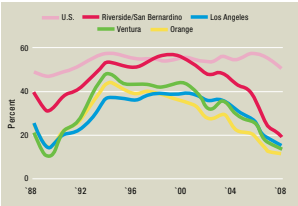
Linking Land Use and Transportation Planning

The quality of life in any region depends in large part on travel - how easy it is to get from home to work and back, the amount of time spent commuting, and the types and degree of choices available for getting around. Closely related to that are the choices we make about how land should be used. The types and appearances of buildings, how they function in a neighborhood or business district, and where they are located all have an effect on transportation use. For example, a small neighborhood that combines a shopping area with nearby residences makes it easier for people to walk for some of their trips (see **Figure 2.2**). Highway-adjacent commercial development, however, tends to require auto travel for all trips.

At the same time, decisions made about transportation also affect what and where we build. Freeway interchanges usually

FIGURE 2.1

Housing Affordability
(Percent of Households Who Can Afford to Purchase a Median-Price Home)



Source: California Association of Realtors

Page: 15

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:42:34 AM
Please see Comment Reference 1 in the Overall Chapter Comments for the Land Use and Housing Chapter.

The region's challenges can be traced to the intersection of

HOW LAND USE AND HOUSING POLICES PRODUCE MULTIPLE BENEFITS

Open Space and Habitat: Emphasizing infill development and focusing growth around urban centers and transportation nodes will discourage sprawling "leapfrog" development, slow the rate of land consumption and help protect important open space on our urban periphery.

Water: Greater emphases on multi-family and non-traditional housing and green building practices help reduce per-capita water consumption, particularly for residential irrigation use.

Energy: Balanced land use growth patterns will reduce VMT and the fuel demands for vehicle travel. Mixed land uses near transportation services can save consumers up to 512 gallons of gasoline per year. Households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods.

FIGURE 2.2
Before and After Photo-Morph

Source: SCAG

encourage development of auto-oriented stores and services, while transit and pedestrian amenities stimulate "Main Street" business and residential development nearby.

We are still growing – the region is expected to add another seven million residents by 2035. The new arrivals are members of our own growing families and those attracted by the strong regional economy and we can expect this growth regardless of the land use decisions we make. However, by linking responsible land use and transportation planning, we can accommodate growth while maintaining the region's mobility, livability, prosperity and sustainability.

THE PLAN

Sustainably planning for land use and housing in Southern California will maximize the efficiency of the existing and planned transportation network, provide the necessary amount and mix of housing for our growing population, enable a diverse and growing economy and protect important natural resources.

We can achieve land use and housing sustainability by implementing the Compass Blueprint planning principles developed corroboratively by SCAG and other partners since 2000. Implementing Compass Blueprint will result in significant land use changes to only 2 percent of the total land area in the region. Implementation efforts, by all levels of government

and all stakeholders, are part of what is referred to as the "2% Strategy."

SCAG's transportation modeling and other analyses show that implementing the Compass Blueprint scenario will:

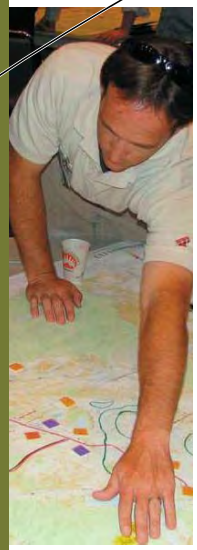
- Provide adequate and affordable housing for our growing population. Production of new housing units will provide an economic stimulus to the region through direct investment and new jobs.
- Promote improved jobs-housing balance throughout the region. Locating new housing near jobs, new employment centers near housing, and both housing and jobs near transit and other transportation corridors will shorten commutes and allow commuting options other than single occupancy vehicles.
- Reduce regional vehicle miles traveled (VMT), resulting in reduced traffic congestion and delay and reduced air quality impacts. Reduced VMT will also lead to significant infrastructure cost savings.
- Improve social equity and environmental justice through revitalization of older suburban and inner-city locations, promotion of economic development in urban core areas and enhancement of local property and sales tax revenues.

Development of the Compass Blueprint

The Compass Blueprint growth vision, 2% Strategy and the Goals, Outcomes and Action Plan outlined in this chapter are the products of a proactive and integrated process that began in 2000 with direction from SCAG's Regional Council and a region-wide series of workshops involving over 2500 stakeholders. SCAG's quantitative modeling and policy analysis techniques then determined some of the objective land use, transportation and economic implications of a range of alternative growth scenarios. By 2004, a regional consensus emerged on a growth vision/land use scenario that will enhance Southern California's livability, mobility, sustainability and prosperity.

The Compass Blueprint growth vision formed the basis for the preferred land use alternative in the 2004 Regional Transportation Plan (RTP). Continued technical analysis and a 2006 series of stakeholder workshops at which over 90 percent of the region's jurisdictions were represented, have resulted in an updated growth vision and a significantly refined scenario. This became the preferred land use alternative for the 2008 RTP and the foundation of the Land Use and Housing chapter of this RCP.

Ultimately, the region should work together toward the outcome of realizing, by 2035, development and redevelopment consistent with the Compass Blueprint growth vision and the Plan Alternative growth scenario developed for the 2008 RTP



Page: 16

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:43:04 AM
Continuation of previous comment relative to Reference 1 of the Overall Chapter Comments for the Land Use and Housing Chapter.

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:45:03 AM
The OCCOG would appreciate review of the technical data that supports the assumption that air quality improvement will be achieved through the land use pattern proposed through Compass Blueprint. Please clarify the degree of "on-the-ground" testing has been conducted to validate this assumption, and identify how the actual benefits of Compass Blueprint land use patterns will be measured and monitored. (Comment Reference 2 of the Overall Chapter Comments for the Land Use and Housing Chapter.)

HOW LAND USE AND HOUSING POLICES PRODUCE MULTIPLE BENEFITS

Air Quality: Land use decisions that reduce the number or length of vehicle trips will directly improve air quality by reducing regional VMT and associated vehicle start, running, and soak emissions.

Solid Waste: Greater emphases on infill development and green building practices will help reduce construction-related waste.

Transportation: Land use decisions may be the single most important factor in determining the performance of the transportation system and in evaluating the need for future transportation investments. Implementation of Compass Blueprint program can reduce about 8.6 million daily VMT in the region.

Economy: Providing an adequate supply of housing that is affordable and desirable will support a strong, diversified workforce and economy.

Implementing Compass Blueprint will result in significant

through SCAG's Integrated Forecast program. The Compass Blueprint scenario describes a potential future for the region and distributes forecast growth in population and employment throughout the region. A palette of future development and redevelopment types (e.g., "city neighborhood" or "town center"), each with an associated density of households and jobs per acre, are mapped to specific locations, creating a scenario that can realistically accommodate the region's total forecast growth while maintaining or enhancing the region's mobility, livability, prosperity and sustainability. The details of the scenario, including maps showing the locations of the growth and tables describing the housing and employment densities and other attributes of the different development types, are presented in the 2008 RTP.

To accurately track implementation progress and assess consistency with the Compass Blueprint, SCAG will develop a monitoring plan and assessment methodology, as described below in the chapter's Action Plan.

LAND USE AND HOUSING GOALS

Successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and 2% Strategy:

- Focusing growth in existing and emerging centers and along major transportation corridors.
- Creating significant areas of mixed-use development and walkable, "people-scaled" communities.
- Providing new housing opportunities, with building types and locations that respond to the region's changing demographics.
- Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations.
- Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots.
- Preserving existing, stable, single-family neighborhoods.
- Protecting important open space, environmentally sensitive areas and agricultural lands from development.

LAND USE AND HOUSING OUTCOMES

- 100 percent of city and county general plans consistent with Compass Blueprint by 2012 (General Plans are the local blueprints for growth and best indicate whether local governments have adopted Compass Blueprint planning principles.).

Page: 17

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 9:45:53 AM
Please define "important open space" as it is used in the chapter. Also, is the reference to "agriculture" referencing prime agricultural lands? Because these terms are defined in state legislation, it is recommended that the RCP be clear and specific in the use of the terms in order to prevent any misunderstanding of the application of the RCP goals by local jurisdictions, particularly if it is to be used in SCAG intergovernmental review process. (Comment Reference 3 of the Overall Chapter Comments for the Land Use and Housing Chapter.)

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:46:25 AM
Please see Comment Reference 1 of the Overall Chapter Comments for the Land Use and Housing Chapter related to discussion of Compass Blueprint/2% Strategy.

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:47:12 AM
The RCP identifies that one of the Land Use and Housing Outcomes is to have 100 percent of City and County General Plans consistent with Compass Blueprint by 2012. Given the concerns raised in Comment #1 above, the OCCOG observes that it would be unlikely that 100% of all City and County General Plans would be consistent with the Compass Blueprint by 2012, and inquires if the outcome should be revised to reflect a more achievable and realistic outcome.

land use changes to only 2% of the region's land area.

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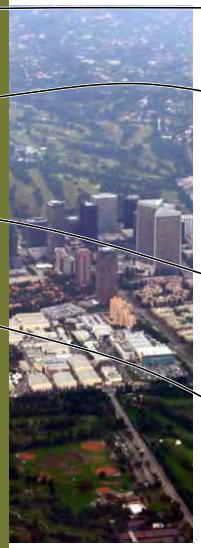
REGIONAL COMPREHENSIVE PLAN

- Significantly increase the number and percentage of new housing units and jobs created within the Compass Blueprint 2% Strategy Opportunity Areas by 2012 and improve the regional jobs-housing balance (tracking the number of new units will measure the region's progress in accommodating forecast growth. Percentage of housing and jobs developed within the Opportunity Areas will indicate the locational efficiency of growth.).
- Reduce total regional vehicle miles traveled (VMT) from carbon-based fueled vehicles to 1990 levels by 2020 (the Land Use and Housing Action Plan can be expected to result in a 10 percent reduction in VMT in 2035 when compared to current trends. VMT serves as a proxy for jobs/housing balance, urban design, transit accessibility, and other urban form issues. VMT per household will decrease with Compass Blueprint implementation.).
- Add one new housing unit to stock for every 3 persons in population growth and one new housing unit for every 1.5 jobs (housing supply measures the availability of housing in comparison to population and jobs.).
- Reduce by 20 percent the percentage of households paying more than 50 percent of their income for combined housing and transportation costs from the 2000 levels (combined housing and transportation costs as a percentage of income is an important measure of housing affordability and efficient development.).
- Increase the region's first-time homebuyer affordability index so that the relationship of minimum qualifying income to entry-level home price mirrors or surpasses the national average (the first-time homebuyer affordability index is another key measure of housing affordability.).
- Increase regional homeownership so that the percentage of households owning their own home mirrors or surpasses the national average. Reduce the existing disparities in homeownership by ethnic group by 50 percent (the region currently suffers from low homeownership rates, especially among certain ethnic groups.).
- Achieve a regional housing vacancy rate of 1.5 percent for owner-occupied units and 5 percent for rental units (these vacancy rates are indicators of a healthy housing market.).
- Significantly improve the efficiency of land use in the region's urbanized areas by 2035 (this measures the number of people and jobs per acre and the region's ability to accommodate growth in parts of the region that are already urbanized or that become urbanized during the planning period.).



18

Page: 18

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:48:16 AM

It is recommended that any proposed outcome identifying a jobs-to-housing ratio should take into consideration the jobs and housing already in any Compass 2% areas. Thus, the reference should be revised to apply to "housing units and/or jobs created," to take into consideration the amount of housing and employment already planned or existing in each Compass 2% Strategy Opportunity Areas when trying to establish a jobs to housing balance. Further, any jobs to housing ratio should take into consideration whether the job is a full-time or part-time position as these have different implications to housing than they do to transportation.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 9:48:52 AM

Please insert the text "/or" where as indicated in the previous comment.

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:50:48 AM

This outcome is presented in relation to the proposed goal of implementing the Compass Blueprint strategy. Should the RCP's reference to homebuyer affordability be discussed in reference to the region's adopted Regional Housing Needs Assessment Allocation (RHNA) Plan, versus the Compass Blueprint? Also, please clarify the rationale of proposing that the relationship of qualifying income to home price mirror the national average.

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:52:17 AM

The OCCOG asks that SCAG please identify why the proposed outcome only references "carbon-based fuels" and asks if the goal should be to reduce energy consumption and thus vehicle miles traveled from all fuel sources?

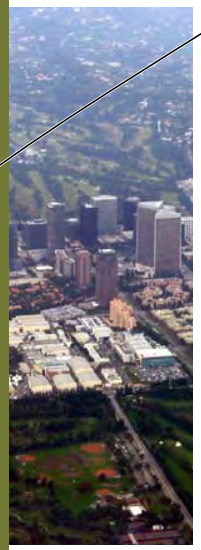
Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 9:55:49 AM

As noted in previous comments, this outcome relating to a vacancy rate factor is being presented in relation to the proposed goal of implementing the Compass Blueprint strategy. The OCCOG asks whether the RCP's reference to any regional housing vacancy rate factor should be discussed in reference to the region's adopted RHNA Plan, versus the Compass Blueprint? Further, if it is determined that it should not, the OCCOG offers that a discussion of why the RHNA Plan, which represents existing state law, is not used would be helpful to readers to understand what is intended by these outcomes.

Comments from page 18 continued on next page

land use changes to only 2% of the region's land area.

- Significantly increase the number and percentage of new housing units and jobs created within the Compass Blueprint 2% Strategy Opportunity Areas by 2012 and improve the regional jobs-housing balance (tracking the number of new units will measure the region's progress in accommodating forecast growth. Percentage of housing and jobs developed within the Opportunity Areas will indicate the locational efficiency of growth.).
- Reduce total regional vehicle miles traveled (VMT) from carbon-based fueled vehicles to 1990 levels by 2020 (the Land Use and Housing Action Plan can be expected to result in a 10 percent reduction in VMT in 2035 when compared to current trends. VMT serves as a proxy for jobs/housing balance, urban design, transit accessibility, and other urban form issues. VMT per household will decrease with Compass Blueprint implementation.).
- Add one new housing unit to stock for every 3 persons in population growth and one new housing unit for every 1.5 jobs (housing supply measures the availability of housing in comparison to population and jobs.).
- Reduce by 20 percent the percentage of households paying more than 50 percent of their income for combined housing and transportation costs from the 2000 levels (combined housing and transportation costs as a percentage of income is an important measure of housing affordability and efficient development.).
- Increase the region's first-time homebuyer affordability index so that the relationship of minimum qualifying income to entry-level home price mirrors or surpasses the national average (the first-time homebuyer affordability index is another key measure of housing affordability.).
- Increase regional homeownership so that the percentage of households owning their own home mirrors or surpasses the national average. Reduce the existing disparities in homeownership by ethnic group by 50 percent (the region currently suffers from low homeownership rates, especially among certain ethnic groups.).
- Achieve a regional housing vacancy rate of 1.5 percent for owner-occupied units and 5 percent for rental units (these vacancy rates are indicators of a healthy housing market.).
- Significantly improve the efficiency of land use in the region's urbanized areas by 2035 (this measures the number of people and jobs per acre and the region's ability to accommodate growth in parts of the region that are already urbanized or that become urbanized during the planning period.).



Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 10:02:09 AM

The OCCOG expresses concern that the proposed fourth outcome in the Chapter regarding a jobs/housing balance would, as worded, potentially double count housing need. As currently worded, the outcome would identify a need for a housing unit for every 1.5 jobs **and a housing unit for every 3 persons of population growth, irregardless of consideration of the population growth also filling the new job. Further, the jobs are not identified as full-time equivalency jobs. Therefore, the jobs identified would include part-time jobs as well as full time jobs – again, potentially generating a greater housing need than what is actually necessary for the employment.**

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 10:04:40 AM

The OCCOG expresses concern with the inclusion of this outcome and questions if the outcome is beyond local control and involves a choice issue for many in this region.

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HOW LAND USE AND HOUSING POLICES PRODUCE MULTIPLE BENEFITS

Security and Emergency Preparedness: Balanced growth minimizing greenfield development at urban fringes reduces exposure to wildfires and other natural disasters that can tax our public safety services.

Public Health: Neighborhoods that generate fewer and shorter vehicle trips and greater transit and non-motorized use mean better air quality and fewer dangerous pollutants.

Environmental Justice: By cleaning up and redeveloping brownfields and providing urban parks, cities can revitalize urban cores where residents have too often been subjected to environmental hazards.

Climate Change: Mixed land uses with access to transportation can save residents up to 512 gallons of gasoline per year and reduce over 4 metric tons of CO_2 per year.

- Significantly decrease the rate of land consumed for urbanization between 2007 and 2035 (land consumption and urbanization measures the rate at which undeveloped land is converted to urban uses, relative to population growth.).
- All cities in the region adopt green building standards by 2012 (green building standards as part of local planning and permitting represents a key element of the Compass Blueprint Growth Vision – sustainability. Green building will also be a key to achieving the sustainability goals identified in the Water, Solid Waste, Energy and Air Quality chapters of this RCP.).

LAND USE AND HOUSING ACTION PLAN

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits								Other Benefits	
				Transportation	Air Quality	Water	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	LU-1. SCAG shall provide technical assistance and regional leadership to implement the Compass Blueprint growth scenario and integrate growth and land use planning with the existing and planned transportation network.	X	X		X	X	X			X	X
		X	LU-1.1 SCAG shall provide planning services to local governments through Compass Blueprint Demonstration Projects. These projects will help local jurisdictions: • Update General Plans to reflect Compass Blueprint principles and integrate land use and transportation planning. • Develop specific plans, zoning overlays and other tools to stimulate desired land-use changes within 2% Strategy Opportunity Areas. • Complete economic analyses and community outreach to ensure that planned changes are feasible and responsive to stakeholder concerns. • Visualize potential changes, through innovative graphics and mapping technology, to inform the dialogue about growth, development and transportation at the local and regional level	X	X		X	X	X			X	X
		X	LU-1.2 SCAG shall continue with a targeted public relations strategy that emphasizes regional leadership, the benefits and implications of Compass Blueprint, and builds a sense of common interests among Southern Californians.	X	X		X	X	X			X	X
		X	LU-1.3 SCAG shall expand the role of the Compass Partnership, a forum convening representatives from government, civic leaders and the development community. The Partnership will advise the region on how public-private partnerships will help leverage the outcomes outlined in this chapter. SCAG shall encourage cooperative land-use decision-making and planning efforts between neighboring jurisdictions.	X	X		X	X	X			X	X
		X	LU-2. SCAG shall encourage leveraging federal and State and local funds to implement the Compass Blueprint.	X			X	X	X			X	X
		X	LU-2.1 All stakeholders should leverage state infrastructure bond financing, including the Department of Housing and Community Development's Transit Oriented Development program and should support legislation that will target infrastructure bond funds for regions with adopted growth visions such as the Compass Blueprint and for projects consistent with these visions.	X			X	X	X			X	X
		X	LU-3 SCAG shall develop an objective monitoring system to gather data and measure regional progress toward implementing the Compass Blueprint growth scenario and achieving the outcomes outlined in this chapter.	X	X		X	X	X			X	X
		X	LU-3.1 SCAG shall define a methodology for assessing local General Plans' consistency with Compass Blueprint.	X	X		X	X	X			X	X
		X	LU-3.2 SCAG shall develop a data set and methodology for determining what portion of regional growth is occurring within 2% Strategy Opportunity Areas.	X	X		X	X	X			X	X
		X	LU-3.3 SCAG shall further develop land use performance measures to be included in future Regional Transportation Plans.	X	X		X	X	X			X	X
X			LU-4 SCAG shall use its Intergovernmental Review process (IGR) role to provide robust review and comment on large development projects regarding their consistency with the Compass Blueprint.	X	X		X	X	X			X	X

Page: 20

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 10:06:31 AM

Proposed Policy LU-3.3 states that "SCAG shall further develop land use performance measures to be included in future Regional Transportation Plans." The OCCOG is unclear as to the objective and meaning of this policy and requests that SCAG clarify what would be anticipated to be developed for the RTP beyond what is already included.

LAND USE AND HOUSING

IGR/Best Practices	Legislation	Constitution	Constrained Policies	Potential for Direct/Indirect Benefits								Other Benefits	
				Transportation	Air Quality	Water	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
Local Government Policies													
X			LU-5 Local governments should provide for new housing, consistent with State Housing Element law, to accommodate their share of forecast regional growth.						X				
X			LU-5.1 Local governments should adopt and implement General Plan Housing Elements that accommodate housing needs identified through the Regional Housing Needs Assessment (RHNA) process. Affordable housing should be provided consistent with RHNA income category distributions adopted for each jurisdiction. To provide housing, especially affordable housing, jurisdictions should leverage existing State programs such as HCD's Workforce Incentive Program and density bonus law and create local incentives (e.g., housing trust funds, inclusionary zoning, tax-increment-financing districts in redevelopment areas and transit villages) and partnerships with non-governmental stakeholders.	X	X		X	X	X				X
X			LU-6 Local governments should leverage federal and State and local funds to implement the Compass Blueprint.	X	X		X	X	X			X	X
X			LU-6.1 All stakeholders should leverage state infrastructure bond financing, including the Department of Housing and Community Development's Transit Oriented Development program and should support legislation that will target infrastructure bond funds for regions with adopted growth visions such as the Compass Blueprint and for projects consistent with these visions.	X	X		X	X	X			X	X
X			LU-6.2 Subregional organizations should leverage the federal transportation planning funds available at the subregional level, to complete projects that integrate land use and transportation planning and implement Compass Blueprint principles.	X	X		X	X	X			X	X
X			LU-7 Local governments should consider shared regional priorities, as outlined in the Compass Blueprint, Regional Transportation Plan, and this Regional Comprehensive Plan, in determining their own development goals and drafting local plans.	X	X	X	X	X	X	X	X	X	X
X			LU-7.1 Local governments should take a comprehensive approach to updating their General Plans, keeping General Plans up-to-date and providing progress reports on updates and implementation, as required by law. Communities are required to submit the General Plan and General Plan elements to SCAG under the IGR Program pursuant to Federal Executive Order No. 12372 and CEQA Section 15206.	X	X	X	X	X	X	X	X	X	X
X			LU-7.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.		X	X	X		X		X	X	X
X			LU-7.3 Local governments and subregional organizations should develop ordinances and other programs, particularly in the older, more urbanized parts of the region, which will enable and assist in the cleanup and redevelopment of brownfield sites.	X	X		X	X	X		X	X	X
X			LU-7.4 Local governments and subregional organizations should develop adaptive reuse ordinances and other programs that will enable the conversion of vacant or aging commercial, office, and some industrial properties to housing and mixed-use with housing.	X	X		X	X	X		X	X	X
Federal and State Government Policies													
	X		LU-8 The State should continue to support and provide funding for the statewide Blueprint Planning program.	X	X	X	X	X	X	X	X	X	X

Page: 21

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 10:09:45 AM

Proposed Policy LU-5 restates local jurisdiction's requirements under existing housing statute. The OCCOG seeks clarification if the RCP is to include a recitation of state law requirements in the action plans and policies. Would the inclusion of all state law requirements be a duplication of efforts? And, further, offers that inclusion of policies that are already state laws could render the RCP "out-of-date" if state law changes. As such, it is recommended that this policy be removed.

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 10:11:16 AM

Proposed Policy LU-6 assumes that all local jurisdictions support the Compass Blueprint plan as proposed (Comment Reference 1 from this Chapter). Also, the OCCOG expresses concern that the RCP and its policies would grant preference in funding to projects that implement the Compass Blueprint Plan, over those that do not. Further, please identify how would this preference impact jurisdictions that do not have Compass 2% Opportunity Areas located within their jurisdictions?

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2008 REGIONAL COMPREHENSIVE PLAN

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits							Other Benefits	
				Transportation	Air Quality	Water	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)													
	X	X	LU-1S SCAG and county transportation commissions should initiate a program to secure significant resources for implementing Compass Blueprint. The program would provide infrastructure funding for specific allowable costs of development projects that integrate land use and transportation planning and are consistent with the 2% Strategy.	X	X		X	X	X		X	X	X
	X	X	LU-2S SCAG shall continue efforts, in collaboration with State agencies and local jurisdictions, to significantly reform State Housing Element law and the Regional Housing Needs Assessment process. These reforms should promote the broad goals stated by the Secretary of Business, Transportation and Housing and shared by SCAG: • Each municipality has a clear responsibility to provide housing based on the growth in population and jobs generated in the community. • Jurisdictions should be able to collaborate in meeting housing needs. • Planning for housing should be pursued over a longer time frame in line with other major growth planning efforts.						X				
Federal and State Government Initiatives													
	X	X	LU-3S The State, in collaboration with SCAG, other regional organizations and local jurisdictions, should work to re-structure and re-incentivize the municipal finance system that currently challenges virtually all local governments in California and often promotes inefficient land uses. Changes should: • Ensure the reliability of revenue streams to local government such that local finances are not the first resort in difficult budget years. • Re-structure sources of municipal revenue to place less emphasis on retail development and sales tax receipts, and to incentivize housing development and other land use changes consistent with regionally shared goals.						X		X		

22

Page: 22

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 10:12:54 AM

The OCCOG notes that proposed Strategic Initiative LU-1S is unclear as to what is expected of county transportation commissions in funding infrastructure needs of Compass Blueprint development projects. For clarification, the OCCOG as: Is this initiative intended to emulate the SANDAG approach, where SANDAG leverages monies to provide improvements to private development projects, to help to make the project a reality?

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 10:14:08 AM

Proposed Strategic Initiate LU-3S references " inefficient land uses." Please clarify or provide a definition of what is meant by "inefficient land uses."

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Open Space

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Open Space and Habitat

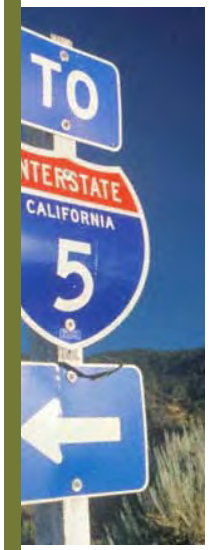
THE CHALLENGE

As the SCAG region rapidly urbanizes, open space resources that enhance quality of life and provide environmental benefit are disappearing. In the most urbanized areas of the region, there is more developed land than natural lands, parks, and farmland combined. In areas where development abuts natural lands or agricultural lands, these resources are often lost to make room for new development or to accommodate services for existing development. Many cores (large blocks of habitats) and linkages are unprotected. In urbanized areas, open space resources such as parks, trails and greenbelts are often scarce.

Although there is a seeming abundance of private vacant lands and even farmlands in the slowly urbanizing and rural areas, the actions taken in urbanized areas have already impacted open space throughout the region:

- The extirpation of species in one part of the region leads to federal and/or state listings affecting areas where these species still occur. The loss and degradation of special habitats (wetlands, riparian, sage scrub, and native grasslands) from past development leads to region-wide regulations.
- Development, past and present, continues to affect water quality and watershed conditions throughout the region.
- Our transportation system created many of the development patterns that exist today. This system crosses almost all large tracts of open space outside of urban areas, impeding wildlife movement and leads to wildlife loss as road kill. In areas where development has also occurred, wildlife linkages have been narrowed or severed. Based on a statewide assessment, there are at least 72 linkages at risk of being severed by existing and projected development.
- Agricultural lands exceeded developed lands in the existing urban core and in outlying areas until relatively recently. Both the rate and amount of conversions to non-farm uses continues to increase. For the first time in its history, it appears the region may have more developed lands than agricultural lands.

Three categories of open space are addressed in this chapter, all of which have common attributes such as aesthetic, air quality, and water quality benefits. Each also offers unique benefits:



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OPEN SPACE RESOURCES

Natural Lands: Undeveloped vacant land with natural vegetation, including lands used for grazing; lands with wildlife habitat.

- Cores: blocks of natural lands that are greater than 1,000 acres and have minimal edge to area ratio.
- Fragments: patches of habitat smaller than 1,000 acres located within or farther than one mile from a core.

Community Open Space: Public open space in or serving communities, such as park and recreation areas, community gardens, dedicated open space, urban forests, greenbelts, and trail systems.

Farmland: Prime farmland, farmland of statewide importance, unique farmland, and farmland of local importance.

There are at least 72 wildlife linkages at risk of being

- **Natural Lands:** These are generally undeveloped and/or vacant lands with some natural vegetation and/or wildlife value, including lands used for grazing. These lands may include large and small blocks of habitat and the open space that links those blocks together. This includes habitat that has some level of existing protection (protected open space) or needs to be protected to preserve the ecological function and value of protected open space, especially areas that serve as wildlife linkages and areas with sensitive habitats not covered by existing conservation programs;
- **Community Open Space:** This includes areas that enhance the quality of life in urban areas and completes interconnected networks of parks, trails, greenbelts, community gardens, and urban forests serving the region's communities; and
- **Farmlands:** This category includes prime farmland, farmland of statewide importance, unique farmland and farmland of local importance as defined by the California Department of Conservation. They provide food, products and economic benefits to the region and include the region's remaining prime and other important agricultural lands, especially farmlands intertwined with unprotected natural lands and developing communities.

There are numerous plans and programs throughout Southern California that attempt to conserve open space resources. Examples include:

- An open space element in a city or county general plan
- Natural community conservation plans and habitat conservation plans
- Mandated management plans for public lands, such as the Southern California Forest Plan and California Desert Conservation Area Plan
- Integrated watershed management plans
- Open space acquisition and habitat enhancement programs implemented by the California Resource Agency, Conservancies, non-profit organizations and trusts
- Resource specific conservation strategies, such as South Coast Missing Linkages
- Open space and parkland acquisition programs implemented by public-private partnerships and individual conservancies
- Open space planning strategies and initiatives such as Green Visions

While these plans address open space issues, they do not individually fulfill the need for a more holistic regional approach, one which evaluates the collective needs of the six-county SCAG region. SCAG's approach is to create a cohesive vision and a comprehensive open space strategy by tying together

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severed by existing and projected development.

these plans and identifying additional opportunities for conservation.

THE PLAN

The intent of this chapter is to plan and provide for the conservation of the region's open space resources focusing on

- Interconnections among resources
- Future land use decisions that will either strengthen or impair the region's ability to sustain the resources, and
- Opportunities for inter-jurisdictional planning

The intent is to conserve the region's open space resources in a way that will ensure sustainability over time. To help guide this effort, open space resources have been grouped into three categories: natural lands, community open space and farmlands and rangelands.

SCAG's role will be to:

- Maintain the regional open space database and use it to track progress in attaining regional open space conservation goals;
- Integrate the policies and actions herein into its existing transportation planning, growth forecasting, intergovernmental review, and legislative programs, and expand its capacity to provide technical services for open space planning;
- Establish a regional forum for coordinating existing programs and initiating new cooperative efforts that emphasize opportunities for cross-county and cross-jurisdictional open space protection; and
- Work in cooperation with its member agencies and open space conservancies in the region to find ways to supplement existing funding sources for open space conservation.
- Include open space mitigation policies and/or mitigation recommendations in the RTP;
- Link funding for planning and/or transportation projects to comply with SCAG's open space program
- Use the inter-governmental review process to address the open space impacts of regionally significant projects;
- Be a regional clearinghouse for data, funding information, program coordination; and
- Propose legislative solutions.

SCAG's member agencies will be asked to:

- Propose and participate in cooperative conservation planning efforts;

This page contains no comments

HOW OPEN SPACE POLICES PRODUCE MULTIPLE BENEFITS

Land Use and Housing: The preservation of open spaces for natural lands and community parks provides aesthetic and recreational benefits to growing communities and can increase property values.

Water: Open space and parkland can enhance groundwater water resources by preserving or expanding the area available for natural groundwater recharge. It can also improve surface water quality by filtering, retaining, or detaining stormwater runoff. Open space also provides opportunities to reuse treated runoff or recycled water for irrigation, thereby reducing the demand for potable water.

Energy: Open spaces can address climate change and mitigate the need to cool a warmer region. This will in turn reduce the need to expand the power infrastructure needed to produce electricity and other sources of energy.

Natural lands sustainability requires maintaining large

- Adopt the regional open space policies presented in the program and apply those policies in planning and reviewing projects
- Provide updated information on local open space resources for inclusion in the regional open space database

Local conservancies and other interested parties will be invited to:

- Propose and participate in cooperative efforts with SCAG member agencies
- Provide updated information on local open space resources for inclusion in the regional open space database.

The goals and outcomes included in this chapter focus on the conservation of regionally significant open space resources. To that end, SCAG completed a comprehensive evaluation of open space resources in the region and its neighboring counties. Geographic Information System (GIS) data were collected from existing sources to assist with and inform the evaluation of open space planning issues. These data were evaluated and analyzed to show the distribution of existing open space resources, levels of existing and planning protection and areas of key habitat linkages. Where available, the SCAG data collected and presented as part of this effort was for the entire region, and includes Kern and San Diego counties.

NATURAL LANDS

The sustainability of natural lands is directly related to maintaining large blocks of habitat (also called "cores"), keeping them relatively impervious to outside disturbance and allowing wildlife linkages to function. This network of large cores and wildlife linkages are part of an ecosystem where plants and animals occur in populations large enough that natural ecological processes (predation, competitive interaction, natural disturbance and recovery) operate so that evolution is sustained. This vast connected landscape provides a sense of place and spiritual renewal that cannot be provided elsewhere. This network recharges the region's watershed and water resources by maintaining previous surfaces necessary for groundwater recharge while combating the effects of air pollution and global warming.

Except for northern Ventura County, all natural lands in the SCAG region occur within three of the nine bioregions in Southern California: South Coast, Mojave Desert and Colorado Desert. Bioregions are areas that include multiple ecological communities based on common physical (climate, geology) biological (vegetation, wildlife) and environmental conditions. Northern Ventura County is unique in that it forms the southeast tip of the Central Coast bioregion and is located where five bioregions converge.

Many of the natural lands in the Southern California bioregions are large interconnected cores. However, near developed areas and along the regional highways, connections between large

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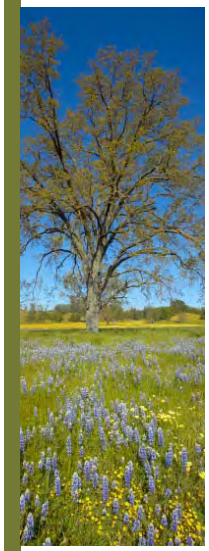
tracts of natural lands have been narrowed and fragmented and in some places permanently severed. Wildlife movement corridors, or wildlife "linkages," are an important component of natural lands. Southcoast Wildlands, a nonprofit organization, evaluated and identified 70 linkages in the SCAG region as areas where natural connectivity is at risk.

One way to determine the overall need for a regional planning effort such as the one SCAG has undertaken is to evaluate the current levels of "protection" for lands in the region, particularly natural lands.[1] This helps to provide a regional context for planning by showing the existing pattern of what is protected and what is not, thereby helping to identify those areas where open space resources are most at risk. Concurrent with this mapping effort, existing plans and programs were reviewed to identify which areas are covered by conservation strategies and which are not.

Figure 3.1 shows the distribution of many key open space resources including "protected" and "unprotected" cores, connectors and fragments within the SCAG region and its vicinity. It also shows the location of the protected and unprotected areas in relation to wildlife linkages, linkage design areas, park and recreation areas (from SCAG's 2005 land use inventory) agricultural lands, and developed lands. Together, these form the region's open space infrastructure. Linkages, cores and connectors exist intra-county and inter-county; they often cross county lines and from the SCAG region into Kern and San Diego counties.

By evaluating the open space resources identified in **Figure 3.1**, SCAG identified those areas with high potential for conservation, particularly areas where cross jurisdictional opportunities exist. Generally, these areas do not fall within the limits of any one jurisdiction, and as such provide an appropriate focus for a regional scale document. **Figure 3.2** provides examples of possible conservation opportunity areas; these are areas where mitigation for impacts of regionally significant project and/or conservation efforts by public and private entities should be directed. Although SCAG does not have the authority to purchase or manage lands, conservation of these areas will be achieved through already established programs or through compacts facilitated by SCAG. SCAG should develop Memoranda of Understanding with state and federal resource agencies as necessary to facilitate the conservation of natural lands.



Page: 29

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:00:39 PM

The OCCOG requests that SCAG please make figures such as Figure 3.1: Regional Open Space Infrastructure; Figure 3.2: Potential Conservation Opportunity Areas, and Figure 3.3: Prime Farmland Grazing available at a larger scale to allow local jurisdictions, county transportation commissions, project sponsors and special districts to identify if any areas would be affected or impacted by future transportation or land use proposals.

FIGURE 3.1: REGIONAL OPEN SPACE INFRASTRUCTURE

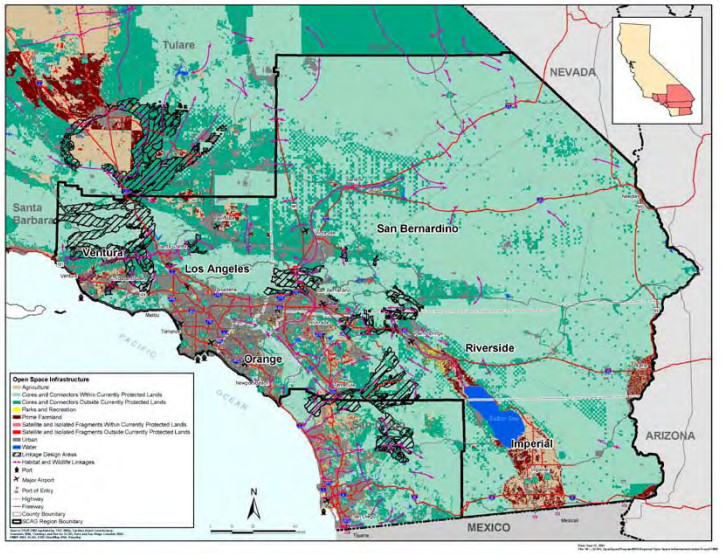


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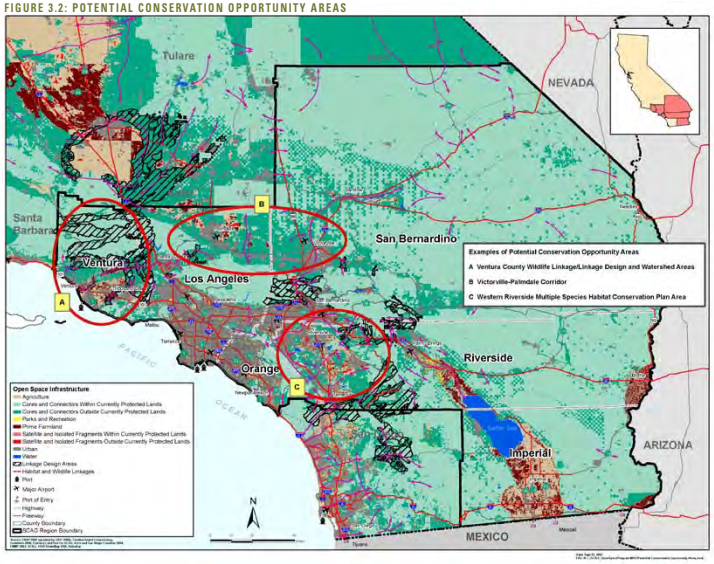
FIGURE 3.2: POTENTIAL CONSERVATION OPPORTUNITY AREAS



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HOW OPEN SPACE POLICES PRODUCE MULTIPLE BENEFITS

Air Quality: The United Nations estimates that a tree uses photosynthesis to reduce about 2 tons of CO_2 in its lifetime. As such, maintaining and planting more trees can reduce greenhouse gas emissions.

Open spaces and particularly trees can provide much needed shade in urban areas, relieving the "heat island effect" that can exacerbate conditions for creating smog.

Agricultural soils help sequester about 0.8% of carbon released by combustion of fossil fuels. Methods such as no-till farming, residue mulching, and cover cropping used in organic farming can help sequester carbon emissions.

Solid Waste: Greater emphases on infill development and green building practices will help reduce construction-related waste.

Open Space and Habitat–Natural Lands Goals

- Ensure a sustainable ecology by protecting and enhancing the region's open space infrastructure and mitigate growth and transportation related impacts to natural lands by:
  - Conserving natural lands that are necessary to preserve the ecological function and value of the region's ecosystems;
  - Conserving wildlife linkages as critical components of the region's open space infrastructure;
  - Coordinating transportation and open space to reduce transportation impacts to natural lands

Open Space and Habitat–Natural Lands Outcomes

- By 2035, increase the amount of protected open space in the region by at least 700,000[2] acres of natural lands that include important core areas,[3] wildlife linkages, have special status habitats or species and/or buffer protected natural lands from development. The number of acres protected would be roughly proportionate to the urban footprint of the 2004 Regional Transportation Plan.
- By 2012, put in place approved conservation strategies for all regionally significant wildlife linkages.

OPEN SPACE AND HABITAT–NATURAL LANDS ACTION PLAN

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Equity	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	OSN-1 Track and monitor open space conservation efforts in the region. • SCAG shall set up a clearinghouse of important GIS data used for open space planning. SCAG shall maintain and update the regional open space database, track open space conservation and development (e.g. any activity that reduces the biological value of natural lands compared to baseline conditions) in the region and will commit to providing annual updates on conservation efforts.	X	X	X	X	X				X	X
X			OSN-2 Use SCAG's Intergovernmental Review (IGR) process to comment on regional projects. • SCAG shall establish criteria for evaluating impacts to regionally significant open space resources, and will recommend mitigation measures for significant impacts to regional resources. These recommendations will be included in SCAG's Regional Open Space Guidance. • Priority review will include 1) existing and proposed General Plans and 2) any individual project that will have a significant impact on natural open space.	X	X	X	X	X				X	X
		X	OSN-3 Develop and implement guidance on mitigation options for open space impacts • SCAG shall develop and implement coordinated mitigation programs for regional projects, with an emphasis on regional transportation projects. • SCAG shall produce and maintain a list/map of potential conservation opportunity areas. These conservation opportunity areas may be used by local governments and project sponsors as priority areas for mitigating impacts to open space resources. (see *Regional Open Space Guidance* for a complete description of Conservation Opportunity Areas) • SCAG shall work in partnership with state and federal agencies, local conservancies and other groups to conserve natural lands in key locations through existing conservation programs, mitigation for the impacts of regional projects and conservation compacts facilitated by SCAG. • SCAG shall work with County Transportation Commissions and Caltrans to refine the proposed open space consistency guidelines as necessary.	X	X	X	X					X	X
		X	OSN-4 SCAG shall support policies and actions that preserve natural areas, specifically those areas identified in local, state, and federal plans.	X		X	X					X	X
		X	OSN-5 SCAG shall support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.	X		X	X					X	
		X	OSN-6 SCAG shall encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites	X									
X			OSN-7 SCAG shall encourage "watershed management" programs and strategies, recognizing the primary role of local governments in such efforts	X	X	X	X	X				X	
X			OSN-8 SCAG shall support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetlands permits.	X			X					X	
X			OSN-9 SCAG shall support and work with communities and research entities on developing measures of the economic value of natural lands.	X		X	X						

Page: Sec1:32

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 10:20:43 AM

Proposed Policy OSN-1 identifies a SCAG role in establishing a clearinghouse of GIS data relating to open space. The OCCOG notes that this task represents a significant work effort with an associated funding cost and asks if this effort would be undertaken through existing fund sources or if it would require new funding? Additionally, in order to prevent duplication of efforts, do other agencies or non-profit organizations in the region conduct similar efforts? Finally, the OCCOG seeks clarification about how would this information be reported to SCAG across the six counties in the SCAG region and then distributed back to the various agencies involved with open space planning?

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OPEN SPACE AND HABITAT

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Economy	Security	Solid Waste	Public Health	Climate Change
X			OSN-10 Integrate open space assumptions into the Regional Growth Forecast • SCAG shall prepare growth forecasts for the region that are based on assumptions that accurately reflect allowed uses on 1) existing designated open space 2) areas subject to regulations that preclude or limit uses and 3) areas where some or all of the lands are proposed for preservation under approved conservation programs.	X	X		X						X
	X		OSN-11 Seek funding for conservation of natural lands • SCAG shall partner with local agencies and non-profit foundations in situations where a regional entity is necessary to secure funds. • SCAG shall seek support (financial, technical, etc) at the state and federal level for a prototype regional open space database program.				X						
Local Government Policies													
X			OSN-12 Local governments should track and Monitor Open Space Conservation by • Considering the most recent annual report on open space conservation in planning and evaluating projects and programs in areas with regionally significant open space resources. • Ensuring consistency with the open space conservation policies and goals of the RCP to be eligible for future funding opportunities and programs administered by SCAG.	X	X	X	X	X			X	X	X
X			OSN-13 Local governments should develop and implement mitigation for open space impacts by: • Promoting coordinated mitigation programs for regional projects and establish the basis for inter regional conservation strategies. • Planning development in locations least likely to cause environmental impact.	X	X		X				X	X	X

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Mobility	Water	Energy	Economy	Security	Solid Waste	Public Health	Climate Change
Project Sponsor and Developer Policies													
x			OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities: • Individual projects submitted for IGR review should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects submitted for IGR review shall demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP's significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements. • Project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth that accompanies transportation projects/improvements.	x	x		x				x	x	x

Page: Sec1:34

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 12:44:21 PM

Proposed Policy OSN-14 identifies that developers and local governments should implement mitigation for open space impacts. The policy identifies that "project sponsors should ensure that one acre of unprotected open space is permanently conserved for each area of open space developed as a result of growth that accompanies transportation projects/improvements." This policy is also identified as an Intergovernmental Review (IGR) policy that project sponsors must respond to in conjunction with a transportation project's environmental review process, and requires assessment of significant open space mitigation considerations that would apply to all transportation projects in adopted Regional Transportation Plans. Some questions and requests for clarification are identified below:

• The formula for mitigating open space – one acre of unprotected open space conserved for each area of open space developed *as a result of growth* that accompanies transportation projects/improvements – the OCCOG notes that this is unclear and requests that SCAG please clarify how this measure would be applied. For example, would the formula apply to existing open space that is developed as a result of land taken to build a transportation project, or would it apply to the growth-inducing impacts of a transportation project and how much existing open space land is developed as a result of that growth? What exactly is being required of county transportation commissions or other agencies when implementing RTP transportation projects? What are the cost ramifications of such a policy, upon transportation project delivery and costs?

• Because open space and farmland are defined in state law and more specifically relative to the California Environmental Quality Act, the OCCOG notes that it is important to clearly define the use of such terms in policy related documents. As such, the OCCOG requests that SCAG please include the definition of "important farmland"and of 'unprotected open space" as they are used in this measure, chapter, and throughout the RCP document.

• Please identify if there are any state law provisions that require this type and degree of open space mitigation for transportation projects?

OPEN SPACE AND HABITAT

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)													
		X	OSN-1S SCAG shall seek to develop cooperative agreements and multi party conservation compacts to accelerate the conservation of natural lands in the region.	X	X	X	X					X	X
	X		OSN-2S SCAG shall put in place an open space funding program to demonstrate to state/federal agencies that SCAG is prepared to serve as the regional entity to distribute state/federal funds for open space conservation.	X	X		X					X	X
	X		OSN-3S SCAG shall seek to create new sources of funding for open space conservation.		X		X						X
X			OSN-4S SCAG shall establish decision-making tools for identifying and prioritizing open space conservation projects, such as those by the San Diego Association of Governments (SANDAG) in distributing funding through the Transnet Environmental Mitigation Program (EMP).		X	X	X					X	X
	X		OSN-5S SCAG should develop Memoranda of Understanding with state and federal resource agencies as necessary to facilitate the conservation of natural lands.	X	X		X					X	X

35

Page: Sec1:35

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 12:46:04 PM

Policy OSN-4S proposes a decision-making tool that identifies and prioritizes open space conservation projects, similar to a program implemented by SANDAG. The OCCOG notes that it would be beneficial for policies that reference already existing programs to include explanatory narrative that provides the reader a background understanding of the scope and components of these proposed programs. This will help to determine if there is consensus in implementing a similar program for the SCAG region.

COMMUNITY OPEN SPACE

Community open space exists in or serves developed communities. Examples include park and recreation areas, community gardens, dedicated open space, urban forests, greenbelts and trail systems. Sustainable community open space is accessible by alternative modes of transportation, whether on foot, on bicycle, or by riding transit. It is distributed so that it serves a wide range of user groups in the region, from children to seniors and features amenities that meet the recreation and outdoor needs of its diverse users. Sustainable community open space also fulfills multiple planning and quality of life objectives contributing to watershed and water quality, air quality management and public health.

Parks and Public Health

A 1996 report by the U.S. Surgeon General found that people who engage in regular physical activity benefit from reduced risk of premature death; reduced risk of coronary heart disease, hypertension, colon cancer, and non-insulin dependent diabetes; improved physical functioning in persons suffering from poor health; and healthier cardiovascular, respiratory and endocrine systems. Physical activity also produces important psychological benefits relieving symptoms of depression and anxiety; improving mood and enhancing psychological well being.[4]

The link between obesity and community open space is particularly relevant. Over the last decade, California has experienced one of the fastest rates of increase in adult obesity of any state in the nation.[5] More than half of California adults now are overweight or already obese. Rates among African American and Latino adults, men over age 25 years, and adults with less than a high school education exceed 60 percent and there is no sign that the increases in obesity are slowing.[6]

The effects of obesity are putting a strain on the health care system and adding additional costs in loss of productivity. Estimated costs in California attributable to physical inactivity, obesity and overweight in 2005 were projected to reach $28 billion. A ten percent improvement – just one person of ten who becomes more active and maintains a healthy weight over a five-year period – could result in savings of nearly $13 billion.[7]

A report published by The Trust for Public Land concluded that strong evidence shows that when people have access to parks, they exercise more.[8] In a study published by the CDC, creation of or enhanced access to places for physical activity led to a 25.6 percent increase in the percentage of people exercising three or more days per week. The study also found that obesity is more likely in unwalkable neighborhoods, but rates of obesity go down as measures of walkability go up.[9]

SCAG evaluated the community open space availability in 16 cities in the region and compared them to the National Recreation and Parks Association standards recommended for park types.[10] As measured against NRPA's overall parks to people standard (6.25-10 acres/1,000 people) three cities

Page: Sec1:36

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 12:47:31 PM

The narrative discussion on Parks and Public Health cites, in its introduction, a 1996 study of the benefits of regular physical activity. The OCCOG suggests that perhaps the emphasis of this section should be the fourth paragraph of the section, which directly relates to access to parklands with exercise opportunities, and from this premise, then provide the information on the health benefits of exercise.

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 12:48:44 PM

This chapter discusses how SCAG evaluated "community open space availability" in 16 cities based upon a National Recreation and Parks Association standard of 6.25 to 10 acres per 1,000 people, and also presents a Figure 3.3 of this evaluation. Because open space is defined in various federal and state regulations, please provide a definition of "community open space" as it is used in this chapter.

HOW OPEN SPACE POLICES PRODUCE MULTIPLE BENEFITS

Transportation: As mandated by federal SAFETEA-LU legislation, open space policies can help to improve the location, design, and other features of new or expanded transportation projects.

Economy: Accessibility to parks and other open space provides major public health benefits that enhance economic productivity and minimize public health costs. Areas without parks have increased obesity, resulting in a loss of productivity (work days lost) and are a major drain on the health care system. The retention of agricultural lands helps provide regional economic diversity, as Riverside, Imperial, and Ventura counties account for over $1 billion in gross value of products sold.

Community open space contributes to watershed, water,

exceeded the standard (Irvine, Pomona and Ventura) while the rest of the cities fell below the standard. **Figure 3.3** shows the results for each of the cities.

FIGURE 3.3
Parks-to-People Ratio per 1,000 Residents

Source: SCAG

Levels of Service

As shown in **Figure 3.3**, the range of acres of parkland per 1,000 people varies greatly throughout several cities. Although, NPRA standards may be helpful to get a general understanding of availability of parkland in a particular city, these standards were developed in the 1930s and fail to reflect the dynamic environment and variety of today's communities. For instance, NPRA standards do not address access nor do they include many types of open space common in urban environments such as urban forests, greenbelts and trails. For that reason, SCAG is encouraging communities to utilize a new paradigm such as Levels of Service (LOS) to measure park needs for their communities. Generally, the LOS paradigm takes into account the following factors:[11]

- Existing open space plans and policies (general plan open space element, parks and recreation plan, watershed management plan)
- Community preference as ascertained by survey, questionnaire and public workshop
- Accessibility by underrepresented groups and underserved populations, including low income or below poverty level communities, underrepresented ethnic groups, children, seniors, disabled individuals and those who are transit dependent
- Multi-modal transportation access within ½ mile
- Multi-purpose, multi-function open space, such as river parks

Page: Sec1:37

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 12:52:18 PM

With respect to the comment from the previous page, this section cited is followed by a Levels of Service section that states that the National Recreation and Parks Association standards, "were developed in the 1930s and fail to reflect the dynamic environment and variety of today's communities."

The reader is confused with the presentation of this information and why the National Recreation and Parks Association standards were cited and analyzed, if deemed to be outdated. It is requested that this be addressed.

Further, SCAG is proposing a Level of Service approach for requiring parkland. In reviewing the proposed list of seven factors to measure park needs, it is highly recommended that the chapter provide explanation as to how each of the proposed factors equates to an amount of parkland that must be provided in jurisdictions, and whether this proposed requirement applies to new development, or for all existing and proposed development within a community.

Also, please clarify the Level of Service factor that all parklands have access to multi-modal transportation within ½ mile of the parkland, and the implications for transit service delivery and cost if such a factor is implemented, particularly if residents can access the parkland by walking or biking.

Also, please clarify how Compass Blueprint areas would be a factor in measuring park needs and in determining Levels of Service for park needs in a community.

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and air quality management and public health.

- Multi-agency initiatives that cover broad geographic areas; and
- Compass Blueprint areas

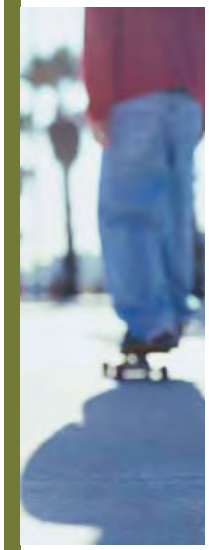
LOS can be assigned similar to the system used in traffic analysis with ranking of "A" for excellent through "E" for failing. A community with a preponderance of these types of criteria provides a higher level of service

Open Space and Habitat–Community Open Space Goals

- Enhance the region's parks, trails and community open space infrastructure to support the aesthetic, recreational and quality-of-life needs, providing the highest level of service to our growing region by:
  - Creating new community open space that is interconnected, accessible, equitably distributed and provides public health benefits;
  - Improving existing community open space through urban forestry and other programs that provide environmental benefits.

Open Space and Habitat–Community Open Space Outcomes

- By 2035, all SCAG subregions have community open space systems that have an "above average" level of service (LOS).
- An "above average" LOS for community open space, by 2012, in areas that participated in SCAG's Compass Blueprint demonstration projects.
- From 2007 conditions, increase the percentage of transit trips that can access community open space in one hour or less by 2012.



OPEN SPACE AND HABITAT

OPEN SPACE AND HABITAT–COMMUNITY OPEN SPACE ACTION PLAN

Initiated Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits								Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	OSC-1 SCAG, in collaboration with its member agencies, shall work to enhance community open space and its accessibility	X	X	X	X	X				X	X
		X	OSC-2 SCAG shall continue to work with the state to develop approaches for evaluating environmental impacts within the Compass Blueprint program, particularly energy, air quality, water, and open space and habitat.	X	X	X	X	X			X	X	X
		X	OSC-3 SCAG and its member agencies will work with open space experts and community interest groups to develop a Level of Service ranking and evaluation system for community open space in the region.	X	X	X		X				X	X
		X	OSC-4 SCAG shall support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.	X	X	X		X					X
		X	OSC-5 SCAG shall encourage member jurisdictions to work as partners to address regional outdoor recreation needs and to acquire the necessary funding for the implementation of their plans and programs.	X		X	X					X	
		X	OSC-6 SCAG shall encourage member jurisdictions that have trails and trail segments determined to be regionally significant to work together to support regional trail networks. SCAG shall encourage joint use of utility, transportation and other rights-of-way, greenbelts, and biodiversity areas.	X	X	X		X				X	X
Local Government Policies/Project Sponsor and Developer Policies													
X			OSC-7 Local governments should prepare a Needs Assessment to determine the adequate community open space level for their areas.	X	X	X	X	X			X	X	X
X			OSC-8 Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities.	X	X	X	X	X			X	X	X
X			OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.	X	X	X	X	X				X	X
X			OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	X	X	X	X	X				X	X
X			OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	X	X	X	X	X			X	X	X
X			OSC-12 Developers and local governments should promote water-efficient land use and development.	X	X	X	X	X			X	X	X
X			OSC-13 Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	X	X	X	X	X			X	X	X

39

Page: Sec1:39

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 12:56:15 PM

Proposed Policy OSC-2 states that "SCAG shall continue to work with the state to develop approaches for evaluating environmental impacts within the Compass Blueprint program, particularly energy, air quality, water, and open space and habitat."

Please clarify if SCAG is already participating in a statewide effort to evaluate the environmental impacts of Compass Blueprint sites, or whether this collaborative effort applies solely to the SCAG region. Also, is this policy in reference to SCAG's efforts to propose state legislation to streamline the environmental processing of Compass Blueprint sites through SB 375? Should this be identified as a proposed legislative policy?

Also, as this chapter relates to open space, should Policy OSC-2 be consistent and only reference open space? If proposed as an overarching policy over several subject areas, should this policy and similar policies be discussed in the RCP as overarching policies that cover multiple RCP chapters in their application?

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 12:56:08 PM

Proposed Policy OSC-8 states that " Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities." Since this policy is proposed for implementation in the Open Space and Habitat chapter of the RCP, and since the policy is an Intergovernmental Review (IGR) policy that would be subject to local jurisdiction response for consistency for any regionally significant projects undergoing environmental review, it is recommended that the policy be revised to provide more clarity and direction on its application to open space requirements.

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 12:55:55 PM

Proposed Policy OSC-10 states that "Developers and local governments should promote infill development and redevelopment to revitalize existing communities." Similar to previous comments, since this policy is proposed for implementation in the Open Space and Habitat chapter of the RCP, and since the policy is an Intergovernmental Review (IGR) policy that would be subject to local jurisdiction response for consistency for any regionally significant projects undergoing environmental review, it is recommended that the policy be revised to provide more clarity and direction on its application to open space requirements.

Author: OCCOG TAC

Comments from page Sec1:39 continued on next page

SUPPLEMENTAL ATTACHMENT 2 FOR ITEM 7

Subject: Comments
Date: 7/20/2008 12:57:37 PM

Proposed Policy OSC-11 seeks implementation of certain land use principles such as green building practices that use resources efficiently. The policy, as currently worded, does not reference any specific application towards open space and habitat considerations. It is suggested that this policy would possibly be better addressed and proposed in other chapters of the RCP, such as Energy or Solid Waste.

OPEN SPACE AND HABITAT–COMMUNITY OPEN SPACE ACTION PLAN

Initiated Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	OSC-1 SCAG, in collaboration with its member agencies, shall work to enhance community open space and its accessibility	X	X	X	X	X				X	X
		X	OSC-2 SCAG shall continue to work with the state to develop approaches for evaluating environmental impacts within the Compass Blueprint program, particularly energy, air quality, water, and open space and habitat.	X	X	X	X	X			X	X	X
		X	OSC-3 SCAG and its member agencies will work with open space experts and community interest groups to develop a Level of Service ranking and evaluation system for community open space in the region.	X	X	X		X				X	X
		X	OSC-4 SCAG shall support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.	X	X	X		X					X
		X	OSC-5 SCAG shall encourage member jurisdictions to work as partners to address regional outdoor recreation needs and to acquire the necessary funding for the implementation of their plans and programs.	X		X	X					X	
		X	OSC-6 SCAG shall encourage member jurisdictions that have trails and trail segments determined to be regionally significant to work together to support regional trail networks. SCAG shall encourage joint use of utility, transportation and other rights-of-way, greenbelts, and biodiversity areas.	X	X	X		X				X	X
Local Government Policies/Project Sponsor and Developer Policies													
X			OSC-7 Local governments should prepare a Needs Assessment to determine the adequate community open space level for their areas.	X	X	X	X	X			X	X	X
X			OSC-8 Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities.	X	X	X	X	X			X	X	X
X			OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.	X	X	X	X	X				X	X
X			OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	X	X	X	X	X				X	X
X			OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	X	X	X	X	X			X	X	X
X			OSC-12 Developers and local governments should promote water-efficient land use and development.	X	X	X	X	X			X	X	X
X			OSC-13 Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	X	X	X	X	X			X	X	X

This page contains no comments

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits								Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)													
		X	OSC-1S SCAG will work with all subregions, counties and cities to prepare needs assessments and develop and refine LOS criteria . The criteria established through the RCP and ancillary efforts will also be used as criteria for statewide bond funding	X	X	X	X	X			X	X	X

This page contains no comments

Sustainable farmlands play a key role in maintaining inter-

HOW OPEN SPACE POLICES PRODUCE MULTIPLE BENEFITS

Public Health: If current trends in obesity and inactivity continue, today's youth will be the first generation in this nation's history to face a shorter life expectancy than their parents. Strong policies to provide places to play in schools, parks, and green spaces will help children become physically fit and perform better academically. Public transportation to these areas is especially vital in this region because many Southern California cities are park-poor. As a result, residents cannot simply walk to neighborhood parks like people in other cities because they often do not exist.

AGRICULTURAL LANDS

Sustainable farmlands are open spaces that maintain food production for the region and are protected from urban encroachment. Conserving sustainable farmland is essential to the overall region as these lands play a key role in maintaining the interconnections of natural lands, community open space and farmlands.

California farmers and ranchers represent a diverse group of individual businesses, with great diversity in farm size and revenue. While globally, exports of agricultural products remain a key driver of agricultural profitability, new market incentives in areas such as renewable energy for production and the development of technologies to convert raw materials into "biofuels" can expand profitability and environmental sustainability opportunities for farmers.

Table 3.1 indicates the importance of agricultural lands to the region as demonstrated by the gross value of products sold. Based on the 2002 USDA Census of Agriculture, county level data, Imperial, Ventura and Riverside Counties round out the top ten producing counties in the state, each with more than one billion in gross value of direct agricultural production.

Conversion of Farmlands

Historically development patterns in the region have been tied as much to the conversion of agricultural lands as to the consumption of natural lands for urban uses. Rapid growth in the region continues to push development outward in search of cheap land that will translate into more affordable housing. Development pressures can make the value of a farmer's land higher than the value of the crops farmed on the land. A key issue in the region today is whether the high rate of farmland conversion in recent years can be slowed to prevent irreversible

TABLE 3.1 TOTAL AGRICULTURAL VALUE BY COUNTY[a,b]

County	2005	2006	2002 State Rank[b]
Riverside	1,168,671,100	1,102,438,400	10
Orange	312,336,287	N/A	22
San Bernardino	565,101,000	435,787,200	15
Los Angeles	277,844,000	N/A	21
Ventura	1,225,109,000	1,508,174,000	9
Imperial	1,286,066,000	1,365,368,000	8

[a] Figures are based on total gross value as indicated in county agricultural reports for 2005 and 2006 (when available)
[b] based on total value of agricultural products sold
From the USDA 2002 Census of Agriculture county profiles

This page contains no comments

losses. An estimated 230,000 acres of farmland and grazing land were converted to non-agricultural uses and/or applied for development entitlements between 1996 and 2004. If this trend continues, the existing inventory of agricultural lands could be reduced by 700,000 acres before 2030.

As agriculture and suburbanization intersect, problems often arise. With so many people living close to so much commercial farming, the negative impacts flow in both directions. For suburban neighbors, there are concerns over dust, noise, odor and even the health effects of living near industrial type activities that use chemicals, heavy machinery and concentrated animal facilities. While for farmers, operating close to new neighborhoods often means reduced productivity and income, regulatory constraints, vandalism and legal liability. Often, the conflict ends in the conversion of still more farmland. **Figure 3.4** highlights those areas where farmlands and urbanization intersect.

Recently studies have looked for ways to integrate farmlands into communities that can reduce or eliminate some of the edge effects described above. New Ruralism is a framework for connecting the concepts of sustainable agriculture and New Urbanism (compact development/ smart growth). It seeks to create permanent agriculture preserves as sources of fresh food for urban regions. These preserves could take the form of green food belt perimeters, buffers between urban areas, small agricultural parks, and/or bigger preserves that include larger farms and rural settlements. The goal is to integrate small to medium scale sustainable agriculture into urban environments, these agricultural preserves can also overlap with areas for wildlife and habitat management and for passive recreation. A major focus of New Ruralism is connecting urban areas to farms through locally grown food.

Eating Locally and Sustainably

Our region can also promote local, sustainable food production that reduces environmental and economic impacts to the region. For example, promoting local food production that serves our region's needs reinforces long-term self-sufficiency in an increasingly globalized market. There are enormous social, environmental, and economic costs involved with food production and distribution. For example, the distance and means of transport by which food is brought into the region can have visible and hidden costs that can be reduced if local agriculture is maintained to serve the food needs of the region.

The food that Southern Californians eat directly affects local and state policy and vice-versa. Currently, the federal government spends billions of dollars to subsidize grains and other crops while providing little support for fruits and vegetables. Rising health care costs and increases in diet related diseases such as diabetes and obesity indicate that healthier diets need to be a priority for the region.

A healthy, balanced region is also one that promotes sustainable farming practices. Organic food is produced by farmers who emphasize the use of renewable resources and the conservation

This page contains no comments

HOW OPEN SPACE POLICES PRODUCE MULTIPLE BENEFITS

Environmental Justice: Southern California may be regarded as the car capital of the world, but for the working poor and other people with limited or no access to a car who depend on public transit, it can be almost impossible to get to work, school, the market, parks, forests, beaches, doctors, or many other basic needs of life. Access to public transportation is also important to increase access to our natural lands and public spaces. A very good example is access to Southern California's four national forests. According to a study by USC Department of Geography, there is virtually no good way to reach the four forests of Southern California by public transportation.

TABLE 3.2 ORGANIC FARMLANDS IN THE SCAG REGION - 2005

County	Organic Acres[a]	Total Farmland[b]	Percent Share
Riverside	3,200	466,467	0.7
Orange	143	13,481	1.1
San Bernardino	244	34,673	0.07
Los Angeles	108	44,050	0.3
Ventura	4,712	297,074	1.6
Imperial	N/A	545,611	N/A

[a] Acreage based on annual Agricultural Commissioners Reports for each county

[b] Based on California Department of Conservation 2005 estimates, excludes rangelands/grazing lands

of soil and water to enhance environmental quality for future generations. Before a product can be labeled "organic," a USDA accredited certifier inspects the farm where the food is grown to make sure the farmer is following all the rules necessary to meet USDA organic standards. Companies that handle or process organic food before it gets to the local supermarket or restaurant must be certified and inspected also. **Table 3.2** shows the acres of organic farming in the region. Imperial County does not keep estimates of organic farming.

Open Space and Habitat–Agricultural Lands Goals

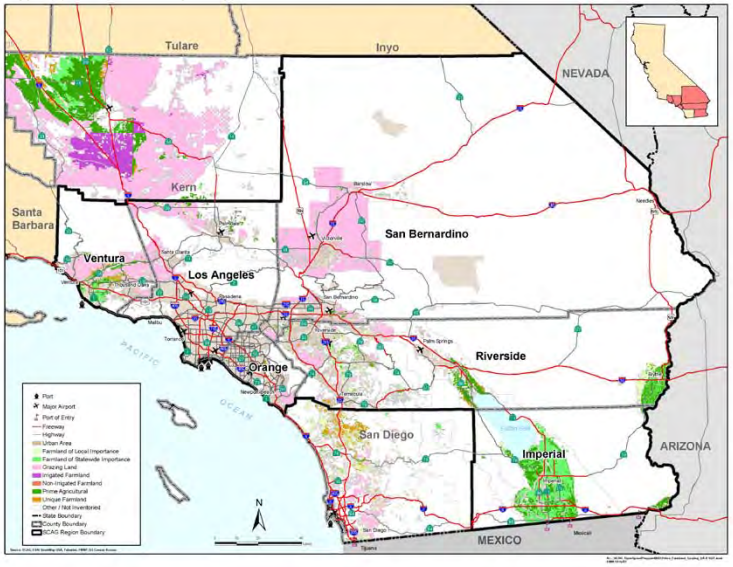
- Preserve the productivity and viability of the region's agricultural lands while supporting a sustainable economy and region by:
  - Maintaining a viable level of agriculture to support economic and food supply needs for the region while supporting sustainable energy, air quality and transportation policies;
  - Promote and support a strong locally-grown food system by encouraging community farming and developing cooperative farming initiates that use sustainable farming practices.

Open Space and Habitat–Agricultural Lands Outcomes

- Develop a new regional farmland conservation strategy and enroll at least 6,500[12] acres of prime farmland in the first four years.
- No net loss of farmlands enrolled in the regional program through 2035.

This page contains no comments

FIGURE 3.3: PRIME FARMLAND GRAZING



OPEN SPACE AND HABITAT–AGRICULTURAL LANDS ACTION PLAN

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefit							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Economic Security	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)												
		X	OSA-1 SCAG shall support policies that preserve and promote the productivity and viability of agricultural lands.	X	X	X	X	X		X	X	X
X			OSA-2 SCAG shall use its IGR process to review projects with potentially significant impacts to important farmlands and recommend impact avoidance and mitigation measures.	X	X	X	X	X		X	X	X
X		X	OSA-3 SCAG shall work with its member agencies and the region's farmland interests to develop regional guidelines for buffering farmland from urban encroachment, resolving conflicts that prevent farming on hillsides and other designated areas, and closing loopholes that allow conversion to non-farm uses without a grading permit.	X	X	X	X	X		X		X
		X	OSA-4 Promote the availability of locally grown and organic food in the region.		X	X	X	X		X		X	X
Local Government Policies												
X			OSA-5 Promote the availability of locally grown and organic food in the region. • Local governments should establish transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands. • Local governments should consider other tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land. • Local governments should ease restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food. • Local governments should consider partnering with school districts to develop farm-to-school programs.	X	X	X	X	X			X	X	X
X			OSA-6 Local governments are encouraged to obtain assistance from the American Farmland Trust in developing and implementing farmland conservation measures or avoid impacts to important farmlands.	X	X	X	X	X		X	X	X	X
X			OSA-7 Local governments should avoid the premature conversion of farmlands by promoting infill development and the continuation of agricultural uses until urban development is imminent; if development of agricultural lands is necessary, growth should be directed to those lands on which the continued viability of agricultural production has been compromised by surrounding urban development or the loss of local markets.	X	X	X	X	X		X	X	X	X
Project Sponsors and Developers												
X			OSA-8 Developers and local governments should submit for IGR review projects with potentially significant impacts to important farmlands. Projects should include mitigation measures to reduce impacts and demonstrate project alternatives that avoid or lessen impacts, at a 1:1 ratio.	X	X	X	X	X		X	X	X	X

Page: Sec1:45

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 1:01:57 PM

Proposed Policy OSA-5 would have impact upon development plans in Orange County where estate and ranchette development types are proposed. The OCCOG would like to note and request that stakeholders such as developers and the Building Industry Association be included in the review and comment of RCP policies such as OSA-5.

Author: OCCOG TAC
Subject: Comments
Date: 7/20/2008 1:06:09 PM

Proposed OSA-8 states that "Developers and local governments should submit for IGR review projects with potentially significant impacts to important farmlands. Projects should include mitigation measures to reduce impacts and demonstrate project alternatives that avoid or lessen impacts at a 1:1 ratio." The OCCOG submits the following comments and questions regarding this proposed policy:

• SCAG's current listing of types of projects that would undergo Intergovernmental Review is included as Appendix A. It is noted that there is no criteria list that includes IGR review of projects that have a potentially significant impact to "important farmlands." Thus, this is a new category of project that is proposed for IGR review. As a starting point, the policy warrants a definition of "important farmlands" to understand the scope of its application.

• Please clarify the meaning and application of a 1:1 ratio to reduce impacts and demonstrate project alternatives. For example, what is the impact of a 1:1 ratio mitigation for jurisdictions or areas that are built-out except for remaining areas that are currently under agricultural production, and where there is no additional lands to use for mitigation? And, would such a project be deemed inconsistent with the proposed RCP policy?

• Because farmland preservation is a significant statewide issue, is the preservation of farmland best addressed as a larger statewide issue? It is suggested that a discussion of this topic be included in the text of the chapter.

This page contains no comments

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)													
		X	OSA-1S SCAG shall work with the agriculture community and other interested parties to establish a regional Farmland Conservation Strategy.	X			X						X
	X		OSA-2S SCAG shall work with the state to ensure that changes in the Williamson Act will not result in the loss of preserved farmlands.	X			X						X
	X		OSA-3S SCAG shall work with the state, local farming interests and other interested parties to develop a new alternative statewide farmland conservation strategy that provides flexibility in terms of years in preservation, combined with tiered tax benefits (i.e., the longer the land is in preservation, the greater the tax benefit).	X			X	X		X			X

Footnotes

1 To provide a "snapshot" of protected lands SCAG used a database complied by GreenInfo, a nonprofit organization specializing in GIS related services, and the Managed Lands Database complied by the Conservation Biology Institute (CBI), a nonprofit organization specializing in conservation planning.

2 From 2004 RTP PEIR p. 3.1-17 "In addition to direct impacts on land use, the urban footprint of new development supported by the 2004 RTP is expected to consume 500,000 to 700,000 acres of vacant, undeveloped land by 2030." Direct impacts include 7,700 of grazing land, 1,400 acres of open space, 6,500 acres of prime farmland and 21,300 acres of vacant lands

3 Core areas are habitat blocks, linkages, or watershed units that protect regional populations of native species, including sensitive, endemic, keystone and umbrella species, and the ecological processes that maintain them.

4 CDC. Physical Activity and Health: A Report on Recommendations of the Task Force on Community Preventive Services. Retrieved online August 23, 2007 http://www.cdc.gov/mmwr/preview/mmwrhtml/rr5018a1.htm

5 CDC. Prevalence of Obesity Among U.S. Adults by State Behavioral Risk Factor Surveillance System (1991–2001). Retrieved online August 23, 2007, http://www.cdc.gov/nccdphp/dnpa/obesity/trend/prev_reg.htm.

6 California Department of Health Services. The Economic costs of Physical Inactivity, Obesity, and Overweight in California Adults: Health Care, Workers' Compensation, and Lost Productivity. Retrieved online August 23 2007 http://www.dhs.ca.gov/ps/cdic/cpns/press/downloads/CostofObesityToplineReport.pdf,

7 California Department of Health Services. The Economic costs of Physical Inactivity, Obesity, and Overweight in California Adults: Health Care, Workers' Compensation, and Lost Productivity. http://www.dhs.ca.gov/ps/cdic/cpns/press/downloads/CostofObesityToplineReport.pdf, 2005.

8 The Trust for Public Land. The Benefits of Parks. Retrieved online August 23, 2007 http://www.tpl.org/content_documents/parks_for_people_Jul2005.pdf

9 CDC. Increasing Physical Activity A Report on Recommendations of the Task Fore on Community Preventive Services. Retrieved online August 23, 2007 http://www.cdc.gov/mmwr/preview/mmwrhtml/rr5018a1.htm

10 Complete results of the case studies are available in the SCAG's Regional Open Space Program, 2008

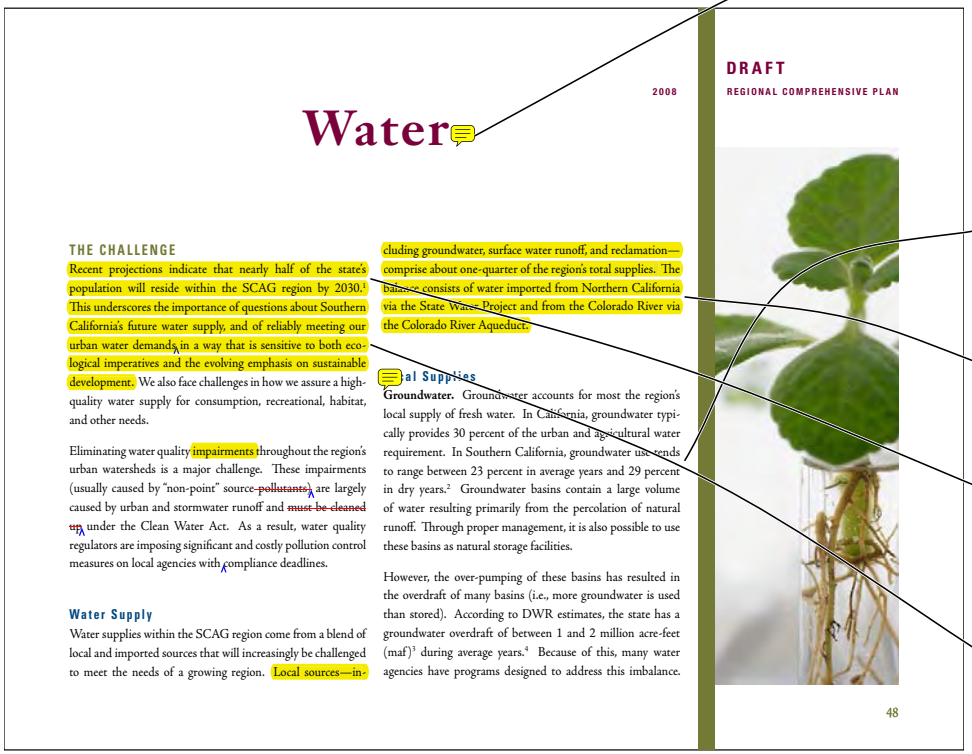
11 For a complete description of LOS and Needs Assessment see SCAG's Regional Open Space Program, 2008

12 6,500 acres identified of prime farmland is the number of acres of identified as directly impacted by projects in the 2004 RTP.

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Water

This page contains no comments

Page: 48



2008

DRAFT

REGIONAL COMPREHENSIVE PLAN

Water

THE CHALLENGE

Recent projections indicate that nearly half of the state's population will reside within the SCAG region by 2030.[1] This underscores the importance of questions about Southern California's future water supply, and of reliably meeting our urban water demands in a way that is sensitive to both ecological imperatives and the evolving emphasis on sustainable development. We also face challenges in how we assure a high-quality water supply for consumption, recreational, habitat, and other needs.

Eliminating water quality impairments throughout the region's urban watersheds is a major challenge. These impairments (usually caused by "non-point" source ~~pollutants~~) are largely caused by urban and stormwater runoff and ~~must be cleaned up~~ under the Clean Water Act. As a result, water quality regulators are imposing significant and costly pollution control measures on local agencies with compliance deadlines.

Water Supply

Water supplies within the SCAG region come from a blend of local and imported sources that will increasingly be challenged to meet the needs of a growing region. Local sources—including groundwater, surface water runoff, and reclamation—comprise about one-quarter of the region's total supplies. The balance consists of water imported from Northern California via the State Water Project and from the Colorado River via the Colorado River Aqueduct.

al Supplies

Groundwater. Groundwater accounts for most the region's local supply of fresh water. In California, groundwater typically provides 30 percent of the urban and agricultural water requirement. In Southern California, groundwater use tends to range between 23 percent in average years and 29 percent in dry years.[2] Groundwater basins contain a large volume of water resulting primarily from the percolation of natural runoff. Through proper management, it is also possible to use these basins as natural storage facilities.

However, the over-pumping of these basins has resulted in the overdraft of many basins (i.e., more groundwater is used than stored). According to DWR estimates, the state has a groundwater overdraft of between 1 and 2 million acre-feet (maf)[3] during average years.[4] Because of this, many water agencies have programs designed to address this imbalance.

48

Author: OCCOG TAC
Subject: Note
Date: 7/20/2008 1:10:26 PM

The Metropolitan Water District of Southern California specifically offered the following comment to the OCCOG TAC:

"Metropolitan strongly endorses SCAG's premise that future regional development must be built on a foundation of sustainability, water use efficiency and the creative use and development of water management strategies. Uncertainties introduced by the current drought, climate change, and the fragile condition of the Sacramento-Bay Delta, underscore the importance of prudent planning by water agencies and watershed districts within Southern California. Metropolitan supports SCAG's continuing role as a regional resource and information facilitator. In this way, SCAG assists Metropolitan in its efforts to assure a reliable, high quality and well-managed future of water for the Southern California region." (From letter dated _____ to the OCCOG TAC, attached for reference.)

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:11:35 PM

It is claimed that about 75% of potable water in the "SCAG region" comes from imported supplies. The Metropolitan Water District of Southern California suggests lowering this to between 66% and 70% as the reference in the text seems a bit high.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:12:05 PM

It is requested that sources of imported water supply listed please include the Los Angeles Aqueduct.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:12:57 PM

Because this document is intended to be used by a wide audience who may not have knowledge of the SCAG region or the growth projections, it is recommended that to be more helpful and meaningful to this audience that the sentence be reworded to include an actual numerical growth statement and not reference to a statewide number that is not known.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:13:54 PM

Please identify a the link between the population and the need to be sensitive to the ecological "imperatives" and the emphasis on sustainable development. These are subjects that are not commonly understood and the linkage may not be obvious to all readers.

Comments from page 48 continued on next page

Water

THE CHALLENGE

Recent projections indicate that nearly half of the state's population will reside within the SCAG region by 2030.[1] This underscores the importance of questions about Southern California's future water supply, and of reliably meeting our urban water demands in a way that is sensitive to both ecological imperatives and the evolving emphasis on sustainable development. We also face challenges in how we assure a high-quality water supply for consumption, recreational, habitat, and other needs.

Eliminating water quality impairments throughout the region's urban watersheds is a major challenge. These impairments (usually caused by "non-point" source pollutants) are largely caused by urban and stormwater runoff and must be cleaned up under the Clean Water Act. As a result, water quality regulators are imposing significant and costly pollution control measures on local agencies with compliance deadlines.

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However, the over-pumping of these basins has resulted in the overdraft of many basins (i.e., more groundwater is used than stored). According to DWR estimates, the state has a groundwater overdraft of between 1 and 2 million acre-feet (maf)[3] during average years.[4] Because of this, many water agencies have programs designed to address this imbalance.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:14:06 PM
Please insert a comma.

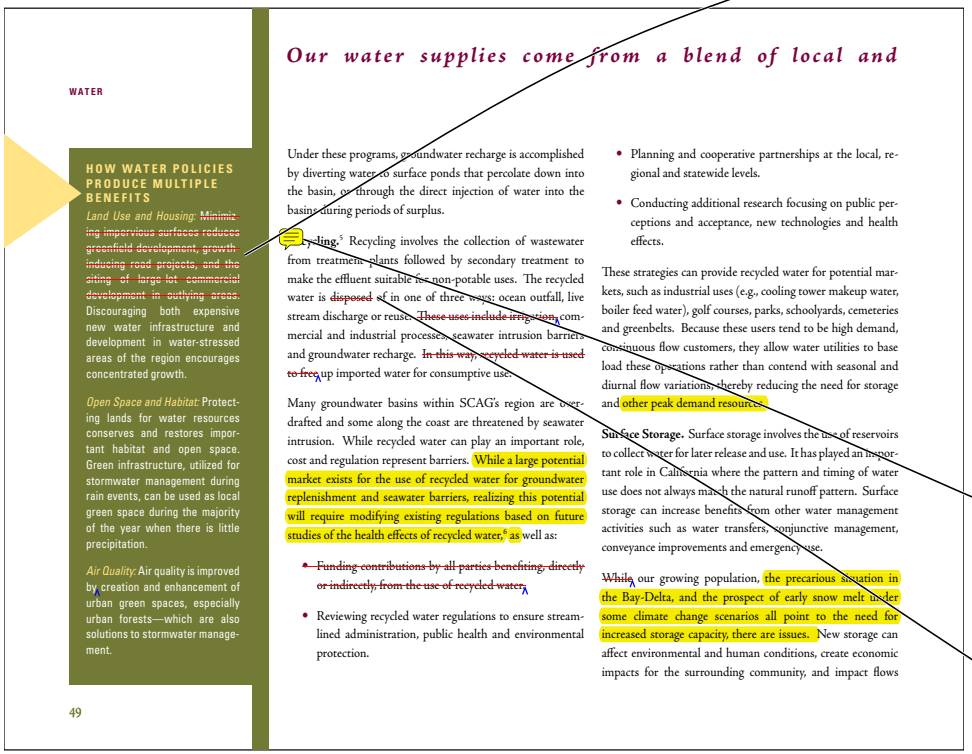
Author: OCCOG TAC
Subject: Note
Date: 7/20/2008 1:14:32 PM
Regarding formatting for this section, is the "Local Supplies" section a subset of "Water Supply"? If so, should the formatting be different?

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:16:44 PM
It is noted that the term "impairments" as used in this section is a new term. That OCCOG asks if this is a term used in the water industry and is it becoming the common terminology for pollutants and other water problems? It is noted that using a term that is only presented in this one document will be confusing to the wide variety of agencies that may use it unless it is clearly defined.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:17:15 PM
Please replace with "pollution".

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:17:16 PM
Please replace with "are required to be appropriately addressed".

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:18:09 PM
Please insert the word "strict" to reflect the strict regulations that govern local water agencies.



WATER

HOW WATER POLICIES PRODUCE MULTIPLE BENEFITS

Land Use and Housing: Minimizing impervious surfaces reduces greenfield development, growth inducing road projects, and the siting of large lot commercial development in outlying areas. Discouraging both expensive new water infrastructure and development in water-stressed areas of the region encourages concentrated growth.

Open Space and Habitat: Protecting lands for water resources conserves and restores important habitat and open space. Green infrastructure, utilized for stormwater management during rain events, can be used as local green space during the majority of the year when there is little precipitation.

Air Quality: Air quality is improved by creation and enhancement of urban green spaces, especially urban forests—which are also solutions to stormwater management.

49

Our water supplies come from a blend of local and

Under these programs, groundwater recharge is accomplished by diverting water to surface ponds that percolate down into the basin, or through the direct injection of water into the basin during periods of surplus.

Recycling.[5] Recycling involves the collection of wastewater from treatment plants followed by secondary treatment to make the effluent suitable for non-potable uses. The recycled water is disposed of in one of three ways: ocean outfall, live stream discharge or reuse. These uses include irrigation, commercial and industrial processes, seawater intrusion barriers and groundwater recharge. In this way, recycled water is used to free up imported water for consumptive use.

Many groundwater basins within SCAG's region are overdrafted and some along the coast are threatened by seawater intrusion. While recycled water can play an important role, cost and regulation represent barriers. While a large potential market exists for the use of recycled water for groundwater replenishment and seawater barriers, realizing this potential will require modifying existing regulations based on future studies of the health effects of recycled water,[6] as well as:

- Funding contributions by all parties benefiting, directly or indirectly, from the use of recycled water.
- Reviewing recycled water regulations to ensure streamlined administration, public health and environmental protection.
- Planning and cooperative partnerships at the local, regional and statewide levels.
- Conducting additional research focusing on public perceptions and acceptance, new technologies and health effects.

These strategies can provide recycled water for potential markets, such as industrial uses (e.g., cooling tower makeup water, boiler feed water), golf courses, parks, schoolyards, cemeteries and greenbelts. Because these users tend to be high demand, continuous flow customers, they allow water utilities to base load these operations rather than contend with seasonal and diurnal flow variations, thereby reducing the need for storage and other peak demand resources.

Surface Storage. Surface storage involves the use of reservoirs to collect water for later release and use. It has played an important role in California where the pattern and timing of water use does not always match the natural runoff pattern. Surface storage can increase benefits from other water management activities such as water transfers, conjunctive management, conveyance improvements and emergency use.

While our growing population, the precarious situation in the Bay-Delta, and the prospect of early snow melt under some climate change scenarios all point to the need for increased storage capacity, there are issues. New storage can affect environmental and human conditions, create economic impacts for the surrounding community, and impact flows

Page: 49

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 1:30:22 PM

It is recommended that the sentence please be deleted for the following reasons. The sentences states, "Minimizing impervious surfaces reduces greenfield development." The cause and effect relationship assumed in this statement is not clear. In this simplified statement of the recommendations for the minimization of impervious surfaces, the sentence could be interpreted in its most simple form to require more undeveloped land surrounding what is built. If used as a policy, without consideration of regional and larger-scale development planning, it could, in fact, result in large lot development with significant distances between structures. Such a situation, would in turn, lead to inefficient use of infrastructure, increased need to use automobiles and reduction of habitat and open space.

Further, the statement makes the assumption that roadway construction and "large-lot commercial development" induces growth, which is noted by the OCCOG to not necessarily be the case. As is presented in ULI's book "Growing Cooler" and discussed in the OCCOG's overall comments on the RCP, the use of the term "growth inducing" is defined as selecting the location for which growth that would have occurred somewhere in the region will occur. The OCCOG notes that this essentially represents the identification of where growth should occur through the investment in the roadways. Due to this definition, it is requested that the term "induced growth" please be clearly defined for its used in the RCP.

Please clarify what is meant by "large-lot commercial development." It is suggested that the reader may be confused because large-lot commercial development typically goes hand-in-hand with residential growth already occurring in an area because it requires a population that will use and purchase its goods.

Author: OCCOG TAC
Subject: Note
Date: 7/20/2008 1:29:56 PM

Please include Orange County Water District's Groundwater Replenishment System that recharges a significant quantity of highly treated recycled water to the Orange County Groundwater Basin either the Groundwater or the Recycling section (information can be found on OCWD's website or through OCWD staff.)

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 1:35:05 PM

The use of the term "disposed" seems awkward because recycled water is reused and not disposed of. It is suggested that an alternative word or statement be included such as, "Recycled water can be either be reused or discharged as ocean outfall or into streams.

Comments from page 49 continued on next page

HOW WATER POLICIES PRODUCE MULTIPLE BENEFITS

Land Use and Housing: ~~Minimizing impervious surfaces reduces greenfield development, growth inducing road projects, and the siting of large lot commercial development in outlying areas.~~ Discouraging both expensive new water infrastructure and development in water-stressed areas of the region encourages concentrated growth.

Open Space and Habitat: Protecting lands for water resources conserves and restores important habitat and open space. Green infrastructure, utilized for stormwater management during rain events, can be used as local green space during the majority of the year when there is little precipitation.

Air Quality: Air quality is improved by creation and enhancement of urban green spaces, especially urban forests—which are also solutions to stormwater management.

Our water supplies come from a blend of local and

Under these programs, groundwater recharge is accomplished by diverting water to surface ponds that percolate down into the basin, or through the direct injection of water into the basins during periods of surplus.

Recycling.[5] Recycling involves the collection of wastewater from treatment plants followed by secondary treatment to make the effluent suitable for non-potable uses. The recycled water is ~~disposed~~ of in one of three ways: ocean outfall, inland stream discharge or reuse. ~~These uses include irrigation,~~ commercial and industrial processes, seawater intrusion barriers and groundwater recharge. ~~In this way, recycled water is used to free up~~ imported water for consumptive use.

Many groundwater basins within SCAG's region are overdrafted and some along the coast are threatened by seawater intrusion. While recycled water can play an important role, cost and regulation represent barriers. While a large potential market exists for the use of recycled water for groundwater replenishment and seawater barriers, realizing this potential will require modifying existing regulations based on future studies of the health effects of recycled water,[6] as well as:

- ~~Funding contributions by all parties benefiting, directly or indirectly, from the use of recycled water.~~
- Reviewing recycled water regulations to ensure streamlined administration, public health and environmental protection.
- Planning and cooperative partnerships at the local, regional and statewide levels.
- Conducting additional research focusing on public perceptions and acceptance, new technologies and health effects.

These strategies can provide recycled water for potential markets, such as industrial uses (e.g., cooling tower makeup water, boiler feed water), golf courses, parks, schoolyards, cemeteries and greenbelts. Because these users tend to be high demand, continuous flow customers, they allow water utilities to base load these operations rather than contend with seasonal and diurnal flow variations, thereby reducing the need for storage and other peak demand resources.

Surface Storage. Surface storage involves the use of reservoirs to collect water for later release and use. It has played an important role in California where the pattern and timing of water use does not always match the natural runoff pattern. Surface storage can increase benefits from other water management activities such as water transfers, conjunctive management, conveyance improvements and emergency use.

While our growing population, the precarious situation in the Bay-Delta, and the prospect of early snow melt under some climate change scenarios all point to the need for increased storage capacity, there are issues. New storage can affect environmental and human conditions, create economic impacts for the surrounding community, and impact flows

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 11:46:23 AM
The following is offered to clarify the sentence: Reuse includes irrigation...

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 11:46:27 AM
The following is offered to clarify the sentence: Reuse of water frees up...

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:36:06 PM
Please clarify what is meant by the statement "other peak demand resources."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:37:12 PM
Please clarify why statement is singled out for inclusion in the text and not included in the list below? For easier reference, it is suggested that the statement be included in the list below the paragraph.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:39:26 PM
Because the situation in the Delta has not yet been discussed in this chapter. For clarity, it is recommended that either "the precarious situation is" be defined in this paragraph or reference to the explanation/discussion later in the chapter be added.

Further, please use consistent terminology for the "Bay-Delta" throughout the chapter. Because this is the first mention of the Delta, it would be appropriate to use the full name "Sacramento Delta (Delta)."

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:39:37 PM
Should this be word "With"

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/27/2008 1:43:45 PM
The following clarification is offered: Identifying funding sources to aid in the promotion and use of recycled water.

Author: OCCOG TAC
Subject: Inserted Text

Comments from page 49 continued on next page

Date: 7/20/2008 1:39:56 PM
The word "the" is missing from the statement.

Our water supplies come from a blend of local and

HOW WATER POLICIES PRODUCE MULTIPLE BENEFITS

Land Use and Housing: ~~Minimizing impervious surfaces reduces greenfield development, growth inducing road projects, and the siting of large lot commercial development in outlying areas.~~ Discouraging both expensive new water infrastructure and development in water-stressed areas of the region encourages concentrated growth.

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Air Quality: Air quality is improved by creation and enhancement of urban green spaces, especially urban forests—which are also solutions to stormwater management.

Under these programs, groundwater recharge is accomplished by diverting water to surface ponds that percolate down into the basin, or through the direct injection of water into the basins during periods of surplus.

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- ~~Funding contributions by all parties benefiting, directly or indirectly, from the use of recycled water.~~
- Reviewing recycled water regulations to ensure streamlined administration, public health and environmental protection.
- Planning and cooperative partnerships at the local, regional and statewide levels.
- Conducting additional research focusing on public perceptions and acceptance, new technologies and health effects.

These strategies can provide recycled water for potential markets, such as industrial uses (e.g., cooling tower makeup water, boiler feed water), golf courses, parks, schoolyards, cemeteries and greenbelts. Because these users tend to be high demand, continuous flow customers, they allow water utilities to base load these operations rather than contend with seasonal and diurnal flow variations, thereby reducing the need for storage and other peak demand resources.

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~~While~~ our growing population, the precarious situation in the Bay-Delta, and the prospect of early snow melt under some climate change scenarios all point to the need for increased storage capacity, there are issues. New storage can affect environmental and human conditions, create economic impacts for the surrounding community, and impact flows

imported sources that will increasingly be challenged.

both up and downstream of diversions. New reservoirs may reduce property tax revenues to local governments or increase values by providing a more reliable water supply. Regulatory requirements require surface storage investigations to consider potential impacts to stream flow regimes, designated wild and scenic rivers, water quality issues, changes in stream geomorphology, loss of fish and wildlife habitat, and risk of failure during seismic and operational events. New projects may need to address additional impacts under the application of various laws, regulatory processes and statutes.[7]

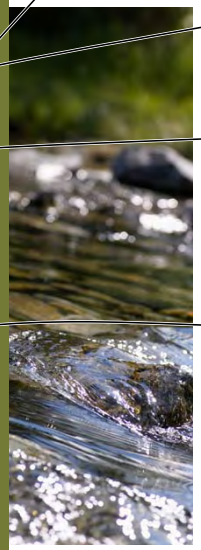
Conservation. Conservation, or urban water use efficiency, involves technological or behavioral changes in indoor and outdoor residential, commercial, industrial and institutional demand that lowers the demand for water. Once invoked primarily in response to drought or emergency water shortage situations, efficiency and conservation have become viable long-term supply options, saving considerable capital and operating costs, avoiding environmental degradation, and creating multiple benefits. Conserved water can be carried over to another time if a supplier has surface or groundwater storage capacity, or stores water by agreement with an agency that maintains a groundwater bank.

A major conservation challenge is to follow the California Urban Water Conservation Council's Memorandum of Understanding and implement 14 cost-effective "best management practices" for urban conservation.[8] These efforts should target water-using devices and practices involving residential dwellings; irrigation; and commercial, industrial and institutional operations. More recently, water agency initiatives have targeted irrigation and the commercial, industrial and institutional sector. Another challenge is to reduce the common practice of over-watering yards. The resulting surface water runoff is an ongoing source of non-source point pollution that causes water impairments requiring remediation.

Desalination. Recent developments in membrane technology and plant siting strategies have increased the financial appeal of this resource option. For example, MWD estimates that its local supplies could include up to 150 thousand acre-feet of desalinated water by 2050. However, several barriers must be overcome to make it a more viable water source, including high capital and operational costs for power and membrane replacement, funding, environmental issues and addressing permitting requirements (e.g., California Coastal Commission).

Imported Supplies

Southern California has historically depended on imported water to supplement local supplies. In 1998, the region imported more than 6 million acre-feet (maf) of water annually, accounting for nearly two-thirds of total water used in the region.[9] Water imports are conveyed by three major facilities: The Los Angeles Aqueduct, operated by the Los Angeles Department of Water and Power; the Colorado River Aqueduct, operated by MWD; and the State Water Project, operated by DWR.[10]



Page: 50

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:40:57 PM
This sentence references "over-watering yards" as "another significant challenge." Although this is a challenge and because this is the section addressing the California Urban Water Conservation Council's Memorandum of Understanding (CUWCC MOU), it is suggested that it would be appropriate to mention other significant BMP-related issues that the CUWCC has been working on. For example, this could include BMP's such as the analysis/minimization of water losses within retail water supply systems (BMP # 3; system water audits) and conservation rate structure issues (BMP # 11; retail conservation pricing).

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:41:11 PM
It is suggested that the use of the word "will" is more appropriate because projects are required to address these additional impacts.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:42:41 PM
It is recommended that the significance of conservation projects (compared with other local and regional water supply projects) should be enhanced, specifically in regard to climate change/ greenhouse gases benefits. The issues are covered in the sidebars on pages 53 and 55; however, it is recommended that more emphasis should be put within the "Conservation" section itself as opposed to relying on the reader to consider the sidebar in combination with this text.

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 12:05:34 PM
Please reword to better define the meaning of the sentence; as written the sentence is awkward and its meaning is not clear.

HOW WATER POLICIES PRODUCE MULTIPLE BENEFITS

Energy: Transporting water requires enormous amounts of energy. It takes 8,900 kilowatt-hours to bring one million gallons (kWh/MG) of water into Southern California. Increasing local water supplies and conserving water would greatly reduce the amount of energy used in the region's water supply system.

Transportation: Discouraging the creation of new impervious surfaces would reduce new roads and surface parking lots, which encourages walkable neighborhoods and transit use.

Security and Emergency Preparedness: A robust green infrastructure system improves protection from flooding and from corresponding safety issues. More local sources of water would decrease the exposure of our Statewide transport system to natural or man-made disasters.

Global climate change could further alter our region's water

State Water Project. The State Water Project (SWP), managed by DWR, is the largest state-owned multi-purpose water project in the country. It delivers water from the Sacramento Delta to 29 state water contractors, providing water to more than 23 million Californians, irrigation for 750,000 acres of agricultural lands, environmental benefits to wildlife refuges and recreational facilities.[11]

Aside from hydrology, the biggest threats to the reliability of SWP supplies are conditions within the Delta. For decades, the Bay-Delta has been the focus of competing interests: economic, ecological, urban and agricultural. These demands have combined with nature to gradually undermine the integrity of the complex system of levees that form the backbone of Bay-Delta water conveyance system. As levees erode, saltwater from the San Francisco Bay continues to encroach on the Delta, increasing salinity and undermining water quality. The presence and apparent decline of endangered species in the Delta have altered pumping operations. The prospect of long shutdowns presents a real threat to the supply reliability of all agencies drawing water from the Delta.[12]

A second concern involves the SWP's need to meet increasingly strict drinking water regulations. For example, following chlorination treatment, SWP water has disinfection by-products that require more advanced and costly treatment such as ozonation. Meeting these regulations and reducing treatment costs will require improving the Delta water supply by cost-effectively combining alternative sources of water, source improvement, and treatment facilities.

In 2000 CALFED, a collaboration of 25 state and federal agencies, released a 30-year plan for Delta restoration and long-term management. The CALFED program, currently overseen by the Bay-Delta Authority, is tasked with addressing the complex series of issues including storage, conveyance, water quality, levee system integrity, and ecosystem restoration.[13] A more recent "Delta Vision" Task Force is charged with presenting to the Governor a set of recommended actions for long-term solutions to the problem-plagued Bay-Delta ecosystem.

Colorado River. The Colorado River represents another major source of imported supply for the SCAG region. Water is conveyed from the Colorado River to urban Southern California via the Colorado River Aqueduct, owned and operated by Metropolitan.[14] Seven states share legal rights to Colorado River Water. Institutional arrangements have varied the amount of imported water available to Southern California. The need to stabilize ~~and expand~~ this supply will be a key challenge for the future.

Los Angeles Aqueduct. The City of Los Angeles imports water from the eastern Sierra Nevada through the Los Angeles Aqueduct (LAA). The original aqueduct was completed in 1913 to import water from the Owens Valley. In 1940 the aqueduct was extended to the Mono Basin. Water supplies have varied based on snowpack levels in Eastern Sierra Nevada

Page: 51

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:43:12 PM
It is recommended that the relationship between the CALFED program and the Delta Vision Task Force be better defined as this is a significant issue.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:43:26 PM
Please insert a space.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:44:06 PM
The OCCOG TAC offers that the text only provides a very brief discussion that does not address the significant challenges faced with the Colorado River. It is recommended that this discussion be expanded to include addressing some of the extensive regulatory and ecological challenges faced by this water supply.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:45:26 PM
The statement reads that discouraging new impervious surfaces reduces new roads and surface parking lots, which in turn would encourage walkable neighborhoods and transit use. The OCCOG TAC has noted that is not accurate without additional context and discussion and, in fact, could result in large lot development discouraging the use of transit and the inefficient use of infrastructure. It is recommended that the sentence be deleted and a different benefit identified.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:45:33 PM
Please insert the word "the"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:46:26 PM
It is not clear if this a reference to Metropolitan Water District and clarification is reuqested.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:49:07 PM
It is suggested that it may not be appropriate to expand the water supply from the Colorado River as it is an already seriously impacted water resource with multiple users and as such it is

Comments from page 51 continued on next page

requested that either the text "and expand" be deleted or an explanation be provided explaining why expansion is appropriate. It is recognized that it is appropriate to stabilize this water source, but the OCCOG notes that expansion of this source would involve significant federal policy and it is arguable that this even something the region would want to undertake.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:47:35 PM
Please replace with "to"

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:47:43 PM
Please replace with "or"

Global climate change could further alter our region's water

HOW WATER POLICIES PRODUCE MULTIPLE BENEFITS

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and court decisions restricting the amount of water than can be imported via the LAA.

Transfers and Water Banking. Following the basic principles of *Integrated Resource Planning*, urban water agencies within Southern California may continue to diversify their sources and reduce dependence on imported water by entering into contractual arrangements with agricultural irrigation districts. Irrigation agencies agree to adopt water conservation measures or to engage in land fallowing.[15] Water that would otherwise be used to irrigate crops is then purchased, or transferred, to urban water agencies. Frequently, this water is stored, or *banked*, in aquifers for use during times of shortage, thus increasing the urban agencies' supply reliability. Water banking also occurs during wet years as rainwater is directed to groundwater recharge facilities and spreading basins for use during times of shortage.

Climate Change[16]

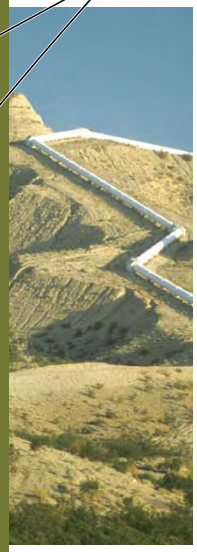
Another challenge that overarches all local water supply issues is the global phenomenon of climate change. Current scientific research suggests that increasing concentrations of atmospheric greenhouse gases are producing global-scale temperature and precipitation changes. Models have predicted that by the end of the century, average winter temperatures could increase by more than 7 degrees, and summer temperatures could increase by as much as 18 degrees. The results of precipitation studies have been less definitive, ranging broadly between models and scenarios. Predictions from these models range from slight increases in precipitation to decreases of up to 30 percent. Nevertheless, it is an issue that water agencies are increasingly accounting for as part of the standard water planning processes.

While uncertainties exist about the exact timing, magnitude and regional impacts of these temperature and precipitation changes, researchers have identified several issues of particular importance to water resource planners. These include:

- A reduction in the Sierra Nevada snowpack
- Increased intensity and frequency of extreme weather events
- Rising sea levels resulting in
  - An increased risk of damage from storms, high-tide events and the erosion of levees.
  - Saltwater intrusion into coastal groundwater
  - Potential pumping cutbacks on the State Water Project and the Central Valley Project.

Other important issues associated with climate change include:

- Effects on local supplies such as groundwater.



Page: 52

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:49:25 PM
Please insert a colon, ":"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:50:41 PM
The OCCOG notes that the section titled, Climate Change, provides only a very brief overview of a significant regional problem and suggests that the section would benefit from additional discussion to support the issues listed. Aditionally, it is recommended that the chapter would benefit if a discussion were included of actions to be taken to reduce the challenge as opposed to simply addressing actions reacting to it relative to water.

HOW WATER POLICIES PRODUCE MULTIPLE BENEFITS

Public Health: Reducing pollution levels in streams and rivers ~~and reducing beach closures~~ will reduce adverse ~~health~~ impacts from exposure. Protecting groundwater sources from saltwater intrusion and man-made sources of pollution will help maintain aquifer water quality. A robust green infrastructure system also provides improved protection from flooding.

Environmental Justice: When communities manage local water quality through increased use of green space, they help bring recreational opportunities ~~into park poor neighborhoods~~.

Climate Change: Policies that encourage water conservation help alleviate forecasted supply impacts of climate change whether due to shorter rainy, lack of winter snow or degraded estuaries, wetlands, and groundwater aquifers.

Two-thirds of California's water bodies were threatened

- Changes in urban and agricultural demand levels and patterns.
- Impacts to human health from water-borne pathogens and water quality degradation.
- Declines in ecosystem health and function.
- Alterations in power generation and pumping operations.

Water ~~is also a contributes~~ to the generation of greenhouse gases through its energy ~~demands~~. The energy component in developing and managing water resources is a growing challenge for the region. Energy is involved in each stage of water's use cycle: source and conveyance, treatment, distribution, consumption and wastewater treatment. In these ways, the management of energy and water supply and water quality are closely inter-related and must be considered together when regional growth and water resource strategies are developed.

These possibilities present challenges to future water planning efforts. Ongoing research concerning the likelihood and potential impacts of climate change needs to be carefully monitored and explicitly addressed by agency planning documents.

Water Demand

Water demand in California can generally be divided between urban, agricultural and environmental uses. According to DWR, for the state as a whole, these three sectors accounted for 11 percent, 41 percent and 48 percent, respectively, during 2000—a year characterized by "normal" rainfall.[17]

In the SCAG region, approximately three-quarters of potable water ~~are~~ provided from imported sources. Annual water demand fluctuates in relation to available supplies and the rainfall in a given year. During periods of drought, water demand can be reduced significantly through conservation while demands on imported supplies tend to decline significantly during years of above average rainfall.

An important challenge relates to the relationship between urban growth patterns and the demand for water. A compact growth pattern requires less water than a diffuse pattern. A compact regional pattern would result in fewer impervious surfaces, increasing opportunities for groundwater recharge.

Wastewater

Much of the urbanized areas of Los Angeles and Orange Counties are serviced by three large publicly owned treatment works (POTWs): the City of Los Angeles Bureau of Sanitation Hyperion Facility, the Joint Outfall System of the Los Angeles County Sanitation Districts, and the Orange County Sanitation District treatment plant. These three facilities handle more than 70 percent of all wastewater generated within the SCAG region and will be increasingly strained as the region continues to grow. In addition, medium sized POTWs (greater than 10 million gallons per day, or mgd) and

Page: 53

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:50:55 PM
Please insert the word "the"

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 12:20:04 PM
Please see comment on page 48 regarding the change in the percentage of sources of water.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 1:51:44 PM
It is recommended that the statement "and reducing beach closures" be deleted because the cause and effect in this sentence are not necessarily linked. The sentence is correct without the phrase.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:51:54 PM
Please replace the word "are" with "is"

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 12:22:43 PM
Because all impacts, not just health impacts would be reduced from reducing pollution levels, it is recommended that the word "health" be deleted.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 1:52:45 PM
Please delete the word "a" as it is grammatically incorrect.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 1:52:49 PM
Please delete the word "is" as it is grammatically incorrect.

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 2:31:35 PM
For clarification, please replace the word "demands" with "requirements of transporting it

Comments from page 53 continued on next page

HOW WATER POLICIES PRODUCE MULTIPLE BENEFITS

Public Health: Reducing pollution levels in streams and rivers ~~and reducing beach closures~~ will reduce adverse ~~health~~ impacts from exposure. Protecting groundwater sources from saltwater intrusion and man-made sources of pollution will help maintain aquifer water quality. A robust green infrastructure system also provides improved protection from flooding.

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Two-thirds of California's water bodies were threatened

- Changes in urban and agricultural demand levels and patterns.
- Impacts to human health from water-borne pathogens and water quality degradation.
- Declines in ecosystem health and function.
- Alternations in power generation and pumping operations.

Water ~~is~~ also ~~a~~ contributes to the generation of greenhouse gases through its energy ~~demands~~. The energy component in developing and managing water resources is a growing challenge for the region. Energy is involved in each stage of water's use cycle: source and conveyance, treatment, distribution, consumption and wastewater treatment. In these ways, the management of energy and water supply and water quality are closely inter-related and must be considered together when regional growth and water resource strategies are developed.

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Wastewater

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throughout California."

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:55:02 PM
Please include the word "typically" because a compact growth pattern may not always require less water. It should be noted that it also depends on the construction standards, landscaping standards, and type of growth.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 1:57:03 PM
It is suggested that the cause and effect referenced in this statement is not necessarily true as increasing green space for the management of water quality does not necessarily lead to an increase of parks in park-poor neighborhoods. It may do so, but conversely it could also lead to recreational opportunities in park rich areas. As the statement does not need the phrase "into park-poor neighborhoods" it is recommended that it be deleted.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:57:14 PM
Please insert the word "seasons"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 1:58:54 PM
It is suggested that the statement that existing facilities "will be increasingly strained as the region continues to grow" assumes no expansion of these facilities or the addition of new facilities. It is recommended for clarity that if the facilities will be strained, there should be reference to a lack of any ability to expand the facilities capacity and/or a discussion of the issues relative to the expansion of the facilities.

or impaired by non-point sources of pollution.

small treatment plants (less than mgd) service smaller communities in Ventura County.

Water Quality[18]

Non-Point Source Pollution. Surface water resources in the SCAG region include creeks and rivers, lakes and reservoirs, and the inland Salton Sea.[19] Reservoirs serving flood control and water storage functions exist throughout the region.

Protecting the quality of water in these bodies will be an ongoing challenge. For example, lining the Los Angeles River and the Santa Ana River with concrete for flood control purposes has made them conveyance systems that concentrate and transfer urban pollutants and waste to the ocean. Estimates show that two-thirds of California's water bodies were threatened or impaired by non-point sources of pollution. Point source pollution refers to contaminants that enter a watershed, usually through a pipe (e.g., discharges from sewage treatment plants and industrial facilities). Non-point source pollution, also known as "pollution runoff," is diffuse and most evident in dry weather conditions. Non-point pollution comes from everywhere, is significantly influenced by land uses, and considered one of the major water quality problems.

A major challenge from non-point sources is the urbanizing of the region. Buildings, roads, sidewalks, parking lots and other impervious surfaces alter the natural hydrology and prevent the infiltration of water into the ground. As land is urbanized, more stormwater flows faster off the land, the greater volume increases the possibility of flooding, and the high flow rates do not allow for pollutants to settle out, increasing pollutant concentrations in the runoff. Generally, the higher the percentage of impervious surfaces, the greater the degradation in stream water quality.

The general quality of groundwater in the SCAG region tends to be degraded as a result of land uses and water management practices. Fertilizers and pesticides typically used on agricultural lands infiltrate and degrade groundwater. Septic systems and leaking underground storage tanks can also impact groundwater. Water quality concerns include:

Salinity. Over-pumping can result in saltwater intrusion from the ocean, further degrading groundwater quality. Wastewater discharges can result in salt buildup from fertilizer and dairy waste. Water agencies need to work with other stakeholders on researching and developing salinity management goals and action plans, which include blending low and high salinity water and the desalination of brackish water.

Perchlorate. Ammonium perchlorate is a primary ingredient of solid rocket propellant and is used in the manufacture of munitions and fireworks. It is readily soluble in water, highly mobile in groundwater, and has significant health effects on the thyroid.[20] Small amounts gave been found in the Colorado River with higher concentrations in local groundwater basins. The challenge is to find cost-effective ways to remove perchlo-

Page: 54

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 1:59:24 PM
It is requested that the number of units missing from this statement be included.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:03:03 PM
It is suggested that this paragraph is confusing to the reader. Please clarify how the general quality of groundwater is degraded by land uses and water management practices. The examples of agriculture and septic systems only occur in limited areas of the region. Further, it is requested that the water management practices that degrade water quality please be identified.

Further, regarding this paragraph and WA-17 on page 59, it is suggested that a significant discussion appears to be missing. It is recognized that these impaired groundwater basins need treatment; however, a number of these impaired aquifers (e.g. specifically nitrogen fertilizer contaminated aquifers) can be mitigated through alternate means such as the use of shallow groundwater wells to extract the impaired groundwater for direct reuse, such as irrigation. Please include a discussion of these issues.

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 2:33:30 PM
Please insert: "have the unintended consequence of concentrating and transferring"

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 2:32:41 PM
Please insert the word "effective"

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 12:34:12 PM
Please define the term "salinity."

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 12:29:30 PM
Please reference the source of the estimates.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 2:03:53 PM

Comments from page 54 continued on next page

or impaired by non-point sources of pollution.

small treatment plants (less than mgd) service smaller communities in Ventura County.

Water Quality[18]

Non-Point Source Pollution. Surface water resources in the SCAG region include creeks and rivers, lakes and reservoirs, and the inland Salton Sea.[19] Reservoirs serving flood control and water storage functions exist throughout the region.

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For clarity, it is suggested that the statement be reworded to read as "from diffuse sources"

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 2:34:08 PM
Please replace the word "pollution" with "urban" to be more specific.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 2:04:04 PM
Please insert the word "is"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:04:41 PM
Please include clarification in the text to indicate that the health affects are not directly on the thyroid (i.e. such as being cancer causing) but that the perchlorate inhibits the function of the thyroid - specifically it inhibits iodide uptake by the thyroid.

We must improve comprehensive and collaborative water-

ENERGY COSTS, GREENHOUSE GASES, AND WATER

In a Los Angeles Department of Water and Power analysis, the energy costs in kilowatt hours per acre foot of water (kwh/af) and CO_2 emission in pounds per acre foot of water (lbs/af) ranged as follows:

- Tertiary Treated Recycled Water: 428 kwh/af and 558 lbs/af
- Pumped Groundwater: 519 kwh/af and 677 lbs/af
- State Project Water Imports: 2580 kwh/af and 2154 lbs/af
- Seawater Desalination: 4100 kwh/af and 5345 lbs/af

rates using conventional water treatment, nanofiltration and reverse osmosis.

Total Organic Carbon and Bromide. When source water containing high levels of total organic carbon (TOC) and bromide is treated with disinfectants such as chlorine or ozone, disinfection byproducts are created. Studies show links between exposure to disinfection byproducts and certain cancers, as well as reproductive and developmental effects. TOCs and bromide in Delta water present challenges to monitor and maintain safe drinking water supplies. The challenge is to better protect SWP water supplies in a cost-effective manner.

Methyl Tertiary Butyl Ether and Tertiary Butanol. Until recently, MTBE was the primary oxygenate in virtually all gasoline used in California to address air pollution issues. However, MTBE has caused ~~a serious~~ problem, as it is very soluble in water and moves quickly into the groundwater. One gallon of MTBE alone (11 percent MTBE by volume) is enough to contaminate about 16.5 million gallons of water at 5 micrograms per Liter. We must find ways to reduce the cost of treating groundwater wells, or risk the temptation to seek increased imports at lower cost. A combination of advanced oxidation processes followed by granular activated carbon can reduce MTBE levels by up to 90 percent.

Arsenic. Arsenic, a naturally occurring substance, in drinking water, has been identified as a risk factor for lung and urinary bladder cancer. Several local water sources contain arsenic concentrations exceeding the federal standard. It appears likely that current treatment standards will increase cost but not necessarily decrease local water supplies. However, if treatment cost increases are sufficient, some water agencies in Southern California may choose to increase their use of imported water to avoid this additional cost.

Uranium. Colorado River water has been compromised by a 10.5-million-ton pile of uranium mine tailings at Moab, Utah. Rainwater has seeped through the pile and contaminated the local groundwater, causing a flow of contaminants into the river. While the Department of Energy has agreed to move the tailings, remediating the site will require Congressional appropriations, and maintaining support for a cleanup will require close coordination and cooperation with other Colorado River users.

Watershed Planning

The way in which land is used—the type of use and level of intensity—has a direct effect on water supply and quality. Watershed management is the process of evaluating, planning, managing, restoring and organizing land and other resource use within an area of land that has a single common drainage point. Watershed management tries to provide sustainable development while maintaining a sustainable ecosystem.

Accommodating growth challenges us to find ways to promote compact, mixed-use development, which can reduce water demand and creates a smaller urban footprint. By reducing

Page: 55

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:06:05 PM
The OCCOG suggests that this section on uranium in water is misleading discussion because it does not address the full issue. It is suggested that the discussion should include references to the fact that uranium is also a naturally occurring pollutant from geology and that contamination in the local groundwater sources also occurs. While the contamination from the mine tailings in Moab, Utah is an issue for the region's water supply, a full discussion of all of the sources of uranium in the regions water supply would be more appropriate (e.g. referencing the naturally occurring pollution from uranium, similar to the discussion of arsenic, since it is a more significant issue in this region.)

Author: OCCOG TAC
Subject: Note
Date: 6/29/2008 2:37:44 PM
It is recommended that a section addressing "Nitrogen" be added.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 2:07:03 PM
It is identified that the reference to "MTBE has caused a serious problem" is not clear to the reader because the impacts from MTBE have not been defined in the text. It is recommended that the text include a discussion of the "problems" it causes.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:08:40 PM
It is noted that the land use discussion in this section is very limited and, as such, may not provide adequate information or background for a more general audience. It is recommended that the text should expand on the options available for better watershed management planning and include land use planning and development options.

Author: OCCOG TAC
Subject: Cross-Out
Date: 6/29/2008 3:01:27 PM
Please delete the word "in"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:10:37 PM
Water resource agencies throughout that region are subject to significant federal and state regulation regarding the various pollutants discussed in this chapter. As such, it is suggested that

Comments from page 55 continued on next page

We must improve comprehensive and collaborative water-

ENERGY COSTS, GREENHOUSE GASES, AND WATER

In a Los Angeles Department of Water and Power analysis, the energy costs in kilowatt hours per acre foot of water (kwh/af) and CO_2 emission in pounds per acre foot of water (lbs/af) ranged as follows:

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Accommodating growth challenges us to find ways to promote compact, mixed-use development, which can reduce water demand and creates a smaller urban footprint. By reducing

for clarification to the reader, the chapter include in this and other sections a recognition that current federal and state laws regulate the amount of these contaminants in the water.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:13:34 PM
The OCCOG recognizes that compact, mixed-use development can lead to an overall smaller urban footprint and thus reduce per capita urban water demand. However, the statement lacks the discussion necessary to explain how and why this would occur. For this result to be acheived will require a wide variety of actions throughout the region to be undertaken. It is suggested that the section be expanded to discuss this and that references to the variety of information sources on this topic be included in the text.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 2:13:39 PM
Please insert the text, "in the regions geology that leaches into"

shed management to reduce demand and improve quality.

impervious surfaces, development generates less surface runoff, and minimizes dispersion into watersheds and groundwater recharge areas receiving this runoff.[21]

THE PLAN

The RCP focuses on three strategies for addressing water supply and quality issues. First, the region needs to develop sufficient water supplies to meet the water demands created by continuing regional growth. Second, we can improve our water quality by implementing land use and transportation policies and programs that promote water stewardship and eliminate water impairments and waste. Finally, the region needs to improve comprehensive and collaborative watershed planning that yields waterwise programs and projects.

Improve Water Supply and Manage Demand

The region needs to improve its stewardship of water supplies and manage demand in order to address substantial growth in population and economic activities. By promoting policies that encourage environmentally-sustainable imports, encouraging local conservation and conjunctive use, reclamation and reuse.

Land Use and Transportation Policies

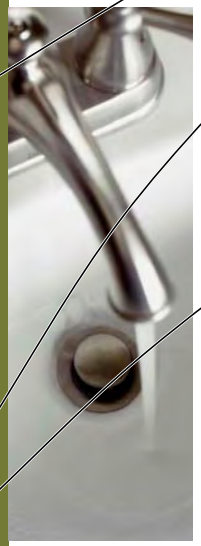
The RCP encourages development strategies that can reduce the region's impervious surfaces and reduce future impacts on surface and groundwater quality and supply. On a regional or watershed level, greater overall water quality protection is achieved through more concentrated or clustered development. Concentrated development protects the watershed by leaving a larger percentage of it in its natural condition.

Watershed Planning

Our region needs to better implement collaborative watershed planning that produces waterwise programs. By promoting better designed communities and projects, we can produce multiple benefits and ecosystem protections. This can be done by integrating local government planning efforts with those of special districts, environmental advocates and other watershed stakeholders.

WATER GOALS

- Develop sufficient water supplies through environmentally sustainable imports, local conservation and conjunctive use, reclamation and reuse to meet the water demands created by continuing regional growth.
- Achieve water quality improvements through implementation of land use and transportation policies and programs that promote water stewardship and eliminate water impairments and waste in the region.
- Foster comprehensive and collaborative watershed planning within the region that produces waterwise pro-



Page: 56

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 12:50:45 PM
This appears to be the primary goal of the chapter and it is therefore recommended that this be emphasized throughout the text of the chapter.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 2:14:30 PM
Because the growth in the region is not fact, it is recommended that the words "the anticipated" be added.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:17:11 PM
This goal is extremely broad in context and coupled with the lack of expansive discussion in the text of the chapter, it is suggested that it would benefit from being more concise.

Further, it is generally accepted that it is not possible to "eliminate" water impairments and waste. Because this document is intended to be used in IGR and as a regional policy document, please change the statement to read "to minimize to the maximum extent practicable and feasible."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:17:36 PM
Based on the discussion of the text, it is suggested that this should be the first goal. Further, it is noted that it is a key goal that SCAG could undertake while the other goals listed would require actions of other agencies.

POLLUTANTS IN URBAN RUNOFF

The California State Water Quality Control Board identified the following pollutants in urban runoff.[22]

Sediment. Excessive loads in streams interfere with photosynthesis, aquatic life respiration, growth and reproduction.

Nutrients. Nitrogen and phosphorus can result in eutrophication of receiving waters, reducing oxygen levels available for other species.

Bacteria and viruses. Pathogens introduced to receiving waters can restrict water contact activities.

Oxygen demanding substances. Lawn clippings, animal excrement and litter reduces dissolved oxygen levels as they decompose.

Oil and grease. Hydrocarbons from autos are toxic to some aquatic life.

Metals. Metals can enter waterways through storm drains along with sediment, or as atmospheric deposition.

Toxic pollutants. Pesticides, phenols and polynuclear aromatic hydrocarbons are toxic chemicals found in stormwater.

Floatables. Trash in waterways increases metals and toxic pollutant loads.

grams and projects with multiple benefits and ecosystem protections, integrating local government planning efforts with those of special districts, environmental advocates and other watershed stakeholders.

WATER OUTCOMES

- Regional per capita water demand reduced by 25 percent by 2030 with waterwise land use and local management policies (local land use policies and water practices are established to maximize efficient use of local water resources and reduce water demand in the SCAG region).
- Regional water impairments eliminated by 2030 with the use of stormwater and urban runoff controls and improved retention and infiltration systems (land use and transportation policies are established to minimize pollution entering water bodies and increase on-site water management).
- All member agencies included as active participants in regional watershed planning and implementation efforts, including concurrent updating of basin plans within the region (coordination and collaboration of local agencies, water districts and other watershed stakeholders to maximize all investments in water management for public benefit).

Page: 57

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 12:56:06 PM
As this is a key outcome, it is recommended that this be the primary outcome in the list.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:18:59 PM
Metropolitan Water District of Southern California noted to the OCCOG TAC that the stated goal of reducing “regional per capita” water use by 25% through waterwise land use an local management policies” seems a bit too ambitious.

Further, the City of Anaheim's Public Utilities staff noted that any goal such as this should be accompanied with recognition that some retail agencies have already implemented aggressive water conservation program/projects over the years. Therefore, due to "saturation" of programs/ projects, have demand hardening impacts (i.e. it is more difficult for them to further reduce demands to specified targets due to their existing saturation of projects within their service area).

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:19:52 PM
It is recommended that any outcomes identified in this chapter, and the overall document, be outcomes that are achievable. Because it is not possible to fully eliminate water impairments, it is recommended that the language be changed to read to state that impairments will be "reduced to the maximum extent practicable."

Secondly, the outcome is limited to the specified systems. It is suggested that the inclusion of managing run off from agriculture and open space is also necessary as they both contribute to water impairments if not managed appropriately.

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 2:38:25 PM
Please insert: ", filtration, "

WATER ACTION PLAN

Incentive/Best Practices	Legislation	Constitution	Constrained Policies	Potential for Direct Benefits: Land Use	Transportation	Air Quality	Energy	Open Space	Economy	Security	Solid Waste	Other Benefits: Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
X			WA-1 SCAG shall create a compendium of best management practices, case studies, and model ordinances that will give 'waterwise' guidance for development entitlements and growth management policymaking.										
		X	WA-2 SCAG shall promote water conservation awareness throughout the region, featuring the connections between water and other resources, including energy and timing of water use.			X	X						X
	X		WA-3 SCAG shall encourage water reclamation ~~region~~ where it is cost-effective, feasible, and appropriate to reduce reliance on imported water.				X			X			X
		X	WA-4 SCAG shall encourage coordinated watershed management planning at the sub-regional level by (1) providing consistent regional data, (2) serving as a liaison between affected local, State, and federal watershed management agencies, ~~and~~ (3) ensuring that watershed planning is consistent with comprehensive regional planning objectives and challenges.				X						
		X	WA-5 SCAG shall facilitate information sharing between local water agencies and local jurisdictions, in order to evaluate future water demands, prepare realistic Urban Water Management Plans, and support sustainable water and growth management policies.	X									
		X	WA-6 SCAG shall encourage integration of water stewardship practices and unify investment incentives among all stakeholders, prioritizing resources for investments that optimize returns and outcomes and best meet fiscal limitations, growth realities and sustainability objectives.										
	X		WA-7 SCAG shall provide, as appropriate, legislative support and advocacy for regional water conservation, supply, and water quality projects.										
	X		WA-8 SCAG shall develop a policy framework for integrating water resources planning and Compass Blueprint planning strategies in order to coordinate positive interactions between local land use policies and regional water supply and water quality actions over time.	X									
Local Government Policies													
X			WA-9 Developers and local governments should consider potential climate change hydrology and ~~attendant~~ impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.					X		X			X
X			WA-10 Developers and local governments should include conjunctive use as a water management strategy when feasible.										
X			WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	X					X				

Page: 58

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:20:47 PM
It is not clear that SCAG is the most appropriate agency to undertake this work effort. It is offered that it may be more appropriate for SCAG to serve as a clearinghouse clearinghouse for the information and use its regional role to provide the information compiled by the water agencies in the region.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 2:20:12 PM
Please delete the word "region."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:23:14 PM
Please clarify what data would be provided by SCAG. It is suggested that an emphasis in such a statement of policy identify that data used for this purpose must be deemed accurate and be consistently maintained. The OCCOG also notes that it should also be recognized that this, in and of itself, is a significant work effort and could require a significant amount of resources and asks if SCAG already has the resources for such a work effort of if they will seek additional resources to undertake such a task.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:23:50 PM
As stated above, it is suggested that SCAG's role in this arena is more appropriate as a forum as opposed to serving as a liaison. It is requested that the policy be restated to reflect that SCAG could serve as a forum for these discussion to take place.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:27:16 PM
This statement is currently a primary function of SCAG and it is suggested that it could be emphasized.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:29:08 PM
This is not necessary if SCAG undertakes the actions in WA-4, as it should already be addressed. It is suggested that it could be more appropriate for the policy to read that SCAG will help facilitate the provision of consistent information between local water agencies and local

Comments from page 58 continued on next page

WATER ACTION PLAN

Incentives/Best Practices	Legislation	Constitution	Constrained Policies	Potential for Direct/Indirect Benefits: Land Use	Transportation	Air Quality	Energy	Open Space	Economy	Solid Waste	Other Benefits: Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)												
X			WA-1 SCAG shall create a compendium of best management practices, case studies, and model ordinances that will give 'waterwise' guidance for development entitlements and growth management policymaking.									
		X	WA-2 SCAG shall promote water conservation awareness throughout the region, featuring the connections between water and other resources, including energy and timing of water use.			X	X					X
	X		WA-3 SCAG shall encourage water reclamation ~~region~~ where it is cost-effective, feasible, and appropriate to reduce reliance on imported water.				X		X			X
		X	WA-4 SCAG shall encourage coordinated watershed management planning at the sub-regional level by (1) providing consistent regional data; (2) serving as a liaison between affected local, State, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with comprehensive regional planning objectives and challenges.				X					
		X	WA-5 SCAG shall facilitate information sharing between local water agencies and local jurisdictions, in order to evaluate future water demands, prepare realistic Urban Water Management Plans, and support sustainable water and growth management policies.	X								
		X	WA-6 SCAG shall encourage integration of water stewardship practices and unify investment incentives among all stakeholders, prioritizing resources for investments that optimize returns and outcomes and best meet fiscal limitations, growth realities and sustainability objectives.									
	X		WA-7 SCAG shall provide, as appropriate, legislative support and advocacy for regional water conservation, supply, and water quality projects.									
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Local Government Policies												
X			WA-9 Developers and local governments should consider potential climate change hydrology and ~~attendant~~ impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.					X		X		X
X			WA-10 Developers and local governments should include conjunctive use as a water management strategy when feasible.									
X			WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	X					X			

jurisdictions. Further, it is noted that it is not currently SCAG's role to prepare Urban Water Management Plans as is stated in the second part of the policy. That function is the responsibility of the water purveyors. It is requested that the text be modified to reflect this situation.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:29:46 PM
This policy would expand the purpose of the Compass Blueprint and, as such, in relation to the goals of the Land Use Chapter, it is suggested that it be discussed in the chapter text. The discussion in the chapter is recommended to also discuss what the implications of such an action would be.

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 2:39:49 PM
Please replace the word "attendant" with "resultant."

WATER

IGR/Best Practices	Legislation	Constitution	Constrained Policies	Potential Direct/Indirect Benefits								Other Benefits	
				Land Use	Transportation	Air Quality	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
x			WA-12 Developers and local governments should reduce exterior uses of water in public areas, and should promote ~~reductions~~ in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, ~~educating other public agencies about water use~~, and installing related water pricing incentives.				x							x
x			WA-13 Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. ~~The federal government's 'no net loss' wetlands policy should be applied to all of these land resources.~~					x						x
x			WA-14 Local governments should amend building codes to require dual plumbing in new construction, and provide incentives for plumbing retrofits in existing development, to enable the safe and easy use of recycled water in toilets and for landscaping.	x									
x			WA-15 Local governments should amend ordinances as necessary to allow municipal and private outdoor use of recycled water for all parks, golf courses, and outdoor construction needs.										
	x		WA-16 ~~Local governments~~ should incentivize the use of recycled water through pricing structures that make it an attractive alternative to treat water in non-potable situations.								x		
		x	WA-17 ~~Local governments~~ should ~~remove~~ salts and other contamination in major groundwater basins to increase conjunctive use of water resources and extend groundwater storage.							x		x	
		x	WA-18 Local governments should create stable sources of funding for water and environmental stewardship and related infrastructure sustainability, including purchase and implementation of green infrastructure.					x					
		x	WA-19 Water purveyors should develop and implement tiered water pricing structures to discourage water waste and minimize polluting runoff.									x	
x			WA-20 Local governments should use both market and regulatory incentive mechanisms to encourage 'water wise' planning and development, including streamlining and prioritizing projects that minimize water demand and improve water use efficiencies.				x						x
		x	WA-21 Local governments should develop comprehensive partnership approaches to remove and prevent water impairments, replacing the existing regulatory command and control approach that has created delays and distrust.										
		x	WA-22 Local governments should create opportunities for pollution reduction marketing and other market-incentive water quality programs.									x	
x			WA-23 Local governments should encourage Low Impact Development and natural spaces that reduce, treat, infiltrate and manage runoff flows caused by storms and impervious surfaces.	x				x					
x			WA-24 Local governments should prevent development in flood hazard areas lacking appropriate protections, especially in alluvial fan areas.	x				x				x	

59

Page: 59

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 2:30:02 PM
Please replace text with "reduced use"

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 2:30:52 PM
Please delete the identified statement as this is the responsibility of water agencies. It is suggested that local governments should provide opportunities for the infromation to be made available to the public and it offered that this could be included in the statement.

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 3:02:49 PM
Please delete the identified statement as it is not necessary. Local governments and developers are already required to consider the no net loss provisions of federal law.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:32:09 PM
Please include a check in the legislation box as retail agencies would need additional regional assistance to attain these goals. Specifically, regional assistance would necessary to provide incentives and to be able to mandate dual plumbing.

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 3:02:56 PM
Please designate the appropriate agency. This is not under the purview of local governments.

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 3:03:03 PM
Please designate the appropriate agency. This is not under the purview of local governments.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 2:33:09 PM
The removal of salts and other contaminants is not possible. Please reword to indicate that salts and other contaminants should be removed to the maximum extent practicable.

Author: OCCOG TAC
Subject: Highlight

Comments from page 59 continued on next page

WATER

IGR/Best Practices	Legislation	Constitution	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Energy	Open Space	Economy	Solid Waste	Public Health	Climate Change
X			WA-12 Developers and local governments should reduce exterior uses of water in public areas, and should promote ~~reductions~~ in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, ~~educating other public agencies about water use~~, and installing related water pricing incentives.				X						X
X			WA-13 Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. ~~The federal government's 'no net loss' wetlands policy should be applied to all of these land resources.~~					X					X
X			WA-14 Local governments should amend building codes to require dual plumbing in new construction, and provide incentives for plumbing retrofits in existing development, to enable the safe and easy use of recycled water in toilets and for landscaping.	X									
X			WA-15 Local governments should amend ordinances as necessary to allow municipal and private outdoor use of recycled water for all parks, golf courses, and outdoor construction needs.										
	X		WA-16 ~~Local governments~~ should incentivize the use of recycled water through pricing structures that make it an attractive alternative to fresh water in non-potable situations.							X			
		X	WA-17 ~~Local governments~~ should ~~remove~~ salts and other contamination in major groundwater basins to increase conjunctive use of water resources and extend groundwater storage.							X		X	
		X	WA-18 Local governments should create stable sources of funding for water and environmental stewardship and related infrastructure sustainability, including purchase and implementation of green infrastructure.					X					
		X	WA-19 Water purveyors should develop and implement tiered water pricing structures to discourage water waste and minimize polluting runoff.									X	
X			WA-20 Local governments should use both market and regulatory incentive mechanisms to encourage 'water wise' planning and development, including streamlining and prioritizing projects that minimize water demand and improve water use efficiencies.				X						X
		X	WA-21 Local governments should develop comprehensive partnership approaches to remove and prevent water impairments, replacing the existing regulatory command and control approach that has created delays and distrust.										
		X	WA-22 Local governments should create opportunities for pollution reduction marketing and other market-incentive water quality programs.									X	
X			WA-23 Local governments should encourage Low Impact Development and natural spaces that reduce, treat, infiltrate and manage runoff flows caused by storms and impervious surfaces.	X				X					
X			WA-24 Local governments should prevent development in flood hazard areas lacking appropriate protections, especially in alluvial fan areas.	X				X				X	

Date: 7/20/2008 2:33:44 PM
It is recognized that this is a good policy for water agencies and local governments, but many retail agencies may need financial assistance to complete rate/cost of service studies (and database programming/software) to implement tiered pricing structures. It is requested that the policy reflect this need.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:34:22 PM
Please define the existing regulatory approach referenced in this policy and the problems with it as this is not a challenge identified or discussed in the chapter.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:35:32 PM
Please add a discussion of Low Impact Development into the chapter. The terminology has not been previously discussed and it is not clear to the reader what this would involve or why this is important.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:36:28 PM
It is noted that this is already a requirement of the NFIP and FEMA regulations and, as such, the Proposed Policy WA-24 is possibly unnecessary. However, if it is to remain in the policies, it is requested that the statement be reworded to state that local governments should be following the federal regulations.

IGR/Best Practices	Legislation	Constitution	Constrained Policies	Potential for Direct/Indirect Benefits: Land Use	Transportation	Air Quality	Energy	Open Space	Economy	Security	Solid Waste	Other Benefits: Public Health	Climate Change
x			WA-25 Local governments should implement green infrastructure and water-related green building practices through incentives and ordinances. ~~Resources include the U.S. Green Building Council's Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.~~	x		x	x	x		x	x	x	x
		x	WA-26 Local governments should integrate water resource planning with existing greening and revitalization initiatives, such as street greening, tree planting, and parking lot conversions, to maximize benefits and share costs.	x		x		x				x	x
		x	WA- 27: Developers and local governments should maximize pervious surface area in existing urbanized areas to improve water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and on-site mitigation.										
x			WA-28 Local governments should maintain and update Best Management Practices for water resource planning and implementation.										
		x	WA-29 Local governments should coordinate with neighboring communities and watershed stakeholders to identify possible collaborative mitigation strategies at the watershed level to properly manage cumulative impacts within the watershed.										
		x	WA-30 Local governments should adopt MOUs and JPAs among local entities to establish participation in the leadership and governance of integrated watershed planning and implementation.										
		x	WA-31 Local governments should increase participation in the implementation of integrated watershed management plans, including planning effort initiated in neighboring communities that cross jurisdictional lines.										
x			WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.			x	x						x
State and Regional Agency Policies													
	x		WA-33 State and regional agencies should develop fair and consistent safety guidelines for use of reclaimed and recycled wastewater for non-potable uses, in order to facilitate more widespread acceptance and use.									x	
x			WA-34 State and regional agencies should design and operate regional transportation facilities so that stormwater runoff ~~cannot contaminate~~ surrounding watershed ecosystems.		x								

Page: 60

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 2:37:55 PM
Because of the changing environment and the organizations that are being created to address "green" issues, it is not necessary to list these resources. A discussion of the resources available today would be appropriate to include in the Chapter text but, it is suggested, that it also recognize that new information and standards that would be appropriate to meet this policy could be developed over the life of the RCP.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:40:06 PM
Please explain what the benefits and shared costs would be as referenced as resulting for the integration of water resources planning with other local initiatives as in proposed Policy WA-26.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:40:27 PM
Please define what is meant by the inclusion of parking lot conversions? Specifically, please explain what they would be converted to in order meet the intent of this policy.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:40:57 PM
Please define what the in-lieu fees would be used for in the context of proposed Policy WA-27 and explain why a fee is appropriate.

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 3:03:23 PM
Please change the word "possible" to "practicable."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:41:28 PM
It is noted that this policy is very vague and it is recommended that it would benefit from additional detail to clarify what is hoped to be acheived.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:42:22 PM
It is suggested that additional discussion of what is anticipated as an outcome from proposed Policy WA-29 be provided in the text of the chapter. Please clarify the possible outcomes.

Comments from page 60 continued on next page

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 2:43:01 PM
Please reword to recognize that stormwater runoff should be minimized to the maximum extent practicable.

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
X			WA-25 Local governments should implement green infrastructure and water-related green building practices through incentives and ordinances. ~~Resources include the U.S. Green Building Council's Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.~~	X		X	X	X		X	X	X	X
		X	WA-26 Local governments should integrate water resources planning with existing greening and revitalization initiatives, such as street greening, tree planting, and parking lot conversions, to maximize benefits and share costs.	X		X		X				X	X
		X	WA- 27: Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent ~~possible~~, including the use of in-lieu fees and off-site mitigation.										
X			WA-28 Local governments should maintain and update Best Management Practices for water resource planning and implementation.										
		X	WA-29 Local governments should coordinate with neighboring communities and watershed stakeholders to identify potential collaborative mitigation strategies at the watershed level to properly manage cumulative impacts within the watershed.										
		X	WA-30 Local governments should adopt MOUs and JPAs among local entities to establish participation in the leadership and governance of integrated watershed planning and implementation.										
		X	WA-31 Local governments should increase participation in the implementation of integrated watershed management plans, including planning effort initiated in neighboring communities that cross jurisdictional lines.										
X			WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.			X	X						X
State and Regional Agency Policies													
	X		WA-33 State and regional agencies should develop fair and consistent safety guidelines for use of reclaimed and recycled wastewater for non-potable uses, in order to facilitate more widespread acceptance and use.									X	
X			WA-34 State and regional agencies should design and operate regional transportation facilities so that stormwater runoff ~~cannot contaminate~~ surrounding watershed ecosystems.		X								

WATER

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Energy	Open Space	Economy	Security	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)												
		X	WA-1S SCAG shall support researching the feasibility and environmental impacts of increasing water supply through saltwater desalination.				X			X		X
		X	WA-2S SCAG shall encourage streamlined water quality regulatory implementation, including identification and elimination of overlapping regulatory programs to reduce economic impacts on local businesses and governments.									
X			WA-3S SCAG shall encourage restoring the region's watersheds to 90 percent pervious surface. Increases in pervious surfaces should be accomplished through new development models and materials, such as green roofs, porous pavement, natural stormwater management, increased park space, and expansion of urban forest.	X								
		X	WA-4S SCAG shall support improving water quality in the region's imported water supplies.									
		X	WA-5S SCAG shall encourage preventing non-native/invasive species from adversely affecting regional water supplies and quality.									
		X	WA-6S SCAG shall encourage the use of stormwater permits on a watershed-wide basis.									
		X	WA-7S SCAG shall support the development and implementation of public education and outreach efforts at the local level regarding watershed management for community leaders and educators. ~~In addition, SCAG will encourage the implementation of these policies at schools (K-12).~~									

Page: 61

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:44:19 PM

In some watersheds, the OCCOG notes that this will not be possible without the removal of significant amounts of existing development. If this initiative is to be included, it is suggested that the initiative should read "90 percent effective pervious surface equivalent to pre-development conditions" to indicate that other technologies can be used to capture stormwater and retain it on site, such as in cisterns.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 2:45:44 PM

Because there is not identification of this issue or reference to the public school system, it is suggested that the statement "SCAG will encourage the implementation of these policies at schools (K-12)" is out of context with the chapter. It is recommended, that because it does not add to the initiative, it be deleted or that text be added to the chapter to discuss what the initiative would entail and why it is needed.

This page contains no comments

Footnotes

1 State of California, Department of Finance, *Population Projections for California and Its Counties 2000-2050*. Sacramento, CA. July 2007.

2 Department of Water Resources, *California's Groundwater-Bulletin 118*. Update 2003. Located at http://www.groundwater.water.ca.gov/bulletin118/update2003/index.cfm

3 The acre-foot is a common measure of volume in discussions of water supply. An acre-foot (af) is the amount of water required to fill an acre-size area with one foot of water.

4 California Department of Water Resources, *Draft Bulletin 118*. Updated 2003.

5 Excerpted from Metropolitan Water District of Southern California, *The Regional Urban Water Management Plan*, November 2005.

6 One concern is that the use of recycled water for groundwater recharge could adversely impact groundwater quality due to the introduction of organic contaminants, metals and salts.

7 Excerpted from the Department of Water Resources Water Plan, Vol2, Ch. 18. 2005.

8 See www.cuwcc.org for more information about CUWCC and the MOU.

9 California Department of Water Resources, *Water Plan*. 1998. This estimate includes water used for agriculture.

10 According to the California Department of Water Resources *Management of the California State Water Project*, Bulletin 132-02, p.3, January 2004:"Although initial transportation facilities were essentially completed in 1973, other facilities have since been built, and still others are either under construction or are planned to be build as needed."

11 California Department of Water Resources, *Management of the California State Water Project*, Bulletin 132-2, p. xxix, January 2004.

12 In addition to saltwater intrusion from the San Francisco Bay, the Delta is also vulnerable to the collapse of aging levees. In June 2004, for example, a levee in the Jones Tract of the Delta failed, resulting in total inundation of the island and disrupting SWP operation.

13 For additional information about the CALFED Program, see http://www.calwater.ca.gov/.

14 The CRA has an annual capacity of 1.3 maf.

15 Some urban agencies also have the ability to enter "spot" water markets and to purchase water on an "as needed" basis.

16 Excerpted from Metropolitan Water District of Southern California, *The Regional Urban Water Management Plan*, pp II-21-23. November 2005.

17 Department of Water Resources, 2005 *Water Plan Update*, Vol. 1, Table 3-1, p. 3-9.

18 *Ibid.*, Chapter IV. 2005.

19 The Salton Sea, the largest inland body of water in California, was formed around 1906 when the Colorado River was accidentally diverted from its natural course. Presently, the Sea is fed by agricultural runoff from the Imperial Valley and Mexico and by the New River and the Alamo River. Without agricultural runoff the Salton Sea would dry up entirely.

20 Perchlorate interferes with the thyroid gland's ability to produce hormones required for normal growth and development.

21 Excerpted from the California Department of Water Resources, *California Water Plan Update* 2005. 2005.

22 The following sections are excerpted from Metropolitan Water District of Southern California, *The Regional Urban Water Management Plan*, Chapter IV. November 2005.

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Energy

This page contains no comments

Energy

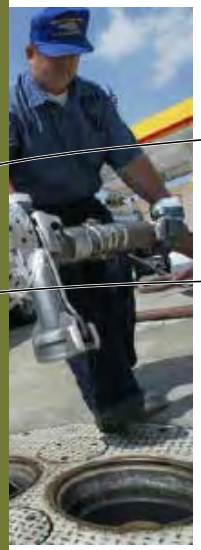
THE CHALLENGE

Clean, stable and sustainable sources of energy for Southern California are critical to supporting a healthy and resilient region. In developing future plans, SCAG must fully weigh and consider energy supply, efficiency, consumption, and environmental impacts such as greenhouse gas emissions. California relies on petroleum-based fuels for 96 percent of its transportation needs.[1] The SCAG region consumes over 23 million gallons of petroleum per day, roughly half of California's oil consumption[2] and vehicle fuel consumption in the region has increased 20 percent over the last ten years.[3] Furthermore, only 15 percent of the electricity consumed in the region is generated from renewable sources.[4] At the same time, SCAG forecasts significant growth in population, households, and jobs that will place new demands on energy production and increase pollution and greenhouse gases.

We live in an energy constrained world. Both environmental and geopolitical factors call into question the long term viability of a fossil fuel-based energy future. Concerns about global climate change have motivated action to move away from fossil fuels, while continued oil price fluctuations and supply constraints have helped raise awareness about the unsustainability of our dependence on imported petroleum.

The U.S. represents 5 percent of the world's population, but consumes 25 percent of the world's oil.[5] In addition, the U.S. Department of Energy forecasts that world energy consumption is projected to increase by 57 percent from 2004 to 2035 and that U.S. consumption of liquid fuels is projected to increase by 30 percent between 2005 and 2030, from 21 million barrels per day to 27 million barrels per day.[6] Most of the U.S. increase is anticipated in the transportation sector, which is projected to account for 73 percent of total liquid fuels consumption in 2030, up from 67 percent in 2005.[7]

At the same time, U.S. currently imports 58 percent of its petroleum and California imports approximately 40 percent of its petroleum. In California, oil production peaked in 1985. Since then, the share of oil from foreign imports has increased rapidly, from below 10 percent in 1995 to over 45 percent in 2006, as shown in **Figure 5.1**.[8] In 2005, California received 35 percent of its foreign imports from Saudi Arabia, 24 percent from Ecuador, and 12 percent from Iraq.[9] Globally, increasing demand from the large growth in the economies of India and China will further tighten world oil supplies. According to the U.S. Energy Information Agency, India has become the fifth largest consumer of oil in the world during 2006.[10] China



Page: 64

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:49:17 PM

Overall Comments: This chapter included a significant amount of useful and quality information. Comments are focussed on areas where it would be helpful to expand on information for the general reader and where more explanation is suggested.

1. The terms oil, liquid fuel, etc... are used interchangably throughout the chapter. Please define the terms and consistent terminology throughout the document; it is suggested that perhaps a glossary would be beneficial.

2. The links between the text of the chapter and the policies are weak. It is noted that the policies should address points made in the chapter.

3. There does not seem to be a difference between the initiatives or the policies. Please clarify or combine the two lists.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:50:53 PM

Please include the reasons why fuel consumption has increased. For example, is it per capita or overall? A per capita increase of 20% would be very significant, but an increase overall would be expected due to the growth in the state.

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 3:09:40 PM

Please insert the word "the"

Page: 65

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:51:43 PM
Because the word "Furthermore" also starts the following sentence, please consider a different conjunction - possibly "Additionally."

HOW ENERGY POLICIES PRODUCE MULTIPLE BENEFITS

Land Use and Housing: Decreasing the region's reliance on fossil fuels will reduce the need to build or expand refinery and delivery infrastructure, thereby reducing siting pressures and potential land use conflict with residential or other incompatible land uses.

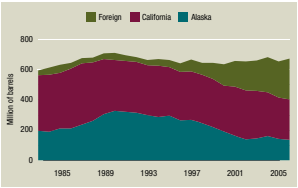
Open Space and Habitat: Energy policies encouraging mixed-use development with pedestrian corridors and bike trails can reduce fuel consumption, improve air quality, and promote an active lifestyle.

Water: In California, water related energy use consumes about 19% of the state's electricity, 30% of its natural gas, and 88 billion gallons of diesel fuel every year; and this demand is growing.

Air Quality: Energy policies that reduce our dependence on petroleum will benefit air quality. Electric vehicles produce only 6 percent of the air pollution generated by the cleanest on gas-powered cars.

Concerns about global climate change have motivated

FIGURE 5.1
Oil Supply Sources in California



Source: California Energy Commission

is the world's most populous country and the second largest energy consumer behind the United States.[11]

There are additional concerns that the nation's dependence on oil, especially from the Persian Gulf, requires a U.S. military presence, with all of its associated economic and social costs.[12] Oil production could be shut down by wars, strikes, and other political events in many countries with proven oil reserves. For example, the countries of Iran, Iraq, Nigeria and Venezuela contain one-third of worldwide reserves but face high levels of political risk. Furthermore, countries defined as having medium to high levels of political risk held 63 percent of proven worldwide oil reserves.[13]

Furthermore, much of the oil remaining in the ground can only be accessed by using complex and costly technologies that present greater environmental challenges than previous technologies used for most of the oil produced to date. Enhanced oil recovery technologies are much costlier than conventional production methods and increase greenhouse gas emissions due to the additional energy required to perform the tasks.

Oil is a finite and non-renewable resource and it is uncertain how future energy consumption trends will be sustained with the current political, environmental and technological constraints. Our nation's reliance on petroleum for our energy needs is even more problematic because of the global trend toward an inevitable turning point–"peak oil"–the peak and then decline of global oil production. Peak oil is the point of maximum oil production whether from a single well, a country, or the planet as a whole. The maximum point of production is expected to happen when about half or slightly more of the ultimately recoverable oil has been produced. To be clear, peaking does not mean "running out." Rather, it indicates the point where global production can no longer be maintained or increased. Production will begin to decline, year after year. Geophysicist M. King Hubbert correctly predicted the 1971 peak in U.S. oil production as shown in **Figure 5.2** and further predicted that sometime between 2005 and 2025, world oil production would reach a peak and begin a sharp decline.[14]

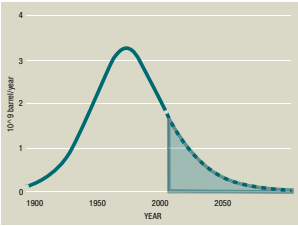
A fundamental problem in predicting oil peaking is the poor quality of and possible political biases in world oil reserves

Page: 66

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:52:24 PM
It is noted that this seems to be a significant statement. It is suggested that it be moved up in the text in order to provide it with more emphasis.

action to move away from fossil fuels.

FIGURE 5.2
U.S. Crude Oil Production Projection



Source: Energy Information Administration, Department of Energy

data. The recent range of estimates varies from late 2005 to a belief that it will never happen. For example, the International Energy Agency reported in July 2007 that the world will face an oil supply "crunch" in the next five years.[15] Most estimates are based on different geological assumptions and investments in expanded oil production. This wide range of peak oil forecasts presents a very difficult dilemma for policy makers. On one hand, action could be delayed until there is a consensus from scientists; however that is unlikely given the strongly held divergent views. On the other hand, waiting to take action could prove costly and result in severe consequences. Initiating a move toward conservation, efficiency, demand reduction and renewables 20 years before peaking would offer the possibility of avoiding a world liquid fuels shortfall and significant economic hardship.[16]

The world supply crunch will impact the SCAG region. A fuel shortage will take a toll on California's economy as consumers are spending more of their household income on gasoline than ever before, particularly with development patterns that create long commutes without access to public transportation. High fuel prices also reduce profit margins for the manufacturing and industrial sectors, which pass the higher cost of their goods and services to consumers. Since September of 2004, the monthly average price of gasoline has increased by more than 35 cents per gallon, costing consumers an additional $6.1 billion for gasoline.[17]

There is also a tightening of natural gas markets due to decreasing supplies and growing demand for natural gas, which makes up 25 percent of the nation's energy use and is by comparison, a relatively clean source of electricity compared to sources such as coal. The U.S. and California will lose a major source of natural gas imports by 2010 due to the decline of Canada's largest producing basin, the Western Sedimentary Basin, coupled with an approximately 2 percent projected average annual growth in Canada's domestic consumption.[18] Although some research has shown a world peak in natural gas occurring a decade after oil, the U.S. and California could experience the effects sooner. For example, natural gas has become the preferred source of electricity generation, supplying over 40 percent of California's power.[19] Also, unlike oil, it

HOW ENERGY POLICIES PRODUCE MULTIPLE BENEFITS

Solid Waste: Energy policies that promote renewable energy generation have the ability to increase the use of waste materials, such as biomass, for energy production.

Transportation: As our region becomes more energy-efficient, the transportation impacts of accommodating a growing energy infrastructure are reduced.

Security and Emergency Preparedness: Energy policies that reduce petroleum consumption could reduce our vulnerability to external disruptions and geopolitical instability.

Economy: A study found that a 35 mpg vehicle fleet would create as many as 170,800 jobs in 2020 including 22,300 in the auto industry and save consumers nearly $25 billion on gasoline with average prices at $2.55 per gallon. The increase in fuel efficiency would also decrease the demand for oil in the U.S. by close to 2.5 million barrels of oil per day.

Continued oil price fluctuations have raised awareness

is more difficult and expensive to import replacement natural gas from overseas – as it has to be liquefied for transport and then re-gasified for distribution.[20] An increase in natural gas prices would negatively affect the economy, potentially leading to reduced sales and employment.[21]

In addition to the uncertainty regarding fossil fuels supplies, there is also uncertainty about how climate change will alter economies and ecosystems at the global, regional and local levels. Transportation is the largest source of greenhouse gas emissions in California (41 percent). In 2004, California produced 492 million gross metric tons of carbon dioxide-equivalent GHG emissions, including imported electricity and excluding combustion of international fuels and carbon sinks or storage.[22] Climate change poses serious risks to our economy, water supply, biodiversity, and public health.

These potentially catastrophic impacts have led to new local and state efforts to reduce the amount of greenhouse gas emissions released into the atmosphere. AB 32 or the Global Warming Solutions Act, requires reducing the state's greenhouse gas (GHG) emissions to 1990 levels by 2020, equal to a 25 percent reduction from current levels. Longer term targets have also been set through Executive Order S-3-05, which calls for reducing GHG emissions to 80 percent below 1990 levels by 2050.

The demand for oil must decline at a similar rate of production in order to avert economic and social consequences of increased prices. If oil and gas become scarce and expensive, it will have profound implications for our economy and way of life.[23] A recent study funded by the U.S. Department of Energy determined that viable mitigation options exist but must be initiated more than a decade in advance to avoid severe economic disruptions.[24]

THE PLAN

The RCP lays out a strategy to reverse the current trends and diversify our energy supplies to create clean, stable, and sustainable sources of energy that address energy uncertainty and environmental health. This plan includes strategies that the region can take to reduce fossil fuel consumption and increase the use of clean, renewable technologies. SCAG will continue to work with stakeholders at the federal, state, regional and local levels to promote these policies and encourage their implementation. However, leadership is needed to coordinate and provide an ongoing forum for local and regional programs to implement an energy savings program.

As stated in the *2006 State of the Region*, we can prepare for these inevitable energy challenges by encouraging community participation, reinvesting in public transportation, and revising land use, zoning and building codes to optimize the consumption of our energy resources. There are numerous strategies that the public sector can undertake to address our energy challenges. These make up the bulk of the proposed Action Plan to promote a more sustainable energy supply.

Page: 67

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 2:54:56 PM

Please expand this discussion to address the uncertainties of how climate change will alter economies and ecosystems in terms of the state, then the region, then the local governments impacts.

It is suggested that the paragraph also note that the information at a local/local government level may be different jurisdiction to jurisdiction.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:01:38 PM

Please provide additional background regarding the 41% of greenhouse gas emissions as this is not consistent with the most recent data released by the California Air Resources Board which indicates that it is about 38% (please see CARB's 2004 Greenhouse Emissions by Sector at http://www.arb.ca.gov/cc/inventory/data/graph/graph.htm).

Please include clarification in the text about all of the sources included in this sector. For example, it would be helpful if the statement identified if the percentage cited includes only automobiles and light trucks or does it also include other transportation sectors such as trucks, trains, planes, ships, etc...

It is suggested that a pie chart showing all of the sources and how it illustrates that the 41% comes from "transportation" would be helpful to illustrate the extent of this issue.

It is also suggested that a section focussing on actions that can be implemented by local governments would be helpful as well. While transportation is one sector to focus on, green building may be a more effective solution to GHG emissions because it is the most cost effective way to address an individual's carbon footprint for new construction that local agencies can directly implement. Albeit this does not necessarily address existing development, it can include redevelopment or retrofit standards.

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 3:14:00 PM

Please insert the words "single source"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:06:02 PM

Comments from page 67 continued on next page

Please add a section strongly linking the data that supports the reasons for the significant policy changes identified. Specifically, "revising land use, zoning, and building codes to optimize the consumption of our energy resources" should be discussed in context of meeting the wide variety of state and federal requirements these implementation tools are required to meet. It is also suggested that the paragraph include text identifying the significant revisions to state law, including the building code that are anticipated to address this issue.

Continued oil price fluctuations have raised awareness

HOW ENERGY POLICIES PRODUCE MULTIPLE BENEFITS

Solid Waste: Energy policies that promote renewable energy generation have the ability to increase the use of waste materials, such as biomass, for energy production.

Transportation: As our region becomes more energy-efficient, the transportation impacts of accommodating a growing energy infrastructure are reduced.

Security and Emergency Preparedness: Energy policies that reduce petroleum consumption could reduce our vulnerability to external disruptions and geopolitical instability.

Economy: A study found that a 35 mpg vehicle fleet would create as many as 170,800 jobs in 2020 including 22,300 in the auto industry and save consumers nearly $25 billion on gasoline with average prices at $2.55 per gallon. The increase in fuel efficiency would also decrease the demand for oil in the U.S. by close to 2.5 million barrels of oil per day.

is more difficult and expensive to import replacement natural gas from overseas – as it has to be liquefied for transport and then re-gasified for distribution.[20] An increase in natural gas prices would negatively affect the economy, potentially leading to reduced sales and employment.[21]

In addition to the uncertainty regarding fossil fuels supplies, there is also uncertainty about how climate change will alter economies and ecosystems at the global, regional and local levels. Transportation is the largest source of greenhouse gas emissions in California (41 percent). In 2004, California produced 492 million gross metric tons of carbon dioxide-equivalent GHG emissions, including imported electricity and excluding combustion of international fuels and carbon sinks or storage.[22] Climate change poses serious risks to our economy, water supply, biodiversity, and public health.

These potentially catastrophic impacts have led to new local and state efforts to reduce the amount of greenhouse gas emissions released into the atmosphere. AB 32 or the Global Warming Solutions Act, requires reducing the state's greenhouse gas (GHG) emissions to 1990 levels by 2020, equal to a 25 percent reduction from current levels. Longer term targets have also been set through Executive Order S-3-05, which calls for reducing GHG emissions to 80 percent below 1990 levels by 2050.

The demand for oil must decline at a similar rate of production in order to avert economic and social consequences of increased prices. If oil and gas become scarce and expensive, it will have profound implications for our economy and way of life.[23] A recent study funded by the U.S. Department of Energy determined that viable mitigation options exist but must be initiated more than a decade in advance to avoid severe economic disruptions.[24]

THE PLAN

The RCP lays out a strategy to reverse the current trends and diversify our energy supplies to create clean, stable, and sustainable sources of energy that address energy uncertainty and environmental health. This plan includes strategies that the region can take to reduce fossil fuel consumption and increase the use of clean, renewable technologies. SCAG will continue to work with stakeholders at the federal, state, regional and local levels to promote these policies and encourage their implementation. However, leadership is needed to coordinate and provide an ongoing forum for local and regional programs to implement an energy savings program.

As stated in the *2006 State of the Region*, we can prepare for these inevitable energy challenges by encouraging community participation, reinvesting in public transportation, and revising land use, zoning and building codes to optimize the consumption of our energy resources. There are numerous strategies that the public sector can undertake to address our energy challenges. These make up the bulk of the proposed Action Plan to promote a more sustainable energy supply.

about our dependence on imported petroleum.

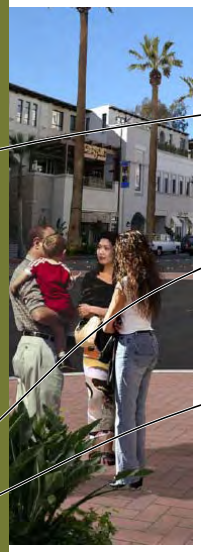
Land Use and Building Design

Strategies to reduce energy consumption include both where development occurs and how it is designed. Land use patterns have shaped energy use by increasing the amount of travel necessary to reach jobs and services. This growth pattern has resulted in an increase in vehicle miles traveled (VMT) at a rate of more than 3 percent a year between 1975 and 2004.[25] Building design and housing types also have a strong relationship to energy use and are thus, a strong focus of this chapter. For example, residents of single family detached housing have been found to consume 22 percent more energy than those of multifamily housing and 9 percent more than those of single-family attached housing.[26] SCAG has commissioned research to identify effective strategies to reduce energy use, with an emphasis on land use. The discussion that follows is a summary of the findings.

Mixed land use (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation has been shown to save consumers up to 512 gallons of gasoline per year. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods.[27] With this reduction, there is less overall energy consumption and less greenhouse gas emissions from personal vehicles. Going hand-in-hand with mixed-use development, is the development of pedestrian corridors and bike trails that connect residents to work sites, shops, and recreational opportunities, which can also realize a reduction of personal vehicle use and fuel consumption.

Neighborhood energy systems allow communities to generate their own electricity and offer potential advantages such as cost reductions and energy savings up to 40 percent. Micro-grids are a subset of community-based distributed generation (DG) or combined heating and power (CHP) systems that focus on power quality and reliability. Micro-grids are used in communities (often industrial parks) that require higher electric reliability and higher power quality than can be provided by the electric utility. Rather than invest in systems for individual buildings or businesses, the community pools resources and shares the benefits of the community-based system. Generally, micro-grids include DG and power conditioning, but may also include energy storage, CHP, and/or renewables.

Orienting streets and buildings for best solar access could significantly reduce energy requirements throughout the life of a building. Streets should be designed to take advantage of passive solar heating and most buildings should be oriented such that the long axis runs east/west. The southern most face of the building should face within 30 degrees of south (See **Figure 5.3**). Also, strategically planting trees on a residential property can reduce attic temperatures up to 20 degrees Fahrenheit and wall temperatures up to 15 degrees Fahrenheit on a sunny summer day as well as reduce air conditioning costs up to 20 percent. The trees absorb numerous pollutants (dust, ash, pollen, smoke), remove carbon from carbon dioxide (CO_2) and release oxygen. They also trap and hold up to 50 gallons of water (each) reducing storm water runoff, increasing water filtration in the ground, reducing soil erosion, and requiring



Page: 68

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:07:50 PM

Because of the significance of these two topics - land use and building design - it is suggested that they be separated these two items into distinct discussions. It is noted that they are two significantly different areas that require different actions. There are different levels of control (builder vs. developer vs. local government) and each has a different set of actions that could be implemented.

It is recommended that this section be restructured to indicate where the control over a specific protocol or item lies (eg. is it something that local government has the greatest control over or the developer or the individual?) Because you can influence people's choices but not force them to change, this will provide the framework to identify those actions that will result in the most significant direct benefit and that can be implemented by the most appropriate agency/individual.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:08:00 PM

Please restate to emphasize that while more research is needed, SCAG is being proactive in identifying effective strategies to meet the issues identified in this chapter.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:08:36 PM

It is noted that landscaping is a specific action that local governments could affect both directly and through site design standards but it is not emphasized. It could be a very effective means to address energy efficiency and therefore the discussion should perhaps be expanded.

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 3:20:25 PM

Please clarify if this is an extreme or based on an average in the SCAG region.

This page contains no comments

The region must become more energy efficient through

HOW ENERGY POLICIES PRODUCE MULTIPLE BENEFITS

Public Health: A South Coast AQMD study found that diesel-based particulate emissions from trucks, ships, and locomotives account for over 80 percent of the toxic air pollution risk in Southern California.

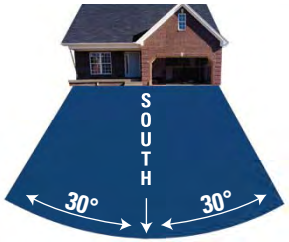
Environmental Justice: Refineries that produce diesel and gasoline fuel from crude oil are often located in low income and minority neighborhoods. Shifting from petroleum-based energy to renewable sources can reduce the need to build or expand energy facilities.

Climate Change: Reducing energy consumption will substantially reduce greenhouse gas emissions. Improving energy efficiency and using renewable energy sources can slow the rate at which we need to build power plants, which are major point sources of greenhouse gases.

minimal watering when mature. Total present value benefits, including energy, environmental and aesthetics are estimated at $1,399,776,270 or roughly $699.89 per tree.[28]

Green buildings can significantly reduce local environmental impacts, regional air pollutant emissions and global greenhouse gas emissions. Green building standards involve everything from energy efficiency, usage of renewable resources and reduced waste generation and water usage. For example, water-related energy use consumes 19 percent of the state's electricity. Furthermore, the residential sector accounts for 48 percent of both the electricity and natural gas consumption associated with urban water use.[29] While interest in green buildings has been growing for some time, cost has been a main consideration as it may cost more up front to provide energy-efficient building components and systems. Initial costs can be a hurdle even when the installed systems will save money over the life of the building. Energy efficiency measures can reduce initial costs, for example, by reducing the need for over-sized air conditioners to keep buildings comfortable. Undertaking a more comprehensive design approach to building sustainability can also save initial costs through reuse of building materials and other means.

FIGURE 5.3
Orienting Buildings for Best Solar Access



A comprehensive and persuasive study of the value of green building savings is the 2003 report to California's Sustainable Building Task Force. In the words of the report:

> "While the environmental and human health benefits of green building have been widely recognized, this comprehensive report confirms that minimal increases in upfront costs of about 2 percent to support green design would, on average, result in life cycle savings of 20 percent of total construction costs – more than ten times the initial investment. For example, an initial upfront investment of up to $100,000 to incorporate green building features into a $5 million project would result in a savings of $1 million in today's dollars over the life of the building."[30]

technology, pricing, and growth decisions.

Alternative Fuels

Alternatives to petroleum and infrastructure will be needed for the SCAG region to achieve the ambitious performance outcome of reducing fossil fuel use 25 percent below 1990 levels by 2020. California's leadership on research and development of alternative transportation fuels will help the SCAG region meet these goals. For example, Assembly Bill 1007 provides a comprehensive framework to examine broad transportation fuel issues and effectively integrate transportation energy and air quality policies. The California Energy Commission (CEC) and California Air Resources Board (ARB) also are analyzing numerous options to reduce the use of conventional transportation, which will assist the SCAG region as it grapples with our transportation energy future.

Each alternative fuel has costs, benefits and performance characteristics that will define its effectiveness as a replacement to petroleum. For example, the CEC's 2005 Integrated Energy Policy Report offers a glimpse into the challenges ahead for replacing fossil fuels with alternatives. For example, an increase in the amount of ethanol in gasoline would result in a loss of fuel economy and require motorists to purchase more gasoline since E-85 contains almost 30 percent less energy than gasoline.[32] These energy challenges will force the region to become more energy efficient through technology enhancements, pricing mechanisms, and integrating land use and transportation decisions.

Renewable Energy

Additional efforts will be needed to reach SCAG's performance outcome of 20 percent renewable energy supply by 2010 and its longer term goal of 30 percent by 2020.[33] Of the electricity consumed in the SCAG region in 2006, an average of 7 percent was generated from eligible renewables. By comparison, 10 percent of the electricity produced in California was renewable.[34] The CEC recommends various opportunities to expand the renewable energy mix such as adopting clear and consistent policies for sustainable biomass development, taking advantage of California's abundant solar energy resources, and tapping into distributed generation and combined heat and power facilities. California has the potential to produce ethanol from cellulosic biomass material such as municipal, agricultural, and forestry wastes. Solar offers a clean, renewable and reliable energy sources. The California Solar Initiative offers incentives and funding for solar installations in an effort to create 3,000 megawatts of new solar-produced electricity by 2017. Distributed generation also offers an option to central station fossil-fueled generation since it is produced on site and connected to a utility's distribution system. The most efficient and cost-effective form of distributed generation is cogeneration or combined heat and power, which recycles waste heat. These technologies help customers become energy independent and protect them from supply outages and brownouts. SCAG will continue to monitor the development of these renewable resource opportunities as well as track their costs and benefits.

Page: 70

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:09:40 PM
Please include a section describing clearly what CARB or other state agencies require or are expected to require relative to this statement about the percentages of renewable energy to be provided by energy providers.

Author: Tsato
Subject: Highlight
Date: 7/20/2008 3:11:05 PM
Please define where this goal comes from? It seems to be an application of the greenhouse gas emissions reductions from AB 32. However, there is no discussion of why this level was chosen for the reduction of fossil fuel use. What would the resultant reduction in GHG emissions be from this reduction in fossil fuels? If the emphasis is to address peak oil and the need to reduce the reliance on fossil fuels for energy, then it is suggested that the sentence should be stated as such and use a standard such as that for renewable energy. The backdating to 1990 levels is confusing.

Further, it is suggested that a discussion of how fossil fuel is used in the state and region would be helpful. A pie chart indicating total fossil fuel consumption and how it is used would be appropriate (e.g. for transportation, home energy, commercial/industrial, etc...)

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 3:21:47 PM
Please reference this to the requirements established by State law.

ELECTRICITY AND TRANSPORTATION

The use of electricity as a transportation fuel for transit, automobiles and goods movement reduces air emissions ARB has estimated that electric vehicles produce only about 6 percent of the air pollution of the cleanest new internal combustion cars available today. The number of electric transportation and goods movement technologies is expected to triple by 2020 to between 900,000 and 1 million units due to known regulatory requirements and financial incentive programs that encourage the use of electric technologies because of their inherent emissions benefits.[31]

Leadership is needed to address our energy challenges

Public Transportation

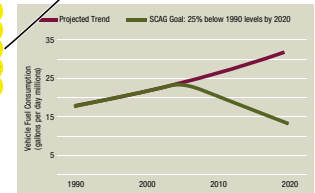
As identified in the *2006 State of the Region*, total transit boardings in the region in fiscal year 2005 increased by 16 percent from 617 million to a record high of 672 million. Nationally, transit boardings also increased at a faster rate than the population. This shift is good news since increases in public transit ridership can proportionately reduce VMT, congestion, fuel consumption and improve air quality. A recent study on public transportation found that current public transit use reduces U.S. gasoline consumption by 1.4 billion gallons each year. In a "growth scenario," the study assumed that ridership would double over current levels due to expanded transit systems, new routes, and improved land use patterns. It concluded that the total national fuel savings from public transportation would double from current savings and would equal 2.8 billion gallons per year.[32] SCAG has the opportunity to influence future fuel demand by increased funding of public transportation in the Regional Transportation Plan (RTP), which integrates the transportation plans of all of the cities and counties within the region. By prioritizing funding priorities for energy efficient transportation projects, the region can begin to reduce petroleum demand and increase air quality.

Reversing the Trend

Leadership is needed to coordinate and provide an ongoing forum for local and regional programs to address our energy challenges and reverse our unsustainable dependence on fossil fuels. As shown in the graphic below, SCAG can lead the way by establishing actions that the region can take to reduce fossil fuel consumption and increase the use of clean, renewable technologies. SCAG will continue to work with stakeholders at the federal, state, regional and local levels to promote these policies and encourage their implementation. The remainder of this chapter will identify how to reverse the current trends and become less dependent on fossil fuels.

FIGURE 5.4

SCAG Vehicle Fuel Consumption: Reversing the Trends



Source: California Department of Transportation and SCAG

Page: 71

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:12:28 PM

This implies that SCAG could be in the place, ahead of other agencies, of establishing actions to reduce fossil fuel consumption. This does not recognize the significant work efforts that are being undertaken by other more direct point sources of greenhouse gas emissions, such as within the electric utility industry or directly by the state in regulating the fuel standards for vehicles. It is suggested that the text should note that SCAG is not an implementing agency.

The OCCOG recognizes that SCAG could act in the realm of identifying strategies that could be implemented by others. It is recommended that this section be re-worded to indicate the actual role that SCAG should play in the realm of the energy challenges (i.e. such as to implement state and federal requirements).

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:13:52 PM

It is noted that this statement does not recognize the significant efforts already being taken throughout the region by some local governments, utilities, etc... As such, it is recommended that the section clearly identify what SCAG is doing that goes above and beyond what the state is requiring and then clearly identify what the State is requiring various agencies to do. It would also be helpful to recognize what some agencies are already doing.

Further, these sentences imply that SCAG has the authority to increase funding for public transportation as opposed to encouraging it. Please include clarification in the text to clearly indicate who can do what (include CTC's in the statements.)

Finally, please identify the types of programs and actions that will be undertaken to implement an increase in funding for public transportation.

and reverse our dependence on fossil fuels.

ENERGY GOALS

- Reduce our region's consumption of non-renewable energy by:
  - Supplying the energy needs of the region today in a way that reduces the negative environmental impacts, social inequities, and economic hardship on future generations;
  - Developing the infrastructure and social capital to adapt to a future energy economy with a constrained supply.
- Increase the share of renewable energy in the region by:
  - Ensuring the resiliency of the region's economy by encouraging and supporting renewable energy infrastructure; and
  - Developing renewable energy sources that reduce the amount of air emissions emitted through the combustion of fossil fuels

ENERGY OUTCOMES

- Decrease the region's consumption of fossil fuels 25 percent from 1990 levels by 2020.
- Increase the share of renewable energy generation in the region to 20 percent by 2010, with additional increases to reach 30 percent by 2020.

Page: 72

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:14:31 PM
See previous comments about rewording the outcome to "decrease the region's consumption of fossil fuels to 25 percent from 1990 levels by 2020." The language that results from the development of the supporting information should then replace this outcome.

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 3:32:35 PM
Please insert "consistent with state law"

ENERGY

ENERGY ACTION PLAN

Tech/Best Practices	Legislation	Constitution	Constrained Policies	Potential for Direct/Indirect Benefits								Other Benefits	
				Land Use	Transportation	Air Quality	Water	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	EN-1. SCAG shall continue to work with the State to develop approaches for evaluating environmental impacts within the Compass Blueprint program, particularly energy, air quality, water, and open space and habitat.[7]	X	X	X	X	X	X			X	X
X			EN-2. 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.	X	X	X	X	X	X		X	X	X
		X	EN-3. SCAG shall continue to pursue partnerships with Southern California Edison, municipal utilities, and the California Public Utilities Commission to promote energy efficiency and reduce greenhouse gas emissions in the region.			X			X			X	X
		X	EN-4. SCAG shall continue to convene key decision makers to discuss energy issues and make recommendations to SCAG's Energy and Environment Committee, where appropriate.	X	X	X					X	X	X
		X	EN-5. SCAG shall convene key stakeholders to evaluate and where feasible, recommend transportation measures such as congestion pricing, a transitional regional goods movement system and an environmental mitigation strategy that reduces fossil fuel consumption and uses non fuel combustion technologies.	X	X	X			X				X
		X	EN-6. SCAG shall monitor and provide input towards development of state energy projections and tools, including the Integrated Energy Policy Report and similar policy documents as well as future efforts to determine the implications of energy generation and consumption for the built environment.	X	X	X						X	X
	X		EN-7. SCAG shall encourage credits for clean post recycle conversion technologies to produce energy or for technologies that offset energy use or emissions.		X	X			X		X	X	X
Local Government Policies													
X			EN-8. Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips.[8]	X	X	X	X	X	X		X	X	X
X			EN-9. Local governments should include energy analyses in environmental documentation and general plans with the goal of conserving energy through the wise and efficient use of energy. For any identified energy impacts, appropriate mitigation measures should be developed and monitored. SCAG recommends the use of Appendix F, Energy Conservation, of the California Environmental Quality Act.	X	X	X			X			X	X

73

Page: 73

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:15:20 PM
The linkage between the text of the chapter and the identified policies and initiatives is not clear. It is recommended that the text of the chapter be strengthened in order for the reader to understand the reasons for the policies listed.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:16:25 PM
The OCCOG observes that the State is already engaged in work efforts to develop energy efficiency and green building guidance; thus, SCAG's efforts in the area would appear to be duplicative of those efforts. It is suggested that an appropriate role for SCAG could be to serve as a clearinghouse for the information and to provide assistance to member agencies to navigate the information from the state.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:17:47 PM
The OCCOG observes that the promotion of energy efficiency and reduction of greenhouse gases by utilities in the SCAG region is already underway and notes that it appears this action is duplicative of those many efforts already underway . It is recommended that this policy be reworded to reflect that SCAG could provide a forum for these regional discussions as opposed to pursuing a partnership with the agencies.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:18:32 PM
The OCCOG observes that this policy appears to be from the solid waste chapter and asks if it was intended to identify reduced VMT?

IGR/Best Practices	Legislation	Constitution	Constrained Policies	Potential for Direct/Indirect Benefits								Other Benefits	
				Land Use	Transportation	Air Quality	Water	Open Space	Economy	Equity	Solid Waste	Public Health	Climate Change
x			EN-10. Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. ~~Energy saving measures that should be explored for new and remodeled buildings include:~~ ~~• Using energy efficient materials in building design, construction, rehabilitation, and retrofit~~ ~~• Encouraging new development to exceed Title 24 energy efficiency requirements.~~ ~~• Developing Cool Communities measures including tree planting and light colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment.~~ ~~• Utilizing efficient commercial/residential space and water heaters. This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits.~~ ~~• Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants or reduce water usage up to 60 percent compared to traditional lawns.~~ ~~• Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings.~~ ~~• Encouraging neighborhood energy systems, which allow communities to generate their own electricity~~ ~~• Orienting streets and buildings for best solar access.~~ ~~• Encouraging buildings to obtain at least 20% of their electric load from renewable energy.~~	x	x	x	x	x	x		x	x	x
x			EN-11. Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. ~~Any infrastructure improvements necessary for project construction shall be completed according to the specifications of the energy provider.~~	x		x							x
x			EN-12. Developers and local governments should encourage that new buildings are able to ~~incorporate solar panels in roofing and~~ tap other renewable energy sources to offset new demand on conventional power sources.	x		x			x				x
x			~~EN-13. Local governments should support only the use of the best available technology including monitoring, air, and water impacts for locating any nuclear waste facility.~~			x	x			x		x	
x			EN-14. Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.		x	x			x				x
x			EN-15. Utilities and local governments should consider the most cost-effective alternative and renewable energy generation facilities.	x		x			x		x	x	x

Page: 74

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 3:38:00 PM
Please delete and discuss these examples in the text of the chapter. It is not necessary to include these specific actions in the policy statement.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 3:18:59 PM
Please delete this statement. This is typically already done and thus not necessary to include in the constrained policies. Specifically, it is already a requirement to do so for significant energy users.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 3:20:30 PM
Please delete the text "incorporate solar panels in roofing and" as it is limiting to the technology. The policy is more meaningful if a broader set of technologies can be applied to its implementation.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 3:20:50 PM
Monitoring of nuclear facilities is a federal issue. It is requested that this policy be reworded to recognize this or be deleted.

ENERGY

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits: Land Use	Transportation	Air Quality	Water	Open Space	Economy	Equity	Solid Waste	Other Benefits: Public Health	Climate Change
X			EN-16. Local governments should consider various best practices and technological improvements that can reduce the consumption of fossil fuels ~~such as:~~ ~~• SCAG shall encourage investment in transit, including electrified light rail~~ ~~• Expanding light-duty vehicle retirement programs~~ ~~• Increasing commercial vehicle fleet modernization~~ ~~• Implementing driver training module on fuel consumption~~ ~~• Replacing gasoline powered mowers with electric mowers~~ ~~• Reducing idling from construction equipment~~ ~~• Incentivizing alternative fuel vehicles and equipment~~ ~~• Developing infrastructure for alternative fueled vehicles~~ ~~• Increasing use and mileage of High Occupancy Vehicle (HOV), High Occupancy Toll (HOT) and dedicated Bus Rapid Transit (BRT) lanes~~ ~~• Implementing truck idling rule, devices, and truck stop electrification~~ ~~• Requiring electric truck refrigerator units~~ ~~• Reducing locomotives fuel use~~ ~~• Modernizing older off-road engines and equipment~~ ~~• Implementing cold ironing at ports~~ ~~• Encouraging freight mode shift~~ ~~• Limit use and develop fleet rules for construction equipment~~ ~~• Requiring zero-emission forklifts~~ ~~• Developing landside port strategy: alternative fuels, clean engines, electrification~~		X	X		X			X	X
X			EN-17. The project implementation agency should consider increasing capacity of existing transmission lines, where feasible.	X		X		X			X	X	
X			EN-18. The project implementation agency should install and maintain California Best Available Control Technologies on all power plants at the US-Mexico border.			X	X					X	X
		X	EN-19. Subregional and local governments should explore participation in energy efficiency programs provided by their local utility ~~such as the Ventura Regional Energy Office, South Bay Energy Savings Center, and the San Gabriel Valley Energy Wise program. These programs can offer customized incentives and public awareness campaigns to reduce energy consumption.~~			X			X				X

Page: 75

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 3:21:08 PM
Local governments does not have the purview over many of the items listed. Indeed, the first bullet point refers to an action of SCAG and not a local government. It is suggested that the language is cleaner without listing the detail; therefore, it is requested that it be deleted.

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 3:51:35 PM
Please clearly identify the implementing agency in this policy.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:21:29 PM
Please clearly identify the appropriate implementation agency. Most project implementation agencies will not have the purview over this and this implies that local governments or all public utilities have purview, which is not the case.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 3:22:02 PM
Please delete as the language is unnecessary. Further, the OCCOG observes that the statement does not recognize that there are many activities already undertaken throughout the region and implies that there are not many in the region. While the programs listed should be celebrated, if these specific programs are to be recognized in the policy statement, it should further recognize that there are numerous other programs in the region.

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits								Other Benefits	
				Land Use	Transportation	Air Quality	Water	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)													
		X	EN-1S: SCAG shall consider energy uncertainty into its future planning and programming, including the Regional Transportation Plan and the Regional Transportation Improvement Program.	X	X	X			X	X		X	X
		X	EN-2S: SCAG shall continue to develop, in coordination with the California Air Resources Board, a data and information collection and analysis system that provides an understanding of the energy demand and greenhouse gas emissions in the SCAG Region.	X	X	X	X					X	X
Federal and State Government Strategies													
	X		EN-3S: The Secretary of Energy, in coordination with other relevant federal agencies, should establish a peak oil strategy to better prepare the United States for a peak and decline in oil production. Such a strategy should include efforts to reduce uncertainty about the timing of a peak in oil production and provide timely advice to Congress about cost-effective measures to mitigate the potential consequences of a peak.		X	X			X	X	X	X	X
	X		EN-4S: The Federal Government should increase Corporate Average Fuel Economy (CAFE) to a level that will reduce our dependence on foreign oil and reduce greenhouse gas emissions.	X	X	X			X	X	X	X	X
	X		EN-5S: The Federal Government should develop a national consensus on alternative fuel research and development.		X	X			X	X	X	X	X
	X		EN-6S: As recommended by the California Energy Commission, the state should continue to fund the Blueprint Planning Grant program and Blueprint Learning Network to assist regional agencies and local governments in developing regional growth plans. The grant program should include energy consumption and greenhouse gas emission reduction as primary outcomes of the blueprints developed within the program. Technical and funding assistance for local governments should be included in this.	X	X	X			X			X	X
	X		EN-7S: The Federal and State Government should promote clean, cost-effective, reliable, domestic renewable energy generation, such as solar power and wind turbines.		X	X			X	X		X	X
	X		EN-8S: State and federal lawmakers and regulatory agencies should pursue the design of programs to either require or incentivize the expanded availability and use of alternative-fuel vehicles to reduce the impact of shifts in petroleum fuel supply and price.		X	X			X	X		X	X
	X		EN-9S: The State and Federal governments should encourage mileage-based vehicle insurance as a voluntary program.		X	X			X				
Local Government Strategies													
X			EN-10S: Local governments should alter zoning to improve jobs/housing balance and creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel.*	X	X	X		X	X			X	X

Page: 76

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:24:04 PM
This initiative states that "SCAG shall consider energy uncertainty into its future planning and programming including the Regional Transportation Plan and the Regional Transportation Improvement Program." The OCCOG observes that is a very significant initiative that could impact all agencies the are involved with and subject to the RTP and RTIP. Please include an explanation of why this would be placed in a federally mandated document.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:25:35 PM
Please clarify why SCAG would undertake actions to analyze greenhouse gas emissions in the region? It is suggested that clarification be provided to discuss whether this would, for example, be in conjunction with SCAQMD? If so, it should state who is participating.

Further, this identifies a need to expand SCAG's modeling capabilities to include greenhouse gas emissions. Please provide more information on whether this was the intent and, if so, what the work effort would be to implement such an initiative.

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 3:49:50 PM
Please restate such that these are actions that can be undertaken by agencies that would use this document as opposed to providing direction to agencies that do not fall under the SCAG region. For example, SCAG shall support each policy.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:27:29 PM
The policy implies that individuals will make a job and housing choice that will reduce energy consumption if only zoning were altered. Further, the OCCOG observes that the policy does not address the fact that only a small percentage of overall trips are work/home trips, as has been identified by SCAG. It is recommended that this policy recognize these factors.

This page contains no comments

Resources

- Go Solar California: http://www.gosolarcalifornia.ca.gov
- Southern California Edison, Energy Efficiency Incentives: http://www.sce.com/RebatesandSavings
- Southern California Gas Company, Energy Efficiency Incentives: http://www.socalgas.com/energyefficiency/
- Federal Tax Incentives for Energy Efficiency: http://www.energystar.gov/

Footnotes

[1] California Environmental Protection Agency (3 April 2006), Climate Action Team Report to Governor Schwarzenegger and the Legislature.
[2] California Department of Transportation, Division of Transportation System Information. (December 2006). California Motor Vehicle Stock, Travel and Fuel Forecast.
[3] California Energy Commission, (September 2005) California Energy Demand 2006-2016 Staff Energy Demand Forecast 2005, CEC-400-2005-034-SF-ED2
[4] Southern California Association of Governments. State of the Region 2006.
[5] United States Census Bureau and United States Energy Information Agency, Basic Petroleum Statistics, (October 2006). Retrieved June 5, 2007 from http://www.eia.doe.gov/neic/quickfacts/quickoil.html.
[6] United States Department of Energy, Energy Information Administration. International Energy Outlook 2007 (May 2007) 7 Retrieved June 5, 2007 from http://www.eia.doe.gov/oiaf/ieo/index.html
[7] United States Department of Energy. (February 2007). Annual Energy Outlook 2007 with Projections to 2030. Retrieved June 12, 2007 from http://www.eia.doe.gov/oiaf/aeo/index.html.
[8] California Energy Commission, Oil Supply Sources to California Refineries. Retrieved October 30, 2007 from http://www.energy.ca.gov/oil/statistics/crude_oil_receipts.html
[9] California Energy Commission, Foreign Sources of Crude Oil Imports to California 2005. Retrieved February 8, 2007 from http://www.energy.ca.gov/oil/statistics/2005_foreign_crude_sources.html
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[11] United States Energy Information Agency, Country Analysis Briefs. Retrieved February 23, 2007 from http://www.eia.doe.gov/emeu/cabs/China/Background.html
[12] Council on Foreign Relations, National Security Consequences of U.S. Oil Dependency. Report of an Independent Task Force (2006). Retrieved March 20, 2007 from http://www.cfr.org/content/publications/attachments/EnergyTFR.pdf
[13] United States Government Accountability Office, Crude Oil: Uncertainty about Future Oil Supply Makes It Important to Develop a Strategy for Addressing a Peak and Decline in Oil Production. (February 2007) GAO-07-283.
[14] Udall, R. and Andrews, S. (1999, January). When will the joy ride end? A petroleum primer. Hubbert Center Newsletter, 99(1), 1-8.
[15] International Energy Agency (July 2007). Medium Term Oil Market Report.
[16] Robert L. Hirsch, Roger H. Bezdek, and Robert M. Wendling, Peaking of World Oil Production: Impacts, Mitigation and Risk Management, U.S. Department of Energy, National Energy Technology Laboratory. February 2005.
[17] California Energy Commission. (November 2005). Integrated Energy Policy Report. CEC-100-2005-007CMF. Retrieved September 26, 2007 from http://www.energy.ca.gov/2005publications/CEC-100-2005-007/CEC-100-2005-007-CMF.PDF.
[18] United States Department of Energy, Energy Information Administration. International Energy Outlook 2006 (June 2006) pp. 37 – 49. Retrieved February 23, 2007 from http://www.eia.doe.gov/oiaf/ieo/pdf/0484(2006).pdf.
[19] California Energy Commission, 2006 Gross System Electricity Production. (April 2007) CEC-300-2007-007. Retrieved June 5, 2007 from http://www.energy.ca.gov/electricity/gross_system_power.html
[20] City of Portland Office of Sustainable Development, Bureau of Planning, and Department of Transportation. Peak Oil Task Force Briefing Book (July 25, 2006).
[21] Global Insight. (February 2006). The Impacts of Natural Gas Prices on the California Economy: Final Report. Retrieved September 27, 2007 from http://www.globalinsight.com/publicDownload/genericContent/natgasfullstudy.pdf.

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[22] California Energy Commission, Inventory of Greenhouse Gas Emissions and Sinks: 1990-2004 Final Staff Report. (December 2006) CEC-600-2006-013-SF. Retrieved March 26, 2007 from http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF.

[23] City of Portland Office of Sustainable Development, Bureau of Planning, and Department of Transportation. Peak Oil Task Force Briefing Book (July 25, 2006).

[24] Robert L. Hirsch, Roger H. Bezdek, and Robert M. Wendling, Peaking of World Oil Production: Impacts, Mitigation and Risk Management, U.S. Department of Energy, National Energy Technology Laboratory. February 2005.

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[27] Transportation Demand Management Encyclopedia. "Transit Oriented Development." Victoria Transport Policy Institute.

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[33] Renewable is defined as solar thermal, solar PV, wind, geothermal, biomass, and small hydro (less than 30 MW).

[34] California Energy Commission, 2005 Gross System Electricity Production. Retrieved on February 7, 2007 from http://www.energy.ca.gov/electricity/gross_system_power.html.

[35] ICF International. (January 2007). Public Transportation and Petroleum Savings in the U.S.: Reducing Dependence on Oil," http://www.icfi.com/Markets/Transportation/doc_files/public-transportation.pdf.

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Air Quality

This page contains no comments

Air Quality

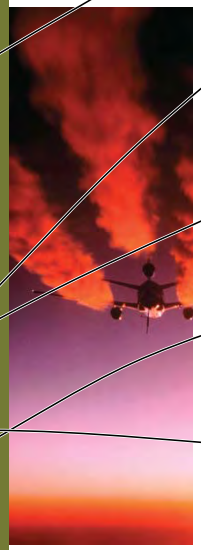
THE CHALLENGE

Since the U.S. Environmental Protection Agency (EPA) developed regulations targeting six "criteria" pollutants that adversely affect human health and welfare, federal, state, and regional regulations have reduced hundreds of tons of air pollution each day in Southern California. Smog alerts are largely a thing of the past, as smog levels have dropped over 75 percent in the past twenty years.

Despite this progress, air pollution continually plagues Southern California. Much of the region continues to exceed National Ambient Air Quality Standards (NAAQS). The South Coast Air Basin (SCAB), one of the four basins in the SCAG region, still has the worst air quality in the nation (the other air basins in the region include the South Central Coast Air Basin (the Ventura County portion), the Mojave Desert Air Basin, and the Salton Sea Air Basin). The American Lung Association reported that, in 2007, the Los Angeles-Long Beach- Riverside region ranked number one as the most polluted area in the United States.[1]

The pollutants that pose the greatest health concern in the SCAG region are ground-level ozone (O_3) and particulate matter (PM). Ground-level ozone, a component of urban and regional smog, is a colorless and poisonous gas that forms in the atmosphere through complex reactions between chemicals directly emitted from motor vehicles, industrial plants, consumer products and many other sources. Repeated short-term exposure to ozone can damage the respiratory tract, causing inflammation and irritation, and induces symptom, such as coughing, chest tightness, shortness of breath, and worsening of asthma symptoms.[2] In recent years, population-based studies have revealed a strong correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality.[3] In addition, ozone causes substantial damage to crops, forests and native plants. Major technological or political breakthroughs that identify new ways to achieve the federal 8-hour ozone standard by 2024 are imperative. However, this is not an easy task. Our region needs to reduce approximately 500 tons per day of ozone-forming pollution, of which a substantial portion is attributable to cars, buses, trucks, and other "mobile sources." Approximately half of the solution relies on long-term measures (known as the "black box" that are undefined.[4]

One of the most dangerous pollutants is particulate matter. Particulate matter is a complex mixture that consists of dry solid fragments, solid cores with liquid coatings, and small



Page: 80

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 4:37:58 PM
Please reword as it is difficult for the reader to understand. The following is offered for clarification: ...health and welfare, regulations at the federal, state, and regional levels have reduced...

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:53:32 PM
It is recommended that the text be phrased with more neutral langauge. The following is suggested "continues to be a problem in" to replace the text "continually plagues"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:54:11 PM
Please explain what damage is caused to crops, forests, and native plants.

Also, please start a new paragraph after this sentence to break up the information into smaller, easier to read sections.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:54:50 PM
Please identify as a number the amount referenced by the statement "substantial portion" that is attributable to cars, busses, trucks, and other mobile sources.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:56:05 PM
It is observed that this sentence describes "approximately half of the solution" to address air quality impacts; however, the other half is not discussed. Please describe the other half of the solution is.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:57:46 PM
Please clarify if the statement that the Los Angeles-Long Beach-Riverside region is ranked number one as the most polluted area in the United States is referencing all pollutants or only air pollutants?

HOW AIR QUALITY POLICIES PRODUCE MULTIPLE BENEFITS

Land Use & Housing: Reducing emissions from local sources of air pollution reduces potential incompatibility of land uses. For example, reducing particulate and toxic air contaminants from manufacturing facilities can reduce conflict with residential uses by reducing ambient pollutant concentrations. This can give jurisdictions more flexibility to site land uses in a region that will become more densely populated.

Open Space and Habitat: Achieving federal ozone standards will reduce damage to vegetation and crops, as ozone inhibits crop productivity and can reduce crop yield.

Water: Reducing airborne pollutants will reduce wet and dry deposition that directly pollutes surface water bodies. Studies also show that a substantial amount of nitrogen load to surface water bodies comes from indirect loads caused by surface water runoff.

$PM_{2.5}$ exceedances contribute to over 5,400 premature deaths and one

droplets of liquid. Of particular concern are fine particulates, or $PM_{2.5}$, which are smaller than 2.5 microns in diameter. $PM_{2.5}$ comes from fuel used in everything from power plants to wood stoves and motor vehicles (e.g., cars, trucks, buses and marine engines). These particulates are even produced by construction equipment, agricultural burning, and forest fires. $PM_{2.5}$ is small enough to penetrate our lungs so deeply that they cannot be expelled by the body. South Coast Air Basin residents make up over 50 percent of the population in the nation that is exposed to $PM_{2.5}$ concentrations above the federal standard. It is estimated that particulates contribute to over 5,400 premature deaths annually and lead to nearly one million lost work days in the South Coast Air Basin. These and even smaller "ultrafine" particulates have become a major health concern that must be addressed.

Perhaps the most publicized air quality problem today is the phenomenon of global climate change. According to the U.S. EPA, the transportation sector directly accounted for approximately 27 percent of total U.S. greenhouse gas emissions in 2003.[5] Our planet has reached the highest emissions levels of carbon-based CO_2, the most prevalent greenhouse gas, in recorded history (see **Figure 6.1**). This unprecedented trend is increasing average global temperatures at alarming rates. A warmer climate would substantially complicate our efforts to fight our historical ozone problems. Further, the impacts of climate change are even more profound, as water supplies, flora and fauna, and nearly every aspect of life as we know it could be adversely affected by a warmer world.

Mobile source emissions, both on-road (e.g. cars, trucks, buses, etc.) and off-road sources (e.g. boats, off-road recreational vehicles, aircraft, trains, ships, industrial and construction equipment, farm equipment, etc.), are the primary culprits contributing to the region's air quality challenges and global climate change. Driving a motor vehicle is the single most polluting thing that most of us do.[6] The 2007 AQMP reports that there are approximately 12 million vehicles in the South Coast Basin. In 2002, these vehicles traveled more than 349 million miles per day; they are projected to travel about 407 million miles per day by the year 2020. Motor vehicles emit millions of tons of pollutants into the air each year. Mobile sources account for about 60 percent of all ozone forming emissions and for over 90 percent of all carbon monoxide (CO) emissions from all sources.[7] CARB considers diesel PM to be a potent global warming agent, as it has been responsible for more than half of black carbon emissions in the U.S. and about 30 percent globally. Diesel engine emissions are responsible for a majority of California's estimated cancer risk attributable to air pollution.[8]

Given the challenges that lie ahead, increased public awareness and a reinvigorated collaborative effort from all agencies and stakeholders is critical to bring this region into attainment with the federal air quality standards. SCAG's contribution to this collaborative effort is essential, as emissions reductions have become front and center of the air quality challenge.

Page: 81

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 3:58:54 PM
Please ensure that the citation is correct. The National Safety Council attributes the statement, "Driving a motor vehicle is the single most polluting thing that most of us do" to the Environmental Protection Agency (please see http://www.nsc.org/ehc/mobile/mse_fs.html)

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:01:08 PM
It is recommended that this section discuss and reference more current information such new CARB data or the 6 Kyoto pollutants. The sentence highlighted is referencing a 1993 study and it is suggested that if this is the most current information, that it be so noted.

Further, the paragraph has primarily been discussion CO2 emissions as opposed to CO as included in the sentence. Therefore, the sentence about CO appears out of context and could be confusing to readers.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:01:55 PM
It is suggested that it would be appropriate to state that the region "is" becoming more densely populated as opposed to state that it "will become".

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:03:50 PM
Please reword. The sentence is very broad and could be difficult for the reader to understand.

million lost work days in the South Coast Air Basin.

The Growth Conundrum

Although regulations and technological breakthroughs have generally improved air quality, our unabated population growth threatens to overwhelm these gains in the future.

The SCAG region is the largest metropolitan planning area in the United States, encompassing 38,000 square miles and has one of the largest concentrations of population, employment, income, business, industry and finance in the world. Our region faces an exponentially growing population coupled by significant economic growth. Forecasts reveal that the region's population is projected to increase by almost 5.8 million people (32%), from 2003 to 2035, employment by 2.5 million jobs (32%), and the number of households by 2.0 million (35%).[9]

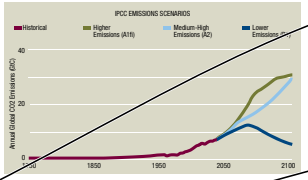
These glimpses of our future underscore a key challenge for the region: How do we make historic reductions in air pollution in the face of continued population growth, sprawling urbanization, increasing vehicle miles traveled, and an expanding economy? Accommodating anticipated growth in the SCAG region in a sustainable way—by taking account of ecological, economic and social factors, while enhancing quality-of-life indicators for future generations—represents a central challenge facing Southern California.

The Growth in Goods Movement

Southern California faces both an extraordinary economic opportunity and a frustrating policy dilemma. Goods movement in the SCAG region is supported, in part, by its geographical advantage such as deep-water marine ports and highly developed network of highways and railways, availability of trans-loading facilities and its large internal market. The region is a major gateway for both international and domestic commerce, and goods movement is the fastest growing segment of the region's transportation sector. Additionally, goods movement plays a vital role in the national, state, and regional economies with one out of every seven jobs in Southern California depending on trade.

The increasing volume of goods moving in and through the SCAG region is straining our infrastructure and exacerbating air quality challenges in three key ways. First, the sheer growth in freight movement could jeopardize current attainment plans for ozone and $PM_{2.5}$. Second, freight-related

FIGURE 6.1
Historical and Projected CO_2 Emissions



Source: International Panel on Climate Change

Page: 82

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:05:09 PM
The term "unabated" is unnecessarily negative in this chapter. It implies that growth is negative and should be stopped (i.e. no growth is the option), which is contrary to other chapters in this document which propose "smarter growth" strategies to accommodate growth. Further, the use of this term does not recognize the significant regional planning efforts that have been undertaken throughout the region to address and plan for growth.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:06:15 PM
This sentence references the AQMP prepared by SCAQMD as the source for population and employment growth projections. However, this is SCAG's forecast for the RTP and it is recommended that the forecast be referenced to the agency that prepared the forecast, namely SCAG.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:07:26 PM
It is suggested that the use of the term "sprawling" in the most densely developed region in the United States is perhaps unnecessarily negative and does not recognize the significant planning and infill development occurring in the region. It is suggested that the word "sprawling" be replaced with the word "increasing."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:08:02 PM
Please clarify if the reference to increasing VMT, represents the overall growth in VMT that would be anticipated from increasing population or if it is representing per capita growth.

The RCP complements local air plans by emphasizing the need to reduce

HOW AIR QUALITY POLICIES PRODUCE MULTIPLE BENEFITS

Energy: Reducing climate change impacts will mitigate the need to cool a warmer region, which will reduce the need to expand the infrastructure needed to produce electricity and other sources of energy.

Economy: Attaining clean air standards can provide substantial economic benefits. In the South Coast Air Basin, attaining federal ozone standards could add $14.6 billion dollars to the economy on average per year by reducing morbidity, mortality, increasing crop yields and visibility, reducing materials expenditures, and congestion relief. In 2014, an estimated $113 million of savings on vehicle operation and maintenance is expected.

Implementing the South Coast AQMP is expected to generate more than 61,400 jobs per year.

diesel particulates create toxic air contaminant hotspots that threaten local air quality near the ports and truck distribution routes. Finally, there are institutional challenges, as goods movement is primarily regulated by the federal government. The projected growth in truck volumes and increase demand on the existing railroad capacity will bring with it associated concerns of automobile traffic delays, and safety concerns; thus, compromising the quality of life, health and safety of the residents and communities in the region.

THE PLAN

The RCP neither replaces nor modifies the air plans adopted within the region, but rather, it sets the policy context in which SCAG participates in and responds to these plans. The RCP builds off the local Air Quality Management Plan (AQMP) processes that are designed to meet health-based criteria pollutant standards in several ways. First, it complements AQMPs by providing guidance and incentives for public agencies to adopt best practices that support the technology-based control measures in AQMPs. For example, the RCP's energy policies will help accelerate turnover of older, more polluting combustion engines that support the South Coast AQMP's control measures.

Second, the RCP emphasizes the need for local initiatives that can reduce the region's greenhouse gas emissions that contribute to climate change, an issue that is largely outside the focus of local attainment plans. Policies such as green building that reduce our "carbon footprint" can have direct impacts on energy, water supply, and other resource areas.

Third, the RCP emphasizes the need for better coordination of land use and transportation planning, which heavily influences the emissions inventory from the transportation sectors of the economy. This also includes minimizes land use conflicts, such as encouraging residential development near freeways, industrial areas, or other sources of air pollution.

The RCP calls on SCAG and local governments throughout the region to implement policies that complement the AQMP in the following ways:

- **SCAG**: As the Metropolitan Planning Organization for Southern California, SCAG has a defined role in developing the transportation control measures (TCMs) for local AQMPs. This can include new TCMs that help reduce the region's "black box" of undefined emission reductions. In its role as a Council of Governments, SCAG can influence a local jurisdiction's actions by providing guidance on policies that address criteria pollutants, greenhouse gases, and public exposure to toxics and other pollutants of concern. It can also prioritize funding for planning and/or transportation projects to projects that are most consistent with the RCP's policies. Finally, as the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance, SCAG can be a regional clearinghouse for data, funding information, program coordination, and recom-

Page: 83

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:10:13 PM

Please clarify the intent of this statement. As has been noted in previous comments, the OCCOG is concerned with the prospect of SCAG prioritizing funding for transportation projects consistent with the RCP, most specifically relative to the projects under the current and renewed Measure M in Orange County. As such, it is requested that the sentence be restated to read: "SCAG should encourage county transportation commissions and other local agencies to prioritize funding for projects that are consistent with RCP principles."

the region's greenhouse gas emissions.

mend that issues at the project or General Plan level be addressed to ensure consistency with the RCP.

- **Local Governments:** Cities and counties can amend general plans to implement land use, energy, transportation, and other policies that reduce their carbon footprint consistent with State law. In addition, local governments can use their land use authority to properly buffer residences and other sensitive land uses from freeways, industrial activity centers, and other sources of toxics or ultrafine particulates.

Continuing the trend toward attainment of clean air standards will be difficult given the pace of population growth, freight activity from our sea and airports, and increasing congestion from a transportation system with limited opportunities to expand roadway capacity and a heavily-subsidized public transit system. The new and revised proposed actions require a collaborative effort from federal, state, and local government in order to meet the air quality targets.

Historically, there has been an inherent conflict between the objectives of economic development and environmental protection. Today, it is possible to achieve economic growth without sacrificing protection for the environment. However, much more work will be needed to achieve this equilibrium. As such, collaborative efforts undertaken by various federal, state, and local regulatory agencies are necessary in overcoming this challenge.

The goals, outcomes, and action plan of the RCP Air Quality chapter aim to coordinate these activities to help the region develop strategies that utilize the most effective technologies, transportation investments, urban design strategies, which reduce air pollution, improve air quality, and protect human health and the natural environment.

AIR QUALITY GOALS

- Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.
- Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas.
- Minimize land uses that increase risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM_{10}, $PM_{2.5}$, ultrafine), and carbon monoxide.
- Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.

Page: 84

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:11:23 PM
Please explain which land uses are addressed by the goal that states, "Minimize land uses that increase risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM10 and PM2.5 ultrafine), and carbon monoxide.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:14:11 PM
The chapter does not include any discussion relating to green building or the air emissions from energy generation. It is suggested that a section be added to the chapter discussing this issue and describing the green building practices that would reduce the impacts on air quality in order to link the goal to the challenges list in the chapter.

HOW AIR QUALITY POLICIES PRODUCE MULTIPLE BENEFITS

Public Health: Reducing ozone levels can reduce permanent scarring of lung tissue and reduce respiratory irritation and discomfort. Reducing $PM_{2.5}$ could significantly reduce the estimated 5,400 premature deaths annually in the region.

Environmental Justice: Air quality policies in the RCP are intended to ensure that minority population and/or low-income populations do not bear impacts that are appreciably more severe or greater in magnitude that the adverse effects that will be suffered by non-minority population and/or non-low-income populations.

Climate Change: Warmer weather will increase the number of days conducive to ozone formation by 25 to 85 percent. In addition, warmer temperatures could increase fire risk, which would increase potential for particulate matter emission episodes.

AIR QUALITY OUTCOMES

- Attain the federal 8-hour ozone standard by the dates specified in the 2007 AQMPs or U.S. EPA rulemaking for the respective non-attainment areas:
  - South Coast Air Basin by 2024
  - Coachella Valley (original classification 2012; revised attainment date to be determined)
  - Antelope Valley and Western Mojave Desert (original classification 2009; revised attainment date to be determined)
  - Ventura County (original classification 2009; revised attainment to be determined)
  - Imperial County by 2010 (pending final U.S. EPA rulemaking)
- Attain the federal $PM_{2.5}$ standards in the South Coast Air Basin by 2015.
- Reduce the region's greenhouse gas emissions to 1990 levels by 2020.
- Amend local government General Plans to limit future growth of residences and other sensitive receptors near major sources of toxic air contaminates and other hazardous air pollutants (e.g., freeways, railyards, and industrial facilities).
- All cities in the region adopt green building standards by 2012.

Page: 85

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 4:54:37 PM
Please indicate that this outcome is consistent with State standards included in AB 32.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:14:50 PM
Please indicate that this outcome is consistent with the standards established by CARB. It is further suggested that the outcome should include in the e.g. statement, rail lines and major transportation corridors other than freeways.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:16:45 PM
The OCCOG seeks clarification as to why each city should adopt standards that may differ from the state and that this be included as a measure for the region? The state is implementing significant green building standards. It is requested that the outcome be a measure of cities and counties implementation of state requirements for green building. It is also noted that county governments should be included in the measurement as they also have and implement building standards that could apply to a significant amount of new development in the region.

AIR QUALITY ACTION PLAN

IG/Best Practice	Legislation	Specification	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Water	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	AQ-1 SCAG shall implement control measures from local Air Quality Management Plans (AQMPs) by:		X		X		X			X	X
		X	AQ-1.1 Ensuring that transportation plans, programs, and projects are consistent with State air quality plans for attaining and maintaining the health-based National Ambient Air Quality Standards (NAAQS).		X		X		X			X	X
		X	AQ-1.2 Ensuring compliance with the Transportation Conformity Rule, including the new air quality standards for fine particulate matter (PM2.5) and 8-hour Ozone.		X		X		X			X	X
		X	AQ-1.3 Ensuring that there is continued development of Transportation Control Measures (TCMs) in the South Coast Air Basin (SCAB).		X		X		X			X	X
		X	AQ-2. SCAG, in conjunction with stakeholders, will pursue environmentally sustainable strategies that implement and complement climate change goals and outcomes.	X	X	X	X	X	X			X	X
		X	AQ-2.1 SCAG, in conjunction with stakeholders, will develop policies and guidance that support the greenhouse gas goals set forth in the Global Warming Solutions Act of 2006 (AB 32), ~~which requires a reduction in global warming emissions to 1990 levels by 2020.~~	X	X		X					X	X
		X	AQ-2.2 SCAG will participate in the development of rules to implement ARB's Group 1 "discrete early action greenhouse gas reduction measures." ~~These include the proposed Low Carbon Fuel Standard, reduction of refrigerant leaks from motor vehicle air conditioners, maintenance, and increased methane capture from landfills.~~				X			X	X	X	X
		X	AQ-2.3 SCAG will participate in the development of ARB's Group 2 non-regulatory activities and greenhouse gas regulations that will be enforceable after January 1, 2010, ~~including electrification, phase two vehicle standards, and more refrigerant controls.~~				X					X	X
		X	AQ-2.4 SCAG will participate in the development of ARB's Group 3 "traditional control measures" aimed to reduce criteria and toxic air pollutants which have concurrent climate co-benefits.				X					X	X
		X	AQ-2.5 SCAG will provide assistance to local governments on how to address climate change issues in General Plan updates.	X	X	X	X	X	X			X	X
		X	AQ-3 SCAG shall develop policies that discourage the location of sensitive receptors that expose humans to adverse air quality impacts by:	X					X			X	
		X	AQ-3.1 Assisting local governments develop policies that minimize exposure of sensitive receptors and sites (e.g. schools, hospitals, and residences) to major sources of air pollution, including diesel particulate matter emissions, such high-traffic freeways and roads, rail yards, ports, and industrial facilities.	X					X			X	
		X	AQ-4 SCAG shall promote sustainable building practices by:	X		X	X		X		X	X	X

Page: 86

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 4:17:42 PM
Please delete as it is unnecessary to restate the state law. Further, because state law could be changed, it would be appropriate to simply include a reference to state law to minimize the need to amend the RCP in the future.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 4:18:14 PM
Please delete this statement. Because of the rapidly changing body of information and technology, it is unnecessary to include examples as they may be considered "out of date" before the next update of the RTP/RCP documents.

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/30/2008 8:28:35 AM
Please delete. See comments for AQ-2.2.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:19:07 PM
Please explain where and in what documents the policy SCAG would develop would be included. Specifically it is requested that the text of the RCP identify if the policies that would be developed would they be included in any mandated document?

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 5:03:29 PM
The examples listed should include all rail lines to be consistent with CARB and AQMD recommendations.

AIR QUALITY

IGR/Best Practice	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits: Land Use	Transportation	Water	Energy	Open Space	Economy	Security	Solid Waste	Other Benefits: Public Health	Climate Change
		X	AQ-4.1 Disseminating information about energy efficiency and green building programs and energy use reduction, ~~such as the EPA's Energy Star Program, the South Coast Air Quality Management District's (AQMD) Equipment Exchange Program, and U.S. Green Building Council's (USGBC) LEED Program through the SCAG web site, web links to other programs, and educational workshops and presentations~~.	X		X	X		X		X	X	X
X			AQ-4.2 Adopting a policy to strive for carbon neutrality for its own facilities and operations.		X		X		X		X	X	X
		X	AQ-4.3 Utilizing its Intergovernmental Review (IGR) process to recommend utilization of green building practices as potential mitigation measures.	X		X	X		X		X	X	X
X		X	AQ-4.4 Engaging both private and public sectors to assist local government in the creation of green business certification programs for businesses that want to reduce energy usage.				X		X			X	X
Local Government Policies													
X			AQ-5 Local governments should implement control measures from local Air Quality Management Plans (AQMPs) such as accelerating the turnover of older, more polluting mobile and stationary source equipment using AB 2766 funding per the State Implementation Plan (SIP).[10]		X		X		X			X	X
X			AQ-6 Local governments should support and pursue environmentally sustainable strategies that implement and complement climate change goals and outcomes such as updating their General Plans to help address the State's AB 32 mandate. This should ~~include an inventory of 1990 emissions of greenhouse gases and a strategy for reducing 2020 emissions to those levels~~.	X	X	X	X		X			X	X
X			AQ-7 Local governments should develop policies that discourage the location of sensitive receptors that expose humans to adverse air quality impacts such as amending General Plans, zoning ordinances, business licensing, and related land use permitting processes to minimize human health impacts from exposure of sensitive receptors to local sources of air pollution. Jurisdictions should consider applicable guidance documents, such as ARB's Air Quality and Land Use Handbook: A Community Health Perspective and the South Coast AQMD's Guidance Document for Addressing Air Quality Issues.	X	X				X			X	
X			AQ-8 Local governments should practice and promote sustainable building practices by:		X		X		X			X	X
X			AQ-8.1 Updating their General Plans and/or zoning ordinances to promote the use of green building practices, ~~which include incorporating LEED design standards and utilizing energy efficient, recycled-content and locally harvested or procured materials~~.				X		X			X	X
X			AQ-8.2 Developing incentive programs (e.g. density bonuses) to encourage green building and resource and energy conservation in development practices.				X		X			X	X
X			AQ-8.3 Adopting policies that strive for carbon neutrality for their own facilities and operations.		X		X		X			X	X

Page: 87

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 5:04:00 PM
Please delete. See comment AQ-2.2.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:20:00 PM
The OCCOG observes that this policy would possibly be more appropriate in the Land Use Chapter as it is not specifically addressing air quality issues. Limiting it to the Air Quality chapter implies that this is the primary arena that would benefit from green building practices, which may not be the case.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:21:39 PM
It was identified by the OCCOG TAC that any effort by SCAG to help agencies create green business certification programs would duplicate existing efforts undertaken by other agencies and entities. In recognition that this is already underway, it is recommended that this be deleted.

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 5:07:03 PM
Please reword to state "be consistent with state guidelines and requirements."

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/29/2008 5:07:15 PM
Please delete. See comment for AQ-2.2

This page contains no comments

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Water	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)													
	X	X	AQ-1S Identify new SIP control strategies that reduce the amount of emissions from the transportation system necessary to reach attainment including transformative goods movement strategies.		X							X	X
	X	X	AQ-2S SCAG, in conjunction with the California Air Resources Board and the South Coast AQMD, shall develop a white paper and build consensus on how to identify discrete control measures that replace the undefined reductions in attainment plans.		X							X	X

Footnotes

1 http://lungaction.org/reports/sota07_cities.html

2 California Air Resources Board. "Recent Research Findings: Health Effects of Particulate Matter and Ozone." January 2004. Available at: http://www.arb.ca.gov/research/health/fs/pm-03fs.pdf

3 South Coast Air Quality Management District. 2007 Air Quality Management Plan. Available at: http://www.aqmd.gov/aqmp/07aqmp/aqmp/Chapter_2.pdf

4 Recognizing the need for immediate action, SCAG adopted a resolution in May 2007 urging the federal and state governments to take emergency responses in the face of an air quality health crisis.

Subsequently, the ARB and SCAQMD worked to find additional emission reductions from already proposed measures or new measures to help meet the PM2.5 air quality standard. In September 2007, representatives from ARB and SCAQMD, and SCAG reached an agreement on emission reduction measures needed to meet the PM2.5 deadline in 2015.

Further, the three agencies (i.e., ARB, SCAQMD, and SCAG) acknowledge that they need to identify new ways to achieve the 8-hour ozone standard by 2024 by tackling the "black box" emission reductions associated with long-term measures, as well as a potentially more stringent federal 8-hour ozone air quality standard. Thus, the three agencies will develop a discussion paper which explores potential new or transformative strategies, such as state-of-technology zero and near-zero transportation systems, other mechanisms such as fee-based incentives, and availability of public funding assistance programs.

5 U.S. Environmental Protection Agency. Available at: http://www.epa.gov/oms/greenhousegases.htm

6 National Safety Council. Available at: http://www.nsc.org/ehc/mobile/mse_fs.htm

7 California Air Resources Board. "Guidelines for the Generation of Mobile Source Emission Reduction Credits Through Purchase and Operation of New, Reduced-Emission Heavy-Duty Vehicles." September 1995. Available at: http://arb.ca.gov/msprog/mserc/hdcrguid.pdf

8 California Air Resources Board. "Diesel Health Effects Fact Sheet." Available at: http://www.arb.ca.gov/research/diesel/dpm_draft_3-01-06.pdf

9 http://www.aqmd.gov/aqmp/AQMPintro.htm

10 In September 1990, AB 2766 was signed into law which authorized a $4 per vehicle surcharge on annual registration fees to fund programs to reduce air pollution from motor vehicles. Under the AB 2766 Program, 40 cents of every dollar collected by the Department of Motor Vehicles is used by cities and counties located in the South Coast Air District to reduce motor vehicle air pollution. Currently, cities and counties receive approximately $19 million AB 2766 funds per year and have expended these funds on a wide range of projects from clean vehicle purchases to various transportation programs to relieve traffic congestion. About half of the funds have been spent on regulatory compliance, the rest on programs whose emission reductions are not directly SIP-quantifiable. ARB will amend its guidance on the use of the fees to include new cost-effectiveness guidelines and a suggested list of SIP creditable projects.

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Solid Waste

This page contains no comments

Solid Waste

THE CHALLENGE

Waste comes from homes, businesses, and industrial enterprises. Between 1995 and 2005, our region disposed of approximately 33 million tons of municipal solid waste into local landfills each year.[1] The average resident disposes of approximately 2.5 pounds of trash a day[2] while non-residential disposal adds up to 1.2 pounds disposed for every $10 of sales receipts.[3] Although we have made great strides in reducing per capita generation–in 1990, residential disposal was estimated at 3.1 pounds per day, existing landfills will not be enough to accommodate our ever-growing population and economy. Therefore, it is imperative that our region works together to develop better strategies for managing our waste.

Traditional solid waste management strategies have relied heavily on creating high capacity, regional landfills (megafills) and, to a lesser extent in California, incineration technologies (such as direct combustion or combustion with energy recovery) to address disposal issues. However, due to significant public opposition, unavailability of suitable land, environmental concerns, and the regulatory framework, it has become increasingly difficult to expand and/or site, permit, and operate new landfills and waste-to-energy (incineration) facilities. Federal, State, and local zoning regulations restrict the number of sites suitable for development. Some restrictions on land use include areas with unstable soils and terrain, landslide-susceptibility, fault areas, seismic impact zones, land near airports, and land in 100 year flood plains. Potential landfill sites must also consider migration control of leachate and methane, soil type to provide a firm foundation, hydrologic settings that will affect landfill layout and drainage characteristics, and a host of other factors. In addition, local public opinion plays a big role when landfills are being sited.[4,5]

Dwindling landfill capacity and increasing health and environmental concerns have forced both the region and the state to make concerted efforts at developing other waste management methods including reducing the amount of waste that goes into landfills. The costs for landfilling our garbage will continue to increase as landfill space decreases. These costs will ultimately be passed on to residents and businesses in the form of higher disposal fees and eventually, in conspicuous impacts to public health and the environment.

Overflowing landfills are only a symptom of a bigger problem—the mismanagement of our natural resources. The result of this mismanagement is evident in the mountains of garbage that we produce and the associated health and environmental

Page: 90

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:33:11 PM

The chapter contains good and useful information for local governments. Comments on the chapter are primarily questions regarding requests for clarification of information.

Numerous acronyms are used throughout the chapter. It is suggested that they be defined and clearly explained. For example, “MMbtu” is used but not defined.

The language used in this chapter specifically tends to be a bit inflammatory and may misrepresent the information being presented. It would better serve the intent of the chapter if the information and data were presented in a more neutral tone. For example, the first statement under “The Plan” section on page 91 states, “We will need a combination of both short and long term solutions to effectively address our overwhelming waste problem.” The OCCOG recognizes that the disposition of waste in the region is a very significant task that must be undertaken; however, the use of the term “overwhelming,” which is defined as something that is overpowering, implies that there is no solution.

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 8:46:58 AM

It is recommended that information regarding population and job growth be added to the section to provide background to the other data provided in the opening paragraph, as has been done in other chapters.

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 8:48:07 AM

Please clarify in the sentence whether the sources listed are the only sources or if there are others. It seems to be an oversimplification that does not consider other sources, such as agricultural wastes.

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 8:48:56 AM

Please define what municipal solid waste is and if there are other waste streams in the region.

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 8:51:33 AM

Please identify if the quantities listed include only waste being taken to landfills or if it is inclusive of waste that is recycled.

Comments from page 90 continued on next page

Also, please clarify what is included in the resident and non-resident trash. For example, how is government waste or agricultural waste classified?

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:36:38 PM
It is observed that the statement that existing landfills will not have the capacity to accommodate waste implies that the existing landfills are the only options for waste in the future and that no new landfill sites will be identified. It is suggested that clarification be included in the statement to indicate that the capacity at existing landfills is not enough for the future growth.

Further, the statement presumes that the population will continue to grow forever by using the term "ever-growing". It would be more accurate to restate as "the anticipated and forecast population and economic growth over the next 30 years."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:37:10 PM
the OCCOG expresses concern over the use of the term mismanagement because it implies wrongdoing. Unless this is the intent, it is recommended that the statement be reworded.

Solid Waste

THE CHALLENGE

Waste comes from homes, businesses, and industrial enterprises. Between 1995 and 2005, our region disposed of approximately 33 million tons of municipal solid waste into local landfills each year.[1] The average resident disposes of approximately 2.5 pounds of trash a day[2] while non-residential disposal adds up to 1.2 pounds disposed for every $10 of sales receipts.[3] Although we have made great strides in reducing per capita generation–in 1990, residential disposal was estimated at 3.1 pounds per day, existing landfills will not be enough to accommodate our ever-growing population and economy. Therefore, it is imperative that our region works together to develop better strategies for managing our waste.

Traditional solid waste management strategies have relied heavily on creating high capacity, regional landfills (megafills) and, to a lesser extent in California, incineration technologies (such as direct combustion or combustion with energy recovery) to address disposal issues. However, due to significant public opposition, unavailability of suitable land, environmental concerns, and the regulatory framework, it has become increasingly difficult to expand and/or site, permit, and operate new landfills and waste-to-energy (incineration) facilities. Federal, State, and local zoning regulations restrict the number of sites suitable for development. Some restrictions on land use include areas with unstable soils and terrain, landslide-susceptibility, fault areas, seismic impact zones, land near airports, and land in 100 year flood plains. Potential landfill sites must also consider migration control of leachate and methane, soil type to provide a firm foundation, hydrologic settings that will affect landfill layout and drainage characteristics, and a host of other factors. In addition, local public opinion plays a big role when landfills are being sited.[4, 5]

Dwindling landfill capacity and increasing health and environmental concerns have forced both the region and the state to make concerted efforts at developing other waste management methods including reducing the amount of waste that goes into landfills. The costs for landfilling our garbage will continue to increase as landfill space decreases. These costs will ultimately be passed on to residents and businesses in the form of higher disposal fees and eventually, in conspicuous impacts to public health and the environment.

Overflowing landfills are only a symptom of a bigger problem—the mismanagement of our natural resources. The result of this mismanagement is evident in the mountains of garbage that we produce and the associated health and environmental

WHEN LANDFILLS CLOSE

Although landfills employ extensive environmental control systems, concerns have been raised about post-closure operations and whether landfill operators are capable of maintaining landfill facilities until the waste no longer poses a risk to public health, safety, and the environment.

Post-closure care of landfills will require decision-makers, the waste industry, environmental organizations, and other stakeholders to continue working together towards developing an adequate solution.

Overflowing landfills are only a symptom of a bigger

impacts that result. For example, to obtain the resources used in the manufacturing and production of many of the goods that we use everyday, the mining industry moves an estimated 28 billion tons of soil and rocks each year (globally).[6] A 1999 study puts this figure at 48.9 billion tons when biomass extraction is included and 8.2 tons per capita average global resource consumption. When broken down by country, figures show that on a per capita level, extraction of raw materials increases with development status.[7]

The goods produced from these resources are usually single-use products that we effortlessly replace or throw away. There is an inextricable link between our current level of resource consumption, the waste we produce, and many environmental problems. Mining leaves behind a wake of destructive impacts. From threatening local and global biological diversity through habitat destruction to increased chemical contamination, erosion, and silting of lakes and streams to toxic air pollution containing arsenic and lead emissions.[8] Our current rate of natural resource extraction has already created health and environmental impacts that will last long into future generations.

THE PLAN

We will need a combination of both short and long term solutions to effectively address our overwhelming waste problem. In the short term, we will still need to rely heavily on landfills and, when local facilities have filled to capacity, exporting our waste to other areas, leading to higher trash rates and added traffic congestion and air pollution. In the long term, we will need to change the way we think about trash and move towards a system of waste prevention and minimization. The move towards this system will take time and require a variety of waste management strategies, including development of conversion technology facilities capable of converting post-recycled residual waste material into useful products to help reduce our dependence on landfills. Our goal is to achieve maximum diversion from landfills through emerging technologies with diversion credit.

Strategies for Managing Our Waste

Landfills today are technically sophisticated, highly regulated, and closely monitored by many local and state agencies. Methane and leachate collection systems are installed in many facilities and state-of-the-art leachate barriers (landfill liners) are required under current regulations. In turn, landfill operations in Southern California have methane capture technologies that turn methane emissions into energy. Average landfill gas emissions are comprised of 50 percent methane. For example, the Puente Hills landfill currently produces 50 MW (gross) of power from landfill capture operations which it sells to Southern California Edison.[10]

Landfills fill a critical need today and will continue to be needed well into the future. Even as we employ all waste prevention, recycling, reuse, composting, and conversion technology strategies, there will always be some inefficiencies in the system and

Page: 91

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:39:54 PM
This statement appears to be presented too early in the chapter because the full discussion of the challenges and strategies has not been presented. The OCCOG notes that by including at this point in the text, it implies that "maximum diversion from landfills through emerging technologies" is the primary goal for the chapter.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:40:05 PM
It is recommended that the term "effortlessly" be changed to another term, such as "easily."

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 9:12:36 AM
Please define "MW."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:41:12 PM
As stated in the first comments on the chapter, the OCCOG TAC recognizes that the disposition of waste in the region is a very significant task that must be undertaken; however, the use of the term “overwhelming,” which is defined as something that is overpowering, implies that there really is no solution. It is recommended that It would better serve the intent of the chapter if the information and data were presented in a more neutral tone.

Page: 92

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 9:05:18 AM

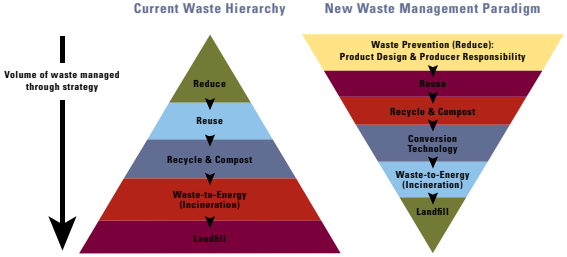
It is requested that the graphic be adjusted to indicate that there are existing waste prevention strategies in place. As shown, the graphic implies that there are not strategies or efforts currently underway.

therefore, waste that will need to be disposed at a landfill. The challenge will be to change our ideas of resource consumption and waste and to begin to think of disposal to landfills as the last resort in waste management. Many of today's health and environmental concerns will become less of a problem as we reduce our garbage volume and become more selective about what we consider trash.

Our current infrastructure to manage waste focuses on disposal first, followed by recycling, reducing, and reusing. The waste hierarchy envisioned for the future focuses on reducing first, then reuse, recycling, conversion technologies and finally disposal to land fill (see **Figure 7.1**).

Shrinking local landfill capacity is also forcing us to transport waste to more distant landfills. A prime example of this is the planned waste-by-rail system being developed by the County Sanitation Districts of Los Angeles County. The system is designed to address the projected shortfall of disposal capacity in Los Angeles County by transporting post-recycled waste to an out-of-county landfill. The rail system will have multiple starting points at large-scale materials recovery facilities throughout Los Angeles County.[11] Existing rail lines will be

FIGURE 7.1
Envisioning a New Waste Management Paradigm



Source: SCAG

This page contains no comments

Despite our best efforts, there will always be inefficiencies

WHAT ARE LOCAL COMMUNITIES DOING?

Many forward thinking communities in the SCAG region are already implementing and adopting policies to increase their waste diversion goals and ensure a better quality of life for their local residents.

- City of Los Angeles: 70 percent diversion by 2020; 90 percent by 2025
- City of Santa Monica: 70 percent diversion by 2010
- City of Pasadena: No waste to landfills and incinerators by 2040
- 16 cities/townships in San Bernardino County have partnered to educate their residents and businesses on waste reduction, reuse and recycling.

used to transport the waste to Mesquite Regional Landfill, in Imperial County located approximately 35 miles east of Brawley. The 2,290 acre landfill is under construction and expected to be operational by 2012. It is permitted to accept up to 20,000 tons of waste per day (with up to 1,000 tons per day coming from Imperial County), and has a maximum capacity of 600 million tons of solid waste over a 100 year lifespan.[12, 13] Due to potential air quality impact that may result from solid waste rail operations, it is expected that waste by rail operations will be consistent with strategies developed for the Air Quality Management Plan and the Regional Transportation Plan.

Although exporting waste is not a preferred waste management option, it is a necessary strategy for ensuring the County has a place to dispose of the garbage generated by County residents and businesses. Unlike other states, California does an excellent job of keeping solid waste within its borders. In the SCAG region, less than one percent of our waste is exported outside of the region.[14]

Diverting Garbage Away from Landfills

In 1989, the legislature passed the California Integrated Waste Management Act (AB 939).[15] This bill mandated a 50 percent solid waste diversion[16] rate by the year 2000 for all cities, counties, and applicable regional agencies in California, but did not include provisions for achieving the diversion rate. Under AB 939, local governments are responsible for preparing a diversion plan and instituting a financial mechanism to implement the plan.

Since then, Californians have done a great job in reducing the amount of waste sent to landfills. Although not all individual jurisdictions have managed to achieve the 50 percent diversion rate, all jurisdictions are making good-faith efforts to comply with the unfunded mandate by implementing quality programs. The estimated diversion rate for California in 2006 is 54 percent (our region's diversion rate is estimated at 50 percent). The California diversion rate translates to 50.1 million metric tons of waste (out of 92.2 million metric tons of waste generated) that avoided disposal to landfills.[17] Diversion is generally defined as the reduction or elimination of the amount of solid waste from solid waste disposal (to landfill or incineration). Thus far, only source reduction (waste prevention), reuse, recycling, and composting activities are considered diversion.

Economic Benefits of Diversion

Diversion activities create jobs, add local revenue, and help stimulate many economic sectors. Some employment opportunities created by these activities include government and private staffed collectors, recyclable material wholesalers, compost and miscellaneous organics producers, materials recovery facilities, glass container manufacturing plants, plastics converters, and retail used merchandise sales. A 2001 report from UC Berkeley stated that, "diverting solid waste has a significantly

Page: 94

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 9:11:56 AM

Please be internally consistent in the use of terminology in the chapter. For example, it is not necessary to include the description of food when identifying organic waste. Organic or green waste is already in the waste stream and includes more than simply food. For example, yard waste is commonly considered organic waste. Additionally, pg. 92 states that food waste specifically accounts for 14% of the waste stream but on pg. 95 is shown as 30.2%.

higher (positive) impact on the economy than disposing it." Diversion also helps communities save money by avoiding payment of tipping fees on each ton of waste disposed. The UC Berkeley study estimated that statewide economic impacts from disposal and diversion at 1999 rates were approximately 17 to 20 percent higher than the impacts if all the waste had been disposed (see **Table 7.1**).[18] This is because reuse and recycling are inherently value-adding, whereas disposal is not; and value-adding processes support jobs and economic activity.[19]

The California waste stream is primarily composed of organic (food) waste, paper products, and construction and demolition debris. Harder-to-decompose items such as plastic, glass, metal, electronic, and hazardous wastes are also present in the waste stream in significant amounts (see **Figure 7.2**).

Reuse and Recycling

California hosts approximately 5300 recycling and reuse facilities, employing 84,000 people and generating an annual payroll of $2.2 billion with $14.2 billion in annual revenues.[20] However, California's recycling market is still on shaky ground, especially because of competition from foreign recycling markets. Many countries will pay a premium for our recyclables because they lack their own raw materials. In an effort to support the local recycling industry, the Integrated Waste Management Board has developed the Recycling Market Development Zone

TABLE 7.1 ECONOMIC IMPACTS OF 1999 WASTE GENERATION GOING TO DISPOSAL OR DISPOSAL AND DIVERSION

Region		Estimated Final Sales 1999 (billions of dollars)	Impact on Economy			
			Output[b] (billions of dollars)	Total Income[c] (billions of dollars)	Value Added[d] (billions of dollars)	Number of jobs created
All California	Disposal only	7.5	18.0	6.8	9.0	154,000
	Disposal and Diversion	9.2	21.2	7.9	10.7	179,000
Southern California[a]	Disposal only	4.1	9.6	3.6	4.7	82,000
	Disposal and Diversion	5.1	11.3	4.2	5.6	95,000

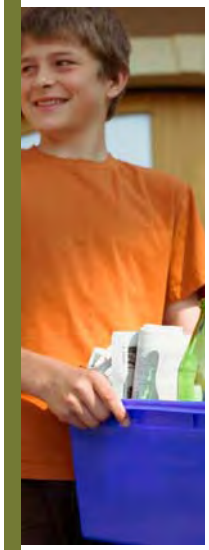
Table adapted from Goldman, G. and A. Ogishi, 2001. The Economic Impact of Waste Disposal and Diversion in California. A Report to the California Integrated Waste Management Board.

[a] Southern California region includes all six SCAG region counties plus San Diego County.

[b] Output impact is a measure of how the disposal sectors influence total sector sales in the economy.

[c] Income impact measures income attributed to disposal-related economic sectors.

[d] Value added is the increase in the value of goods and services sold by all sectors of the economy.



Page: 95

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 9:12:46 AM
Please define "MMBtu."

HOW SOLID WASTE POLICIES IMPACT OTHER RESOURCES

Land Use and Housing: As the need for new landfill capacity diminishes, communities will not run into problems of landfill siting pressures. The siting or new or expanded waste management facilities are often incompatible with existing or planned land uses in a community.

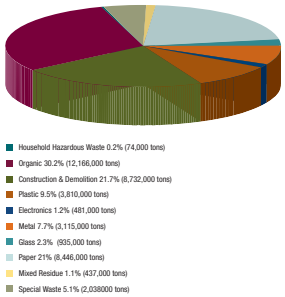
Open Space and Habitat: Materials extraction activities are intensely disruptive to wildlife and their natural habitats. Changing and reducing the waste stream will significantly reduce open space impacts by reducing the need for raw materials extraction and reducing the pressure to open new landfills.

Water: If the waste stream is reduced, the amount of litter, especially plastics that pollute the waterways, will be reduced. This will also reduce the potential for groundwater contamination from improperly disposed items.

Reuse and recycling prevent pollution that may be caused by

(RMDZ) program. The program provides loans, technical assistance, and free product marketing to businesses that use materials from the waste stream to manufacture their products.[21] Although this market development program is important, local governments have continually stressed the need for the State to take a leadership role in developing markets since our services and products are trading and competing on a global basis, and thus are susceptible to events/market fluctuations throughout the world. Based on the economic principle of supply and demand, recyclables will end up in landfills if markets are not developed or strengthened.

FIGURE 7.2
Composition of California Waste



Source: California Integrated Waste Management Board. 2004. Statewide Waste Characterization Study. (Publication # 340-04-005)

There are numerous benefits to recycling and reuse programs. Reuse and recycling reduce the need for landfilling and prevent pollution that may be caused by the manufacturing, transportation, and use of products from virgin materials (see **Figure 7.3**). They help conserve natural resources (timber, water, minerals); sustain the environment for future generations; save energy and avoid fossil fuel use from extractive industries; decrease emission of GHGs that contribute to global climate change; protects and expands U.S. manufacturing jobs; and increases U.S. competitiveness.[22]

A 1994 Tellus Institute study showed that with the exception of aggregate materials for road base, many materials show energy savings by using recycled materials instead of virgin materials. The range of differences in energy saved varies greatly. At the high end is aluminum -- it takes 142.68 MMBtu per ton more to process aluminum from raw ore than it does to process the same product from recyclables. At the low end is molten glass for which the energy difference is only 1.54 MMBtu per ton of product.[23] A more recent life cycle assessment study from ALCOA researchers has shown that it takes 95 percent less energy to recycle aluminum than to create it from raw materials.[24]

manufacturing, transportation, and other processes.

Construction and Demolition Debris

Construction and demolition (C&D) debris comprises 21.7 percent of California's overall disposed waste stream. This equates to approximately 8.7 million tons of C&D debris disposed to landfill. Lumber debris makes up half of that figure, followed by concrete, asphalt roofing, gypsum board, and composite/remainder C&D.[25]

Addressing C&D waste prevention can be as simple as using best management practices during construction such as advanced framing, double checking measurements to reduce sizing mistakes, and using durable materials that need less frequent replacement.[26] It also means using green building design principles to maximize the use of remanufactured, recycled, or more efficient materials or materials that are designed to be replaced in a modular manner. Unlike demolition waste, up to 80 percent of construction waste is reusable or recyclable.[27] C&D diversion rates have reached as high as 97 percent on individual State of California projects, and are typically at least 50-75 percent in green buildings.[28]

FIGURE 7.3
Comparing Life Cycles of a Recycled and Virgin Product

Source: Environmental Protection Agency. 1998. Puzzled About Recycling's Value? Look Beyond the Bin. EPA530-K-97-008. http://www.epa.gov/msw/recpubs.htm.

Cities are starting to institute green building ordinances that require maximum recycling of C&D debris for many types of new construction. Uniform statewide requirements for green building or C&D recycling ordinances do not yet exist, although state legislation has been introduced to address this issue. Currently, each city develops its own ordinance: defining the size, cost, and type of project that is subject to C&D recycling as well as the amount of material recycling required.

The 2003 report to California's Sustainable Building Task Force provides a comprehensive and convincing study of the value of green building savings. It was found that although there were minimal increases of about 2 percent in up-front costs to add green building features, life cycle savings resulted in 20 percent of total construction costs—more than 10 times the initial investment. For example, an initial up-front investment of up to $100,000 to incorporate green building elements

Page: 96

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:42:13 PM
Please include more information differentiating construction and demolition waste. They each are regulated by different state laws and it is suggested that each warrants better definition.

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 9:15:49 AM
Please add more information regarding what is intended by the inclusion of green building design principles. It is not clear what is intended for construction and what is intended for demolition when referencing green building.

This page contains no comments

The attraction of conversion technologies is their ability to

HOW SOLID WASTE POLICIES IMPACT OTHER RESOURCES

Energy: Recycling and waste prevention conserve energy. Making goods from recycled materials typically requires less energy than making goods from virgin materials. Waste prevention avoids energy used in the extraction, transport, and processing of raw materials to create new products.

Air Quality: Emissions from transport, manufacturing, production, and disposal and other waste management practices will be avoided through increased recycling, reuse, and waste prevention. Further, methane gas associated with new or expanded landfills can be reduced, with benefits for climate change and regional ozone planning efforts.

Transportation: As packaging waste is reduced, the need for vehicles to transport waste to disposal or recycling facilities should also be reduced.

into a $5 million project would result in a savings of $1 million in today's dollars over the life of the building.[29]

Food Waste, Organics, and Composting

Californians throw away more than 5 million tons of food scraps each year. Food waste makes up 14 percent of California's waste stream. This includes all food being disposed by residences, businesses, schools, prisons, and other institutions. Green material collection programs have been implemented in many cities and counties, but not until recently has collection of food scraps been considered. Management of food scraps provides additional opportunities to help meet the State's diversion goals as well as provide greater uses for this resource. The CIWMB suggests the following order for food scrap management: (1) prevent food waste, (2) feed people, (3) convert to animal feed and/or rendering, and (4) compost. Large events and venues, public facilities (e.g., public agency and school cafeterias), and private business such as restaurants and grocery stores could all be targeted for food waste diversion activities.[30]

Decomposition of food waste and other organics are a major source of greenhouse gas emissions from landfills. Organic waste comprises 30 percent of waste disposed to landfills. That figure includes food scraps, textiles, composite organics, and green material like landscape and tree trimmings, grass clippings, and agricultural residues. Diverting organic wastes to composting prevents the production of methane, which is produced during decomposition under anaerobic (oxygen-lacking) conditions such as those found in landfills. Composting has many environmental benefits. In addition to reducing landfill volume and emissions by diverting organic waste, compost can be used in the following ways: to enhance garden and agricultural soils, in wetland construction, as landfill cover, for erosion control, and in land/stream reclamation projects. Although there are environmental concerns associated with composting, primarily emissions and odor complaints, advancements in composting technologies and proper implementation of these technologies are able to help alleviate these concerns.

Conversion Technologies

Conversion technologies (CTs) refer to a diverse set of processes used to convert waste products into high-value goods such as industrial chemicals or gas, liquid, and solid fuels. Fuel products can be burned to produce energy or refined for higher quality uses to make a variety of industrial products.[31] The attraction of CTs is their ability to convert landfill waste into products that can take the place of fossil fuels mined from natural resources.

CTs target *post-recycled* municipal solid waste residuals currently destined for disposal at landfills as their feedstock. That is, before waste is sent to a CT facility, it is sorted to make certain recyclables are removed and collected. Many CT proponents feel CTs with recycling offer a much better alternative than incineration or disposal to landfill. In addition, CTs have the capability of recovering additional recyclable materials,

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especially metals and glass that might otherwise not be feasibly recoverable since it operates at an optimum level when recyclables are extracted prior to the conversion process.

A study conducted for CIWMB compared a life cycle analysis of landfills (with various stages of landfill gas collection), waste to energy (WTE) combustion (incineration), and hypothetical conversion technologies. It was found that the hypothetical CT scenario could potentially have a two times lower net energy consumption when compared to the incineration scenario and up to 11 times lower than landfill without energy recovery. The CT scenario included energy savings (10-20 percent of the total net energy savings) from additional materials recycling prior to conversion and the offsets associated with the prevention of extraction and production of virgin materials.[32] However, the environmental benefits of conversion technology scenarios are highly dependent on their ability to achieve high conversion efficiencies and high materials recycling rates.

At the present time, conversion technologies are considered ineligible as a diversion strategy under AB939 and the permitting and siting of CT facilities has been met with some opposition. Conversion technologies have been around for decades, but it is only recently that their applicability to solid waste management has begun to be fully developed. At this time, the successful development and use of CTs is occurring throughout Europe and Japan.

Three main categories of conversion technologies are being developed for management of solid waste - thermal, chemical, and biological conversion – as well as systems that utilize a combination of 2 or more categories of conversion to more effectively convert the various components of the waste stream.

- Thermal (thermochemical) conversion is characterized by processes that use high temperatures to achieve high conversion rates of dry, organic material. These processes include gasification, pyrolysis, plasma arc, and catalytic cracking. Advanced thermal conversion primarily refer to technologies that employ only pyrolysis and/or gasification to process municipal solid waste.[33] The primary products of thermochemical conversion technologies include: fuel gas (syngas - CO_2, CO, CH_4, H_2), heat, liquid fuel, char, and ash.[34]

- Biological (biochemical) conversion processes rely on microorganisms to break down the biogenic, organic fraction of the waste stream. These processes are focused on the conversion of biodegradable organics found in MSW residue into high energy products. The products of bioconversion are biogas (CH_4 and CO_2), biofuel (ethanol, biodiesel, fuel oil, etc.), and residue that can be used for compost. Biogas usually has less energy (Btu/ft^3) than syngas produced by thermal conversion systems.[35] Non-biodegradable organic feedstocks, such as most plastics, are not convertible by biochemical processes.

- Chemical (physicochemical) conversion processes use lower temperatures than thermal conversion and have lower reaction rates. These processes rely on chemical

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HOW SOLID WASTE POLICIES IMPACT OTHER RESOURCES

Environmental Justice: Landfills and other solid waste management facilities tend to be built in areas that see them as a boost to their local economy. These areas tend to be in poor or minority neighborhoods. Reducing the need for new or expanded facilities could reduce their disproportionate impact on disadvantaged communities.

Climate Change: Reducing the amount of waste deposited into landfills reduces the need to build and expand landfills, which account for 1/3 of California's methane emissions. Methane is a very potent greenhouse gas that has 21 times more global warming potential than carbon dioxide.

We need to address waste elimination at the source and let

reactions and are focused on the conversion of organic wastes into high energy products. Processes, such as acid hyrolysis, thermal depolymerization, and fermentation, typically focus on generating fuels such as ethanol or biodiesel.

Maximizing Diversion - A New Paradigm

In the last 10-15 years there has been a strong movement to recognize the link between the waste we generate and the natural resources we consume. Today's economy is based on the extraction of "cheap" resources to make products that are largely designed to end up in landfills. Waste is a reflection of our inefficient use and mismanaged consumption of finite, natural resources. The 2004 Growth Vision recognized this and stated that "management of solid waste (and hazardous waste) must be sustainable in order to efficiently manage natural resources and in order to protect the environment today and in the future."

A new paradigm is taking shape that builds on all the waste diversion strategies that were previously discussed. Although the three Rs of solid waste management – Reduce, Reuse, Recycle – still hold true, a renewed emphasis on the first R is taking hold. We need to go beyond current waste diversion strategies by addressing waste elimination at the source and distributing the responsibility for waste on both the consumer and the producer. Instead of managing just the end results of our consumption-related activities (trash), we focus on resource conservation and management. The aim is to create a whole system approach to the way materials flow through society, where all discarded materials are resources for others to use and resource conservation and recovery is built into every process. It also means designing and managing products and processes to reduce impacts to the environment, volume and toxicity of waste and materials, and waste of natural resources, as well as managing materials flow to prevent the creation of un-recyclable products. We can probably never achieve 100 percent materials efficiency but, "we can get darn close!"[38]

Strategies to maximize diversion look at the entire product life cycle to assess the true economic, environmental, and health-related costs of manufacturing products. Life cycle assessments[39] (LCAs) attempt to appraise all the inputs and outputs that are associated with the creation and disposal of a product. Included are the direct inputs to the production process, associated wastes and emissions, and the future (downstream) fate of the product. Using aluminum recycling and production as an example, downstream effects that should be analyzed would include the energy consumption and emissions of smelters used to melt the raw ore versus recyclable cans and the ultimate fate and use of the product. In some cases, recyclables that have been locally collected are exported for use overseas.

LCAs and similar applications can identify deficiencies in a process and help compare the benefits and costs of multiple systems. By evaluating the existing materials flowing through a community, we can identify opportunities to take what one

This page contains no comments

business considers a byproduct or waste and provide that material to another business that can use that material as production feedstock. In addition, an LCA that compares recycling systems with other waste management strategies (such as, disposal at landfills or disposal at conversion technology facilities) would provide useful information for basing future waste management decisions. Such an LCA for California's waste management system would be a useful tool for local policymakers.

Promoting these types of strategies is good regional policy as existing businesses can save money by creating efficiencies in production and government agencies and other organizations have better analytical tools for making important decisions.[40]

Product Stewardship and Extended Producer Responsibility

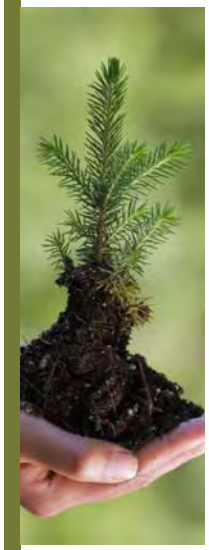
This new paradigm requires that we change the current solid waste management hierarchy to one that focuses on product stewardship and extended producer responsibility principles because one of the most effective ways to manage waste is to prevent it from being produced in the first place.

Product stewardship is a product-centered approach to environmental protection. It extends the responsibility for a product to everyone involved in the product lifecycle. This means that manufacturers and producers design products that are recyclable, reusable, less toxic, less wasteful, and/or more durable. It also means getting rid of excessive packaging such as the cardboard box that encloses a plastic medicine bottle. Retailers and consumers are then responsible for ensuring that proper recycling and disposal of products occur.

Product stewardship is often used interchangeably with Extended Producer Responsibility (EPR). However, EPR focuses the brunt of the responsibility for creating an environmentally compatible product on the manufacturers and producers of the product. Producers retain responsibility for their end-of-life (EOL) products. This provides them with incentives for designing products for recycling, reuse and easy dismantling.[41] For example, businesses making products that are leased, such as HP (photocopiers) have long known that their products will be returned so they have learned to make remanufacturing profitable. When businesses are compelled to internalize the true costs of wasteful packaging and inefficient material use, there is incentive to create more innovative and efficient waste management strategies.

EPR policies should give producers an incentive to design products that:

- Use fewer natural resources;
- Use greater amounts of recycled materials in manufacturing;
- Can be reused;
- Can be more easily treated/dismantled and recycled;
- Reduce or eliminate the use of hazardous substances or materials in the manufacturing of products.



LIFE CYCLE ASSESSMENTS

Life Cycle Assessments (LCAs) need not be limited to analyzing the life cycle of a single product. LCA is a methodology that can analyze the interactions of a technological system with the environment. It can be used as a decision-making tool to help weigh environmental and health impacts between various waste management options. If used correctly,[36] LCAs can answer questions like, "Are impacts from manufacturing aluminum cans from raw material really much worse than the impacts from re-manufacturing of recycled aluminum and if so, how much worse?" and "Have the costs of environmental and health impacts, such as losing ecosystem services10 and the loss of worker days been calculated into the costs?" Governments, private firms, consumer organizations, and environmental groups can all use LCA as a decision support tool.[37]

The EPR approach should be seen as a system for preventive environmental policy-making. EPR promotes a sustainable approach to resource use and reduces the quantity of solid waste going to a landfill, by diverting end of life products to re-using, recycling, or other forms of recovery. Many corporations are recognizing the value of EPR and have developed voluntary EPR strategies in their organizations.

The Solid Waste Action Plan

All of the strategies that have been laid out are meant to provide guidance and background for implementing the action plan that follows. The goal attempts to encapsulate the vision for solid waste and resource management that will move our region toward a more sustainable and healthier future. This will require a coordinated effort of implementing all of the short-term and long-term policies/actions that are contained within this plan. Some, of which require changing how our whole region thinks about solid waste management issues.

Recycling, composting, conversion technologies, and landfills all play a part in moving towards maximizing diversion. We will need to employ this mix of strategies to handle current waste disposal needs as we transition to a system of real natural resource management. Even if we achieve close to 100 percent materials efficiency, there will still be residual waste that will need to be disposed at landfills or managed with conversion technologies.

SOLID WASTE GOALS

- A region that conserves our natural resources, reduces our reliance on landfills, and creates new economic opportunities in the most environmentally responsible manner possible.

SOLID WASTE OUTCOMES

- All SCAG region jurisdictions should meet a 40 percent waste disposal rate[42] by 2035 to minimize disposal to landfill ~~provided appropriate utilization of technologies are permitted and diversion credit is provided by the State for waste management strategies including, but not limited to, appropriate and environmentally sound recycling, composting, and conversion technologies with diversion credit as well as other actions and strategies contained in this chapter, such as product stewardship and extended producer responsibility.~~
- Conversion and other alternative technologies should be available as a diversion strategy in the next five years with one or more new conversion technology facilities sited in the SCAG region by 2020.

Page: 101

Author: OCCOG TAC
Subject: Replacement Text
Date: 6/30/2008 9:18:18 AM
Please delete last portion of the sentence. It is not necessary to place conditions on the outcome.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:44:07 PM
It is requested that this outcome be clarified to identify the specific targets for this outcome. It is observed that the use of the terminology "should be" makes the outcome ambiguous.

SOLID WASTE ACTION PLAN

Constrained Policies

BMP/Best Practices	Legislation	Coordination		Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Open Space	Economy	Security	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	SW-1 SCAG shall encourage all levels of government to advocate for source reduction and waste prevention.			X	X	X		X		X	
X		X	SW-2 SCAG shall encourage policies that: (a) promote expansion of recycling programs and facilities that provide local recycling services to public and private sectors and (b) encourage development of viable, local, and sustainable markets to divert materials from landfills.			X	X	X		X			X
X			SW-3 SCAG shall adopt and implement a recycled content procurement program and participate in programs that promote the purchase of recycled content products			X	X	X		X			X
		X	SW-4 SCAG shall support and encourage the CIWMB to conduct comprehensive life cycle assessments of all components of the waste management practices including but not limited to, waste disposal to landfills, composting, recycling, and conversion technologies. A comprehensive analysis must include environmental impacts, health effects, emissions, use of resources and personnel, costs of same to collect wastes and recyclables, transportation costs (local, within U.S. or international), processes to separate recyclables, and production of end products using collected recyclables and raw materials.			X	X	X					X
	X		SW-5 SCAG shall continue to support and encourage legislation that advocates for the elimination of unnecessary duplication and/or restrictive regulations that hinder recycling, reuse, composting and conversion of solid waste and redefines conversion technologies as a diversion strategy to allow development of these facilities in the SCAG region.			X	X	X		X			X
		X	SW-6 SCAG should coordinate source reduction, reuse, recycling, composting, and conversion technology efforts to increase economies of scale.			X	X	X		X			X
		X	SW-7 SCAG should encourage the equal distribution of industrial impacts among all income levels from all types of solid waste management facilities including recycling, composting, and conversion technology facilities.	X		X	X	X		X			X
		X	SW-8 SCAG shall support the development of public education and outreach efforts to increase awareness of the benefits of a regional policy to maximize diversion.			X	X	X		X			X
Local Government Policies													
X			SW-9 Local governments should update general plans to reflect solid waste sustainability issues such as waste reduction goals and programs (1996 RCP, 135).	X		X	X	X	X				X
X			SW-10 Local governments should discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, landfills should be sited with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.	X		X	X	X	X	X			X

Page: 102

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 9:20:47 AM
Please ensure that each of the policies is applied to the agency that has purview over the action.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:44:32 PM
It is recommended that the large number of policies applicable to local governments be consolidated into fewer, more comprehensive policies. It is observed that the policies, as currently listed, are repetitive and sometimes restate one another.

SOLID WASTE

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits: Use	Transportation	Air Quality	Water	Energy	Open Space	Economy	Security	Other Benefits: Public Health	Climate Change
x			SW-11 Local governments should discourage exporting of locally generated waste outside of the SCAG region. ~~Disposal within the county where the waste originates shall be encouraged as much as possible. Green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with AQMP and RTP policies should be required.~~	x	x	x	x	x	x	x		x	x
x			SW-12 Local governments should maximized waste diverion goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.			x	x	x		x			x
x			SW-13 Local governments should build local markets for waste prevention, reduction, and recycling practices.			x	x	x		x			x
x	x		SW-14. Developers and local governments should integrate green building measures into project design and zoning ~~such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures that should be explored for new and remodeled buildings include:~~ ~~• Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.~~ ~~• An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion.~~ ~~• Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.).~~ ~~• Reuse of existing building structure and shell in renovation projects.~~ ~~Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:~~ ~~• Development of indoor recycling program and space.~~ ~~• Design for deconstruction.~~ ~~• Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components.~~	x		x	x	x	x	x			x
x	x		SW-15 Local governments should develop ordinances that promote waste prevention and recycling such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and instituting ordinances to divert food waste away from landfills and toward food banks and composting facilities.			x	x	x		x			x
x			SW-16 Local governments should support environmentally friendly alternative waste management strategies such as composting, recycling, and conversion technologies.			x	x	x		x			x
x			SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	x		x	x	x					x
x		x	SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.	x		x	x	x					x
x			SW-19 Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	x		x	x	x					x

Page: 103

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 4:45:00 PM
Please delete the second sentence. Retaining and disposing of waste within the same county is not always the most appropriate action as some cities are closer to landfills in adjacent counties. Further, it is not necessary given the other policies included in the list.

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 9:25:51 AM
SW-13 and SW-19 could possibly be combined to state "encourage the creation of and facilitate."

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 4:45:19 PM
Please delete the specific actions as they may change over time. Further, if specific information and detail are to be identified in the policy, please separate the project design and zoning from the construction and demolition recommendations.

Author: OCCOG TAC
Subject: Highlight
Date: 6/30/2008 9:26:53 AM
Please see comment for SW-13.

Additionally, please delete the word "synergistic."

Constrained Policies

IGR/Best Practices	Legislation	Constitution		Potential for Direct/Indirect Benefits: Land Use	Transportation	Air Quality	Water	Energy	Open Space	Economy	Security	Other Benefits: Public Health	Climate Change
x			SW-20 Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities in conjunction with existing waste management or material recovery facilities.	x		x	x	x					x
x			SW-21 Local governments should increase programs to educate the public and increase awareness of reuse, recycling, composting, and green building benefits ~~and raise consumer education issues at the County and City level, as well as at local school districts and education facilities~~.			x	x	x		x			x
State and Federal Government Policies													
	x		SW-22 CIWMB should create waste diversion incentives to increase waste diversion past 50% including credit for conversion technology.			x	x	x		x			x
	x		SW-23 Federal and State governments should develop and implement new and existing legislation that requires recycled content procurement programs, favoring the purchase of recycled and recyclable products or products with built-in EPR design in all state and federal agencies.			x	x	x		x			x
	x		SW-24 Federal and State governments should explore financial incentives such as tax credits, subsidies, and price supports for waste diversion activities that include waste reduction, recycling, composting, and conversion technologies.			x	x	x		x			x
	x	x	SW-25 CIWMB, Air Resources Board, and the California Water Resources Board should coordinate to address regulatory challenges and streamline the permitting process for solid waste conversion and composting technologies.			x	x	x					x
	x		SW-26 The federal government and CIWMB should establish policies that provide (a) diversion credit for beneficial use of post-recycled, solid waste residuals managed at non-burn conversion technology facilities, and (b) separate and remove conversion technologies from the "transformation" definition.			x	x	x	x			x	x
	x		SW-27 Federal, State, and local governments should support and encourage federal and state incentives for the research and development of pilot or demonstration projects for solid waste conversion technologies.			x	x	x	x				x
		x	SW-28 CIWMB should do the following to improve education and awareness of solid waste management issues: (a) actively promote education regarding reuse, recycling, composting and solid waste conversion technology programs; (b) provide information concerning the costs and benefits of these programs to local governments; and (c) facilitate state and local government coordination of consumer awareness programs to minimize unnecessary duplication of effort in solid waste outreach programs carried out by local government.			x	x	x	x	x			x
	x		SW-29 The Federal government should provide funding and support for continuation of waste management public education programs.			x	x	x	x	x			x
	x	x	SW-30 The CIWMB should take a more active leadership role in developing recycling markets since our local services and products are trading and competing on a global basis and thus are susceptible to events/market fluctuations throughout the world.			x	x	x	x	x			x

Page: 104

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:46:11 PM
Please clarify what is meant by "in conjunction with." Specifically, does this mean near to those facilities or identifying a commitment to take the other waste streams identified?

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 4:46:47 PM
Please delete the last portion of the sentence as they are not under the purview of local governments.

Page: 105

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:47:56 PM
Please include a discussion and description in the chapter regarding "Pay as You Throw" disposal systems proposed in this policy. Background information has not been provided in the chapter to identify what would be incorporated in or involved with this program.

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Open Space	Economy	Security	Public Health	Climate Change
State and Federal Government Initiatives													
	X		SW-1S Federal, State and local governments should support and implement source reduction policies which promote product stewardship through the following actions: • Create incentives for participation in Product Stewardship and Extended Producer Responsibility (EPR) initiatives such as, encouraging public-private partnerships with product stewardship goals (e.g. The European Green Dot system) and offering incentives to producers who use recycled content to encourage growth in the recycled contents market. • Create ordinances with EPR policies that require producers and manufacturers to produce "sustainable" packaging and products, develop life cycle assessments for products, as well as, support the development of infrastructure and markets for the recycling and reuse of these products. EPR principles that should be included are: increasing the useful life of products through durability and reparability; increasing production efficiency to produce less production waste and less packaging waste; increasing recyclable material content and reducing virgin material content; facilitating material or product reuse; and decreasing of the toxicity of products. Packaging should be easily recyclable or biodegradable based on any number of EPR strategies including, Design for the Environment (DfE) or Design for Disassembly (DfD) principles. For example, businesses such as, takeout food distributors, should utilize packaging that is compatible with recycling and composting options available.		X	X	X	X	X	X		X	X
	X		SW-2S Federal, State and local governments should create tax incentives that help companies derive profit from resource efficiency. Actions such as the following would be included: • Institute Pay As You Throw (PAYT) solid waste disposal systems. • Require that companies take back certain types of packaging for reuse or recycling.		X	X	X	X	X	X		X	X

Footnotes

[1] California Integrated Waste Management Board. Annual Summary Report: Waste Flow by Origin. Multi-year Countywide Origin Summary. Data retrieved (June 2007) from http://www.ciwmb.ca.gov/LGCentral/DRS/Reports/Orgin/WFOrginAnnual.asp .

[2] California Integrated Waste Management Board. June 2007. Estimated Residential Disposal Rates. http://www.ciwmb.ca.gov/LGCentral/Rates/Disposal/Resident.htm.

[3] California Integrated Waste Management Board. June 2007. Estimated Non-Residential Disposal Rates. http://www.ciwmb.ca.gov/LGCentral/Rates/Disposal/NonResid.htm.

[4] Environmental Protection Agency. 1995. Decision Maker's Guide to Solid Waste Management, Volume II. Washington DC.: U.S. EPA Office of Solid Waste.

[5] Walsh, P. and P. O'Leary. 2002. Evaluating a Potential Sanitary Landfill Site. Waste Age. May 2002:74-83.

[6] Fishbein, B., Ehrenfield, J. and J. Young. 2000. Extended Producer Responsibility: A Materials Policy for the 21st Century. New York: INFORM, Inc.

[7] Schandl, H. and N. Eisenmerger. 2006. Regional Patterns in Global Resource Extraction. Journal of Industrial Ecology 10(4):133-147.

[8] Ibid.

[9] Leachate is liquid generated from moisture brought in with the waste, from rainfall which percolates into the landfill, and from the waste decomposition process. It contains dissolved and insoluble chemicals. http://www.ciwmb.ca.gov/landfills/NeedFor/Protection.htm

This page contains no comments

[10] Sanitation Districts of Los Angeles County. Puente Hills Gas-to-Energy Facility. http://www.lacsd.org/info/energyrecovery/landfillgastoenergy/puentehillsgastoenergy.asp

[11] Sanitation Districts of Los Angeles County. 2007. Waste-By-Rail. http://www.lacsd.org/info/waste_by_rail/default.asp

[12] California Integrated Waste Management Board. 1997. Waste Board Approves Permit for Regional Landfill in Imperial County. Notice 97-031. http://www.ciwmb.ca.gov/PressRoom/1997/mar/NR031.HTM

[13] Sanitation Districts of Los Angeles County. 2006. Mesquite Regional Landfill Fact Sheet. http://www.lacsd.org/info/waste_by_rail/fact_sheets.asp

[14] California Integrated Waste Management Board. 2007. County Waste Flow Information: California Counties Disposal Destination Data. http://www.ciwmb.ca.gov/LGCentral/Summaries/CountyInfo.asp

[15] Public Resources Code (PRC), Section 41780.

[16] Diversion is generally defined as the reduction or elimination of the amount of solid waste from solid waste disposal (to landfill or incineration). Source reduction (waste prevention), recycling, reuse, and composting activities are considered diversion.

[17] California Integrated Waste Management Board. 2007. Waste Stream Information Profiles http://www.ciwmb.ca.gov/Profiles/.

[18] Goldman , G and A. and Ogishi, The Economic IMpact of Waste Disposal and Diversion in California. A Report to the California Integrated Waste Management Board, 2001.

[19] National Recycling Coalition. 2001. California Recycling Economic Study. Prepared for the California Integrated Waste Management Board.

[20] Ibid.

[21] California Integrated Waste Management Board. 2007. Recycling Market Development Zones. http://www.ciwmb.ca.gov/RMDZ/.

[22] Environmental Protection Agency. 1998. Puzzled About Recycling's Value? Look Beyond the Bin. EPA530-K-97-008. http://www.epa.gov/msw/recpubs.htm.

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[25] California Integrated Waste Management Board. 2004. Statewide Waste Characterization Study. (Publication # 340-04-005).

[26] Alameda County Waste Management Authority. 2006. 2006 Builders Guide to Reuse and Recycling: A Directory for Construction & Demolition Landscaping Materials. http://stopwaste.org/docs/build ersguide-05.pdf.

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[29] Ibid.

[30] Integrated Waste Management Board. 2007. "Food Scrap Management." http://www.ciwmb.ca.gov/FoodWaste/

[31] California Integrated Waste Management Board. 2004. Evaluation of Conversion Technology Processes and Products.

[32] California Integrated Waste Management Board. 2005. Conversion technologies report to the legislature. (Publication # 442-05-016).

[33] Defra. 2005. Advanced Thermal Treatment of Municipal Solid Waste. Waste Implementation Programme New Technologies.

[34] California Integrated Waste Management Board. 2004. Evaluation of Conversion Technology Processes and Products.

[35] URS. 2005. Conversion Technology Evaluation Report. Prepared for The County of Los Angeles Department of Public works.

[36] The Society for Environmental Toxicology and Chemistry (SETAC) has defined guidelines for the stages of a generic product life cycle that muse be considered in LCAs (Tan and Culaba, 2002).

[37] Tan, R. and Culaba A. (2002) Environmental Life-Cycle Assessment: A Tool for Public and Corporate Policy Development, available from The American Center for Life Cycle Assessment, available at: http://www.lcacenter.org/library/pdf/PSME2002a.pdf

[38] Zero Waste New Zealand Trust, 2003. Getting There! The Road to Zero Waste. Aukland: Envision New Zealand, Ltd.; Zero Waste International Alliance, 2007

[39] Also referred to as Life Cycle Analysis

[40] Chelsea Center for Recycling and Economic Development. N.d. Assessing the flow of materials in a region: lessons learned from three Massachusetts communities.

[41] Lindhqvist, T. Extended Producer Responsibility in Cleaner Production. Lund University. The International Institute of Environmental Economics.

[42] Waste disposal rate means the amount of waste sent to landfills. This disposal rate roughly translates to a 60% diversion rate but with the caveat that strategies not counted under the current definition of diversion (such as conversion technologies and certain types of source reduction efforts) are credited as diversion.

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Transportation

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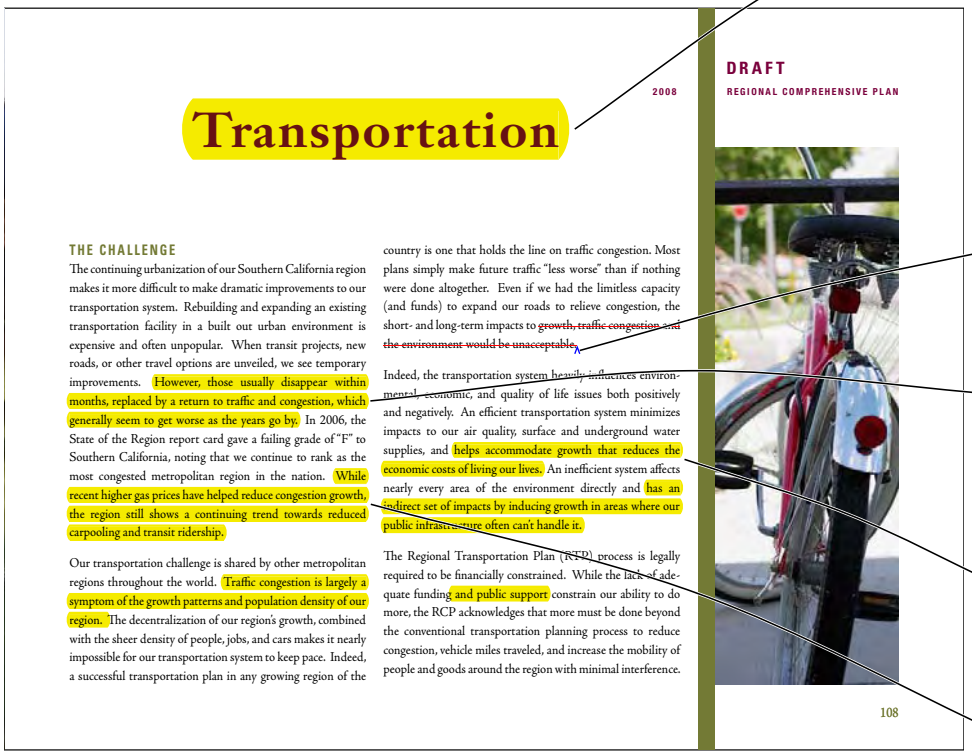
Page: 108



Transportation

2008

DRAFT

REGIONAL COMPREHENSIVE PLAN

THE CHALLENGE

The continuing urbanization of our Southern California region makes it more difficult to make dramatic improvements to our transportation system. Rebuilding and expanding an existing transportation facility in a built out urban environment is expensive and often unpopular. When transit projects, new roads, or other travel options are unveiled, we see temporary improvements. However, those usually disappear within months, replaced by a return to traffic and congestion, which generally seem to get worse as the years go by. In 2006, the State of the Region report card gave a failing grade of "F" to Southern California, noting that we continue to rank as the most congested metropolitan region in the nation. While recent higher gas prices have helped reduce congestion growth, the region still shows a continuing trend towards reduced carpooling and transit ridership.

Our transportation challenge is shared by other metropolitan regions throughout the world. Traffic congestion is largely a symptom of the growth patterns and population density of our region. The decentralization of our region's growth, combined with the sheer density of people, jobs, and cars makes it nearly impossible for our transportation system to keep pace. Indeed, a successful transportation plan in any growing region of the country is one that holds the line on traffic congestion. Most plans simply make future traffic "less worse" than if nothing were done altogether. Even if we had the limitless capacity (and funds) to expand our roads to relieve congestion, the short- and long-term impacts to ~~growth, traffic congestion and the environment would be unacceptable.~~

Indeed, the transportation system heavily influences environmental, economic, and quality of life issues both positively and negatively. An efficient transportation system minimizes impacts to our air quality, surface and underground water supplies, and helps accommodate growth that reduces the economic costs of living our lives. An inefficient system affects nearly every area of the environment directly and has an indirect set of impacts by inducing growth in areas where our public infrastructure often can't handle it.

The Regional Transportation Plan (RTP) process is legally required to be financially constrained. While the lack of adequate funding and public support constrain our ability to do more, the RCP acknowledges that more must be done beyond the conventional transportation planning process to reduce congestion, vehicle miles traveled, and increase the mobility of people and goods around the region with minimal interference.

108

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:53:26 PM

Because transportation and transportation planning are considered to be primary functions of SCAG and that are reflected in the goals of the RTP, it is recommended that this chapter more closely reflect the RTP and clearly identify where it is different or expands upon the RTP.

Because this document is intended to be read by a wide range of audiences with varying levels of knowledge about regional planning and SCAG, it is recommended that the various documents and programs referenced throughout the chapter (and the RCP) be clearly defined (blueprint, RTP, etc…) For example, it is suggested that it would be helpful to include a glossary/list of definitions/acronyms in the document and in this chapter, specifically, include a sidebar with the definitions of the different acronyms.

It is suggested that references throughout the Chapter to the "anticipated RTP" should reflect the adopted or completed 2008 RTP.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 4:54:16 PM

The following rewording is offered for clarification: "people, the regional economy, and the environment would be unacceptable." (The impacts would not be to growth, but to the people that constitute "growth.")

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 4:56:25 PM

This sentence is made in reference to transportation improvements and it is noted that it is an opinion statement. The OCCOG observes that it is also not accurate for all improvements, locations, or situations as some improvements do result in noticable and measurable traffic improvements that last for a significant time. It is recommended that it read "often" instead of "usually."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:00:03 PM

Please explain what is meant by efficient transportation systems help to accomodate growth that "reduces the economic cost of living our lives" ? The OCCOG notes that it is not clear what is meant by the phrase "economic cost of living our lives."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:00:54 PM

Comments from page 108 continued on next page

Transportation

THE CHALLENGE

The continuing urbanization of our Southern California region makes it more difficult to make dramatic improvements to our transportation system. Rebuilding and expanding an existing transportation facility in a built out urban environment is expensive and often unpopular. When transit projects, new roads, or other travel options are unveiled, we see temporary improvements. However, those usually disappear within months, replaced by a return to traffic and congestion, which generally seem to get worse as the years go by. In 2006, the State of the Region report card gave a failing grade of "F" to Southern California, noting that we continue to rank as the most congested metropolitan region in the nation. While recent higher gas prices have helped reduce congestion growth, the region still shows a continuing trend towards reduced carpooling and transit ridership.

Our transportation challenge is shared by other metropolitan regions throughout the world. Traffic congestion is largely a symptom of the growth patterns and population density of our region. The decentralization of our region's growth, combined with the sheer density of people, jobs, and cars makes it nearly impossible for our transportation system to keep pace. Indeed, a successful transportation plan in any growing region of the country is one that holds the line on traffic congestion. Most plans simply make future traffic "less worse" than if nothing were done altogether. Even if we had the limitless capacity (and funds) to expand our roads to relieve congestion, the short- and long-term impacts to ~~growth, traffic congestion and the environment would be unacceptable.~~

Indeed, the transportation system heavily influences environmental, economic, and quality of life issues both positively and negatively. An efficient transportation system minimizes impacts to our air quality, surface and underground water supplies, and helps accommodate growth that reduces the economic costs of living our lives. An inefficient system affects nearly every area of the environment directly and has an indirect set of impacts by inducing growth in areas where our public infrastructure often can't handle it.

The Regional Transportation Plan (RTP) process is legally required to be financially constrained. While the lack of adequate funding and public support constrain our ability to do more, the RCP acknowledges that more must be done beyond the conventional transportation planning process to reduce congestion, vehicle miles traveled, and increase the mobility of people and goods around the region with minimal interference.

Please explain if this is in reference to per capita measurements because transit ridership is reported to be increasing in the nation as well as the region as a result of higher gas prices.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:03:43 PM

The OCCOG offers that typically, roads are not extended for the sake of extending a road and would further offer that road construction could be considered to be induced by planned growth, as opposed to the other way around. It is suggested that a discussion of what is meant by "induced growth" would be helpful in this section. For example, please explain if the used of the terminology regarding "induced growth" is used in the context presented by ULI in their book "Growing Cooler."

Additionally, it is not clear what is meant by "often can't handle it." If growth is planned in areas that do not have adequate infrastructure, it is not an issue of the transportation system, but an issue of planning for the growth. Therefore, this statement implies wrongdoing. It is recommended that the statement be deleted or reworded.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:05:52 PM

The OCCOG observes that this statement may be misleading to some readers and, further, notes that it may not reflect the goals of other chapters. Specifically, the land use chapter advocates for land use patterns that would increase population density in specific areas. This sentence states that it will cause increased traffic congestion, which does not appear to be a what is intended by the text in the chapter, which advocate for densification in order to more efficiently use transportation resources.

Additionally, it is recommended that the discussion regarding growth patterns and their influence on traffic congestion be expanded to explain the reasons it may occur.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:08:24 PM

The OCCOG observes that it is not clear that there is a there a lack of public support to develop our transportation system, as exemplified by the number of counties that have passed self-taxing measures to pay for transportation improvements. It is suggested that perhaps in the context of this paragraph, the text should be clarified to identify that public support is a constraint when it involves the expansion of the transportation infrastructure into new areas or that would result in the purchase of private property, if this is what was intended.

HOW TRANSPORTATION POLICIES PRODUCE MULTIPLE BENEFITS

Land Use and Housing: Focusing transportation investments to serve critical centers for housing and jobs helps guide land use planning. In doing so, transportation investments can increase property values and demand for subsequent development, such as transit-oriented development.

Open Space and Habitat: Location choices for new or expanded transportation facilities can play a large role in the ability to maintain or limit impacts on existing natural lands.

Water: Promoting transportation projects that reduce urban sprawl can reduce surface water runoff contamination and maximize recharge of underground aquifers. Improved highway and roadway design can help mitigate transportation-related water quality problems.

While the RTP is legally required to be financially constrained, more

The RCP is founded on the premise that we need to make profound changes in the way we travel today and radically alter the way we plan our transportation system tomorrow.

Our challenges to developing transportation policies that can achieve ambitious mobility goals can be broadly divided into three categories:

- addressing demand on our transportation system from growth in population, employment and households,
- preserving, wisely utilizing, and, when necessary, expanding our infrastructure, and
- funding.

Demand on Our Transportation System

Each major mode in our transportation system faces challenges meeting the growth that is ~~coming our way~~. If current population and employment trends continue as projected, regional traffic delay is expected to more than double to 3.6 million hours of daily delay by 2030. Travel speeds on highways will become more unpredictable and average speeds will decrease substantially. In addition to conventional passenger surface transportation, there are two other major dynamics that will continue to grow over the next 25 years and pose major challenges for the region.

Crisis in Transporting Goods. The Southern California region is facing dramatic growth in rail and truck traffic. Almost all of the short-haul and significant chase of medium- and long-haul movement of goods occur by truck. Severe congestion due to truck traffic is expected to worsen in the region's major transportation corridors like the I-710 and SR-60 freeways, as the regional system will see up to 216 percent more truck trips by 2035. Containerized trade volume is expected to triple to 42.5 million Twenty-Foot Equivalent Units (TEUs) by 2030. These forecasts are capacity-constrained significantly below anticipated demand, and are based on an increase of port terminal productivity from 4,700 TEUs per acre per year currently to over 10,000 TEUs per acre per year in the future. The ability of the ports to handle this unprecedented growth in containerized cargo volumes is critical to the continued health of the local, regional, and the national economy.

The challenge in address the growth in containerized cargo at the ports is compounded by traffic bottlenecks for trucks entering and leaving the port areas. Additionally, the region's intermodal rail yards are reaching capacity and causing delays in moving both international and domestic containers between rail and trucks. Our ability to accommodate the subsequent rail and truck distribution traffic will substantially drive whether we can achieve ambitious transportation goals.

Air Travel. The level of air passenger demand is forecast to double before 2035 from the current regional level of 88 million annual passengers (MAP). For every one million regional air passengers, it is estimated that there is a positive regional economic impact of $620 million (in 1998 dollars) and 4,475

Page: 109

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:10:41 PM
The OCCOG notes that the statement that the "RCP is founded on the premise that we need to make profound changes in the way we travel today and radically alter the way we plan our transportation system tomorrow" implies that transportation is the main focus of the RCP; it is suggested that if this is really the intent of the statement, it would perhaps be more appropriate to include it in the introduction or Executive Summary of the document. If it is not the intent, the following statement is offered as an alternate: "The RCP recognizes that the transportation system and mode choice affect many aspects of the quality of life in the region."

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 5:10:53 PM
Please insert the word "a"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:11:11 PM
Please define what a "twenty-foot equivalent unit" is.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 5:11:29 PM
Please replace the phrase "coming our way" with the word "anticipated"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:12:18 PM
It is not clear that "drive" is the appropriate word. It is suggested that the word "influence" may be more appropriate and clarify what is meant by the statement.

Author: OCCOG TAC
Subject: Inserted Text
Date: 7/20/2008 5:12:41 PM
For clarification, please add the following to the sentence: "unless changes are also made to our transportation infrastructure resulting in changes in the way that people travel in the region."

must be done to reduce congestion from today's levels.

jobs. In addition, the number of jobs created by air cargo and freight movement in the region is enormous and vital to the overall health of the regional economy. However, the increased traffic that will cross our region's roads and freeways to get to our eight commercial service airports must be addressed if we are to reduce congestion beyond current levels.

Preserving and Expanding Our Infrastructure

The region must get the most out of the current system. This is especially true for the State Highway System. Small physical improvements (e.g., auxiliary lanes that extend the merging range) and technology deployments (e.g., advanced ramp metering) offer us affordable solutions to restore some of the lost productivity due to increasing congestion. These technology deployments are often referred to as Intelligent Transportation Systems or ITS. The combination of investments reduces delays and the duration of congestion, and improves the predictability of travel time.

Every investment in our transportation system creates a long-term commitment to operate and maintain that infrastructure. Current estimates show that our region needs $40 billion in order to maintain our current system. However, we have a funding shortfall of over $26 billion, meaning that as most of our transportation infrastructure continues to age, it will ultimately require more investment in maintenance and preservation.

In light of this inability to even maintain our existing system, the region must find ways to expand travel options for passenger and freight movement. Conventional multi-modal investments must be complemented with land use strategies, market-based initiatives, and other major, innovative programs if we are to reverse the ~~historical~~ trends toward increasing congestion and vehicle miles traveled.

Financial Needs

The SCAG region faces significant financial challenges to meet current transportation maintenance and operational needs for the RTP horizon, not to mention what is needed to further improve mobility and air quality in the region. Historical sources of funding such as gas taxes may be a decreasing source of revenue in light of potential shifts to other fuel sources. Public-private partnerships, user fees, and other sources of revenue must be explored if we are to find new ways to address current and future congestion.

THE PLAN

While the RCP calls for unprecedented goals and action, it recognizes that the pending 2008 RTP will make up the constrained, or funded, foundation of any more ambitious long-term plan. The pending RTP relies on a number of strategies to achieve more modest, constrained goals. These include an increased focus on operational, management and preservation

Page: 110

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 6:04:27 PM
The following is recommended for clarification: "unconventional means of addressing transportation, including"

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 5:13:24 PM
Please delete the word "historical" as it is unnecessary because "trends" implies the use of historical information.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:18:05 PM
Please reword as the sentence is unclear. The OCCOG observes that the funding shortfall for maintenance means that as the infrastructure ages and is not maintained, even more significant investment and commitment will be necessary in the future to not only make up for any continued shortfall but to address the fact that the existing system will continue to deteriorate due to the the current lack of investment.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:18:52 PM
Please provide more information on the intent of the RCP to provide "less modest" goals than the constrained goals of the RTP as implied by the statement that the RTP relies on more modest, constrained goals than the RCP.

TRANSPORTATION

HOW TRANSPORTATION POLICIES PRODUCE MULTIPLE BENEFITS

Energy: The transition of the vehicle fleet to non-petroleum-based energy sources will have profound changes in overall energy demand. The impact of potential shifts to electric-powered sources of transportation on power plants must be addressed.

Air Quality: On-road mobile sources make up 40% and 57% of our region's smog-forming ROG and NO_x emissions, and 77% of carbon monoxide emissions. Transition of passenger and freight vehicle fleets to cleaner fuels is an important strategy in the region's efforts to achieve clean air standards and reduce localized hotspots of toxic air pollutants.

Economy: Improved mobility has a profound impact on the economy as traffic delays time and associated additional fuel costs are distributed throughout the economy, particularly as it impacts the movement of goods.

111

Our region needs to do more now to plan for the unprecedented growth

strategies; land-use integration with transportation investments; and strategic system expansion investments.

Preservation – Protecting our Infrastructure

The 2008 RTP proposes setting aside substantial funding for infrastructure preservation. However, ~~there will remain substantial shortfalls needed to fund the $40 billion in needs.~~

Operational Strategies – Getting the Most Out of Our Existing System

The 2008 RTP proposes funding for operational strategies that improve the productivity of the State Highway System through 2035. The total amount of funding represents less than one percent of the overall RTP expenditures, but is expected to produce benefits that are almost an order of magnitude higher.

Transportation Demand Management (TDM)

The 2008 RTP includes $1.25 billion in TDM investments through 2030, with over $900 million dedicated to non-motorized transportation improvements.

Strategic System Expansion/Capital Investments

SCAGs transportation planning proposes a balanced investment in all of the Region's modes so that the system performs at the highest level possible.

For example, the 2008 RTP includes a Strategic Arterial Improvement concept that could involve a combination of widening, signal prioritization and other Intelligent Transportation Systems (ITS) deployment and grade separation at critically high-volume intersections to enhance the flow speed and capacity of the arterial. In addition to the specific arterial improvements identified under the Smart Street Improvement Program, this Plan proposes a significant increase in funding for arterial improvements and capacity enhancements.

Strategic Growth Linked to Transportation

The 2008 RTP will continue to promote land use policies that ~~have proved~~ to be both regionally beneficial relative to ~~their transportation performance~~ and in tune with the emerging public policy, development patterns and community needs throughout the region. Policies will include:

- Identify regional strategic areas for infill and investment
- Structure the plan on a 3-tiered system of centers development.

Page: 111

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 5:19:12 PM
It is observed that the statement is confusing. The following is offerred for clarification: "there remains a substantial shortfall in the funding for the $40 billion in needs."

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 6:38:35 PM
Should this be "arterial system"?

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 6:37:29 PM
Please insert the following for clarification: "for these improvements"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:20:11 PM
Please explain what is meant by "almost an order of magnitude higher."

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:49:12 PM
If a list of land use policies is to be included in this section, it is recommended that the section reflect the full text adopted by the Regional Council in August 2007. The adopted list included the necessary explanations to give context for each of the bullets.

It is offered that a more general discussion considering the influences that land use and transportation have on one another is possibly more appropriate for this section.

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 6:38:50 PM
Please insert the word "voluntary"

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 5:49:51 PM
Please replace the phrase "have proved" with "are demonstrated" as the policies have not yet been proven on a regional scale to provide the benefits identified in the section.

Author: OCCOG TAC

Comments from page 111 continued on next page

Our region needs to do more now to plan for the unprecedented growth

HOW TRANSPORTATION POLICIES PRODUCE MULTIPLE BENEFITS

Energy: The transition of the vehicle fleet to non-petroleum-based energy sources will have profound changes in overall energy demand. The impact of potential shifts to electric-powered sources of transportation on power plants must be addressed.

Air Quality: On-road mobile sources make up 40% and 57% of our region's smog-forming ROG and NO_x emissions, and 77% of carbon monoxide emissions. Transition of passenger and freight vehicle fleets to cleaner fuels is an important strategy in the region's efforts to achieve clean air standards and reduce localized hotspots of toxic air pollutants.

Economy: Improved mobility has a profound impact on the economy as traffic delays time and associated additional fuel costs are distributed throughout the economy, particularly as it impacts the movement of goods.

strategies; land-use integration with transportation investments; and strategic system expansion investments.

Preservation – Protecting our Infrastructure

The 2008 RTP proposes setting aside substantial funding for infrastructure preservation. However, ~~there will remain substantial shortfalls needed to fund the $40 billion in needs.~~

Operational Strategies – Getting the Most Out of Our Existing System

The 2008 RTP proposes funding for operational strategies that improve the productivity of the State Highway System through 2035. The total amount of funding represents less than one percent of the overall RTP expenditures, but is expected to produce benefits that are almost an order of magnitude higher.

Transportation Demand Management (TDM)

The 2008 RTP includes $1.25 billion in TDM investments through 2030, with over $900 million dedicated to non-motorized transportation improvements.

Strategic System Expansion/Capital Investments

SCAGs transportation planning proposes a balanced investment in all of the Region's modes so that the system performs at the highest level possible.

For example, the 2008 RTP includes a Strategic Arterial Improvement concept that could involve a combination of widening, signal prioritization and other Intelligent Transportation Systems (ITS) deployment and grade separation at critically high-volume intersections to enhance the flow speed and capacity of the arterial. In addition to the specific arterial improvements identified under the Smart Street Improvement Program, this Plan proposes a significant increase in funding for arterial improvements and capacity enhancements.

Strategic Growth Linked to Transportation

The 2008 RTP will continue to promote land use policies that ~~have proved~~ to be both regionally beneficial relative to ~~their transportation performance~~ and in tune with the emerging public policy, development patterns and community needs throughout the region. Policies will include:

- Identify regional strategic areas for infill and investment
- Structure the plan on a 3-tiered system of centers development.

Subject: Replacement Text
Date: 7/20/2008 5:50:20 PM
The following is offered to replace the text "their transportation performance" for clarification: "there performance in the regional transportation system, and reflective of"...

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:51:36 PM
Because the land use chapter discusses the land use strategies, it is suggested that it is unnecessary and repetitive to include the list of strategies in this chapter. It is observed that the bullet points listed do not have context and are not defined here; hence, they are confusing for the reader and their meaning and intent is not clear. As noted above, a discussion of the policies in relation to transportation is recommended.

This page contains no comments

in cargo volumes on our air and surface transportation systems.

- Develop "complete communities" through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other.
- Develop nodes on a corridor.
- Plan for additional housing and jobs near transit.
- Plan for a changing demand in types of housing.
- Continue to protect stable existing single family areas.
- Ensure adequate access to open space and preservation of habitat.
- Integrate land use to decentralized regional aviation strategy and job creation.
- Incorporate local input and feedback on future growth.

Goods Movement Strategies

Our region needs to do more now to plan for the unprecedented growth in future cargo volumes and their impacts on our air and surface transportation system. To that end, the San Pedro Bay ports are planning and developing programs to increase capacity and enhance operational efficiency in the handling of cargo, while minimizing the impacts of port goods movement activity on the environment and public health. Some of these strategies that will play a key role in allowing the ports to realize their full potential in supporting the growth in cargo include the following:

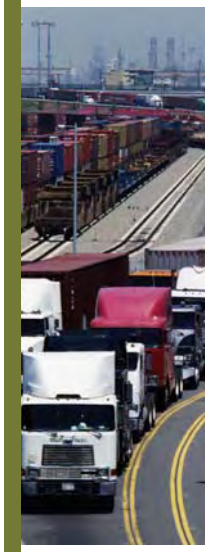
- On-dock Rail Capacity Enhancements,
- PierPass Off-peak Program,
- Virtual Container Yards, and
- Port Clean Air Action Plan Strategies

Looking beyond the Ports to the freight distribution network, the RTP will include strategies to facilitate truck movement including:

- Truck Climbing Lanes,
- Dedicated Truck Lanes, and
- Truck Emission Control Strategies

SCAG's 2008 RTP also proposes rail system capacity enhancements that reduce truck traffic, including, rail grade separations, and improve freight mobility, and exploring alternatives to reduce rail emissions. These strategies include:

- Near Dock Intermodal Yard Capacity Enhancements,
- Rail Mainline Capacity Improvements,
- Rail Grade Separations,
- On-dock Rail Projects



The increased use of market-based incentives should be considered

HOW TRANSPORTATION POLICIES PRODUCE MULTIPLE BENEFITS

Public Health: Reducing and eliminating passenger and freight-related vehicle travel and congestion will reduce adverse health impacts from transportation-related air pollution. For example, living near heavy traffic nearly triples the chance of emergency room visits or hospitalizations for asthma suffers.

Environmental Justice: Developing an effective long-term transportation system must avoid, minimize, or mitigate disproportionately adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations. It must also ensure full and fair participation by all affected communities in the transportation decision-making process.

Climate Change: Policies that encourage and expand public transit will reduce passenger vehicle use and subsequently reduce greenhouse gas emissions.

- HSRT Freight Corridor, and
- Locomotive Engine Upgrades

Finally, Inland Ports and related initiatives have been proposed to reduce truck vehicle miles traveled (VMT), decrease congestion, and lower emissions. The broad potential benefits of an inland port include facilitating goods movement, encouraging economic development, reducing traffic congestion, and promoting the regional objectives.

High Speed Rail Transport System

The HSRT system comprises a long-term vision connecting the region's ports, airports, and urban activity centers. The system can be constructed in multiple stages that can each be financially viable. The financial performance will be enhanced as the system is extended in connectivity throughout the region and the volume of users increases.

Aviation

SCAG's Regional Aviation Strategy would accommodate a total regional passenger aviation demand of 170 million annual passengers (MAP). Under the Strategy, rather than relying on expanding existing urban airports, the future demand for air travel will be largely served by using available capacity at airfields located in the Inland Empire and north Los Angeles County where projected population growth will be best served. This plan calls for constraining the LAX to its estimated existing physical capacity of 78 MAP, increasing the Ontario International Airport to 30 MAP, and a new passenger airport at Palmdale that will accommodate 12.8 MAP.

Cooperation between airport authorities is necessary to ensure efficient usage of capacity. Cooperation between airports would be accomplished through the integration of airport master plans, and the development of memoranda of understanding and contractual agreements between airports. These agreements would also identify complementary roles and market niches between airports to increase synergy in the system and maximize utilization of available airport capacities throughout the region. For example, Los Angeles World Airports would play a key role in integrating master plans for the three airports it operates, namely LAX, Ontario and Palmdale.

Airport Ground Access

The Regional Aviation Strategy will have localized ground access impacts at a number of airports. Particularly, the Regional Aviation Strategy will result in dramatic increases in airport activities (people as well as cargo) at Ontario, Palmdale and a number of other airports. A number of freeway and arterial improvements and transit strategies are proposed in SCAG's 2008 RTP to address the ground access issues as part of the overall transportation investment in the region.

Page: 113

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 5:51:57 PM
Please replace "a" with "the development of a"

Author: OCCOG TAC
Subject: Inserted Text
Date: 6/29/2008 6:46:36 PM
Please insert, "(HSRT)" or include the full name in the following sentence.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:52:24 PM
Please include an explanation of what this plan is and how it is adopted in the region, as was done regarding the RTP.

as a way to mitigate traffic volumes on existing roadways.

Beyond the RTP

It is recognized that beyond the constraints of the RTP, more should be done to reduce VMT, congestion and improve air quality. Any new strategies will likely call for collaboration and cooperation with local, state and federal governments. Public-private partnerships will also need to be explored to tap into new resources for investment.

One example of public-private partnerships may be the implementation of market-based incentives, such as (but not limited to) High Occupancy Toll Lanes or congestion pricing. These offer promise in mitigating traffic volumes on existing roadways and managing future travel on new facilities. The ability of market based incentives to achieve transportation goals, improve air quality should be maximized while addressing potential economic and social concerns.

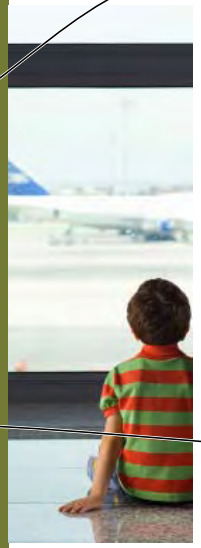
The RCP's strategic initiatives reflect broad categories of ideas that will be refined through completion of the pending 2008 RTP. Specifically, development of the RTP's Strategic Plan will help refine this Plan's strategic initiatives.

TRANSPORTATION GOALS

- A more efficient transportation system that reduces and better manages vehicle activity.
- A cleaner transportation system that minimizes air quality impacts and is energy efficient.

TRANSPORTATION OUTCOMES

- Reduce the region's vehicle miles traveled from all vehicles and from carbon-based fueled vehicles to 1990 levels by 2020.
- Reduce the region's use of gasoline and diesel fuel from on-road vehicles to 1990 levels by 2020, including accelerating the penetration of vehicles fueled by fuel cells or other non-petroleum based engine technologies.



Page: 114

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:54:54 PM

The statement that "It is recognized that beyond the constraints of the RTP, more should be done to reduce VMT, congestion, and improve air quality" is a significant policy statement. Please identify who recognizes this. The OCCOG notes that it is not currently an adopted policy at SCAG, particularly relative to the reduction of VMT.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 5:59:02 PM

It is noted that the outcomes listed do not address goods movement, which is expected to increase substantially in the next 20 years, as discussed extensively in the chapter.

Additionally, relative to all of the outcomes, it is suggested that the text explain how these listed outcomes are attainable when compared to the goals of the RTP (e.g. goods movement, etc…)

Please explain how these outcomes were developed and the rationale on which they were based. The first outcome identifies a reduction of VMT and fuel consumption to 1990 levels. The OCCOG notes and expresses concern that the outcome appears to be an application of the target formula for greenhouse gas emissions but applied VMT and fuel consumption; however, there is no discussion in the chapter of how this could be achieved. It should be noted that it seems unrealistic when considered relative to the anticipated increases in population during the same time frame?

It is recommended that the outcomes consider shifts in the use of alternative modes of transportation as the measures of success to meet the goals of the RCP. The emphasis on measures to reduced carbon-based fuels leads the reader to assume these outcomes are only intended to address air quality issues as opposed to transportation issues and, as such, their application may be more appropriate in the Air Quality Chapter.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:07:19 PM

As was identified in the Executive Summary, one of SCAG's primary purposes for the RCP is use in intergovernmental review (IGR). It was stated in SCAG staff reports to the Regional Council that staff intended for the RCP to serve as a compilation of SCAG's adopted and approved policies in a single document to facilitate the IGR functions. As such, relative to the Transportation Chapter specifically, the goals, outcomes and policies should include those of the RTP, which, for a metropolitan planning organization, is its primary program. It is recommended that the transportation goals reflect the RTP. Where they do not, it is requested that the text

Comments from page 114 continued on next page

clearly indicate why the RCP goals do not.

Further, the OCCOG observes that there is very little linkage between the goals listed and the text of the chapter. It is suggested that the goals reflect the emphasis of the discussion in the chapter. For example, there are no goals identified for cargo and diesel-fueled vehicles, goods movement, or airports. It is recommended that consideration of these issues be included in the goals of this chapter

Additionally, it would be appropriate for this chapter to address in its text and goals issues such as alternative modes of transportation, increasing transit ridership, etc. that may go beyond the goals of the RTP.

as a way to mitigate traffic volumes on existing roadways.

2008

DRAFT

REGIONAL COMPREHENSIVE PLAN

Beyond the RTP

It is recognized that beyond the constraints of the RTP, more should be done to reduce VMT, congestion and improve air quality. Any new strategies will likely call for collaboration and cooperation with local, state and federal governments. Public-private partnerships will also need to be explored to tap into new resources for investment.

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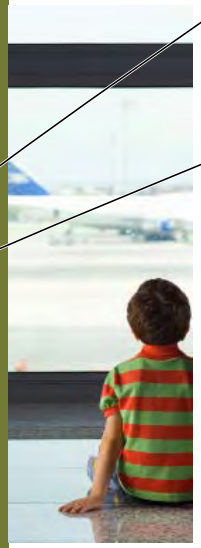


114

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:08:39 PM
The goal to reduce vehicle activity is a very significant goal. Relative to the anticipated growth in the region, it is not clear to the reader based on the text that this reduction is a goal for the region. Please include a discussion in the chapter identifying that this goal is responding to a challenge in the region and that it is supported regionally.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:09:43 PM
Please identify what "vehicle activity" is included in this goal. For example, does it include trucks, trains, airplanes, and ships - all of which have been identified in the chapter as increasing in activity in the region.

TRANSPORTATION

TRANSPORTATION ACTION PLAN

Tech/Best Practices	Legislation	Constitution	Constrained Policies	Potential for Direct/Indirect Benefits								Other Benefits	
				Land Use	Air Quality	Water	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	TR-1 SCAG shall ensure that transportation investments are based on SCAG's adopted Regional Performance Indicators.	X	X		X		X	X		X	X
		X	TR-2 SCAG shall ensure safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system will be RTP priorities and will be balanced against the need for system expansion investments.	X	X		X		X			X	X
		X	~~TR-3 SCAG shall develop a collaborative implementation program that identifies required actions and policies for RTP land use and growth strategies that differ from expected trends.~~	X	X		X	X	X		X	X	X
		X	TR-4 SCAG shall support and encourage High Occupancy Vehicle gap closures that significantly increase transit and rideshare usage.		X		X					X	X
		X	TR-5 ~~SCAG shall monitor progress of the RTP, including timely implementation of projects, programs, and strategies.~~									X	
		X	TR-6 SCAG shall address SAFETEA-LU requirements that call for improved safety planning and consultation with environmental and natural resource stakeholders when considering transportation funding plans, programs, and projects.	X	X	X	X	X	X	X	X	X	X

115

Page: 115

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:09:59 PM
Please identify and define what the "Regional Performance Indicators" referenced in the proposed policy are.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:10:23 PM
The policy does not appear to reflect or link to meeting the goals or the outcomes. Please identify what goal or outcome this is fulfilling.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 6:11:06 PM
The following text is offered to replace proposed policy TR-3: "SCAG shall develop a collaborative outreach and educational program that identifies the encouraged voluntary actions and policies necessary to implement the RTP's voluntary land use and growth strategies that differ from expected trends."

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 6:11:40 PM
For clarification, the following text is offered to replace proposed policy TR-5: "SCAG shall monitor progress of the RTP and its strategies, including timely implementation of projects and transportation project related programs.

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits								Other Benefits	
				Land Use	Air Quality	Water	Energy	Open Space	Economy	Security	Solid Waste	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)													
x		x	TR-1S SCAG, transportation commissions, local governments, and other project proponents should use the Compass Blueprint to influence the funding of future transportation planning and investments.	x	x		x	x	x			x	x
x		x	TR-2S SCAG shall help coordinate regional, State, and federal consensus on how to address the additional strategic investments and technological breakthroughs necessary to meet mobility and air quality goals.	x	x		x		x		x	x	x
x	x	x	TR-3S Beyond the RTP, SCAG shall study the effectiveness of market based incentives and disincentives that can be used separately or in conjunction with each other in order to reduce VMT.		x		x	x	x			x	x

Page: 116

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:13:12 PM

Because the Compass Blueprint was established and remains an entirely voluntary land use concept of which many organizations, including the OCCOG have expressed concerns with, it is inappropriate at this time to indicated that funding for future transportation projects should be tied to its implementation. Please delete this policy initiative until such time that there is regional concensus supporting the implementation of the Compass Blueprint.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:14:38 PM

It if offered that SCAG should be assisting other agencies, including county transportation commissions and the SCAQMD, but may not necessarily be the agency that should "coordinate" the activities. It is requested that the statement be reworded to reflect that other agencies are responsible for the coordination and that it will be SCAG's role is to work with them.

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Security

This page contains no comments

Security and Emergency Preparedness

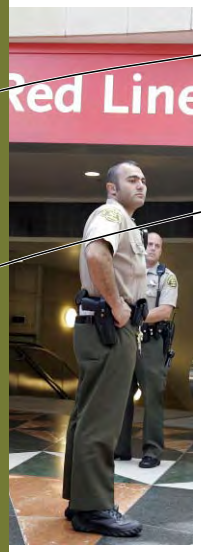
THE CHALLENGE

Southern California is home to significant threats; including earthquakes, tsunamis, wildfires, flooding and mudslides. More recently, terrorism has been added to the threats that the region must prepare against. The complexity of the SCAG region, with a range of potential terrorism targets, presents significant challenges in coordinating and implementing effective homeland security programs. The unexpected and complex nature of these natural and human-caused incidents require extensive coordination, collaboration and flexibility among all of the agencies and organizations involved in planning, mitigation, response and recovery.

Safety is defined as the protection of persons and property from unintentional damage or destruction caused by accidental or natural events. **Security** is defined as the protection of persons or property from intentional damage or destruction caused by vandalism, criminal activity or terrorist attacks. The Transportation Research Board has classified emergency events that affect transportation agencies into several categories, which is illustrated below in **Table 9.1**.

The interdependency of the jurisdictions and organizations makes regional cooperation and coordination essential to security and emergency preparedness. No significant event is truly local, as political boundaries are permeable and critical local infrastructure may serve the entire region. No jurisdiction stands alone. A high-risk, well-resourced municipality may be as dependent on a smaller jurisdiction for support in an emergency and vice-versa. Typically, no single agency is responsible for transportation security. At the local level, safety may be handled within one office, especially within transit agencies. However, the security of a surface transportation mode is often managed by more than one entity. For example, highways and transit networks traverse multiple police jurisdictions, local fire departments generally fill the incident command role after terrorist events, regional command and control centers respond to both natural and intentional disasters, and federal agencies intervene as needed and based on specific guidelines such as the crossing of state boundaries.

A proactive region that improves its homeland security programs and prepares for emergencies is better insulated against the economic, public health, transportation, and other impacts from natural and human-caused accidents. When a disaster occurs, there is a cascading effect on the transportation, utilities, communications, fuel, and water infrastructure services and delivery systems that we depend on. When one of these



Page: 118

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:18:42 PM

The OCCOG expresses concern that this chapter appears to propose a significantly expanded role for SCAG in the areas of security and emergency preparedness. It is recommended that this chapter be reworked to clearly identify what SCAG's current requirements are and should be in the realm of this topic area. The OCCOG recognizes that significant work in the areas of security and emergency preparedness are already undertaken by numerous other agencies, including first responders and emergency operations centers.

Further, it is recommended that SCAG's role be clearly identified as one of fulfilling requirements under SAFETEA-LU and to serve as a data provider for regional transportation data, as necessary and in coordination with County transportation commissions.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:19:22 PM

It is suggested that the text clearly identify that the State Emergency Plan addresses these issues. As such, it is recommended that the text present the information from the state plan instead of trying to restate it.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:19:41 PM

Please reference the source of this definition.

HOW SECURITY AND EMERGENCY PREPAREDNESS POLICIES PRODUCE MULTIPLE BENEFITS

Land Use and Housing: Minimizing impacts related to emergencies should influence land use decisions, such as minimizing tsunami or flood-related impacts could result in rezoning low-lying land, bringing potentially high value land off of the housing market.

Open Space and Habitat: Weighting wildfire risk would likely limit development in certain high wildfire risk areas.

Water: Drinking water supply is a sensitive target for both natural and human-caused emergencies. Investments that minimize risks to drinking water will necessarily benefit our ability to ensure an adequate, safe water supply.

Energy: Minimizing our reliance on petroleum sources of energy insulates us from acute oil shortages due to terrorist or natural events (e.g., hurricanes impacting refineries).

When a disaster occurs, there is a cascading effect on the transportation,

critical elements in our support system breaks down, it has a domino effect on other elements. When multiple elements break down, the effect can be crippling. Some of the ways in which the infrastructure can be affected in a disaster or emergency and effects on emergency service providers are shown in **Tables 9.2** and **9.3**.

A continuing, cooperative and collective regional effort will be needed to assist the region in the planning, preparation and response to emergencies, whether caused by natural or human elements. To assist in this effort, this chapter identifies SCAG's potential role and responsibility in regards to the relationship between transportation and emergency preparedness. It describes the current programs at the federal, State and local levels; identifies security issues in the transportation infrastructure; and recommends policies for SCAG and other stakeholders.

The continued emphasis on enhancing transportation security is also reflected in the most recent transportation authorization bill, known as SAFETEA-LU (Safe, Accountable, Flexible, Efficient Transportation Equity Act–A Legacy for Users). SAFETEA-LU specifies that Metropolitan Planning Organizations (MPOs) such as SCAG develop a metropolitan planning process that provides consideration for projects and

TABLE 9.1 EMERGENCY EVENTS IMPACTING TRANSPORTATION AGENCIES[1]

Naturally Occurring	Human Caused	
	Intentional	Non-Intentional
Droughts Dust/Wind Storms Earthquakes Electrical Storms Floods High Winds Hurricanes Ice Storms Landslides Naturally Occurring Epidemics Snowstorms and Blizzards Tornadoes Tropical Storms Tsunamis Wildfires	Bomb Threats and Other Threats of Violence Disruption of Supply Sources Fire/Arson Fraud/Embezzlement Labor Disputes/Strikes Misuse of Resources Riot/Civil Disorder Sabotage: External and Internal Actors Security Breaches Terrorist Assaults Using Chemical, Biological, Radiological, or Nuclear Agents Terrorist Assaults Using Explosives, Firearms, or Conventional Weapons Theft Vandalism War Workplace Violence Cyber Attacks	Accidental Contamination or Hazardous Materials Spills Accidental Damage to or Destruction of Physical Plant and Assets Accidents That Affect the Transportation System Gas Outages Human Errors HVAC System Failures or Malfunctions Inappropriate Training on Emergency Procedures Power Outages Software/Hardware Failures or Malfunctions Unavailability of Key Personnel Uninterruptible Power Supply (UPS) Failure or Malfunction Voice and Data Telecommunications Failures or Malfunctions Water Outages

Page: 119

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:21:04 PM

Many of the benefits identified in the sidebars of this chapter discussing multiple-benefits reference challenges and safety issues not discussed in the chapter. It is offered that due to this, it is not clear how these benefits would be realized by the actions of the RCP and the various agencies in the region.

It is recommended that all of the stated multiple benefits be reworded and restated to reflect the discussion in the chapter.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:21:40 PM

It is recommended that this, the requirements of SAFETEA-LU, be the focus of the chapter and as such, it is strongly recommended that this discussion be relocated to an earlier position in the chapter.

communications, fuel, and water services and systems that we depend on.

strategies that will "increase the security of the transportation system for motorized and non-motorized users."

THE PLAN

The RCP aims to achieve and sustain risk-based target levels of capability to prevent, protect against, respond to, and recover from major human- caused or natural events in order to minimize the threat and impact to lives, property and the regional economy. This centers around coordinating the numerous plans, programs, organizations and infrastructure in place within the SCAG region to provide safety and security of the regional transportation system for many potential situations.

SCAG's role in homeland security is based on the potential role of a MPO in relationship to six phases of an incident/disaster:[2]

- Prevention: Stopping an attack before it occurs; improved facility design; surveillance, monitoring
- Response/Mitigation: Reducing impacts of an attack; evacuation; identifying best routes; effective communication system
- Monitoring: Monitoring and evaluating incidents; surveillance, monitoring, sensing, public information
- Recovery: Facilitating and reconstruction, restoring operation of transportation system
- Investigation: Determination of causes, and responsible parties; security/police activity
- Institutional Learning: Self-assessment of actions; feedback to prevention element

TABLE 9.2 POSSIBLE EFFECTS OF DAMAGE TO INFRASTRUCTURE[3]

Service	Effect
Transportation	Inability to get emergency service personnel into the affected area. Inability to transport victims away from the area.
Electrical	Increased risk of fire and electrical shock. Possible disruption to transportation system if downed lines are across roads.
Telephone	Lost contact between victims, service providers, and family members. System overload due to calls from or to friends or relatives.
Water	Disruption of service to homes, businesses, and medical providers. Inadequate water supply for firefighting. Increased risk to public health if there is extensive damage to the water supply or if it becomes contaminated.
Fuel Supplies	Increased risk of fire or explosion from ruptured fuel lines. Risk of asphyxiation from natural gas leaks in confined areas.

Page: 120

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:22:34 PM

This section appears to recommend that SCAG prepare a hazard mitigation plan. The OCCOG notes that this is not required of SCAG and as such, it is recommended that the entire section be reworked to reflect what the "Plan" would be reflective of SCAG's limited role in security and emergency preparedness.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:23:47 PM

It is not clear that SCAG could function in a "coordinating" role under current state and federal legislation. It is requested that the text reflect that SCAG's role should be limited to what it has purview to do and that it not advocate for an increased role in this area.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:24:47 PM

SCAG currently does not have a role relative to homeland security, as the statement indicates with the phrase "potential role." It is not clear that there is support for such an expanded role. Please clarify what the goal for this expansion of responsibility would be and why SCAG should should serve in an expanded role.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:26:14 PM

The OCCOG requests that the text of Table 9.2 relate to SCAG's current role in security and emergency preparedness. It is offered that this would be more helpful to those entities that are the intended audience of the RCP.

HOW SECURITY AND EMERGENCY PREPAREDNESS POLICIES PRODUCE MULTIPLE BENEFITS

Air Quality: Reducing our exposure to emergency scenarios can substantially protect short- and long-term air quality as Southern California's existing air quality challenges could be exasperated by terrorist attacks or other disasters. For example, a fire at one of the region's oil refineries would cause a significant acute increase in emissions of particulates and toxic air contaminants.

Transportation: Increasing funding for transportation system preservation and maintenance reduces the likelihood of facility failure (e.g., a bridge collapse) that can cause short-term disruptions to circulation. However, it could also reduce funding transportation system expansion.

The RCP aims to prevent, protect against, respond to, and recover from

~~Because of its traditional role as the MPO for the six-county Southern California region, SCAG is best suited to provide a forum where plans and data can be developed and coordinated with other regional planning efforts; and work towards developing regional consensus, but not be responsible for operation and implementation of plans and programs. SCAG should play a lead role in some areas, a minor role in others, or play no role at all. For example, SCAG has almost no role in the investigation aspect of security, only a minor role, as champion, in the recovery phase; but should play a lead role in championing and convening prevention and developing the institutional learning. SCAG could play a significant role in helping the region coordinate planning in preparation and anticipation of potential future incidents; and coordinate public information dissemination strategies.~~

~~This enhanced leadership and~~ A data provision role is designed to support federal, state and local security and emergency responders. The RCP proposes that SCAG coordinate more with these front-line responders to ensure that planning and information are available to help the region deal with inevitable emergencies.

The recommended policies of this plan are also designed to urge transportation planning agencies to devote adequate funding to the operations and maintenance of our aging transportation system. Failing infrastructure is often the result of insufficient roadway, bridge, and transit system maintenance due to lack

TABLE 9.3 POSSIBLE EFFECTS OF DAMAGE ON EMERGENCY SERVICE PROVIDERS[3]

Type of Damage	Effect
Roadways, Bridges, Tunnels, Interchanges	Inability to assess damage accurately. Ambulances prevented from reaching victims and/or victims prevented from reaching emergency medical services. Police prevented from reaching areas of civil unrest. Fire departments prevented from getting to fires. Flow of needed supplies is interrupted. Inability to deploy assets as part of incident response and to manage transportation flows Inability for emergency service providers to manage an evacuation
Structural	Damaged hospitals unable to receive patients. Increased risk of damage from falling debris.
Disrupted Communication	Victims unable to call for help. Coordination of services is hampered. Inability for incident command structure to receive real time situational information, reducing its effectiveness
Fuel Line Damage	Fire and paramedic services overburdened. Inability to sustain emergency response and recovery
Disrupted Water Service	Firefighting capabilities restricted. Medical facilities hampered.

Page: 121

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 5:22:56 PM
Please see previous comments regarding the multiple benefit sidebar.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 6:29:14 PM
Please delete this paragraph. It is not recommended that SCAG insert itself into the existing process for developing regional emergency response plans. Forums for this coordination already existing. It is recognized that SCAG can play a role in providing regional transportation data if it focusses its efforts on maintaining an accurate and reliable database of the transportation network. It is suggested that any discussion on SCAG's role in regional response planning be focussed on performing this role to the best of its ability.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 6:30:13 PM
It is requested, reflective of the previous comments, that the word "A" replace the phrase "This enhanced leadership and"

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:31:10 PM
It is recommended that SCAG not act in a coordinating capacity but in a support capacity for the agencies already tasked with this work. SCAG could serve in an important capacity to provide regional data if, as an organization, data accuracy and maintenance is emphasized and made a priority. The OCCOG does observe, however, that because SCAG's regional data is currently updated on an "as-needed" basis for purposes of preparing the RTP or special studies, it may not be suitable for security and emergency preparedness purposes.

Page: 122

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 6:31:43 PM
Please delete Table 9.4. This information is unnecessary as it is recommended that SCAG's role not be expanded and be limited to SAFETEA-LU requirements and a role in data provision.

major events to minimize impacts to lives, property, and the economy.

of funding or other resources. While not as glamorous as earmarking funding for roadway and transit system expansions, our region must improve its commitment to ensuring that the existing transportation system is safe and secure from natural and man-made incidents. To that end, the RCP recommends that SCAG work with partner agencies, federal, state and local jurisdictions to find opportunities to leverage and effectively utilize transportation and public safety/security resources in support of this effort.

Table 9.4 highlights SCAG's role in responding to specific threats to the region.

Earthquakes. The most likely threat to the region is one we have faced many times in varying severity, the earthquake. The 1971 Sylmar earthquake and the 1994 Northridge trembler caused significant transportation damages to the region. An even greater earthquake in the SCAG region is not just a statistical possibility, but a certainty.

~~TABLE 9.4 SCAG'S ROLE IN SECURITY AND EMERGENCY PREPAREDNESS~~

~~Incident Phase~~	~~Traditional~~	~~Convener~~	~~Champion~~	~~Developer~~	~~Operator~~
~~Prevention~~	♠	☑	☑	♠	☒
~~Response/Mitigation~~	♠	☑	☑	♠	♠
~~Monitoring/Information~~	♠	☑	☑	♠	☒
~~Recovery~~	♠	☑	♠	☒	☒
~~Investigation~~	♠	☒	☒	☒	☒
~~Institutional Learning~~	☑	☑	☑	☑	☑

~~No Role~~ ☒ ~~Minor Role~~ ♠ ~~Lead Role~~ ☑

~~Roles~~

~~Traditional~~	~~Help manage the system management and operations role in the ongoing transportation planning activities. The primary responsibility for projects rests elsewhere.~~
~~Convener~~	~~The MPO acts as a forum where operations plans can be discussed and coordinated with other plans in the region, still not responsible for operation and implementation.~~
~~Champion~~	~~The MPO works aggressively to develop regional consensus on operations planning. MPO planners develop programs and projects and the MPO takes the lead in developing regional agreements on coordinated operations.~~
~~Developer~~	~~MPO develops regional operation plans and incorporates operations strategies into the transportation plan. System-oriented performance measures would be used to identify strategic operations gaps in the transportation system.~~
~~Operator~~	~~The MPO would be responsible for implementing operations strategies that were developed as part of the MPO-led planning process.~~

HOW SECURITY AND EMERGENCY PREPAREDNESS POLICIES PRODUCE MULTIPLE BENEFITS

Economy: Taking risk adverse positions on investments may result in overinvestment in security-related improvements to the detriment of other public needs.

Public Health: Preventing man-made events can reduce impacts to public health in a number of ways. For example, during severe wildfires, children who do not have asthma experience asthma-like symptoms, including noise, eye, and throat irritations.

Environmental Justice: Developing effective plans for ensuring public safety and emergency preparedness system must avoid, minimize, or mitigate disproportionately adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations. It must also ensure full and fair participation by all affected communities in the decision-making process.

We must increase per capita funding for transportation system

SCAG's role in an earthquake would be based on the severity of the earthquake. For smaller earthquakes, SCAG would work with local agencies to program transportation infrastructure repairs.

For moderate earthquakes, SCAG would work with the State and federal government to "fast track" the programming of transportation infrastructure repairs.

For significant earthquakes, SCAG would provide GeoData to responders to help identify transit dependent areas for rescue and evacuation, and critical transportation infrastructure that would need to be repaired to most efficiently help in the relief and recovery efforts. SCAG should maintain mutual aid agreements with other metropolitan areas in the event the organization is disabled by the event, maintaining the flow of data to responders.

There is a danger that an earthquake or series of earthquakes may cause water retention facilities to fail. Dam owners are required by California Regulations to provide a technical study and an inundation map, showing the area downstream of a dam that would be inundated or otherwise affected by the failure of the dam and accompanying large flood flows.

Based upon a review of inundation maps or based upon information gained by an on-site inspection and consultation with the affected local jurisdiction (when the requirement for an inundation map is waived), the Office of Emergency Services shall determine and designate areas where death or personal injury would, likely result from the partial or total failure of a dam. The appropriate public safety agencies of any city, county, or city and county, the territory of which includes any of those areas, may adopt emergency procedures for the evacuation and control of populated areas below those dams.[4]

Tsunamis. Tsunamis, while less frequent than earthquakes, have happened in the past, and will likely happen in the future. An August 31, 1930 tsunami resulted in a three meter run-up (maximum vertical elevation wave reached above sea level at the time of tsunami) wave observed in Santa Monica bay. One man drowned and several swimmers required rescuing.

Even small tsunamis can be dangerous, producing dangerous undertows that can drown swimmers, rip ships from their moorings and damage low lying structures.

While development along the coast would be affected, based on the size of the waves, the greatest threatened areas would be the ports of Long Beach and Los Angeles, which have a dock height of only a few feet above the high tide line. The major sources of tsunami energy that could reach our seaports are from the northern regions offshore of Alaska and from southern regions near Chile. Tsunamis from great earthquakes in the Far East do not appear to impact the Ports as much as those from generation regions in the north and the south.[5]

In the event of a tsunami, SCAG would work with the State and federal government to "fast track" the programming of transportation infrastructure repairs.

Page: 123

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 5:28:30 PM
Please see previous comments regarding the multiple benefit sidebars.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:33:41 PM
The OCCOG observes that while the threat of tsunamis exists, it finds that the lack of discussion regarding wildfires, an almost annual threat, is perplexing. Wildfires present a significant risk in the region and annually cause significant damage and present wide ranging impacts in the region. Therefore, it is recommended that a section discussing wildfires be added to the chapter.

maintenance and preservation programs over existing levels.

Flooding. Much of the SCAG region is composed of alluvial fans, gently sloping landforms created over time from the erosion of the surrounding mountains. Flooding, even though characterized by shallow depth, can be quite destructive, traveling at relatively high speed and carrying sediment and debris.

In 1938, after a tremendous flood that killed 113 people, the Army Corps of Engineers began channelizing the major rivers in Los Angeles County, developing six catch basins and 14 smaller mountain dams in an effort to reduce flooding. While flooding has not been eliminated, the impacts in urban areas of Los Angeles County have been reduced.

Since then, the regional population has grown significantly into the Inland Empire and North Los Angeles County. Many of the alluvial floodplains in these areas have been developed, primarily with residential housing. Droughts and wildfires increase the risk of flash floods and mudslides during rain storms.

The combination of damaged hillsides, alluvial fans and inclement weather allow some degree of accuracy in predicting danger areas for flooding, allowing precautionary evacuations and road closures.

In the event that flooding damages transportation infrastructure, SCAG would work with the State and federal government to "fast track" the programming of transportation infrastructure repairs.

SECURITY AND EMERGENCY PREPAREDNESS GOALS

- Ensure transportation safety, security, and reliability for all people and goods in the region.
- 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.

SECURITY AND EMERGENCY PREPAREDNESS OUTCOMES

- Increase per capita funding by 2012 for transportation system maintenance and preservation programs over 2007 levels.
- Increase per capita funding for Intelligent Transportation Systems projects that enhance or benefit regional transportation security.
- ~~100 percent of government agencies and organizations involved in planning, mitigation, response and recovery involved in improving emergency preparedness coordination, collaboration and flexibility.~~

Page: 124

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:36:22 PM
The OCCOG observes that this would be a significant responsibility for any one agency. With SCAG's limited role in the arena of safety and emergency preparedness, the OCCOG is unclear as to how SCAG could adopt and fulfill such a goal. It is offered that this goal should perhaps reflect the goals in the RTP relative to security and emergency preparedness and reflect SAFETEA-LU requirements?

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:36:42 PM
It is offered that a discussion of more recent flooding events would be more relevant and is recommended to be added.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:37:25 PM
Intelligent Transportation Systems (ITS) used as a measure in this outcome are not discussed in the chapter; therefore, this outcome has no relation to the text of the chapter. Please add a section addressing ITS to the chapter.

Author: OCCOG TAC
Subject: Replacement Text
Date: 7/20/2008 6:38:29 PM
Please delete this outcome as it is already done throughout the region and is unnecessary to have in the RCP an outcome. The RCP is not likely to influence government agencies and organizations in the emergency response.

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 5:32:28 PM
Please identify whether this is a recommendation or if it is a process that already occurs.

SECURITY AND EMERGENCY
PREPAREDNESS

SECURITY AND EMERGENCY PREPAREDNESS ACTION PLAN

Gov/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Open Space	Economy	Solid Waste	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)													
		X	SE-1 SCAG shall help ensure the rapid repair of transportation infrastructure in the event of an emergency.		X					X		X	
		X	SE-1.1 SCAG, in cooperation with local and state agencies, shall identify critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.		X		X	X		X		X	
		X	SE-1.2 SCAG, in cooperation with county transportation commissions, California and the federal Government, shall develop a transportation recovery plan for the emergency awarding of contracts to rapidly and efficiently repair damaged infrastructure.		X					X			
		X	SE-2 SCAG shall continue to deploy and promote the use of intelligent transportation system (ITS) technologies that enhance transportation security and reduce air pollution.		X	X		X		X		X	
		X	SE-2.1 SCAG shall work to expand the use of ITS to improve surveillance, monitoring and distress notification systems and to assist in the rapid evacuation of disaster areas.		X								
		X	SE-2.2 SCAG shall incorporate security into the Regional ITS Architecture.		X								
X			SE-3 SCAG shall establish transportation infrastructure practices that promote and enhance security.		X								
X			SE-3.1 SCAG shall work with transportation operators to plan and coordinate transportation projects, as appropriate, with Department of Homeland Security grant projects, to enhance the regional transit security strategy (RTSS).		X							X	
X			SE-3.2 SCAG shall encourage 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.		X					X		X	
		X	SE-3.3 SCAG shall establish a Transportation Security Working Group (TSWG) with goals of RTP consistency with RTSS, and to find ways SCAG programs can enhance RTSS.		X							X	
		X	SE-4 SCAG shall establish a forum where policy makers can be educated and regional policy can be developed.										
		X	SE-4.1 SCAG shall work with local officials to develop regional consensus on regional transportation safety and security policies.										
		X	SE-5 SCAG shall help to enhance the region's ability to deter and respond to acts of terrorism, human-made or natural disasters through regionally cooperative and collaborative strategies by:										
		X	SE-5.1 Working with local officials to develop regional consensus on regional transportation safety, security, and safety-security policies.										
		X	SE-6 SCAG shall help to enhance the region's ability to deter and respond to terrorist incidents, human-made or natural disasters by strengthening relationship and coordination with transportation.		X								
		X	SE-6.1 SCAG shall encourage all SCAG elected officials are educated in the National Incident Management System (NIMS).										

Page: 125

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:39:33 PM
Please rework the policy recommendations to reflect the requested discussion in the chapter and to limit SCAG's role in the area of security and emergency preparedness to that required by SAFETEA-LU.

This page contains no comments

IGR/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Open Space	Economy	Solid Waste	Public Health	Climate Change
		X	SE-6.2 SCAG shall work with partner agencies, federal, state and local jurisdictions to improve communications and interoperability and to find opportunities to leverage and effectively utilize transportation and public safety/security resources in support of this effort.		X								
		X	SE-7 SCAG shall work to enhance emergency preparedness awareness among public agencies and with the public at-large.										
		X	SE-8 SCAG shall work to improve the effectiveness of regional plans by maximizing the sharing and coordination of resources that would allow for proper response by public agencies by:										
		X	SE-8.1 Encouraging and providing a forum for local jurisdictions to develop mutual aid agreements for essential government services during any incident recovery, particularly for those issues that are multi-county.										
		X	SE-9 SCAG shall help to enhance the capabilities of local and regional organizations, including first responders, through provision and sharing of information by:									X	
		X	SE-9.1 Working with local agencies to collect regional GeoData in a common format, and provide access to the GeoData for emergency planning, training and response.	X	X	X	X	X	X	X	X	X	
		X	SE-9.2 Establishing a forum for cooperation and coordination of these plans and programs among the regional partners including first responders and operations agencies.										
		X	SE-9.3 Developing and establishing a regional information sharing strategy, linking SCAG and its member jurisdictions for ongoing sharing and provision of information pertaining to the region's transportation system and other critical infrastructure.	X	X	X	X	X	X	X	X	X	X
		X	SE-10 SCAG shall provide the means for collaboration in planning, communication, and information-sharing before, during, or after a regional emergency by:									X	
X			SE-10.1 Developing and incorporating strategies and actions pertaining to response and prevention of security incidents and events as part of the ongoing regional planning activities.										
		X	SE-10.2 Offering a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.	X	X	X	X	X	X	X	X	X	
		X	SE-10.3 Entering into mutual aid agreements with other MPOs to provide data sharing in the event that SCAG is no longer able to function due to an incident.									X	

Footnotes

[1] National Cooperative Highway Research Program Report 525 Volume 9 "Guidelines for Transportation Emergency Training Exercises" McCormick Taylor Inc. 2006

[2] Michael D. Meyer, Ph.D, P.E., Georgia Institute of Technology: The Role of the Metropolitan Planning Organization (MPO) in Preparing for Security Incidents and Transportation System Response.

[3] Federal Emergency Management Agency: Community Emergency Response Team (IG-317) Student's Guide

[4] California Government Code Section 8589.5

[5] Tsunami Hazard Assessment For The Ports Of Long Beach And Los Angeles, (Moffatt and Nichol) 1997. http://www.portoflosangeles.org/DOC/REPORT_Tsunami_%20April_2007.pdf

Summary of Comments on Draft 2008 Regional Comprehensive Plan - Economy

This page contains no comments

Page: 128

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:47:04 PM

The OCCOG observes that California businesses face significant challenges and notes that there are significant costs on doing business in this state. The regulatory framework of California is a significant issue for our regional economy as such, it is recommended that this also be addressed in the discussion of of SCAG's share of U.S. jobs. The OCCOG notes that it is not that these costs are all bad, but that they represent a challenge that should be addressed in this region.

Additionally, identification of the myriad opportunities for economic development, as opposed to simply focusing on solely goods movement, would make the chapter more applicable to a wider array of jurisdictions or areas in the region.

Finally, this chapter would benefit by a financial strategies section to identify the challenges and possible solutions for addressing those challenges.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:44:34 PM

The statement that it is the "region's challenge to add a projected three million jobs" implies that the three-million more jobs are "needed" in the region. Please provide an explanation of why these jobs are expected in the region.

Economy

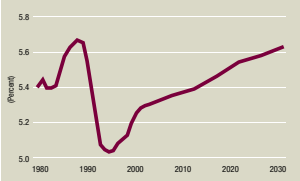
THE CHALLENGE

While the SCAG region has a strong economic base with several sectors poised for growth in jobs and wages, policy intervention can help to ensure that the regional economy grows in the quantity and quality of jobs. Specifically, the region's challenge is to add a projected three million jobs between 2005 and 2035. The projected job growth needs to provide a wide range of job opportunities for residents while requiring additional workers at all skill levels.

Current projections indicate that the SCAG region should enjoy job growth faster than the national growth rate (**Figure 10.1**). While the region experienced a severe recession in the 1990's led by downturns in aerospace and construction jobs that dropped the region's share of U.S. jobs from 5.7 percent in 1990 to 5.0 percent in 1995, the SCAG region has outpaced the nation in job growth since 1995. By 2005, the region's share of U.S. jobs rose steadily to 5.3 percent.

FIGURE 10.1

SCAG Region Share of U.S. Jobs



Source: SCAG

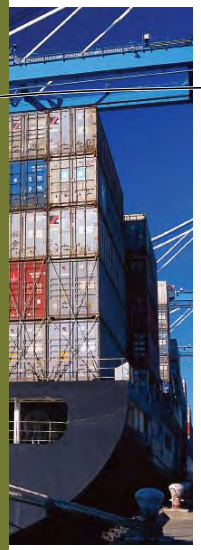
Jobs in the region are projected to continue to increase faster than the national growth rate and by 2035 the SCAG region is projected to capture 5.6 percent of U.S. jobs, still slightly below the high level of 1990.

Sectors like international trade; architectural and design services; tourism and entertainment; technology and the nation's largest manufacturing complex give the region a good head start on developing a prosperous economy over the next 30 years.

However, the projected job and income growth will not come automatically. Economic growth and the chance for broadly shared prosperity depend on meeting a number of substantial economic challenges.

Improving the Economic Competitiveness of Key Sectors

In this increasing globalized economy, regions compete for the location of industries that export goods and services across not only their own country but around the world. The SCAG



The region's challenge is to add three million jobs at all skill levels by 2035

HOW ECONOMY POLICIES PRODUCE MULTIPLE BENEFITS

Land Use and Housing: A strong and diverse economy provides for jobs and affordable housing necessary for our growing, changing population.

Open Space and Habitat: Economic policies that support agricultural would benefit the top producing counties of Riverside, Imperial and Ventura and preserve open lands.

Water: Economic investments could be directed to regional and local projects that address the goals of a watershed or larger-scale planning and management area. This performance-based incentive policy could restore watersheds, improve water quality and enhance water conservation.

Energy: If energy and climate change policies are designed to create direct incentives for California companies that invest in new technologies, the Gross State Product (GSP) could increase by up to $74 billion annually and create 89,000 new jobs by 2020.

region faces challenges in providing the infrastructure to support local, national, and international goods movement as well as providing for the mobility needs for the rest of the economy. Such investments must also occur within a context of environmental quality, justice and respect for local communities.

Moreover, the region must increase its share of employment in those industries and service sectors where wages and salaries will be higher than average and where growth, nationwide and internationally, is expected to be strong (e.g. professional, business and information services, wholesale trade and transportation services, tourism and entertainment sectors, and high technology and green technology sectors). It should also include industries with a defined career ladder that do not necessarily require advanced education (e.g. logistics). At the same time that it pursues growth in these sectors, the region must maintain a sufficiently diverse economic base overall and sufficient local, self-reliance, so as protect against over-dependence upon any few industries or income streams and help insulate the regional economy from global downturns.

Education and Workforce Challenges

A skilled workforce is fundamental for turning economic opportunities into successful outcomes for residents and the region. Attracting, retaining, educating and training a diverse, skilled labor force has become an increasingly important objective for regional economies. The ability to attract workers (and firms) is dependent upon the livability and quality of life for the region, its business climate, and working conditions. Investments in these areas are critical for the SCAG region. The region is facing a draft shift in its labor force as the baby boomers retire and are replaced, in large part by immigrants and their children and grandchildren, many of whom come with a relatively lower level of educational achievement than much of the region's existing labor force. Improvement of the region's educational system as well as training opportunities for adult workers is critical.

Economic Growth Must be Consistent With Regional Environmental, Health, Mobility and Social Justice Goals

International trade can create good job opportunities and raise real income levels for the SCAG region. Significant investment is necessary to improve the efficiency and capacity of the region's goods movement infrastructure if we are to benefit from the growth in international trade expected, while remaining globally competitive. Such changes must also occur within a context of environmental quality (see "The Green Economy"), environmental justice and respect for local communities.

Needed improvements in the region's goods movement infrastructure depend upon cooperation between government and the private sector. Public investment and planning can play a strong role in attracting needed additional private investment. At the same time, improvements to the system should not come at the expense of other transportation system invest-

Page: 129

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:47:53 PM

It is suggested that more data, including a table showing the percentages of foreign-born workers and their ages, would be helpful and add supporting information for this section to both define the need and identify opportunities that can be best addressed.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:48:37 PM

Please clarify and better define what is meant by "consistency with regional environmental health, mobility, and social justice goals."

The OCCOG also notes that the statement is repeated throughout the Chapter and in this section to the extent that it looses its meaningfulness as opposed to presenting a thoughtful response to real conditions - such as pollution, activist citizens, etc.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:49:40 PM

Please provide more information on the challenges and the possible solutions in the Education and Workforce Section. The issue listed is to improve the system, however, government cannot force the public to use the system, which is also a significant challenge, but which is not discussed.

Additionally, the section also emphasizes the need for improved educational attainment. Please include a discussion of the need to additional skilled labor training which is also facing a significant shortage of workers.

while balancing environmental and social goals.

ments, nor should they be only the burden of local, regional or state governments.

Given current limits on local and state finances, innovative methods will be needed to procure and pay for these system improvements. Both the federal and State governments must act to support innovative procurement and public-private funding mechanisms, and should take legislative action to allow the region to pursue innovative funding strategies. The national purpose served by Southern California's goods movement system also points to the need for strong federal participation in assisting the region with the substantial local burdens it bears in serving this role—including traffic congestion, air pollution, noise, public health impacts, visual blight, and freight-related safety incidents. These burdens are not compensated, thus forming an effective subsidy for lower-priced goods in other states. The federal government should explore ways to compensate the region for the services it provides.

Quality of Life

Quality of life is an economic competitiveness challenge, as our ability to improve mobility, air quality and housing will influence and be influenced by the economy. Recent trends in housing prices and affordability raise serious challenges for the region in attracting and retaining industries that offer good jobs. Although housing is discussed extensively elsewhere in the RCP, it is important to remember that housing, particularly the lack of diversified options, is a challenge to future regional prosperity.

THE GREEN ECONOMY

Environmental quality and economic growth can go hand in hand. Promoting clean energy and jobs has been found to have a positive impact on the economy and individual pocketbook as is illustrated in the following studies.

A study by the Economic Policy Institute found that a policy package including development of new energy-efficiency and renewable energy technologies, transitional assistance to compensate any workers and communities harmed by the policies, and a modest carbon/energy tax would reduce U.S. carbon emissions by 27% in 2010 and by 50% in 2020 and increase GDP increase by a modest 0.24% in 2010 and by 0.6% in 2020, and add an additional 660,000 net jobs would be created in 2010, 1.4 million in 2020.[1]

In addition, a report, "Economic Growth and Greenhouse Gas Mitigation in California," offered an independent assessment of the economic impacts of AB 32. This study conducted by the University of California, Berkeley, and delivered to the state legislature on August 16, 2006, found that returning California greenhouse gas emissions to 1990 levels by 2020, as identified in AB 32, can boost the annual Gross State Product (GSP) by $60 billion and create 17,000 new jobs by 2020. The study found that the gains could be up to $74 billion in annual GSP and 89,000 new jobs by 2020 - if climate policies are designed to create direct incentives for California companies to invest in new technology.[2]

Page: 130

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:51:51 PM
Please clarify this statement as SCAG's extensive discussions relative to the impacts of goods movement on the region may not be widely known by all of the audiences for the RCP.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:53:43 PM
This statement gives the federal government direction to address the issue related to goods movement. Relative to the comments on the text earlier in the section, please expand on this to explain or clarify what the region can do to address the issue and what limitation the region faces. Specifically, it is recommended that the section include a discussion of why federal actions are necessary.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:54:23 PM
Please reword to make a stronger statement that goods movement burdens the region and clearly identify what the federal government needs to do - specifically through the provision of funding and legislative changes to address the impacts from this economic sector. Because the intended audience for the RCP may not be familiar with this topic, they will not have had the opportunity to have been involved in the many discussions on this topic that have taken place at SCAG.

HOW ECONOMY POLICIES PRODUCE MULTIPLE BENEFITS

Air Quality: The unintended consequences of a vibrant economy could produce increased air pollution, primarily along major corridors. However, a comprehensive economic program would recognize potential environmental and social externalities and help distribute the costs and benefits in a way that reduces the negative air quality impacts of more economic activity and an expanded surface transportation system.

Solid Waste: Strong economic policies could help promote the reuse and recycling of materials through incentive programs, thereby reducing the amount of waste disposed of at landfills.

Transportation: A strong economy generally increases the need for movement of passengers and freight, which challenges the region to provide adequate capacity to provide a safe and efficient transportation system.

RCP promotes sustained economic health that diversifies our economy

Strengthening Local Self-Reliance

A major challenge for the region is to maintain and strengthen local-self reliance while recognizing the need to diversify the region's economy and expand Southern California's role in the global economy. Our ability to create jobs and produce goods locally that serve the needs of our six-county region can only enhance the long-term sustainability of an economy that doesn't have to import all of its needs. The environmental and economic costs of transport alone can temper the trend toward farming out jobs and importing goods from cheaper manufacturing centers outside the region and country. However, finding a healthy balance between self-reliance and strategic participation in the global economic marketplace will be a key challenge for Southern California.

THE PLAN

~~The RCP is built on the notion that our region needs to grow by balancing economic prosperity with environmental protection and local quality of life goals. To that end, the RCP recommends policies that promote~~ mutually supportive economic development strategies, land use decisions, transportation investments, and educational improvements. These include:

- Focusing development in urban centers, existing cities and along (existing and future) transportation corridors
- Providing housing to meet the needs of all income levels
- Locating new housing near existing jobs and new jobs near existing housing
- Designing/building 'green' to save resources, reduce costs and increase competitiveness
- Identifying and addressing issues related to environmental justice in the formulation of policies and plans (as required in Title VI of the Civil Rights Act of 1964, President Clinton's 1994 Executive Order 12898, and related DOT and FHWA Orders)
- Strengthening local self-reliant industries that provide jobs and goods for our region's needs
- Developing a well-educated work force
- Fiscal and governmental policies that support these approaches

This comprehensive strategy prioritizes the notion that local businesses must be profitable and competitive regionally, nationally and internationally. However, it also addresses the physical, economic, environmental and human capital dimensions. For example, it recognizes the need to alleviate poverty and meet the basic needs of all who participate in our economy. In addition, such a strategic vision will only succeed if government agencies, the private sector, non-profit organizations and the region's residents embrace it. Only with the participation and cooperation of all the region's stakeholders will this vision be realized.

Page: 131

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:55:47 PM

The OCCOG observed that this section is confusing and repeats that environmental and quality of life goals without addressing economic goals. It is suggested that the section be reworded to refocus on the economic development strategies necessary to meet the challenges defined in the previous section.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 6:56:56 PM

It is noted that the wording of this statement from the working draft was stronger. It is suggested that the sentence be changed: "The region's economic viability and attractiveness depend upon mutually supportive economic development strategies, land use decisions, transportation investments, and educational improvements."

Further, this is a key goal and, as such, is recommended to be emphasized and supported throughout the chapter.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:57:35 PM

Please delete these two statements as as they are obvious requirements and as such, do not need to be stated in the text.

strengthens local self-reliance, and expands global competitiveness.

2008

DRAFT

REGIONAL COMPREHENSIVE PLAN

ECONOMY GOALS

- ~~Position the SCAG region and its economy to seize opportunities and address challenges that will enhance the region's mobility, livability, prosperity, and sustainability.~~
- Enable business to be profitable and competitive (locally, regionally, nationally, and internationally).
- ~~Promote an economy that rewards hard work, perseverance, and ingenuity to allow individuals and families to achieve a better quality of life.~~
- Ensure that the maximum possible number of residents participate in the growth of prosperity in the SCAG region. (Note that a goal of broadly shared prosperity does not imply a strategy of redistributing today's income. Strategies to ensure that future economic gains are broadly distributed are based, by contrast, on expanding opportunity and the commitment of business and government leaders to recognize that individuals and communities left behind today must be made full partners in the growth of tomorrow's economy.)
- Promote sustained economic health through diversifying the region's economy, strengthening local self-reliance and expanding competitiveness.
- Ensure a healthy, flourishing economy that provides sufficient employment opportunities to decrease poverty and meet the basic needs of all the people who participate in our economy by:
  - Promoting education and workforce training policies that give residents an opportunity to compete for the full range of jobs available with good wages and benefits;
  - ~~Encouraging and enabling charities and non-profits to help provide for the poorest in our region;~~
  - Achieving economic development while being consistent with the region's sustainability goals for land use, air quality, and other resource areas; and
  - ~~Accomplishing this within an ecological and sustainable context that uses resources wisely.~~

ECONOMY OUTCOMES

- Increase job growth to add three million jobs to the regional economy by 2035.
- Eliminate gaps in educational achievement between different racial and ethnic groups.
- Increase the real per capita income to restore 1997 levels of household and individual purchasing power.

Page: 132

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 6:59:02 PM
Overall, the OCCOG notes that the goals statements are weakly worded and do not specifically address the economy or the economic development of the region, but appear to be more general in nature. Facts are noted in the statements but are not supported by strong policy statements or by information provided in the Chapter. It is recommended that to strengthen the goals that they should be strongly linked to the discussions of the Chapter.

Author: OCCOG TAC
Subject: Highlight
Date: 6/29/2008 4:22:13 PM
It is recommended that this be the first goal of the chapter.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 7:00:23 PM
Please delete as this is a quality of life goal that should perhaps be a overall goal or principle of the RCP; it is not an economic development goal. It may be appropriate elsewhere in the document, but not in this chapter.

Author: OCCOG TAC
Subject: Cross-Out
Date: 6/29/2008 4:22:46 PM
It is not clear why this is in the economy chapter as it is more a quality of life goal than an economy goal.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 7:01:04 PM
Please delete as this is an obvious statement and begs the question of "as opposed to rewarding what."

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 7:01:53 PM
It was observed that this goal restates the previous goal and as such is unnecessary. It is recommended that it be deleted.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 7:04:35 PM

Comments from page 132 continued on next page

The OCCOG observes that the identified outcome is really a goal as it is extremely unlikely that the RCP or SCAG could "eliminate" gaps in educational attainment between different racial and ethnic groups. It is recommended that the outcomes be things that could be achieve by the agencies that will carry out the actions identified in the chapter and that SCAG may have a policy to support the actions and activities of the educational system to achieve this goal.

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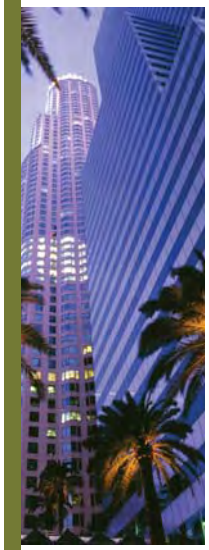
strengthens local self-reliance, and expands global competitiveness.

ECONOMY GOALS

- ~~Position the SCAG region and its economy to seize opportunities and address challenges that will enhance the region's mobility, livability, prosperity, and sustainability.~~
- Enable business to be profitable and competitive (locally, regionally, nationally, and internationally).
- ~~Promote an economy that rewards hard work, perseverance, and ingenuity to allow individuals and families to achieve a better quality of life.~~
- Ensure that the maximum possible number of residents participate in the growth of prosperity in the SCAG region. (Note that a goal of broadly shared prosperity does not imply a strategy of redistributing today's income. Strategies to ensure that future economic gains are broadly distributed are based, by contrast, on expanding opportunity and the commitment of business and government leaders to recognize that individuals and communities left behind today must be made full partners in the growth of tomorrow's economy.)
- Promote sustained economic health through diversifying the region's economy, strengthening local self-reliance and expanding competitiveness.
- Ensure a healthy, flourishing economy that provides sufficient employment opportunities to decrease poverty and meet the basic needs of all the people who participate in our economy by:
  - Promoting education and workforce training policies that give residents an opportunity to compete for the full range of jobs available with good wages and benefits;
  - ~~Encouraging and enabling charities and non-profits to help provide for the poorest in our region;~~
  - Achieving economic development while being consistent with the region's sustainability goals for land use, air quality, and other resource areas; and
  - ~~Accomplishing this within an ecological and sustainable context that uses resources wisely.~~

ECONOMY OUTCOMES

- Increase job growth to add three million jobs to the regional economy by 2035.
- Eliminate gaps in educational achievement between different racial and ethnic groups.
- Increase the real per capita income to restore 1997 levels of household and individual purchasing power.



This page contains no comments

HOW ECONOMY POLICIES PRODUCE MULTIPLE BENEFITS

Security and Emergency Preparedness: A stronger economy can help fund the improvements to our security and preparedness plans that help secure the region.

Public Health: A strong economy community investments in infrastructure and programs that directly or indirectly promote public health improvements, such as community parks and after-school programs.

Environmental Justice: Effective economic policies must address environmental justice by investing in cleaner technologies that reduce exposure to harmful pollutants as well as creating sustainable employment opportunities.

Climate Change: Future economic growth must be done in ways that don't increase the region's contribution to global climate change. International accords demonstrate the win-win potential to pursue economic growth while reducing greenhouse gases.

- Expand green technologies and related employment in green technologies and services above and beyond what is needed to meet Title 24[3] requirements by 2035.
- Increase the region's economic vitality and attractiveness by focusing housing and job additions in urban centers, employment centers, and transportation corridors, such that there will be a minimum of 35 percent of the region's household growth and 32 percent of employment growth in these areas from their levels in 2005 by 2035.
- Increase the affordability of health care by 50 percent to reduce losses in productivity resulting from inaccessible health care.
- Promote sustained economic health through diversifying the region's economy, strengthening local self-reliance and expanding global competitiveness.

ECONOMY ACTION PLAN

HPI/Best Practices	Legislation	Coordination	Constrained Policies	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Open Space	Security	Public Health	Climate Change
SCAG Policies (SCAG policies shall be subject to consideration for future Overall Work Plans)												
		X	EC-1 SCAG shall form an active Prosperity Partnership, a coalition of public and private entities, dedicated to developing and implementing a common economic strategy for the SCAG region.									
		X	EC-2 SCAG shall partner with institutions to help develop global trade logistics infrastructure needed for local businesses to remain competitive.		X							
		X	EC-3 SCAG shall partner with economic development organizations to assist in attracting and retaining local and foreign investment.									
		X	EC-4 SCAG, in collaboration with local jurisdictions, shall increase awareness - both private and public sectors - of efforts currently underway supporting industry cluster formation in our region.									
		X	EC-5 SCAG shall encourage regional universities and business schools to explore opportunities to maximize benefits from public dollars.									
		X	EC-6 SCAG shall inform stakeholders (workforce boards, community colleges and businesses) about long-term demographic and workforce trends in the SCAG regional forecast.									
		X	EC-7 SCAG in partnership with local governments shall support K-12 education programs, particularly for at-risk students that help improve high school graduation rates and increase opportunities for all qualified students to attend and graduate from college.									
		X	EC-8 SCAG and local jurisdictions shall partner with workforce boards and community colleges in identifying specialized training courses that; 1) meet current and future job needs, 2) upgrade technological skills and open up career opportunities of adult and young workers, and 3) assist people adapting to change.									
		X	~~EC-9 SCAG, state agencies and local jurisdictions, should support programs that connect school district databases region-wide to track and assess student performance to better ensure a match between education and skill requirements and attainment.~~									
		X	EC-10 SCAG should develop partnerships that assist in creating a suite of technologies or a renewable portfolio of services that allow the SCAG region to plan for a greener, more sustainable economy.			X		X				X
		X	EC-11 SCAG shall actively engage environmental stakeholders to promote efficiencies, conservation, and renewable energy resources by working with the business sector and government agencies, such as the California Center for Sustainable Energy, the state's Environmental Agency (Cal-EPA), the California Transportation Commission, air districts and others.			X		X				X
		X	EC-12 SCAG shall partner with organizations that promote the creation of new advanced, environmentally friendly, sustainable technologies for all sectors in the region's economy.		X	X		X			X		X
	X		EC-13 SCAG shall continue efforts to leverage state infrastructure bond financing to our region to implement the enormously challenging goods movements and transit oriented development infrastructure.	X	X	X						
		X	EC-14 SCAG, in collaboration with State agencies and local governments, should support programs that develop workforce in green technology.									
		X	EC-15 SCAG shall explore means of improving housing availability and pricing. Affordable housing shortage is compounding the difficulty for emerging industries to attract and retain demand positions, which are mostly the younger, more recently educated work force. Similarly, it also adds to the difficulties in attracting and retaining employees from other areas.	X								

Page: 134

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 7:05:33 PM
The OCCOG expresses concern that the policies and strategies identified do not address many economic issues and focus primarily on quality of life, goods movement and education to the exclusion of other economic development strategies. It is recommended that this section be re-worked to include more and broader ranging economic develop strategies that could be applied throughout the region.

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 7:06:52 PM
It is not clear how SCAG would carry out many of the programs identified in this section as many of the policies and actions are under the purview of other entities. It is recommended that each policy be reviewed as to whether it should be an action of SCAG directly or reworded such that SCAG would support efforts by other organizations and that SCAG possibly could serve in the capacity to provide the opportunity for a regional forum.

Author: OCCOG TAC
Subject: Cross-Out
Date: 7/20/2008 7:08:39 PM
This is a responsibility of the state education system and is not supported by the text in the chapter to identify how it relates to the economy or economic development. As such, it is recommended for deletion.

This page contains no comments

ECONOMY

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits							Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Open Space	Security	Solid Waste	Public Health	Climate Change
SCAG Initiatives (SCAG initiatives shall be subject to consideration for future Overall Work Plans)													
		X	EC-1S SCAG, in collaboration with State agencies and local governments, should promote the region's livability and quality of life, along with its business climate and working conditions by support investments in attracting, retaining, educating, and training a diverse, skilled labor force.										
		X	EC-2S SCAG, in collaboration with State agencies and local jurisdictions, shall promote and support regional policies that: • Promote sustainable economic development, within an ecological context, that uses resources wisely and sustainably and builds sustained economic health. • Reward local ingenuity, initiative, enterprise and creativity. • Give local governments flexibility to attract needed businesses and jobs without compromising social or environmental standards. • Promote fiscal reform at the State, county and local level (involving sales, property and income taxes) to meet the region's capital investment needs. Reform must address increasing local control over school and transportation funds and de-emphasize local dependence on sales tax revenues. Overall, tax systems should be diverse enough to protect against over-reliance upon any small number of income streams. • Work with industries to diversify their industrial bases. • Help local firms replace jobs that cannot be retained. • Expand employment in existing high-wage service-sector firms. • Foster growth of small and medium-sized, locally-based firms	X									
		X	EC-3S SCAG and local jurisdictions shall support development of workforce strategies that upgrade skills and open up career opportunities for adult workers who need to adapt to change.										
		X	EC-4S SCAG in partnership with local jurisdictions shall support an increase in opportunities for immigrants to learn English at convenient times and locations										
X		X	ECS-5S SCAG, in collaboration with State agencies and local governments, shall encourage industries to incorporate more energy efficient resources into their products.					X					X
X		X	EC-6S SCAG and local jurisdictions shall support efforts to increase employment in green, sustainable technologies and/or related industries.										
		X	EC-7S SCAG shall promote the implementation of the Southern California Regional Strategy for Good Movement Action Plan, which is based on three principles: • International trade can create good job opportunities and raise real income levels for the SCAG region. To benefit from the growth in international trade expected, while remaining globally competitive, significant investment is necessary to improve the efficiency and expand the capacity of the region's goods movement infrastructure. Such changes must also occur within a context of environmental quality, environmental justice and respect for local communities. • Improvements to the goods movement system should not come at the expense of other transportation investments nor should improvements by only the burden of local, regional or state government. • Investments in the regional goods movement system should be made to realize regional benefits that have statewide implications		X	X						X	

IGR/Best Practices	Legislation	Coordination	Strategic Initiatives	Potential for Direct/Indirect Benefits								Other Benefits	
				Land Use	Transportation	Air Quality	Water	Energy	Open Space	Security	Solid Waste	Public Health	Climate Change
X		X	EC-8S SCAG in collaboration with State agencies and local governments, should support policies such as: • Market-based emissions trading programs that use a cap with progressive reductions of the cap overtime. • Legislation that promotes "green building" through a mixture of regulation and incentives. • Clean air plans that reduce port-generated pollution from airplanes, vessels, trains, trucks and terminal operating equipment by 45% over the next five years.	X	X	X		X				X	X
X		X	EC-9S SCAG, in collaboration with state agencies and local governments, should support policies that streamline the permit process and regulatory requirements imposed upon developers so as to eliminate excessive review time, cost and inefficiency.	X									
X		X	EC-10S State agencies and local governments should reform the state-local government fiscal relationship to help achieve sound, sustainable development. If government is going to "incentivize" the behavior of its governmental institutions, the incentive needs to be in line with its overall goals and objectives (*e.g.* making affordable workforce housing available). Local jurisdictions working through their representative advocacy groups (e.g. the League of National Cities) need to work with the state to balance the "fiscalizations" of the land use impacts, moving towards making cities fiscally ambivalent over using land for retail or housing purposes.	X									

Footnotes

[1] Barrett, James P. and J. Andrew Hoerner. Economic Policy Institute. Clean Energy and Jobs: A comprehensive approach to climate change and energy policy. (2002).

[2] Roland-Holst, David. Economic Growth and Greenhouse Gas Mitigation in California. August 16, 2006.

[3] Title 24, Part 6 of the California Code of Regulations sets energy efficiency standards for residential and nonresidential buildings.

Page: 136

Author: OCCOG TAC
Subject: Highlight
Date: 7/20/2008 7:11:14 PM

The OCCOG notes that it is limiting to only look to the development process for solutions. Local governments are already subject to the permit streamlining act under California state law. The chapter did not present any discussion addressing the overall costs that businesses and industry face due to on-going regulation. It is recommended that this also be addressed in the chapter as opposed to only focussing on the permit process.

Draft Regional Comprehensive Plan Comments and Revisions Log

Caltrans

Category	Comment	Recommended Response	Recommended RCP Edits
General	The RCP policies appear to be consistent with the policies outlined in the Southern California Association of Government (SCAG) Regional Transportation Plan (RTP.)	Comment noted	None
General	While a tremendous effort was deployed in producing the broad and comprehensive RCP, I found it difficult to identify any one specific approach or strategy that stood out as different, i.e. new. There is a good deal of information to digest in reading the RCP, however, there is no definitive "take-away" under any of the chapters and that is unfortunate. The document is well prepared, overall, however it does not create any kind of anticipation or excitement as to what the region is doing or might be doing short-term, near-term or long-term.	Comment noted. The RCP is not intended to expand SCAG's purview. Rather, the policies noted are advisory, and are necessary to underscore interrelations between planning topics.	None
General	SCAG's RCP is based on the fact that we need to make profound changes in the way we travel and alter the way we plan tomorrow's transportation system. As a broad conceptual document, the RCP exemplifies the continuous, cooperative, and comprehensive metropolitan planning process described in CFR 450.306. The document considers projects, strategies, and services that address planning factors such as: economic vitality, safety, security, accessibility, mobility, energy conservation, connectivity, and efficiency. The challenge will be refining these broad strategic initiatives and ideas into a financially constrained Business Plan.	Comment noted	None
	Assessing our Challenges: *A major challenge that should not be overlooked* is regional coordination and decision-making. Gregory Freeman, of the Los Angeles Economic Development Corporation wrote the "60-Mile Circle" in which he noted that the "region operates at the scale of states and even countries, yet lacks the central institutions that characterizes these larger entities." The very size of the regions' stakeholders makes it extremely difficult in bringing resolution to the challenges identified in the RCP. Yes, regional coordination and decision-making is a major challenge, that along with	Comments noted. The scope of the Economy chapter was reviewed and proved by the Community, Economic and Human Development committee. The challenge of regional coordination and decision-making can be performed outside of the scope of the Economy Chapter.	None
	Paragraph 2: The 2008 RTP is no longer pending, but is adopted and federally approved	Comment noted. All references to the RTP will be updated.	Update all references to RTP, removing "pending"
	Compass Blueprint -The RCP makes numerous references to the SCAG Compass Blueprint and that the outcomes, goals and strategies are part of the integrated process. It might be prudent to include the fact that blueprints are primarily developed to provide local accountability and that full implementation relies on local general plans.	Comment noted.	RCP and Compass Blueprint implementation will certainly depend largely on local action. Accordingly, the goals, outcomes and action plan for this chapter and the RCP are oriented largely toward local-level decision making.
	Page 18, Paragraph 2 – Land Use and	Comment noted and	None.

	Housing: Often land use decisions are reactive rather than proactive and often times are based on revenue-generation concerns. Both revenue and VMT have severe implications on land use patterns. As long as the tax structure of local government remains unchanged, there can be little support from local government on energy efficiency and climate friendly growth patterns. There may need to be an entirely new way or dynamic approach in terms of how land use is regulated. Is there any dialogue or anything on the political horizon that would give us reason to believe that this could change?	agreed. The chapter accounts for the "fiscalization of land use" problem with the statement in the second paragraph of page 14 and the third Strategic Initiative on page 22.	
	Bullets 1 and 2: Housing "availability" appears to be the focus rather, than housing "affordability". Given the regions extremely high need for housing affordability, and high foreclosure rates, it might have been well for the RCP to expand the discussion on these issues.	Comment noted. The chapter discusses housing affordability on page 14 and 16. Outcomes related to household housing and transportation costs as a percentage of income and the homebuyer affordability index are directly related to housing affordability. Increasing housing availability (supply) will also improve affordability.	None.
	Compass Blueprint -The RCP makes numerous references to the SCAG Compass Blueprint and that the outcomes, goals and strategies are part of the integrated process. It might be prudent to include the fact that blueprints are primarily developed to provide local accountability and that full implementation relies on local general plans.	Comment noted.	
	Page 52 – Water: While this section provides a comprehensive discussion of water issues in the region, why is there no discussion of the California Water Plan which is the State's strategic plan for managing water resources statewide? The plan is updated every 5 years by the California DRW and is a key element in the Governor's Strategic Growth Plan (2005)	Comment is noted. Edit recommended	Chapter will include information on significance of State Water Plan for the SCAG Region.
	Page 67 – Energy: It is *important to recognize* that population growth is outpacing the rate at which land use options alone can reduce VMT. Therefore, enhanced engine efficiencies and cleaner fuels are also a critical component in reaching the GHG reduction targets for absolute reductions back to 1990 levels that are needed in ordered to meet 2020 emissions reductions goals Further, infrastructure funding policies and project choices at the local, state or federal level can determine the long-term energy and climate impacts of a region's infrastructure for years into the future. For example, policies that support dense communities, transit-oriented development and mixed –use can reduce energy use, GHG emissions and commute time while having a positive effect on transit ridership.	SCAG agrees that engine efficiencies and cleaner fuels are a critical component of reaching the 2020 emissions reductions targets and have included various best practices and technological improvements in Policies EN-16 and EN-5. Policies EN-1, EN-8, EN-10, and EN-10S encourage SCAG and municipalities to support mixed-use communities.	
	Green Buildings - The RCP does not address the possibility that there may ultimately be a fee or price placed on $C0_2$. If this should	The RCP Energy Chapter was reviewed by a diverse group of	

	occur, what are the implications for new buildings if any?	policy makers and experts. Although a CO2 fee was discussed within the Energy Working Group, it was determined to be speculative at this time. The document includes various policies that encourage regional coordination if a CO2 fee is put in place, such as Policies EN-3, EN-4, EN-5, and EN-7.	
	Alternative Fuels / GHG - There is no discussion of Zero Emission Vehicles under this heading. Why so? There is, however a reference to zero emission forklifts in the Constrained Polices Matrix. A tremendous reduction in GHGs per year could be avoided if all vehicles in the State were replaced with ZEVs in the year 2010 which would result in approximately 35 million tons/year from LDVs by the year 2030. This level of reduction would provide substantial progress toward the State's Alternative Fuels Plan which lays out a 2050 vision calling for 40 percent of transportation fuels coming from electricity/hydrogen and 30 percent coming from other alternative fuel sources. Is it realistic to expect that the California vehicle fleet would be 100 percent electric? Probably not. If significant support in favor of Evs materialized, what would the impact be on GHG emissions?	Comment noted and revisions will be incorporated. The impact of electrification on GHG emissions is currently the topic of research at CARB, under the auspices of AB 32. Please note that a sidebar on page 71 includes a discussion of electricity and transportation based on the California Energy Commission's Integrated Energy Policy Report.	Add to 2nd paragraph on page 70, "In addition, the State's Alternative Fuels Plan lays out a 2050 vision calling for 40 percent of transportation fuels coming from electricity/hydrogen and 30 percent coming from other alternative fuel sources."
	The Challenge (Air Quality) - Paragraph 3: How realistic is it for the region to expect that since about half of the emission reductions needed are expected to come from yet unidentified long-term measures in the "black box"? In effect, these are unspecified, unidentified unpredictable technologies that must be identified, tested, vetted and are often limited by the constraints of their design. Such strategies such (e.g. oxygenated fuel, I&M program, reformulated gas) have had a measure of success; however these have not proven to be the panacea in transportation-related pollution reductions. It is however, fair to note that such strategies have added value as part of an integrated strategy. Some in the environmental community and environmental justice advocates see the "black box" as something that is adverse to communities in non attainment areas. On the one hand waiting until technology is developed to help resolve the issue is not necessarily a bad thing; however, what relief is there for communities in non attainment areas (still breathing the bad air) while waiting for long-term measures to be developed? The paragraph assumes that the public in general accepts the "black box" but shouldn't there be a measure of sensitivity addressed here as to the burden on communities due to the fact that the region has no solution for the problem at this time. Must communities wait and wait for solutions to come? Where is the balance?	The reference to the black box is intended to illustrate the challenge with meeting air quality standards and provides context for the outcomes and policies in the Air Quality chapter.	None

Draft Regional Comprehensive Plan Comments and Revisions Log

	This chapter should include a mention of air quality issues in Imperial County. In particular, unregulated burning and other uncontained emissions generated from stationery and mobile sources in Mexicali, Mexico which are the prime contributors of air quality problems in Imperial County, especially in regards to excessive particulates. It is suggested to include a policy or goal such as the following: "Cooperate and coordinate with Baja California to reduce emissions of critical pollutants in the Mexicali-Imperial Valley region as soon as practicable."	Comment noted.	None
	Air Quality: The Plan - Last sentence in this paragraph sites the example, "the RCP's energy policies will help accelerate turnover of older, more polluting combustion engines". The RCP constrained Policies (Page 76) notes that expanding light duty retirement programs as a policy that will help in reducing the consumption of fossil, but this alone will do little to help accelerate turnover of older more polluting engines. The Alternative Fuels and Renewable Energy sections (Page 70 of document), do not identify how the RCP will help in this effort, neither is an explanation noted in the Constrained or Strategic Matrices.	Comment noted. Policy EN-16 addresses vehicle retirement programs and fleet modernization.	None
	Operational Strategies: Getting the Most Out of Our Transportation System: More information is needed in this section to locate these operation strategies in the recently adopted RTP.	Comment noted. Will refer to Chapter Three of the Regional Transportation Plan regarding the regional transportation system	Revise paragraph to reflect reference to RTP The Highways and Arterials Supplemental Report of the 2008 RTP proposes funding for operational strategies that can improve the productivity of the Regional Highway System through 2035. The total amount of funding for these improvements represents less than one percent of the overall RTP expenditures, but the benefits, when compared to the costs, are expected to be significant

Draft Regional Comprehensive Plan Comments and Revisions Log

Ventura County Regional Energy Alliance

Category	Comment	Recommended Response	Recommended RCP Edits
Energy	General Comments on the Energy Chapter for consideration: 1. As a planning agency, SCAG plan could place more emphasis on useful coordination of existing energy plans, such as the Statewide Strategic Plan for Energy Efficiency as required by the California Public Utilities Commission. This document includes emphasis on local government actions, but does not readily identify a consistent funding mechanism for local governments to support the plan/utilities efforts to advance energy efficiency over fossil fuel.	Comment noted. Unfortunately, a consistent funding mechanism has not been identified. SCAG looks forward to continued coordination with the Ventura Regional Energy Alliance to pursue funding for local governments to support the energy efficiency.	None recommended.
Energy	2. Discussion of neighborhood systems and mixed uses seems to imply that permits (conditional or otherwise) would acknowledge that one property could provide heat/power to an adjacent property; the concept is useful, but current regulations do not allow for this ---this issue is power generation. The concept of shared/distributed energy districts is useful, but requires more coordination with California Energy Commission.	Comment noted. SCAG acknowledges that more coordination is needed to address power generation through Policies EN-2, EN-3 and EN-4.	None recommended.
Energy	3. The plan should emphasize the value of energy investments that have a lifecycle benefit--not just the short term/first costs consideration.	Page 72 discusses lifecycle assessments in the first energy goal which states, "Supplying the energy needs of the region in a way that reduces negative environmental impacts, social inequities, and economic hardship on future generations." Furthermore, page 70, alternative fuels, discusses the costs and benefits of alternative fuels. SCAG proposes to coordinate with the California Energy Commission and the California Air Resources Board to analyze options to reduce the use of conventional transportation. Policy EN-6 would require SCAG to monitor and provide input toward state energy plans. Through this process, the Regional Council has the discretion to reference the RCP and emphasize the stated energy goals.	None recommended.

Draft Regional Comprehensive Plan Comments and Revisions Log

Energy	4. Energy should be connected to security/prepardness planning for the region; particularly benenficial to identify self-generators that can stay on-line in the event of earthquake, terrorism, etc., and how these are positioned/encouraged regionally to maintain adequate supply to meet health/safety for such facilities as wastewater/water systems, hospitals, etc..	Comment noted. The Security chapter discusses how security and emergency preparedness policies produce multiple benefits related to energy.	
Energy	5. Energy finance is not addressed; suggest that it be generally addressed as component of planning; topics might include comments on how to finance, return on investment in high/super efficient/new technologies; as well as opportunities for CEC loans; green credit banking, tax incentives/rebates that may be useful, etc...	Comment noted. Edit recommended.	Provide a general discussion of energy funding opportunities.
Energy	6. Energy regulation in the state is not clearly understood by many at the local or regional government planners, commissioners, or electeds; the ideas/plans presented may need to be reviewed with eye to current regulatory constraints/opportunities and recommended actions that will advance the region to meet the shared goals. There is a "disconnect" between the goals (shareholder profit/rate structures/regulations) of investor owned utilities and the goals (reliability/reasonable costs for all constituents) of local government that could derail planning efforts. SCAG should play a regional role, along with other regional energy offices/organizations to assure coordination of effort.	Many of the policies in the RCP call on SCAG to coordinate this effort and provide further guidance for the region. The Regional Council has the discretion to commit staff time and resources to update the document with the current regulatory constraints and opportunities as well as future actions.	None recommended.
Energy	I had opportunity to attend a couple of the subcommittee meetings and maintain connection with a few of the participants, so appreciate the efforts that went into the document, and look forward to implementation.	Comment noted. Your participation is appreciated and your expertise was invaluable to this process.	None recommended.

Draft Regional Comprehensive Plan Comments and Revisions Log

Ventura County Integrated Waste Management

Category	Comment	Recommended Response	Recommended RCP Edits
Solid Waste	**Page:** 90 **Paragraph:** 1 **Current wording:** "…existing landfills will not be enough to accommodate our ever growing population..." **Suggested wording:** "…existing landfills, *and potentially future landfills, may* not be enough to accommodate our ever growing population..."	Edit as recommended.	See suggested wording.
	Page: 90 **Paragraph:** 2 **Current wording:** "Traditional solid waste management strategies have relied heavily on creating high capacity, regional landfills (megafills) and, to a lesser extent in California, incineration technologies (such as direct combustion or combustion with energy recovery) to address disposal issues." **Suggested wording:** "Traditional solid waste management strategies have relied heavily on ~~creating~~ high capacity, ~~regional~~ *relatively local* landfills (megafills) and, to a lesser extent in California, incineration technologies (such as direct combustion or combustion with energy recovery) to address disposal issues."	Comment noted.	Edit will be added.
	Page: 90 **Paragraph:** 2 **Current wording:** "In addition, local public opinion plays a big role when landfills are being sited." **Suggested wording:** "In addition, local public opinion plays a big role when landfills are being sited. *Local public opinion will play an even bigger role in landfill siting discussions as the region moves from a relatively local landfill network to a higher reliance on outlying facilities designed to accept volumes of waste far in excess of that which will be generated by the local population. As local populations come to understand the implications of waste importation, one can expect even greater difficulty in siting such facilities.*"	Comment noted. Local populations near potential landfill sites are presumed to have the same concerns whether the landfill is accepting local waste (within the jurisdiction) or importing the waste from another jurisdiction. Therefore, public opinion encountered when siting landfills, whether regional or local, is expected to have a similar impact.	Edit to read, "In addition, local public opinion plays a big role in landfill siting discussions."
	Page: 90 **Current wording:** "Dwindling landfill capacity and increasing health and environmental concerns have forced both the region and the state to make concerted efforts at developing other waste management methods including reducing the amount of waste that goes into landfills. " **Suggested amendment(s):** "*Dwindling landfill capacity near urban centers, increasing health and environmental concerns and public policy goals promoting conservation of resources*, have forced both the region and the state …"	Edit as recommended.	See suggested amendment.
	Page: 90 **Paragraph:** 3 **Current wording:** "The costs for landfilling our garbage will continue to increase as landfill space decreases." **Suggested amendment(s):** "The costs for landfilling our garbage will continue to increase as *local* landfill space decreases *near urban*	Edit as recommended.	See suggested amendment.

	centers."		
	Page: 90 **Current wording**: "…conspicuous impacts to public health and the environment." **Suggested amendment(s)**: As written, this is a subjective opinion and is not supported by factual content. Including a credible source for such a statement would be advisable. Suggest rewriting as: "These costs will ultimately be passed on to residents and businesses in the form of higher disposal fees."	Comment noted.	None.
	Page: 90 **Current wording**: "…mismanagement of our natural resources." **Suggested amendment(s)**: As written, this is a subjective opinion and is not supported by factual content. Including credible sources for such a statement would be advisable.	Comment noted.	None.
	Page: 90 **Paragraph:** 3 **Comments**: If we rely on landfill capacity as a scare tactic to justify recycling, there may be a loss of support for recycling efforts when safe, large, and distant landfills are served by rail-haul options or when existing landfills near urban areas may be expanded. This argument fails to highlight the major reasons to recycle such as: conservation of resources, reduction of energy and pollution within the manufacturing process, increased local economic activity and job creation.	Comment noted. Part of the intent of the paragraph is to point out that landfilling will not always be the most cost-effective option. The other arguments for recycling can be found in the rest of the solid waste chapter.	Edit will be added.
	Page: 91 **Current wording**: "…concerns have been raised about post-closure operations and whether landfill operators are capable of maintaining landfill facilities…" Suggested amendment(s): As currently written, this is unfounded opinion and is not supported by factual content. Including a credible source for such a statement would be advisable. Does the CIWMB agree with this statement, as a regulator of state landfills? Perhaps the concerns may more appropriately pertain to the availability of post-closure funding and potential liabilities.	Comment noted. These concerns have also been voiced by individuals in the waste management industry. The availability of post-closure funding to be able to maintain a landfill past its active life is definitely a concern. According to Subtitle D of the Resource Conservation and Recovery Act, once a landfill closes, the owner/operator is responsible for maintaining the landfill for a minimum of 30 years (post-closure care). This includes making repairs as needed to the landfill cover, monitoring ground water quality, managing the leachate collection system, monitoring the gas control system, etc. In addition, it is now becoming recognized that 30 years may be insufficient for complete degradation in a landfill to occur (especially dry-tomb landfills). These landfills may continue to pose a risk to public health and the environment past the post-closure care period.	None.
	Page: 91 **Current wording**: First paragraph **Suggested amendment(s)**: I do not see the attempted connection, as currently written, between solid waste in landfills and mining destruction. Materials collected from mining	Comment noted. Mining is an example of the intensive use of natural resources to create everyday products that eventually end up in our landfills.	None.

	efforts (metals, diamonds, etc.) are not typically entering landfills as solid waste.		
	Page: 91 **Current wording:** "Our current rate of natural resource extraction has already *created health and environmental impacts that will last long into future generations*." **Suggested amendment(s):** As written, this is merely subjective opinion and is not supported by factual content. Including a credible source for such a statement would be advisable.	Comment noted.	None.
	Page: 91 **Current wording:** "In the short term, we will still need to rely heavily on landfills and, when local facilities have filled to capacity, exporting our waste to other areas, leading to higher trash rates and added traffic congestion and air pollution." **Comment:** As written, this statement is merely subjective opinion and is not supported by factual content. Including a credible source for such a statement would be advisable. Indeed, utilization of remote, high-capacity landfills via a rail infrastructure may actually reduce air impacts by thoughtful siting of transfer stations, which will reduce travel distance of collection vehicles and the related emissions.	Comment noted. See text change. Many communities are not situated near rail lines and those that are in close proximity of a rail transfer station could potentially feel the impact of increased truck traffic.	Edit to read, "In the short term, we will still need to rely heavily on landfills."
	Page: 91 **Current wording:** "…including the development of conversion technology facilities…" **Suggested amendment(s):** "…*and may include* development of conversion technology facilities…"	Comment noted.	None.
	Page: 91 **Current wording:** "Our goal is to achieve maximum diversion from landfills through emerging technologies with diversion credit." **Suggested amendment(s) :** Rewrite sentence as: "Our goal is to achieve maximum *waste prevention and* diversion *of waste* from landfills, *with corresponding diversion credit, utilizing all technologically feasible and fiscally prudent means*."	Edit as recommended.	See suggested amendment.
	Page: 91 **Current wording:** "In turn, landfill operations in Southern California have methane capture technologies that turn methane emissions into energy." **Suggested amendment:** "In turn, *some* landfill operations in Southern California have methane capture technologies that turn methane emissions into energy." Although energy recovery is becoming more common, it is certainly not uniformly implemented at all landfills as implied in the text.	Edit as recommended.	See suggested amendment.
	Page: 92 **Current wording:** "Many of today's health and environmental concerns will become less of a problem as we reduce our garbage volume and become more selective about what we consider trash." **Suggested amendment(s):** As currently written, this is unfounded opinion and is not supported by factual content.	Comment noted.	Edit will be added.

Draft Regional Comprehensive Plan Comments and Revisions Log

	Page: 92 **Current wording**: **"**Our current infrastructure to manage waste focuses on disposal first, followed by recycling, reducing, and reusing." **Suggested amendment(s)**: This statement is historical and no longer accurate within California. It should be rewritten as: "Our *past* infrastructure to manage waste *focused upon* disposal first, followed by recycling, reducing, and reusing."	Comment noted. Even with the advent of AB 939 in 1989, landfill disposal is currently still where the bulk of our unwanted trash goes and therefore, a large focus of waste management agencies.	None.
	Page: 92 **Current wording**: **"**The waste hierarchy envisioned for the future focuses on reducing first, then reuse, recycling, conversion technologies and finally disposal to land fill (see Figure 7.1)." **Suggested amendment(s)**: "The waste hierarchy envisioned *in 1989 focused* on reducing first, then reuse, recycling, conversion technologies and finally disposal to land fill (see Figure 7.1)."	Comment noted.	None.
	Page: 92 **Figure 7.1**: Figure 1 **Current wording**: "Current Waste Hierarchy" **Suggested amendment(s)**: **"**Past Waste Hierarchy"	Comment noted.	None.
	Page: 92 **Figure 7.1**: Figure 2 **Current wording**: "New Waste Management Paradigm" **Suggested amendment(s)**: "*Waste Management Paradigm Since 1989*"	Comment noted.	None.
	Page: 93 **Current wording**: "Many forward thinking communities…are adopting policies…" **Suggested amendment(s)**: Change "many" to "*some*" since, as currently written, only three cities are provided as credible examples (the other 16 are only agreeing to provide education, which is insignificant since all jurisdictions are already supposed to be providing education with the passage of AB 939 in 1990).	Edit as suggested.	See suggested amendment.
	Page: 93 **Current wording**: "Although not all individual jurisdictions have managed to achieve the 50 percent diversion rate, all jurisdictions are making good-faith efforts to comply with the unfunded mandate by implementing quality programs. **Suggested amendment(s)**: "Although not all individual jurisdictions have managed to achieve the 50 percent diversion rate, jurisdictions are making good-faith efforts to comply with the unfunded mandate by implementing quality programs." Remove the word "all" since not all jurisdictions receive good-faith rulings from the CIWMB.	Edit as suggested.	See suggested amendment.
	Page: 94 **Current wording**: "Diversion also helps communities save money by avoiding payment of tipping fees on each ton of waste disposed." **Suggested amendment(s)**: What is the	Comment noted.	Edit will be added.

	definition of "communities"? *Jurisdictions* generate significant revenue from fees for waste delivered to their landfills. For example, the County of Ventura derived almost $ 2.5 million in revenues from the solid waste entering just one of our County's landfills in 2007.		
	Page: 94 **Current wording:** "California's recycling market is still on shaky ground, especially because of competition from foreign recycling markets." **Suggested amendment(s):** This statement is completely inaccurate and indicates a fundamental lack of understanding as to how recycling markets works. It is highly unlikely local markets could ever utilize all secondary materials (recyclables) generated within California. With no export markets, our local landfills would undoubtedly fill up at a significantly quicker rate with unmarketable, recyclable waste. Furthermore, recyclables are commodities and, as such, bring significant revenue to the United States and our state. In fact, years ago, the CIWMB determined that California alone had export sales of $1 billion, not to mention the benefit derived from thousands of recycling jobs relying upon the export marketplace, local and state tax revenues, etc. Recyclables have always been one of the largest exported U.S. products. Suggested rewording may include: "Local markets for recyclables not only increase the local economic benefit of recycling, but can enhance market stability. While vital, and necessary, for sustaining the value and marketability for most types of secondary materials, foreign markets are also more vulnerable to import restrictions (especially for dirty plastic), tariffs, political changes, currency fluctuations and labor and environmental concerns."	Comment noted. The RCP does not suggest that California never export its recyclables, only that creating a stable, local recycling market would be both economically beneficial and environmentally sound. Over the years, a number of recycling facilities in California have closed due to competition from overseas markets that are able to pay more per pound of recyclable material than local companies. As such, California's local recycling market is still highly unstable.	None.
	Page: 95 **Side Column:** Paragraph 1 **Current wording:** **"**As the need for new landfill capacity diminishes…" **Comments:** Regarding "diminishing landfill capacity needs", this is subjective opinion, not a factual statement, as economic and population growth projections for our state make this a seeming impossibility. This bullet also seems to suggest misguidedly that Land Use issues only exist with landfill operations. Siting and operation of the alternative solutions proposed within this document, some of which will require large parcels of land and have an appearance similar to an oil refinery or power plant, may very well experience the same or similar land use challenges as a landfill.	Comment noted.	Edit will be added.
	Page: 95 **Side Column:** Paragraph 3 **Current wording:** "The siting or new…" **Suggested amendment(s):** Typo. I believe the author(s) meant to write "of."	Edit as recommended.	Replace "or" with "of."

Draft Regional Comprehensive Plan Comments and Revisions Log

	Page: 95 **Side Column:** Side bar, paragraph 3 **Comment:** Litter is not related, in any meaningful way, to the rate of diversion from landfill disposal. Further, litter does not impact ground water quality in any significant way.	None.	Edit will be added.
	Page: 95 **Current wording:** "The program provides loans, technical assistance, and free product marketing to businesses that us materials from the waste stream to manufacture their products." **Comments:** The term "technical" should be more specific, to include "*permit assistance, site selection assistance, and help identifying and acquiring materials for manufacturing*"...	Comment noted. A more detailed technical discussion could be provided in a follow-up to the RCP.	None.
	Page: 95 **Current wording:** "They help conserve natural resources (timber, water, minerals);" **Suggested amendment(s):** I suggest removing the word "timber" as this is, generally, not an accurate statement and furthers a popular misconception about the cutting of trees within the United States. In the U.S., trees harvested for lumber and paper are located primarily on privately owned forest lands and are viewed as a "crop", planted for the specific purpose of being cut down for timber and paper. Once cut, the trees will be replanted for the same purpose indefinitely. Further, fibers in paper can only be recycled a finite number of times owing to the natural breakdown of the fibers, thus necessitating the use of virgin pulp obtained only from trees.	Comment noted. In addition to private lands, publicly-owned lands (including old growth forests) managed by the U.S. Forest Service may also be subject to timber harvest. This chapter does not intend to discuss timber production in depth nor does it assert that virgin materials should never be used. However, the purpose of this sentence is to point out the advantages of recycling, such as reducing the input of virgin materials.	None.
	Page: 95 **Paragraph:** 2 **Current wording:** "protects, and expands U.S. manufacturing jobs: and increases U.S. competitiveness." **Suggested amendment(s):** Text erroneously switches in mid-paragraph from plural to singular. Should be rewritten as "…protect, and expand U.S. manufacturing jobs: and increase U.S. competitiveness."	Edit as recommended.	See suggested amendment.
	Page: 96 **Current wording:** "Construction and demolition (C&) debris comprises 21.7 percent of California's overall waste disposed waste stream." **Suggested amendment(s):** "*As of 2004,* construction and demolition (C&) debris comprise~~s~~d 21.7 percent…" This figure is now 4 years old, per the chart on page 95, and it is unlikely C&D waste debris now comprises such a high percentage of the state's waste stream, especially with so many C&D debris diversion programs and ordinances in effect throughout the state.	Comment noted. See text change.	Edit to read, "In 2004, construction and demolition (C&D) debris comprised 21.7 percent…"
	Page: 96 **Figure 7.3:** Figure 2 **Current wording:** "REMANUFACTURING" **Suggested amendment(s):** Use the term "MANUFACTURING." A virgin product cannot be remanufactured prior to use.	Edit as recommended. Edit to be made to "Life Cycle of A Virgin Product" figure.	Change, "Remanucturing" to "Manufacturing"

Draft Regional Comprehensive Plan Comments and Revisions Log

	Page: 96 **Current wording:** Third full paragraph; "*Cities* are starting to institute…" and "Currently, each *city* develops its own…" **Suggested amendment(s):** Change the words "Cities" and "city" to "*jurisdictions*" or to "cities *and counties*…" as currently written, positive actions of *counties*, especially unincorporated areas, are excluded. The County of Ventura, for example, has had a C&D debris diversion ordinance in effect since early 2007.	Edit as recommended.	Insert, "counties" to sentence.
	Page: 97 **Current wording:** **"**Green material collection programs have been implemented in many cities and counties, but not until recently has collection of food scraps been considered." **Suggested amendment(s):** "Green material collection programs have been implemented in many cities and counties, many of which include food scraps." Food scrap recycling really is not a recent phenomenon.	Comment noted. Food scrap recycling, while not a recent phenomenon is not yet a standard practice.	Edit will be added.
	Page: 97 **Current wording:** Second full paragraph **Suggested amendment(s):** Within this paragraph, I would encourage adding text which states the need for changes in California legislation to allow more organic material to be treated as compost material, either by broadening what type of food items can be treated as such or by restricting the types of materials now considered to be "food" and not allowed for processing at compost facilities. Ideally, both actions could occur legislatively in the very near future.	Comment noted. A more detailed technical discussion could be provided in a follow-up to the RCP.	None.
	Page: 97 **Current wording:** "Organic waste comprises 30 percent of waste disposed to landfills. That figure includes food scraps, textiles, composite organics, and green material like landscape and tree trimmings, grass clippings, and agricultural residues." **Comment:** The data here appears suspect. What time period is this information referencing (when was the study conducted yielding this result)? What is the source of this information (i.e., is it credible)? With the near universal implementation of green waste diversion in our region, the organic component of landfilled refuse is no where near the 30% level. Therefore, the suggested reduction in methane production will not be realized. Further, landfill gas is produced by the decomposition of all organic materials within the landfill, which include food and green waste as well as plastic, paper, wood, carpet, etc.	Comment noted. This data comes from the 2004 Waste Characterization Study commissioned by the CIWMB. See figure 7.2 (page 95) of the draft RCP. Wood, paper, and plastic are separate materials classes and would hopefully be diverted to reuse (wood) and recycling. See text change.	Add footnote 30b referencing source of data. Add "carpet" to list of organics.
	Page: 97 **Current wording:** Last paragraph; "…feedstock." **Suggested amendment(s):** Change the word "feedstock" to "*source of raw material*", which is both more accurate terminology within the recycling industry as well as being more readily understood by the average reader.	Edit as recommended.	Edit to read, "CTs target post-recycled municipal solid waste residuals currently destined for disposal at landfills as their feedstock (i.e., source of raw material)."
	Page: 97 **Current wording:** Last paragraph; "Many CT	Comment noted.	Edit will be added.

	proponents feel…" **Suggested amendment(s):** For a more balanced and accurate assessment of CT, which is not currently being utilized (or perhaps currently feasible) in North America, there should be some mention of the currently impractical cost of CT and the potential negative effect upon state businesses and residents burdened (i.e., economic hardship) with the escalated, projected costs of CT processing versus more cost effective means of solid waste disposal. Furthermore, CT proponents are eager to claim CT will not compete with recycling, but there is nothing preventing it from doing so. For example, an acid hydrolysis plant seeking cellulose could draw paper from mills or bioconversion technologies could draw green waste from composters.		
	Page: 98 **Current wording:** "However, the environmental benefits of conversion technology scenarios are highly dependent on their ability to achieve high conversion efficiencies and high materials recycling rates." **Suggested amendment(s):** "However, the environmental benefits of conversion technology scenarios are highly dependent on their ability to achieve high conversion efficiencies, high materials recycling rates*, operate reliably, and provide a cost effective solution*." There should also be mention of the currently impractical cost of CT, particularly given the projected costs of CT processing versus more cost effective means of solid waste disposal.	Comment noted. A more detailed technical discussion on CT costs could be provided in a follow-up to the RCP.	None.
	Page: 98 **Current wording:** "At this time, the successful development and use of CTs is occurring throughout Europe and Japan." **Comment:** It would be useful to have some examples of these referenced CT activities in Europe and Japan and how those activities *may* apply to waste streams of SCAG members.	Comment noted. A more detailed technical discussion could be provided in a follow-up to the RCP.	None.
	Page: 98 **Paragraph**: Bulleted items – Thermal, Biological, and Chemical **Comment:** For each of these listed technologies, it would be appropriate to detail the potential problems/technical challenges, the products as well as the by-products/end wastes, and the health/environmental impacts (i.e. air pollution, noise, odor, etc.) of these type of facilities.	Comment noted. A more detailed technical discussion could be provided in a follow-up to the RCP.	None.
	Page: 99 **Current wording:** Section under "Climate Change:" "Reducing the amount of waste deposited…" **Suggested amendment(s):** Add text such as "*While capturing methane gas at landfills is increasingly common for conversion into valuable energy*, reducing the amount of waste…"	Edit as recommended.	See suggested amendment.
	Page: 99 **Current wording:** First paragraph, "The 2004	Edit as recommended.	Replace "The" with "SCAG's"

Draft Regional Comprehensive Plan Comments and Revisions Log

	Growth Vision…" **Suggested amendment(s):** Add "SCAG's 2004 Growth Vision…" to clarify for a reader.		
	Page: 99 **Current wording:** Second paragraph, "…by addressing waste elimination…" **Suggested amendment(s):** "*By encouraging legislation requiring manufacturers to reduce waste*…" Neither consumers nor residents can control waste "at the source," so legislation must be introduced, or strengthened to achieve this result.	Comment noted. See text change.	Edit to read, "…by addressing waste elimination at the source and distributing the responsibility for waste on, not just the consumer, but the producer as well."
	Page: 99 **Current wording:** "…'we can get darn close.'" **Suggested amendment(s):** The use of these five words as a specific and potentially unrelated quote is awkward and should be, instead, used in the sentence's entirety as a paraphrase, such as "We 'may never achieve 100 percent materials efficiency but we can get darn close.'"	See text change.	Change placement of quotes.
	Page: 100 **Current wording:** First paragraph, "…production feedstock." **Suggested amendment(s):** Change these words to "*source of raw material in their manufacturing process*," which is both more accurate terminology within the recycling industry as well as being more readily understood by the average reader.	Edit as recommended.	See suggested amendment.
	Page: 100 **Current wording:** First paragraph re: LCA **Suggested amendment(s):** There should be a mentioning here of CALMAX, the state's material exchange program that shares these same goals, while assisting both residents and businesses alike. Go to www.ciwmb.ca.gov/CalMAX/	Comment noted. See text changes.	Insert sentence, "For example, the CIWMB currently runs a free materials exchange service, the California Materials Exchange (CalMAX) program, that helps businesses, organizations, and individuals find markets for materials that would otherwise be discarded."
	Pages: 100-101 **Current wording:** Section under "Product Stewardship and Extended Producer Responsibility." **Suggested amendment(s):** Add some text referencing the need for either the introduction, or strengthening, of legislation requiring manufacturers to reduce waste, preferably at the federal level. Furthermore, while the idea of EPR is environmentally attractive, for a more balanced and accurate assessment of this policy, there should be, at the very least, reference to a common perception within the U.S. that EPR is expensive and thus, financially (economically) detrimental. See http://pubs.acs.org/hotartcl/est/00/apr/hanis.html, for example. I suggest stating text such as that "*EPR represents another example of the economic cost for positive environmental stewardship.*" (A sentiment also suggested within the previously discussed subject of conversion technology).	Comment noted. See text changes. The economic cost associated with EPR is not necessarily evidence of the unsuitability of EPR as a cost-efficient waste minimization strategy. Instead, it is a reflection of the complexities inherent in instituting a new policy or set of policies to handle an area of waste management that has historically been overlooked. The success of a cost-effective EPR policy in the United States will depend on a variety of conditions including, the comprehensive design of an EPR policy (or policies), the manner in which the policy (or policies) is (are) implemented, the ability to learn from EPR legislation employed in the EU (notably the UK and Germany),	Insert sentence, "However, for EPR to be truly effective, legislation requiring the implementation of EPR practices will need to be instituted at the state and preferably, federal levels."

Draft Regional Comprehensive Plan Comments and Revisions Log

		and the willingness to assign a large portion of responsibility to industry (manufacturers and producers).	
	Page: 101 **Current wording**: Second paragraph; "Some, of which require changing how our whole region thinks about solid waste management issues." **Suggested amendment(s)**: This is not a sentence but a sentence fragment, thereby being grammatically incorrect.	See text changes.	Edit to read, "Some of these actions will require changing the way our region thinks about solid waste management issues."
	Page: 101 **Current wording**: "Recycling, composting, conversion technologies, and landfills all play a part in moving towards maximizing diversion." **Suggested amendment(s)**: **"**Recycling, composting, conversion technologies, and landfills *may* all *one day* play a part in moving towards maximizing diversion." Conversion technology really does not currently play any significant part in this process so this is not an accurate statement.	Comment noted.	None.
	Page: 101 **Current wording**: "We will need to employ…resource management." **Suggested amendment(s)**: As written, this sentence comes across largely as a one-sided opinion. I suggest rewriting this sentence as: "*Future success in effective resource management will require a creative mix of proven, cost-effective strategies to satisfy anticipated waste disposal needs*."	Comment noted.	Edit will be added.
	Page: 101 **Current wording**: "…waste that will need to be disposed at landfills or managed with conversion technology." **Suggested amendment(s)**: "...*waste requiring disposal at landfills or, if economically feasible and technologically practical, conversion technology*."	Comment noted.	Edit will be added.
	Page: 101 **Current wording**: Sentence under "Solid Waste Goals" **Suggested amendment(s)**: Rewrite as "…in the most environmentally responsible *and cost efficient* manner possible." Jurisdictions must ensure that fiscal responsibility remains a priority as guardians of rate payers' tax dollars. To readily accept any/all technologies at any costs is neither responsible nor prudent.	The Solid Waste Chapter goals included in the Draft RCP were developed under the guidance of the Solid Waste Task Force and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Solid Waste Chapter goals at their discretion.	None.
	Page: 101 **Current wording**: Sentence under "Solid Waste Outcomes" **Suggested amendment(s)**: First, this is a "run-on" sentence. I suggest rewriting as two (or even three) sentences to reduce this confusing text. Secondly, focusing just on a numerical diversion or disposal reduction goal forces jurisdictions to focus on high tonnage materials such as asphalt and concrete, rather than focusing on high value material (i.e. cans) or material with the most environmental impact (i.e. food waste). It also removes the focus from the integrated waste	The Solid Waste Chapter outcomes included in the Draft RCP were developed under the guidance of the Solid Waste Task Force and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Solid Waste Chapter outcomes at their discretion.	None.

	management hierarchy. "Reduce" and "Re-use" strategies handle fewer tons than "Recycle" strategies. Additionally, diversion and disposal rates are often influenced by factors beyond the control of jurisdictions (i.e., inherent accuracy problems of the system of jurisdictional tonnage allocation, etc.). A focus on quality of programs with "good faith" determinations will likely yield a more effective environmental impact.		
	Page: 102 **Current wording:** Item #6 **Suggested amendment(s):** Need to define "coordinate" or expound upon. This is a vague term.	The term "coordinate" is used according to the following definition - organize and bring together.	None.
	Page: 103 **Current wording:** Item #1; "Local governments should discourage the exporting of locally generated waste outside of the SCAG region." **Suggested amendment(s):** As written, this policy is not advisable for at least two reasons. First, it conflicts with current practices for most California jurisdictions' method of biosolids management, particularly with respect to Ventura County Publicly Owned Treatment Works (POTWs). The transport of biosolids to locales currently outside of the SCAG region is legal and permissible by both EPA regulations and state statutes. While the County believes local markets for generated waste can frequently be beneficial and should be encouraged, it should not be supported as an only option. Secondly, as already submitted with respect to comments for page 94, there is no way local markets could ever utilize all recyclable waste generated within the SCAG region; export markets are an absolute necessity to ensure the ongoing health of the recycling industry and the extending of the life spans of our local landfills. Recyclables are commodities and have always been one of the largest exported U.S. products; as such, recyclable waste products generate billions of dollars to the United States and our state. An unhindered recyclables marketplace must be encouraged. Lastly, what is the SCAG's definition of "waste", as used within this item?	Comment noted. See text changes. The RCP does not create any new legal mandates or regulations for local governments and will not change any existing mandates. The Solid Waste Chapter policies included in the Draft RCP were developed under the guidance of the Solid Waste Task Force and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Solid Waste Chapter policies at their discretion.	Edit to read, " Local governments should discourage the exporting of locally generated waste (destined for landfills) outside of the SCAG region…."

Draft Regional Comprehensive Plan Comments and Revisions Log

California Office of Emergency Services

Category	Comment (verbal)	Recommended Response	Recommended RCP Edits
Security	Please rework policy recommendation SE-6.1 to include the California Standard Emergency Management System	Comment Noted. Will incorporate	Rework to read: **SE-6.1 SCAG shall encourage all SCAG elected officials are educated in the National Incident Management System (NIMS) and California Standard Emergency Management System (SEMS).**

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Introductory Comments

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	At its meeting of July 24, 2008, the Board of Directors of the Orange County Council of Governments (OCCOG) discussed the draft 2008 Regional Comprehensive Plan (RCP) that was released for public comment in January 2008 by the Southern California Association of Governments (SCAG). The OCCOG Board noted that the Regional Comprehensive Plan has been under preparation for several years and has been presented to the OCCOG and at various SCAG committee and Regional Council meetings. At these meetings, the RCP has been portrayed as an entirely voluntary document that includes a variety of policies and programs that could be undertaken by local governments or project proponents should they so choose. However, the OCCOG Board continues to express concern that, in light of legislative proposals under consideration by State legislators and the anticipated use of the RCP by the SCAG as a policy guidance document to be used in intergovernmental review, the voluntary guiding measures and action items that are proposed in the RCP could take on a much more significant role. For example, the proposed Senate Bill 375 (SB 375) and proposed implementation of Assembly Bill 32 (AB 32) both identify an increased emphasis on regional planning efforts. Such emphasis places much more significance on local government implementation of the RCP because these bills speak to the issue of consistency between	The draft resolution to adopt the RCP contains language explicitly excluding its use in implementing State and Federal mandates or programs not anticipated at the time of adoption. While policies in the RCP could influence future SCAG planning and associated funding decisions, it is not intended for this purpose, and any use of the RCP in future programming decisions would be subject to future Regional Council action. Comment noted. IGR is a mandated activity for SCAG. However, comments to lead agencies are advisory as are any other comments in a CEQA process. SCAG has administered an IGR program for at least 20 years, and is unaware of instances in which its comments have a created a hardship for the lead agency.	None recommended

	general plans and the SCAG region's Compass Blueprint, which is embodied in RCP. Perhaps most significantly, future funding allocations could be tied to meeting the consistency requirements mandated by these bills. While the OCCOG Board has a strong desire to work towards the regional solutions needed to address the goals of such legislation, the RCP was never portrayed by the SCAG as a potential implementation tool of these significant pieces of legislation. As such, the OCCOG Board recommends that the RCP should clearly identify that the document is intended solely as a voluntary menu of optional measures and action items available to local governments and project proponents, and that it is not intended as the vehicle to implement requirements or mandates that may result from these pieces of legislation.		
	The OCCOG Board also recognizes the public outreach SCAG has undertaken on the Regional Comprehensive Plan. In fact, the OCCOG undertook outreach to Orange County jurisdictions, transportation agencies, special districts, resource agencies, the private sector, and public interest groups, in order to secure their input and recommendations on the proposed Plan policies as the OCCOG Board had previously pledged in a letter to the CEHD dated August 29, 2007 (Attachment 1). Further, it was recognized that the planning and public outreach process on the RCP is likely to result in many comments and recommendations from throughout the region that are valid, but may offer differing perspectives, and	The RCP Chapters have undergone extensive review. During 2004 through 2007, the RCP Task Force reviewed and discussed each chapter multiple times, approving release to the appropriate policy committee. In addition, the Solid Waste Task Force, Water Policy Task Force, Energy Working Group and Open Space Working Group assembled a group of experts to review and comment on their respective chapters. In 2005 and 2006, the policy committees were informed of progress on each chapter. In 2007, the policy committee began reviewing the main components of the chapters including the goals, outcomes and action plans. SCAG appreciates the outreach conducted by OCCOG and the review	None recommended

	thus will warrant careful consideration and deliberation. The timeline recommended by the RCP Task Force that identifies the close of the public comment period thus will warrant careful consideration and deliberation. The timeline recommended by the RCP Task Force that identifies the close of the public comment period on August 11, 2008 and consideration of adoption by the Regional Council on September 4, 2008 does not appear to provide adequate time to allow for thoughtful consideration and meaningful discussion of the comments that SCAG may receive on the draft RCP.	undertaken by Orange County jurisdictions, transportation agencies, special districts, resource agencies, the private sector, and public interest groups beginning in August of 2007.	
	Based upon these considerations and concerns, the OCCOG Board unanimously offers the following regarding the draft 2008 Regional Comprehensive Plan: 1) Technical comments and recommendations on the draft 2008 Regional Comprehensive Plan, as detailed in Attachment 2, identifying overall comments on the draft RCP and each of its chapters; and in Attachment 3, identifying specific technical comments;	Please see responses to comments below, which are sorted by topic.	Revisions have been recommended, as practicable.
	2) Recommends that the draft 2008 Regional Comprehensive Plan be revised and reviewed through a re-activated SCAG Plans and Programs Technical Advisory Committee before being redistributed;	Each chapter was developed by staff under the guidance of the RCP Task Force and policy committees. All chapters were also significantly shaped by either topic-specific working groups and task forces or by in-depth discussions with individual stakeholders and experts. A re-activated Plans and Programs Technical Advisory Committee could consider revisions at a future time.	Prepare technical appendix on input review, input, and participation.
	3) Recommends that the SCAG RCP Task Force-recommended timeline for the draft 2008 Regional Comprehensive Plan be	Any process could always benefit from additional review and input, but given the time and input already reflected in the RCP, any	None recommended

	extended to address public comments and recommendations; and,	delay for additional review would be unnecessary.	
	4) Recommends that the draft 2008 Regional Comprehensive Plan be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor should it be used in any SCAG mandated program, including intergovernmental review.	Page 2 of the Draft RCP states," …while the RCP recommends more integrated resource planning, *it does not mandate it*. Rather, local governments are asked to consider this Plan's recommendations in General Plan updates, municipal code amendments, design guidelines, incentive programs and other actions." Furthermore, all policies identified for agencies other than SCAG contain the voluntary language "should."	None recommended.
	The OCCOG is committed to the continued discussion of the Regional Comprehensive Plan and to working with SCAG throughout completion of the document.	Comment noted.	

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments

Sorted by Chapter

General Comments

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	SCAG is not required to prepare a Regional Comprehensive Plan (RCP). To provide context for the document and indicate how the document should or could be used in the region and by SCAG, please add a section to the document explaining why SCAG is undertaking the development of the RCP and why it is in their purview to do so. For example, please explain why SCAG can or could use an RCP containing recommended and voluntary actions and policies that are not under its purview in it's mandated intergovernmental review process.	Comment noted. The RCP includes two sections that explain why SCAG is undertaking preparation of a RCP, the Executive Summary and the final chapter, Moving Forward.	None recommended
	Each chapter of the Regional Comprehensive Plan identifies a series of goals, outcomes and actions plans that contain a series of policies. Please clarify how these goals, outcomes and action plan policies are to be applied and measured. For example, are they applied to the total region, or are they applied down to the jurisdictional level? In particular, if development projects and transportation projects are to be reviewed through the intergovernmental Review process against these RCP policies, are the RCP outcomes and policies to be applied at a site-specific level? Additionally, please clarify which of the goals, outcomes and policies are under SCAG's purview, which are already existing adopted or approved policies, and which are recommendations that would be entirely voluntary. If the RCP is to be	The goals, outcomes and action plans included in the RCP are intended to be applied at the regional scale and not the jurisdictional or site-specific level.	None recommended

	used in IGR, policies from mandatory programs or programs that are currently adopted SCAG policies versus those that are voluntary should be clearly identified.		
	All the RCP policies would represent a significant commitment of resources and expenditures by local jurisdictions that would need to be considered against available revenues and jurisdiction priorities. Further, the RCP commits SCAG to a significant number of actions, including some that SCAG does not currently have authority to undertake. Does SCAG have the resources to commit to these actions? If not, how will SCAG address identifying which actions it will undertake, which it will not, and how they will be prioritized? Please also identify, similar to the General Comment #2, the legal authority under which SCAG could undertake all of these actions? Again, this information will help to clarify the context of the document and how it will or can be used.	The RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would be subject to additional discussion.	None recommended
	There is concern that even if the RCP is voluntary, non-binding and represents good principles and policies, legislative proposals such as AB 32 and SB 375 can change the non-binding nature of goals and policies. Please explain how the RCP may be used by SCAG in the development of any mandatory regional plans or programs.	The draft resolution to adopt the RCP contains language explicitly excluding its use in implementing State and Federal mandates or programs not anticipated at the time of adoption. While policies in the RCP could influence future SCAG planning and associated funding decisions, it is not intended for this purpose, and any use of the RCP in future programming decisions would be subject to future Regional Council action.	
	Each chapter's action plan identifies three categories of action policies: 1) Intergovernmental Review/Best Practices 2) Legislation 3) Coordination To provide a clear understanding of how the	The action plan matrix in each chapter includes a check mark under the header "IGR" if it is intended for this purpose.	

	many policies will be applied, it would be helpful if the listing of policies under Intergovernmental Review/Best Practices were separated into two categories to prevent confusion. One category would be the listing of Intergovernmental Review Policies that SCAG would apply to regionally significant projects as they undergo IGR review (external to SCAG process), and another category: Best Practices, that would relate to best management practices that SCAG as an agency would implement (internal SCAG process) or that could be considered as voluntary actions. For developers, local jurisdictions, special districts and agencies submitting projects that would undergo SCAG IGR review, the distinction and separation would simplify the document. The separation would make clear those policies that could be expected to be raised during the IGR process, and not be confused with a set of policies that represent SCAG work efforts and are not yet appropriate to be raised during the IGR process until SCAG's work effort is completed: Example: Open Space and Habitat: Agricultural Lands Action Plan, page 45, OSA-3, which is listed as an IGR/Best Practices policy and should be separated out as a SCAG Best Practices policy: "OSA-3: SCAG shall work with its member agencies and the region's farmland interests to develop regional guidelines for buffering farmland from urban encroachment, resolving conflicts that present farming on hillsides and other designated areas, and closing loopholes that allow conversion to non-farm uses without a grading permit."		

	Each chapter presents data and information regarding the challenges faced by the topic addressed by the chapter (e.g. the land use chapter addresses land use challenges). A desired future and outcomes are then identified within a plan for the region to reach that desired future. However, it is not clear in all of the chapters how the goals, outcomes, and actions reflect the discussion of the challenges or the future plan. For example, the Transportation Chapter engages in a lengthy discussion of goods movement within the region but does not contain any goals, outcomes, or policies addressing it. It is recommended that there be a clear and logical linkage between the discussion presented in each chapter and the goals, outcomes, and policies/programs identified	Each chapter contained in the RCP was developed under the guidance of the RCP Task Force, policy committees and in many cases chapter specific working groups. The Regional Council may revisit chapter content at their discretion.	None recommended
	Each chapter's action plan identifies a number of policies and programs recommended to be undertaken by different stakeholders in the region, including SCAG, local governments, public utilities, etc… It is appropriate for the RCP to include direction to those entities that may be responsible in the SCAG region for the implementation of the plan. However, it is recommended that the RCP not direct entities, such as the state and federal government and not under the purview of SCAG. It is recommended that all policies and programs directing actions for the state and federal government and other entities be directed towards actions that can be undertaken by entities in the region. For example, policy WA-33 from the Water Chapter states: "State and regional agencies should develop	Each chapter contained in the RCP was developed under the guidance of the RCP Task Force, policy committees and in many cases chapter specific working groups. The Regional Council may revisit chapter content at their discretion.	None recommended

	fair and consistent safety guidelines for use of reclaimed and recycled wastewater for nonpotable uses, in order to facilitate more widespread acceptance and use." The policy could be reworded to read: "SCAG should encourage the State and regional agencies to develop fair and consistent safety guidelines for use of reclaimed and recycled wastewater for non-potable uses to facilitate more widespread acceptance and use."		
	It is recommended that the language used in the document be more neutral and present the facts, analysis and recommendations without bias. The document is currently written using a persuasive tone of voice that often attempts to convince the reader of the severity of a given challenge. This implies a bias in the interpretation of the facts. A persuasive tone may also dissuade readers from trusting the validity of the information and recommendations because it begs the question of what the other side of the argument may be	Comment noted. Revisions recommended, as needed.	Edits will be completed as needed.
	Each chapter in the document presents a significant amount of data and detail on the topic area. Some of the data in the document does not appear to be accurately referenced. For example, the Air Quality Chapter, page 81, states: "Driving a motor vehicle is the single most polluting thing that most of us do each day." It is cited as being from the National Safety Council. However, it is from research completed by the Environmental Protection Agency and is only referenced by the National Safety Council. It is recommended that citations and other sources of data should be reviewed for	Citations will be checked for accuracy.	Edits will be completed as needed.

	accuracy, particularly since the RCP is intended to serve as a resource document for various entities in the region.		
	Data presented in each chapter should be current data relevant to the discussion. For example, the Air Quality Chapter, on page 81 quotes a study completed in 1995 addressing mobile source emissions. It is recommended that either a more current source for the information be identified or, if it is still valid, that the sentence add a statement acknowledging that the information being presented, while older, is still accurate.	Data will be checked per this comment.	Edits will be completed as needed.
	Many chapters in the RCP indicate that SCAG will use the RCP to guide decisions regarding funding. Please clarify how SCAG would use the RCP in making funding decisions and which funds would be subject to this guidance. Further, if funding is tied to the implementation of the RCP, which is currently a voluntary guidance document, it is recommended that the document should clarify that the funding come from new funding sources and should not be a redirection of existing funding sources. Also, please clarify if it is an RCP objective to establish a SCAG position that states that infrastructure bond funding be tied to consistency with the implementation of the visions of the Regional Comprehensive Plan and Compass Blueprint, as indicated in the Land Use Chapter in measure LU-2.1 which states, "All stakeholders should leverage state infrastructure bond financing, including the Department of Housing and Community Development's Transit Oriented Development program and should support legislation that will	The RTP needs to contain general discussion on how the MPO has addressed requirements for integrated planning, and SCAG cites its RCP efforts in response to this requirement. This statement does not create policy seeking consistency requirements for bond funding. The Commentor is referred to the responses regarding the Land Use and Housing Chapter for additional detail.	None recommended

	target infrastructure bond funds for regions with adopted growth visions such as the Compass Blueprint and for projects consistent with these visions. ?		
	A theme of the RCP is the concept of "induced" growth due to roadway construction; however, there is no discussion of what this means relative to the RCP. Because the meaning of the word "induced" implies that the one thing causes another – roadway construction causes growth – it is confusing to the reader. As defined in ULI's book, "Growing Cooler", induced growth refers to growth that would have occurred somewhere else in the region in the absence of the investment in the infrastructure at one specific location. This is fundamentally different than one causing the other and really implies planning for growth through infrastructure investment. It is recommended that the RCP clearly define what is meant by "induced" growth as it is used throughout the document.	Comment noted	Edits will be completed as needed.

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments

Sorted by Chapter

Executive Summary

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	What is the RCP? (OCCOG Technical Review Supplement 7-2)	Comment noted	None
	Why should OCCOG review the RCP? The RCP could significantly influence any plans or programs developed by SCAG to meet federal and state requirements. (OCCOG Technical Review Supplement 7-2)	The draft resolution to adopt the RCP contains language explicitly excluding its use in implementing State and Federal mandates or programs not anticipated at the time of adoption. While policies in the RCP could influence future SCAG planning and associated funding decisions, it is not intended for this purpose, and any use of the RCP in future programming decisions would be subject to future Regional Council action.	None
	It is not clear that the policies outlined in the RCP represent the preferred future for the SCAG region (OCCOG Technical Review Supplement 7-2)	The policies included in the Draft RCP were developed under the guidance of the RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit policies at their discretion.	None
	It is unclear how these programs would influence any regional planning efforts that could become mandatory. (OCCOG Technical Review Supplement 7-2)	Comment noted. The RCP is not intended to satisfy future mandated activities. Language included in the draft adopting resolution specifically states this.	
	RCP policies could be used . . . in SCAG's mandated IGR capacity to be applied to projects as additional mitigation measures. (OCCOG Technical Review Supplement 7-2)	Comment noted. IGR is a mandated activity for SCAG. However, comments to lead agencies are advisory as are any other comments in a CEQA process. SCAG has administered an IGR program for at least 20 years, and is unaware of instances in which its comments have a created a hardship for the lead agency.	
	The RCP does not consistently reflect SCAG's existing and adopted policies. (OCCOG Technical Review Supplement 7-2)	The RCP, among other purposes is intended to establish new policies, which will carry the weight of SCAG policies when and if adopted.	None
	Includes policies and recommended actions that	The RCP is not intended to expand SCAG's purview.	None

	are not currently under SCAG purview. (OCCOG Technical Review Supplement 7-2)	Rather, the policies noted are advisory, and are necessary to underscore interrelations between planning topics.	
	Does not clearly identify the specific policies that would be used in IGR. (OCCOG Technical Review Supplement 7-2)	The action plan matrix in each chapter includes a check mark under the header "IGR" if it is intended for this purpose.	None
	Information in each chapter is not presented in a consistent manner. (OCCOG Technical Review Supplement 7-2)	Comment noted	None
	It is unclear which chapters/topcis have received regional, professional or technical level review by interested and affected stakeholders. (OCCOG Technical Review Supplement 7-2)	Each chapter was developed by staff under the guidance of the RCP Task Force and policy committees. All chapters were also significantly shaped by either topic-specific working groups and task forces or by in-depth discussions with individual stakeholders and experts. Prior to adoption, information on review and input will be provided to the Regional Council, and a technical appendix on participation will be prepared.	Prepare technical appendix on input review, input, and participation.
	The RCP could establish legal precedent; thereby, increasing liability for local governments and other organizations subject to SCAG's IGR. (OCCOG Technical Review Supplement 7-2)	It is unclear from the comment what precedent or liability might be created. Note that SCAG adopted a Regional Comprehensive Plan and Guide, which has been used for substantially similar purposes as intended for the current draft, in 1996.	
	Please identify the programs, whether under SCAG, the State, or other agencies, being considered under this umbrella statement? Additionally, please clarify if this RCP objective is establishing a SCAG position stating that State of California infrastructure bond funding be tied towards consistency to the implementation of the visions of the Regional Comprehensive Plan and to Compass Blueprint. (p. 3)	The RTP needs to contain general discussion on how the MPO has addressed requirements for integrated planning, and SCAG cites its RCP efforts in response to this requirement. This statement does not create policy seeking consistency requirements for bond funding.	
	The OCCOG notes, that if this document is to be used as a policy guidance document for SCAG it would be helpful to member agencies as well as the	Comment noted. Edit recommended. For purposes of the RCP, integrated resource planning can be defined as planning across a broad	Add citation to SAFETEALU requiring integration of environmental considerations.

	public if the various specific federal transportation planning requirements referenced in this objective were clearly identified and cited. Also, please define the term "integrated resource planning." It is a term that is used throughout the Regional Comprehensive Plan and warrants an overview and description in the Executive Summary. In the definition, please identify if it includes, for example, air quality, open space,solid waste considerations along with transportation and land use? (p. 3)	range of resource topics that emphasizes interconnections between topics (eg. Relationship between energy and air quality)	
	The OCCOG recommends that the Executive Summary clearly identify all the purposes of the Regional Comprehensive Plan. If prioritizing federal and state funds is one of the desired outcomes of the RCP as is implied by this statement, it should be identified as a bullet point as to why the RCP is being developed. Regarding this statement, what are the procedures and guidelines by which such funds would be allocated? Does this mean that the RCP would give greater weight or priority for those projects that support the RCP vision? And, further, would the funds for programs only be given to cities and counties that are member agencies of SCAG, which is the current SCAG Regional Council policy in granting the Compass Demonstration Project funds? (p. 3)	Comment is noted. Edit recommended. Language in the RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would by clearly subject to additional debate and discussion.	Add phrase ". . . though this RCP does not create any specific proposal to affect the distribution of funds."
	Please clarify the meaning of the RCP being updated with each RTP to reflect changes in legislation, technology, policy and other variables. Does the Regional Comprehensive Plan need to be updated every four years and how would the land use component be addressed every 4 years? (p. 3)	Comment noted. Edit recommended	Edit to read "To that end SCAG proposes to review the RCP on a regular basis in concert with the Regional Transportation Plan and updated as needed to reflect changes . . ."
	According to an air quality consultant on the OCCOG	Comment noted. Edit recommended	Edit to include citation to 2007 South Coast AQMP.

	TAC, this statement is not universally accepted in inferring that growth is the key factor to air quality improvements leveling off or slowing down. As such, it would be helpful for the statement to be cited or discussed with more detail. (p. 4)		
	It is recommended that the word "the" with the word "a": The OCCOG TAC noted that the reference to "***the* body of evidence shows that our global climate is heating up…" should be changed to "*a* body of evidence….". There is information that is contrary to this identified impact, and the narrative should so recognize. (p. 5)**	Comment noted. Edit suggested	Edit to replace statement in question with According to the International Panel on Climate Change 2007: Synthesis Report Summary for Policymakers "Warming of the climate system is unequivocal." That same report cites numerous potential threats to human health, agriculture, and other systems.
	It is recommended that this statement be revised to reflect that the RCP identifies a menu of options that could be considered by local jurisdictions, as has been stated at various policy and Regional Council meetings at SCAG. It is further recommended that the paragraph be revised to state that the RCP is also open to consideration of additional and new policies and programs that have been or may be developed by local jurisdictions but which may not be expressly stated in the RCP, yet which are consistent with and promote the goals of the RCP. This would clarify that the role of the RCP is to be used as a voluntary guidance document that offers a compilation of options and measures which local governments and other entities could use as a "menu." (p. 7)	Comment noted. Edit recommended	Edit as suggested in comment.
	Please clarify the financial incentives that SCAG anticipates using to promote sound planning principles. (p. 7)	Comment noted. Edit recommended	Edit to strike "financial incentives."
	It is recommended that the stakeholders also include special districts such as water, sewer and solid waste agencies because,	Comment noted. Edit recommended. Also note that special districts, including water and air agencies, received copies	Edit to add the phrase "and other public entities including special districts"

	relative to many chapters in the RCP, they are the primary entities with purview over the specific area in which a measure is identified (i.e. many water measures will primarily need to be addressed by water agencies.) Further, it is recommended that all of these agencies be outreached to for their review and comment on this document because the RCP and its draft policies also affect these agencies. (p. 7)	of the draft RCP and have participated in dialogue in many cases, notably through the Water Policy Task Force. A record of all participation and input will be developed as a Technical Appendix to the RCP.	
	Please clarify how SCAG would use the RCP in making funding decisions. (p. 7)	Comment is noted. Language in the RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would by clearly subject to additional debate and discussion	
	The OCCOG identifies a concern with the RCP statement recommending that county transportation commissions modify their criteria for planning and promoting transportation projects to promote integrated planning objectives identified in the RCP. Orange County voters have approved existing and Renewed Measure M projects for which there is no leeway in changing these projects. (p. 8)	Comment noted. Edit recommended.	Edit phrase to read "...commissions can, to some degree, modify their criteria . . ."
	It is requested that SCAG clarify if the RCP outcomes – the quantitative targets – are proposed to be measured at the regional level, or if these targets are to be applied down to the city or project level, particularly if the RCP policies are to be used for Intergovernmental Review (IGR)? (p. 10)	Comment noted. The RCP outcomes are intended to apply at the regional scale.	
	Please note that the OCCOG and its member agencies have yet to see the Compass Blueprint database and maps, await	Comment noted. Further note that making refinement to the Compass Blueprint program, such that it achieves regional	Edit recommended

	receipt of the Compass Blueprint database and maps, and find it difficult to understand the scope of implications or the degree of concern with policies identifying a desire for consistency with Compass Blueprint in absence of seeing how SCAG has incorporated Orange County jurisdictions' input to the draft Compass Blueprint maps that were reviewed and extensively commented on at SCAG's November 2006 workshop in Orange County. (p. 10)	consensus, is an on-going effort and commitment of SCAG.	

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Land Use and Housing

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments			
	There is a single goal in the Land Use and Housing Chapter of the RCP: "Successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and the 2% Strategy." The OCCOG TAC has identified a series of questions and comments relating to SCAG's Compass Blueprint Strategy. They are as follows: • OCCOG does not know what the adopted SCAG Compass Blueprint Plan represents, and whether or not any of the Orange County jurisdictions are consistent with and are implementing Compass Blueprint. At the November 2006 SCAG workshop with Orange County jurisdictions, the preliminary Compass Blueprint maps developed by SCAG's consultants did not accurately illustrate where growth would be occurring; Orange County jurisdictions presented specific comments and corrections on where growth would occur and emphasized the need for consistency with the Orange County Projections. SCAG has not provided a revised set of maps that incorporate or respond to Orange County's feedback on the initial set of Compass Blueprint maps. The OCCOG TAC seeks clarification and response on the status of receiving the adopted Compass Blueprint maps and database, so that Orange County jurisdictions can initiate a review of data and confirm	Comment noted. Further note that making refinement to the Compass Blueprint program, including maps and forecast scenarios, such that it achieves regional consensus, is an on-going effort and commitment of SCAG. Orange County jurisdictions' input has been and will continue to be integral to this process. The map of potential transit-oriented development TOD sites submitted to the Department of Housing and Community included all rail stations, rapid bus stops and "bus hubs" in the region. The map was submitted to the OCCOG TAC at the TAC's December 11, 2007 meeting. Growth forecasts will be prepared and adopted in concurrence with the RTP schedule. Other non-binding, voluntary Compass Blueprint planning efforts may be conducted in the interim. Any mapping or growth visioning efforts will be in collaboration with affected jurisdictions. At this time, Compass Blueprint Demonstration Project assistance is available only to SCAG member jurisdictions. There are no plans to change this.	Change chapter text to maintain consistency among Compass Blueprint, adopted 2008 RTP and draft RCP: p. 16: "SCAG's transportation modeling and other analyses show that implementing the Compass Blueprint scenario will:" p. 16: "The Compass Blueprint growth vision formed the basis for the preferred land use alternative in the 2004 Regional Transportation Plan (RTP). Continued technical analysis and a 2006 series of stakeholder workshops at which over 90 percent of the region's jurisdictions were represented, have helped refine the vision. Ultimately, the region should work together toward the outcome of realizing, by 2035, development and redevelopment consistent with the Compass Blueprint growth vision and the Advisory Land Use Policies of the 2008 RTP." (Delete text referring to "Plan Alternative Scenario on pp. 16, 17, 20.)

	if and how the adopted map and database reflects local input/OCP-2006. • It is OCCOG's understanding that SCAG submitted a Compass Blueprint map for the region to the State Department of Housing and Community Development, in response to Transit Oriented Development (TOD) bond funding that would be targeted towards TOD sites. The OCCOG TAC desires a copy of the Compass Blueprint map that was submitted to HCD, to confirm if the TOD sites identified on this Compass Blueprint map represent Orange County's local input of where transit-oriented development growth would occur. This verification is important to ensure that Orange County TOD sites are eligible for any bond fund proceeds. • The Regional Comprehensive Plan document identifies that the RCP is proposed to be updated every four years, concurrent with the 4-year update of the Regional Transportation Plan. Please clarify if the four-year update of the RCP correspondingly means that SCAG's Compass Blueprint plan and database is proposed to be updated with each RTP/RCP cycle. The OCCOG TAC also seeks clarification on the SCAG process for updating and approving theCompass Blueprint plan, and how local jurisdictions would participate in the update of the Compass Blueprint Plan to ensure that the Plan is consistent with local General Plans. • The OCCOG TAC seeks clarification on how SCAG will outreach to all the jurisdictions in the SCAG region on the proposed Compass Blueprint plan, specifically, whether SCAG will conduct		

	a series of technical workshops on the proposed Plan and whether Compass Blueprint maps will be available for local jurisdictions to review. • SCAG has identified that the re-distribution of land uses represented in the Compass Blueprint Plan would be implemented as a voluntary initiative, and through the development of demonstration pilot projects that would be measured and produce empirical data. However, there is not much funding for Compass. The OCCOG TAC seeks clarification if SCAG is to re-examine its policy that funds for Compass demonstration projects can only be made available to those jurisdictions that are SCAG member cities, if Compass Blueprint is to succeed as a voluntary initiative. (p.17)		
	The OCCOG TAC would appreciate review of the technical data that supports the assumption that air quality improvement will be achieved through the land use pattern proposed through Compass Blueprint. The TAC desires clarification on the degree of "on-the-ground" testing has been conducted to validate the assumption, and how will the actual benefits of Compass Blueprint land use patterns be measured and monitored. (p.19)	Comment noted. Links among land use, VMT, emissions and air quality have been well documented by SCAG transportation modeling ad by empirical study in Southern California and elsewhere. SCAG staff can work with the OCCOG TAC to review the literature.	None
	Please define "important open space." Also, is the reference to "agriculture" referencing prime agricultural lands? The RCP needs to be clear and specific, to prevent any misunderstanding of the application of the RCP goals by local jurisdictions. (p.20)	Comment noted. The references to important open space and agricultural lands were approved by the RCP task force and CEHD as voluntary goals for planning in the region. The RCP does not specify any particular parcels for development or protection.	None
	The RCP identifies that one of the Land Use and Housing Outcomes is to have 100 percent of City and County General Plans	Comment noted. The desired outcome is that 100% of local General Plans be qualitatively consistent with Compass	Edit to read "100 percent of city and county General Plans consistent with Compass Blueprint principles by 2012."

	consistent with Compass Blueprint by 2012. Given the concerns raised in Comment #1 above, the OCCOG TAC observes that it would be unlikely that 100% of all City and County General Plans would be consistent with the Compass Blueprint by 2012, and inquires if the outcome should be revised to reflect an achievable and realistic outcome. (p.20)	Blueprint principles. It is not expected that all General Plans will quantitatively mirror any particular growth forecast scenario.	
	The proposed outcome should reflect a balance of jobs to housing that takes into consideration the jobs and housing already in any Compass 2% area. Thus, the reference should be revised to apply to "housing units and/or jobs created," to take into consideration the amount of housing and employment already planned or existing in each Compass 2% Strategy Opportunity Areas when trying to establish a jobs to housing balance. (p.21)	Comment noted. This outcome does seek to "improve the regional jobs-housing balance," as recommended by the TAC comment. The outcome also calls for an increased percentage of future regionwide growth in housing **and** jobs to be located within Opportunity Areas.	None
	This outcome is presented in relation to the proposed goal of implementing the Compass Blueprint strategy. Should the RCP's reference to homebuyer affordability be discussed in reference to the region's adopted Regional Housing Needs Assessment Allocation Plan, versus the Compass Blueprint? Also, please clarify the rationale of proposing that the relationship of qualifying income to home price mirror the national average. (p.21)	Comment noted. Housing affordability is a goal of Compass Blueprint as well as the RHNA. The proposed affordability index is an effective measurement. As Southern California is currently less affordable than the nation as a whole, reflecting the national average will represent a significant but reasonable improvement.	None
	Please clarify why the proposed outcome only references "carbon-based fuels". Should the goal be to reduce energy consumption and thus vehicle miles traveled from all fuel sources? (p.21)	Comment noted. A more general interpretation of VMT will better reflect desired congestion-reduction and environmental outcomes, and will be a better indicator of jobs/housing balance, urban design, transit accessibility, and other urban form issues.	Edit to read "Reduce total regional vehicle miles traveled (VMT) to 1990 levels by 2020"
	As noted in Comment #9 above, this outcome relating to a vacancy rate factor is being presented in relation to the proposed	Comment noted. Housing availability and affordability is a goal of Compass Blueprint as well as the RHNA. The outcome is	None

	goal of implementing the Compass Blueprint strategy. Should the RCP's reference to any regional housing vacancy rate factor be discussed in reference to the region's adopted Regional Housing Needs Assessment Allocation Plan, versus the Compass Blueprint? (p.21)	consistent with RHNA policy and methodology.	
	The OCCOG TAC expresses concern that the proposed outcome regarding a jobs/housing balance would, as worded, potentially double count housing need. As currently worded, the outcome would identify a need for a housing unit for every 1.5 jobs and a housing unit for every 3 persons of population growth, irregardless of consideration of the population growth also filling the new job. Further, the jobs are not identified as fulltime equivalency jobs. Therefore, the jobs identified would include part-time jobs as well as full time jobs – again, potentially generating a greater housing need than what is actually necessary. (p.22)	Comment noted. See recommended edits.	Edit to read "Add one new housing unit to stock for every 3 persons in population growth or one new housing unit for every 1.5 full-time equivalent jobs, whichever is greater"
	The OCCOG TAC is concerned with the inclusion of this outcome, and questions if the outcome is beyond local control and involves a choice issue. (p.22)	Comment noted. Outcome is not intended to be entirely dependent on local planning. The local-level action plan in the RCP, however, will contribute to achieving this outcome.	None.
	Proposed Policy LUH-3.3 states that "SCAG shall further develop land use performancemeasures to be included in future Regional Transportation Plans." The OCCOG TAC is unclear as to the objective and meaning of this policy. (p.24)	Comment noted. SCAG staff will work with TAC to describe land use monitoring and modeling efforts.	None
	Policy LUH-5 restates local jurisdiction's requirements under existing housing statute. The OCCOG TAC seeks clarification if the Regional Comprehensive Plan is to include a recitation of state law requirements in the action plans and policies.	Comment noted. The RCP will not create any new legal mandates or regulation for local governments and will not change any existing mandates. The RCP is not intended to satisfy future mandated activities. Language included in the	None

	Would the inclusion of all state law requirements be a duplication of efforts? (p.25)	draft adopting resolution specifically states this.	
	Proposed Policy LUH-6 assumes that all local jurisdictions support the Compass Blueprint plan as proposed (Comment #1 from this Chapter). Also, there is concern that the Regional Comprehensive Plan and its policies would grant preference in funding to projects that implement the Compass Blueprint Plan, over those that do not. Further, how would this preference impact jurisdictions that do not have Compass 2% Opportunity Areas located within their jurisdictions? (p.25)	Comment noted. This policy only recommends that jurisdictions voluntarily take advantage of funds available for planning efforts consistent with Compass Blueprint (e.g. state Infill Infrastructure grants). While policies in the RCP could influence future SCAG planning and associated funding decisions, it is not intended for this purpose, and any use of the RCP in future programming decisions would be subject to future Regional Council action.	None
	Strategic Initiative LUHS1-1 is unclear as to what is expected of county transportation commissions in funding infrastructure needs of Compass Blueprint development projects. Is this initiative following the SANDAG approach, where SANDAG leverages monies to provide improvements to private development projects, to help to make the project a reality? (p.26)	Comment noted. Initiative would create closer partnerships among CTCs, local and regional planning, similar to SANDAG and other programs. Some portion of CTC infrastructure funding could be targeted to projects that best support RCP, Compass Blueprint and local growth vision goals.	None
	Strategic Initiate LUHSI-3 references " inefficient land uses." Please clarify or provide a definition of "inefficient land uses" (p.26)	Comment noted. "Inefficient" refers to land use patterns that help generate relatively high regional VMT when compared with other modeled land use scenarios.	None

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Open Space & Habitat

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	The OCCOG requests that SCAG please make figures such as Figure 3.1: Regional Open Space Infrastructure; Figure 3.2: Potential Conservation Opportunity Areas, and Figure 3.3: Prime Farmland Grazing available at a larger scale to allow local jurisdictions, county transportation commissions, project sponsors and special districts to identify if any areas would be affected or impacted by future transportation or land use proposals.	The maps included in the RCP are intended to show the general distribution of open space throughout the region and are not intended to be used at the project level. However, all of the maps are available for download from SCAG's website and from SCAG staff by request	
Orange County Council of Governments	Proposed Policy OSN-1 identifies a SCAG role in establishing a clearinghouse of GIS data relating to open space. The OCCOG notes that this task represents a significant work effort with an associated funding cost and asks if this effort would be undertaken through existing fund sources or if it would require new funding? Additionally, in order to prevent duplication of efforts, do other agencies or non-profit organizations in the region conduct similar efforts? Finally, the OCCOG seeks clarification about how would this information be reported to SCAG across the six counties in the SCAG region and then distributed back to the various agencies involved with open space planning?	SCAG regularly reviews and updates its data needs and requirements to reflect its planning objectives. Although there may be some cost associated with acquiring new data, many data can be acquired at a minimal cost. Further, SCAG anticipates coordination amongst partner agencies (see comment from LA County Parks and Recreation) who would also provide data to SCAG that could then be distributed and used throughout the region. It is not SCAG's intention to duplicate efforts; rather the intention is to serve as a regional facilitator for disseminating data.	
Orange County Council of Governments	Proposed Policy OSN-14 identifies that developers and local governments should implement mitigation for open space impacts. The policy identifies that "project sponsors should ensure that one acre of unprotected open space is permanently conserved for each area of open space developed as a result of growth that accompanies transportation projects/improvements." This policy is also identified as an Intergovernmental Review (IGR) policy that project sponsors must respond to in conjunction with a transportation project's environmental review process, and requires assessment of significant open space	Comment noted. It is not SCAG intention to place an undue burden on projects or project delivery in the region. The following edit is suggested to make the policy consistent with existing policy and law strike "growth that accompanies" Commentor is referred to the California Department of Conservation, as citied on page 25. Unprotected open space is defined as natural lands or farmlands (as defined on page 25) that are not currently protected from development. SCAG is unaware of	Edit recommended. In the fifth bullet: strike "growth that accompanies"

	mitigation considerations that would apply to all transportation projects in adopted Regional Transportation Plans. Some questions and requests for clarification are identified below: • The formula for mitigating open space – one acre of unprotected open space conserved for each area of open space developed *as a result of growth* that accompanies transportation projects/improvements – the OCCOG notes that this is unclear and requests that SCAG please clarify how this measure would be applied. For example, would the formula apply to existing open space that is developed as a result of land taken to build a transportation project, or would it apply to the growth-inducing impacts of a transportation project and how much existing open space land is developed as a result of that growth? What exactly is being required of county transportation commissions or other agencies when implementing RTP transportation projects? What are the cost ramifications of such a policy, upon transportation project delivery and costs? • Because open space and farmland are defined in state law and more specifically relative to the California Environmental Quality Act, the OCCOG notes that it is important to clearly define the use of such terms in policy related documents. As such, the OCCOG requests that SCAG please include the definition of "important farmland" and of 'unprotected open space" as they are used in this measure, chapter, and throughout the RCP document. • Please identify if there are any state law provisions that require this type and degree of open space mitigation for transportation projects?	existing state law that provides the comprehensive protection proposed in the RCP.	
Orange County Council of Governments	Policy OSN-4S proposes a decision-making tool that identifies and prioritizes open space conservation projects, similar to a program implemented by SANDAG. The OCCOG notes that it	Comment noted. In the interest of maintaining a readable, concise document, background information was limited. The commentor is encouraged to view information on	

	would be beneficial for policies that reference already existing programs to include explanatory narrative that provides the reader a background understanding of the scope and components of these proposed programs. This will help to determine if there is consensus in implementing a similar program for the SCAG region.	SANDAG's EMP program on SANDAG's website at http://www.sandag.org/index.asp?projectid=263&fuseaction=projects.detail	
Orange County Council of Governments	The narrative discussion on Parks and Public Health cites, in its introduction, a 1996 study of the benefits of regular physical activity. The OCCOG suggests that perhaps the emphasis of this section should be the fourth paragraph of the section, which directly relates to access to parklands with exercise opportunities, and from this premise, then provide the information on the health benefits of exercise.	Comment noted.	
Orange County Council of Governments	This chapter discusses how SCAG evaluated "community open space availability" in 16 cities based upon a National Recreation and Parks Association standard of 6.25 to 10 acres per 1,000 people, and also presents a Figure 3.3 of this evaluation. Because open space is defined in various federal and state regulations, please provide a definition of "community open space" as it is used in this chapter.	Commentor is referred to page 25 for a definition of community open space.	
Orange County Council of Governments	With respect to the comment from the previous page, this section cited is followed by a Levels of Service section that states that the National Recreation and Parks Association standards, "were developed in the 1930s and fail to reflect the dynamic environment and variety of today's communities." The reader is confused with the presentation of this information and why the National Recreation and Parks Association standards were cited and analyzed, if deemed to be outdated. It is requested that this be addressed. Further, SCAG is proposing a Level of Service approach for requiring parkland. In reviewing the proposed list of seven factors to measure park needs, it is highly recommended that the chapter provide explanation	Comment Noted. Edit recommended. SCAG's intent is not to confuse the commentor, but rather to demonstrate that the only existing method for analyzing park availability was developed in the 1930s and does not reflect the types of open space that occur in many cities and counties. The LOS approach is proposed as a new way to reflect the needs of the dynamic cities and counties within the SCAG region. LOS is not a requirement for new parkland as indicated by the commentor; rather it is a tool for cities to determine their own needs, much as the existing NRPA standards are used today (but as discussed is an	Recommended edit: post LOS report on SCAG's website

	as to how each of the proposed factors equates to an amount of parkland that must be provided in jurisdictions, and whether this proposed requirement applies to new development, or for all existing and proposed development within a community. Also, please clarify the Level of Service factor that all parklands have access to multi-modal transportation within ½ mile of the parkland, and the implications for transit service delivery and cost if such a factor is implemented, particularly if residents can access the parkland by walking or biking. Also, please clarify how Compass Blueprint areas would be a factor in measuring park needs and in determining Levels of Service for park needs in a community.	outdated method for determining need). The commentor is referred to SCAG's website for additional information on LOS. SCAG envisions adding LOS and other methods of determining park needs to the existing suite of services provided through the Compass Blueprint program.	
Orange County Council of Governments	Proposed Policy OSC-2 states that "SCAG shall continue to work with the state to develop approaches for evaluating environmental impacts within the Compass Blueprint program, particularly energy, air quality, water, and open space and habitat." Please clarify if SCAG is already participating in a statewide effort to evaluate the environmental impacts of Compass Blueprint sites, or whether this collaborative effort applies solely to the SCAG region. Also, is this policy in reference to SCAG's efforts to propose state legislation to streamline the environmental processing of Compass Blueprint sites through SB 375? Should this be identified as a proposed legislative policy? Also, as this chapter relates to open space, should Policy OSC-2 be consistent and only reference open space? If proposed as an overarching policy over several subject areas, should this policy and similar policies be discussed in the RCP as overarching policies that cover multiple RCP chapters in their application?	Comment noted. The RCP is not intended as a means to implement current or future state legislation. Language included in the draft adopting resolution specifically states this. The open space and habitat chapter policies included in the Draft RCP were developed under the guidance of the Open Space Working Group and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Open Space and Habitat Chapter policies at their discretion.	
Orange County Council of Governments	Proposed Policy OSC-8 states that " Local governments should encourage patterns of urban development and land use, which reduce costs on	Comment noted. The open space and habitat chapter policies included in the Draft RCP were developed under the guidance of the	

	infrastructure and make better use of existing facilities." Since this policy is proposed for implementation in the Open Space and Habitat chapter of the RCP, and since the policy is an Intergovernmental Review (IGR) policy that would be subject to local jurisdiction response for consistency for any regionally significant projects undergoing environmental review, it is recommended that the policy be revised to provide more clarity and direction on its application to open space requirements.	Open Space Working Group and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Open Space and Habitat Chapter policies at their discretion.	
Orange County Council of Governments	Proposed Policy OSC-10 states that "Developers and local governments should promote infill development and redevelopment to revitalize existing communities." Similar to previous comments, since this policy is proposed for implementation in the Open Space and Habitat chapter of the RCP, and since the policy is an Intergovernmental Review (IGR) policy that would be subject to local jurisdiction response for consistency for any regionally significant projects undergoing environmental review, it is recommended that the policy be revised to provide more clarity and direction on its application to open space requirements.	Comment noted. The open space and habitat chapter policies included in the Draft RCP were developed under the guidance of the Open Space Working Group and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Open Space and Habitat Chapter policies at their discretion.	
Orange County Council of Governments	Proposed Policy OSC-11 seeks implementation of certain land use principles such as green building practices that use resources efficiently. The policy, as currently worded, does not reference any specific application towards open space and habitat considerations. It is suggested that this policy would possibly be better addressed and proposed in other chapters of the RCP, such as Energy or Solid Waste.	Comment noted. The intent of the RCP and its policies is to demonstrate the interconnectedness of many issue areas including open space, energy and solid waste. The commentor is referred to the sidebar on page 31 "How Open Space Policies Produce Multiple Benefits" for further clarification.	
Orange County Council of Governments	Proposed Policy OSA-5 would have impact upon development plans in Orange County where estate and ranchette development types are proposed. The OCCOG would like to note and request that stakeholders such as developers and the Building Industry Association be included in the review and comment of RCP policies such as OSA-5.	Comment noted. Commentor is referred to the technical appendix on public participation.	

Orange County Council of Governments	Proposed OSA-8 states that "Developers and local governments should submit for IGR review projects with potentially significant impacts to important farmlands. Projects should include mitigation measures to reduce impacts and demonstrate project alternatives that avoid or lessen impacts at a 1:1 ratio." The OCCOG submits the following comments and questions regarding this proposed policy: • SCAG's current listing of types of projects that would undergo Intergovernmental Review is included as Appendix A. It is noted that there is no criteria list that includes IGR review of projects that have a potentially significant impact to "important farmlands." Thus, this is a new category of project that is proposed for IGR review. As a starting point, the policy warrants a definition of "important farmlands" to understand the scope of its application. • Please clarify the meaning and application of a 1:1 ratio to reduce impacts and demonstrate project alternatives. For example, what is the impact of a 1:1 ratio mitigation for jurisdictions or areas that are built-out except for remaining areas that are currently under agricultural production, and where there is no additional lands to use for mitigation? And, would such a project be deemed inconsistent with the proposed RCP policy? • Because farmland preservation is a significant statewide issue, is the preservation of farmland best addressed as a larger statewide issue? It is suggested that a discussion of this topic be included in the text of the chapter.	Comment noted. The following edit is recommended to correct a typographical error in this policy. The policy is intended to mitigate impacts to important farmlands as defined by the California Department of Conservation (see page 25 for definitions) at a ratio of one acre of farmland developed to the preservation of one acre of farmland (i.e., 1 to 1 ratio). Project sponsors should also include in their plans and EIRs alternatives that demonstrate avoidance of farmlands or alternatives that would lessen impacts to potentially impacted farmlands. Comment that the preservation of farmland is best dealt with at the state level is noted. The SCAG region includes more than 1.4 million acres of farmland, with nearly one million acres in Riverside and Imperial Counties alone. Therefore, the RCP task force and the Open Space Working Group feel this is an issue of regional significance and developed policies that reflected this view. The Regional Council may revisit the Open Space and Habitat Chapter policies at their discretion.	Edit to read: "OSA-8 Developers and local governments should submit for IGR review projects with potentially significant impact to important farmlands. Project should include mitigation measures to reduce impacts and demonstrate project alternatives that avoid or lessen impacts. ~~at a 1:1 ratio.~~ Mitigation at a ratio of 1:1 is recommended."

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Solid Waste

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	The chapter contains good and useful information for local governments. Comments on the chapter are primarily questions regarding requests for clarification of information. Numerous acronyms are used throughout the chapter. It is suggested that they be defined and clearly explained. For example, "MMbtu" is used but not defined. The language used in this chapter specifically tends to be a bit inflammatory and may misrepresent the information being presented. It would better serve the intent of the chapter if the information and data were presented in a more neutral tone. For example, the first statement under "The Plan" section on page 91 states, "We will need a combination of both short and long term solutions to effectively address our overwhelming waste problem." The OCCOG recognizes that the disposition of waste in the region is a very significant task that must be undertaken; however, the use of the term "overwhelming," which is defined as something that is overpowering, implies that there is no solution.	Comment noted. This chapter has been written and edited in cooperation with SCAG's Solid Waste Task Force (SWTF). Members of the SWTF include both elected officials and individuals representing a variety of waste management agencies. Significant input has been provided in all aspects of the solid waste chapter, including the tone, wording, and information presented in the chapter. Please refer to "The Plan" on pages 91-101 for strategies and solutions to managing our waste.	None.
	It is recommended that information regarding population and job growth be added to the section to provide background to the other data provided in the opening paragraph, as has been done in other chapters. (p. 90)	Comment noted. See text change. Details about job growth can be obtained from other chapters.	Insert sentence "Our region's population is expected to grow by 5 million people, increasing to a total of 24 million by 2035."
	Please clarify in the sentence whether the sources listed are the only sources or if there are others. It seems to be an oversimplification that does not consider other sources, such as agricultural wastes. (p. 90)	See text change. A more detailed technical discussion on residential and commercial waste sources (including agricultural waste) could be provided in a follow-up to the RCP.	Delete sentence. Add footnote 1b. "Includes both residential and commercial waste sources."
	Please define what	See text change.	Insert "(garbage)" after the

	municipal solid waste is and if there are other waste streams in the region. (p.90)		term municipal solid waste.
	Please identify if the quantities listed include only waste being taken to landfills or if it is inclusive of waste that is recycled. Also, please clarify what is included in the resident and non-resident trash. For example, how is government waste or agricultural waste classified? (p.90)	Footnote will be added. A more detailed technical discussion on resident versus non-resident trash could be provided in a follow-up to the RCP.	Footnote 3b. "Does not include waste that is recycled."
	It is observed that the statement that existing landfills will not have the capacity to accommodate waste implies that the existing landfills are the only options for waste in the future and that no new landfill sites will be identified. It is suggested that clarification be included in the statement to indicate that the capacity at existing landfills is not enough for the future growth. Further, the statement presumes that the population will continue to grow forever by using the term "ever-growing". It would be more accurate to restate as "the anticipated and forecast population and economic growth over the next 30 years." (p.90)	Comment noted. Siting and developing new landfills in California is a difficult, complicated, and time-consuming process, especially in the SCAG region where land that is in close proximity to urbanized areas yet appropriate for landfill use is scarce. Please see draft RCP pages 91-93 for discussion on local landfill capacity. See text change.	Delete "ever."
	the OCCOG expresses concern over the use of the term mismanagement because it implies wrongdoing. Unless this is the intent, it is recommended that the statement be reworded. (p. 90)	Comment noted. The term mismanagement is defined as management that is inefficient.	None.
	This statement appears to be presented too early in the chapter because the full discussion of the challenges and strategies has not been presented. The OCCOG notes that by including at this point in the text, it implies that "maximum diversion from landfills through emerging technologies" is the primary goal for the chapter. (p. 91)	Comment noted.	Edit to read, "Our goal is to achieve maximum waste prevention and diversion of waste from landfills, with corresponding diversion credit, utilizing all technologically feasible and fiscally prudent means."
	It is recommended that the term "effortlessly" be	Edit as suggested in comment.	Replace "effortlessly" with "easily" as recommended.

	changed to another term, such as "easily." (p. 91)		
	Please define "MW." (p. 91)	See text change.	Insert “Megawatt (MW)”
	As stated in the first comments on the chapter, the OCCOG TAC recognizes that the disposition of waste in the region is a very significant task that must be undertaken; however, the use of the term “overwhelming,” which is defined as something that is overpowering, implies that there really is no solution. It is recommended that It would better serve the intent of the chapter if the information and data were presented in a more neutral tone. (p. 91)	Comment noted. Commentor is referred to the sections entitled “The Plan” and “Strategies for Managing Our Waste” on pages 91-93.	None.
	It is requested that the graphic be adjusted to indicate that there are existing waste prevention strategies in place. As shown, the graphic implies that there are not strategies or efforts currently underway. (p. 92)	The graphic compares a vision of the future of waste management strategies with traditional waste management priorities.	None.
	Please be internally consistent in the use of terminology in the chapter. For example, it is not necessary to include the description of food when identifying organic waste. Organic or green waste is already in the waste stream and includes more than simply food. For example, yard waste is commonly considered organic waste. Additionally, pg 92 states that food waste specifically accounts for 14% of the waste stream but on pg. 95 is shown as 30.2%. (p. 94)	Please see “Food Waste, Organics, and Composting” on page 97 for the discussion on food waste and other organics. Food waste is a specific type of organic waste and the most abundant. Food waste accounts for 14% of waste disposed in landfills. The overall amount of organic waste (food waste, textiles, landscape materials, agricultural residues, etc.) account for 30% of waste disposed in landfills.	None.
	Please define "MMBtu." (p. 95)	Definition will be added to footnotes.	MMBtu = Million British Thermal Units. A standard unit of measurement used to denote both the amount of heat energy in fuels and the ability of appliances and air conditioning systems to produce heating or cooling.
	Please include more information differentiating construction and demolition waste. They each are regulated by different state laws and it is suggested that each warrants better definition. (p. 96)	Comment noted. The section is meant to provide an overview of the issues in construction and demolition (C&D) waste management. It is not intended to provide a detailed discussion on particular laws associated	None.

		with C&D waste. Local governments typically address construction and demolition waste collectively in a construction and demolition (C&D) ordinance. A more detailed technical discussion could be provided in a follow-up to the RCP.	
	Please add more information regarding what is intended by the inclusion of green building design principles. It is not clear what is intended for construction and what is intended for demolition when referencing green building. (p. 96)	See text change. A more detailed technical discussion could be provided in a follow-up to the RCP.	Insert, "…minimize waste by maximizing…" to the sentence for further clarity.
	Please delete last portion of the sentence. It is not necessary to place conditions on the outcome. (p. 101)	Comment noted. The solid waste chapter outcomes included in the Draft RCP were developed under the guidance of the Solid Waste Task Force and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Solid Waste Chapter Outcomes at their discretion.	None.
	It is requested that this outcome be clarified to identify the specific targets for this outcome. It is observed that the use of the terminology "should be" makes the outcome ambiguous. (p. 101)	Comment noted. The Solid Waste Chapter outcomes included in the Draft RCP were developed under the guidance of the Solid Waste Task Force and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Solid Waste Chapter Outcomes at their discretion.	None.
	Please ensure that each of the policies is applied to the agency that has purview over the action. (p. 102)	Comment noted.	None.
	It is recommended that the large number of policies applicable to local governments be consolidated into fewer, more comprehensive policies. It is observed that the policies, as currently listed, are repetitive and sometimes restate one another. (p. 102)	Comment noted. The Solid Waste Chapter Outcomes included in the Draft RCP were developed under the guidance of the Solid Waste Task Force and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Solid Waste Chapter Outcomes at their	None.

		discretion.	
	Please delete the second sentence. Retaining and disposing of waste within the same county is not always the most appropriate action as some cities are closer to landfills in adjacent counties. Further, it is not necessary given the other policies included in the list. (p. 103)	Comment noted. See text changes.	Edit to read, "…Disposal within the county where the waste originates shall be encouraged as much as possible, when appropriate."
	SW-13 and SW-19 could possibly be combined to state "encourage the creation of and facilitate." (p. 103)	Comment noted. The solid waste chapter policies included in the Draft RCP were developed under the guidance of the Solid Waste Task Force and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Solid Waste Chapter policies at their discretion.	None.
	Please delete the specific actions as they may change over time. Further, if specific information and detail are to be identified in the policy, please separate the project design and zoning from the construction and demolition recommendations. (p. 103)	See text change. As implied by the existing language, specific actions provided in Policy SW-14 are only examples and by no means limit the types of actions that can be taken to reflect the intent of the policy. Project design should be an integral part of both project construction and demolition as discussed on p. 96 of the Draft RCP.	Replace "such as" with, "including but not limited to" for further clarity.
	Additionally, please delete the word "synergistic."(p. 103)	Comment noted.	None.
	Please clarify what is meant by "in conjunction with." Specifically, does this mean near to those facilities or identifying a commitment to take the other waste streams identified? (p. 104)	Comment noted. See text change.	Replace "in conjunction with" to "near" for further clarity.
	Please delete the last portion of the sentence as they are not under the purview of local governments. (p. 104)	See text change. The intent of the last portion is to urge local governments to work with and/or support other agencies' efforts to increase consumer education.	Insert, "and if appropriate, help raise"
	Please include a discussion and description in the chapter regarding "Pay as You Throw" disposal systems proposed in this policy. Background information has not been provided in the chapter to identify what would be incorporated in or involved with this program. (p. 105)	See text change.	Insert "…where customers are charged for solid waste disposal services based on the amount that is thrown away."

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Energy

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	Overall Comments: This chapter included a significant amount of useful and quality information. Comments are focussed on areas where it would be helpful to expand on information for the general reader and where more explanation is suggested. (p. 64)	Comment noted.	None
	1. The terms oil, liquid fuel, etc... are used interchangably throughout the chapter. Please define the terms and consistent terminology throughout the document; it is suggested that perhaps a glossary would be beneficial. (p. 64)	Comment noted. Edit recommended.	The term “liquid fuel” will be replaced with “fossil fuels” for consistency
	2. The links between the text of the chapter and the policies are weak. It is noted that the policies should address points made in the chapter. (p. 64)	Comment noted.	None
	3. There does not seem to be a difference between the initiatives or the policies. Please clarify or combine the two lists. (p. 64)	Pages 10 – 11 of the Draft RCP clarify the differences between constrained policies and strategic initiatives. The constrained policies are “recommended near-term, feasible policies that stakeholders should consider for implementation.” The strategic initiatives are “longer-term strategies that require significant effort to implement but are necessary to achieve the RCP’s desired goals and outcomes.” The Action Plan has been reviewed by the Energy Working Group, the Energy and Environment Committee, and the Regional Comprehensive Plan Task Force. The Regional Council may revisit policies at their discretion.	None
	Please include the reasons why fuel consumption has increased. For example, is it per capita or overall? A per capita increase of 20% would be very significant, but an increase overall would be expected due to the growth in the state. (p. 64)	Per capita fuel consumption would not be significant because it accounts for growth. In terms of reducing our region’s consumption of fossil fuel, tracking overall uses will identify more significant trends.	None
	Please insert the word "the" (p.64)	This edit will be made.	Insert “the”
	Because the word "Furthermore" also starts the following sentence, please consider a different conjunction - possibly "Additionally." (p. 65)	This edit will be made.	Change the sentence to begin with “additionally”
	It is noted that this seems to be	This edit will be made.	Move this sentence to the

	a significant statement. It is suggested that it be moved up in the text in order to provide it with more emphasis. (p. 66)		beginning of the following paragraph. "Initiating a move toward conservation, efficiency, demand reduction and renewables 20 years before peaking would offer the possibly of avoiding a world liquid fuels shortfall and significant economic hardship. The world supply crunch will impact the SCAG region…"
	Please expand this discussion to address the uncertainties of how climate change will alter economies and ecosystems in terms of the state, then the region, then the local governments impacts. It is suggested that the paragraph also note that the information at a local/local government level may be different jurisdiction to jurisdiction. (p. 67)	The RCP can be viewed as a starting point in regional planning around climate change mandates. However, this document is not intended to be a technical greenhouse gas reduction plan, as its benefits have not been quantified, and it cannot be used to implement any future mandates on the region. More information on the impacts of climate change can be found on the State's Climate Change portal.	None
	Please provide additional background regarding the 41% of greenhouse gas emissions as this is not consistent with the most recent data released by the California Air Resources Board which indicates that it is about 38% (please see CARB's 2004 Greenhouse Emissions by Sector at http://www.arb.ca.gov/cc/inventory/data/graph/graph.htm). Please include clarification in the text about all of the sources included in this sector. For example, it would be helpful if the statement identified if the percentage cited includes only automobiles and light trucks or does it also include other transportation sectors such as trucks, trains, planes, ships, etc... It is suggested that a pie chart showing all of the sources and how it illustrates that the 41% comes from "transportation" would be helpful to illustrate the extent of this issue. It is also suggested that a section focussing on actions that can be implemented by local governments would be helpful as well. While transportation is one sector to focus on, green building may be a more effective solution to GHG	The reference will be updated with the most recent information. As previously stated, the RCP is not a greenhouse gas plan. Further information on the greenhouse gas emissions and strategies can be found on the State's Climate Change portal.	Replace 41% with 38%

	emissions because it is the most cost effective way to address an individual's carbon footprint for new construction that local agencies can directly implement. Albeit this does not necessarily address existing development, it can include redevelopment or retrofit standards. (p. 67)		
	Please insert the words "single source"	This edit will be made	Edit recommended. The words “single source” will be added
	Please add a section strongly linking the data that supports the reasons for the significant policy changes identified. Specifically, "revising land use, zoning, and building codes to optimize the consumption of our energy resources" should be discussed in context of meeting the wide variety of state and federal requirements these implementation tools are required to meet. It is also suggested that the paragraph include text identifying the significant revisions to state law, including the building code that are anticipated to address this issue. (p. 67)	Text will be added to address the newly adopted Green Building Code.	Revision recommended. Edit page 69, end of green building section to read: “On July 17, 2008, the California Building Standards Commission adopted a green building code to promote healthy, energy, and resource efficient building practices throughout the state. The standards cover commercial and residential construction in the public and private sectors as well as schools of all levels, hospitals and other public institutions. The thresholds include a 50 percent increase in landscape water conservation and a 15 percent reduction in energy use compared to current standards. All the measures if acted upon would at least be comparable to the requirements of a "silver rating" under the Leadership in Energy and Environmental Design (LEED) standards set by the U.S. Green Building Council (USGBC).”
	Because of the significance of these two topics - land use and building design - it is suggested that they be separated these two items into distinct discussions. It is noted that they are two significantly different areas that require different actions. There are different levels of control (builder vs. developer vs. local government) and each has a different set of actions that could be implemented. It is recommended that this	The purpose of this section is to provide background information to the reader. It is agreed that these are both significant areas but both address the building envelope, which is an effective way to help reduce energy use.	None

	section be restructured to indicate where the control over a specific protocol or item lies (eg. is it something that local government has the greatest control over or the developer or the individual?) Because you can influence people's choices but not force them to change, this will provide the framework to identify those actions that will result in the most significant direct benefit and that can be implemented by the most appropriate agency/individual. (p. 68)		
	Please restate to emphasize that while more research is needed, SCAG is being proactive in identifying effective strategies to meet the issues identified in this chapter.(p. 68)	This edit will be made.	Edit recommended. Page 68 will be edited to reflect the concerns stated here.
	It is noted that landscaping is a specific action that local governments could affect both directly and through site design standards but it is not emphasized. It could be a very effective means to address energy efficiency and therefore the discussion should perhaps be expanded. (p. 68)	Comment is noted. The Water Chapter provides a discussion of conservation measures, including landscaping.	None
	Please clarify if this is an extreme or based on an average in the SCAG region. (p. 68)	Comment is noted. Based on the report, it appears to be an average, which could vary based on climatic variability. The study is nonetheless informative for cities. The full report is citied in the footnotes and can be accessed online at http://www.fs.fed.us/psw/programs/cufr/research/studies_detail.php?ProjID=15.	None
	Please include a section describing clearly what CARB or other state agencies require or are expected to require relative to this statement about the percentages of renewable energy to be provided by energy providers. (p. 70)	At the direction of the Regional Comprehensive Plan Task Force, the RCP advocates for even bolder policies that attempt to achieve a healthier, more sustainable region. SCAG will continue to coordinate with ARB and other state agencies regarding their requirements and programs.	None
	Please define where this goal comes from? It seems to be an application of the greenhouse gas emissions reductions from AB 32. However, there is no discussion of why this level was chosen for the reduction of fossil fuel use. What would the resultant reduction in GHG emissions be from this reduction in fossil fuels? If the emphasis is to address peak oil and the need to reduce the reliance on fossil fuels for	Comment noted. The RCP was developed in a lengthy, deliberative, and open process. The energy chapter material, outcomes and policies included in the Draft RCP were developed under the guidance of the Energy Working Group and RCP Task Force and approved for review by the Energy and Environment Committee. The Regional Council may revisit the Energy Outcomes and Policies at their discretion.	None

	energy, then it is suggested that the sentence should be stated as such and use a standard such as that for renewable energy. The backdating to 1990 levels is confusing. Further, it is suggested that a discussion of how fossil fuel is used in the state and region would be helpful. A pie chart indicating total fossil fuel consumption and how it is used would be appropriate (e.g. for transportation, home energy, commercial/industrial, etc...) Please reference this to the requirements established by State law. (p. 70)		
	This implies that SCAG could be in the place, ahead of other agencies, of establishing actions to reduce fossil fuel consumption. This does not recognize the significant work efforts that are being undertaken by other more direct point sources of greenhouse gas emissions, such as within the electric utility industry or directly by the state in regulating the fuel standards for vehicles. It is suggested that the text should note that SCAG is not an implementing agency. The OCCOG recognizes that SCAG could act in the realm of identifying strategies that could be implemented by others. It is recommended that this section be re-worded to indicate the actual role that SCAG should play in the realm of the energy challenges (i.e. such as to implement state and federal requirements). (p. 71)	The purpose of this statement was to recognize the leadership opportunities that exist. It was not the intent of the statement to diminish work done throughout the region, which in many cases, goes above and beyond this RCP.	None
	It is noted that this statement does not recognize the significant efforts already being taken throughout the region by some local governments, utilities, etc... As such, it is recommended that the section clearly identify what SCAG is doing that goes above and beyond what the state is requiring and then clearly identify what the State is requiring various agencies to do. It would also be helpful to recognize what some agencies are already doing. Further, these sentences imply	As with the previous response, the purpose of this statement was to recognize the leadership opportunities that exist. It was not the intent of the statement to diminish work done throughout the region, which in some cases, goes above and beyond this RCP. Further technical input and coordination is recommended in EN-4 and EN -5. If the RCP is adopted, the Regional Council can act upon these policies, directing staff to expand upon the information requested in this comment.	None

	that SCAG has the authority to increase funding for public transportation as opposed to encouraging it. Please include clarification in the text to clearly indicate who can do what (include CTC's in the statements.) Finally, please identify the types of programs and actions that will be undertaken to implement an increase in funding for public transportation. (p. 71)		
	See previous comments about rewording the outcome to "decrease the region's consumption of fossil fuels to 25 percent from 1990 levels by 2020." The language that results from the development of the supporting information should then replace this outcome. (p. 72)	The energy chapter outcomes included in the Draft RCP were developed under the guidance of the Energy Working Group and RCP Task Force and approved for review by the Energy and Environment Committee. The Regional Council may revisit the Energy Chapter Outcomes at their discretion. Future technical studies can be performed at the Regional Council's discretion.	None
	Please insert "consistent with state law" (p. 72)	The 30% outcome is not state law. Rather, it is a goal set by Executive Order S-3-05. The state law, SB 107, requires the California Energy Commission and the California Public Utilities to study and report on the feasibility of the goal. They have subsequently found this goal (33%) to be feasible. The energy chapter outcomes included in the Draft RCP were developed under the guidance of the Energy Working Group and RCP Task Force and approved for review by the Energy and Environment Committee. The Regional Council may revisit the Energy Chapter Outcomes at their discretion	None
	The linkage between the text of the chapter and the identified policies and initiatives is not clear. It is recommended that the text of the chapter be strengthened in order for the reader to understand the reasons for the policies listed. (p.73)	The energy chapter outcomes included in the Draft RCP were developed under the guidance of the Energy Working Group and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Energy Chapter Outcomes at their discretion. Future technical studies can be performed at the Regional Council's request.	None
	The OCCOG observes that the State is already engaged in work efforts to develop energy efficiency and green building guidance; thus, SCAG's efforts in the area would appear to be duplicative of those efforts. It is suggested that an appropriate role for SCAG could be to serve as a clearinghouse for	Comment is noted. Additional information regarding current state efforts will be added.	Additional information on page 69 is recommended.

	the information and to provide assistance to member agencies to navigate the information from the state. (p.73)		
	The OCCOG observes that the promotion of energy efficiency and reduction of greenhouse gases by utilities in the SCAG region is already underway and notes that it appears this action is duplicative of those many efforts already underway . It is recommended that this policy be reworded to reflect that SCAG could provide a forum for these regional discussions as opposed to pursuing a partnership with the agencies. (p.73)	The comment is noted. The Regional Council can consider policy changes at their discretion.	None
	The OCCOG observes that this policy appears to be from the solid waste chapter and asks if it was intended to identify reduced VMT? (p. 73)	The comment is noted. The Regional Council can consider policy changes at their discretion.	None
	Please delete and discuss these examples in the text of the chapter. It is not necessary to include these specific actions in the policy statement. (p. 74)	The comment is noted. The information provided in the policy is intended to assist local governments and is therefore recommended to remain in the policy text. The Regional Council can consider policy changes at their discretion.	None
	Please delete this statement. This is typically already done and thus not necessary to include in the constrained policies. Specifically, it is already a requirement to do so for significant energy users. (p. 74)	The comment is noted. The information provided in the policy is intended to assist local governments and is therefore recommended to remain in the policy text. The Regional Council can consider policy changes at their discretion	None
	Please delete the text "incorporate solar panels in roofing and" as it is limiting to the technology. The policy is more meaningful if a broader set of technologies can be applied to its implementation. (p. 74)	The policy also includes “other renewable energy sources” to broaden the technologies that are encouraged. Therefore, this edit is not needed.	None
	Monitoring of nuclear facilities is a federal issue. It is requested that this policy be reworded to recognize this or be deleted. (p. 74)	The comment is noted. The Regional Council can consider policy changes at their discretion.	None
	Local governments does not have the purview over many of the items listed. Indeed, the first bullet point refers to an action of SCAG and not a local government. It is suggested that the language is cleaner without listing the detail; therefore, it is requested that it be deleted. (p. 75)	The comment is noted. The term “project implementation agencies” will be added to clarify the policy based on the comment. In addition, the reference to “SCAG shall” will be deleted.	Edits on page 75, Policy EN-16
	Please clearly identify the	The project implementation agency	Edit on page 75, Replace

	implementing agency in this policy. (p. 75)	will be clarified.	"The project implementation agency" should be replaced with "Utilities"
	Please clearly identify the appropriate implementation agency. Most project implementation agencies will not have the purview over this and this implies that local governments or all public utilities have purview, which is not the case. (p. 75)	The project implementation agency will be clarified.	Edit on page 75, Replace "The project implementation agency" should be replaced with "Utilities"
	Please delete as the language is unnecessary. Further, the OCCOG observes that the statement does not recognize that there are many activities already undertaken throughout the region and implies that there are not many in the region. While the programs listed should be celebrated, if these specific programs are to be recognized in the policy statement, it should further recognize that there are numerous other programs in the region. (p. 75)	The reference to the Ventura Regional Energy Office, South Bay Energy Savings Center, and the San Gabriel Valley Energy Wise program are in no way meant to diminish other energy efficiency partnerships in the region. The groups listed in this policy participated in the development of the energy chapter and requested to be recognized.	None
	This initiative states that "SCAG shall consider energy uncertainty into its future planning and programming including the Regional Transportation Plan and the Regional Transportation Improvement Program." The OCCOG observes that is a very significant initiative that could impact all agencies the are involved with and subject to the RTP and RTIP. Please include an explanation of why this would be placed in a federally mandated document. (p. 76)	The Final RTP includes a section on energy uncertainty and identifies areas for future research and deliberation prior to development of the next RTP. SAFETEA-LU further states that the metropolitan planning process "shall provide for consideration of projects and strategies that will protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns." Therefore, no changes to the initiative are recommended.	None
	Please clarify why SCAG would undertake actions to analyze greenhouse gas emissions in the region? It is suggested that clarification be provided to discuss whether this would, for example, be in conjunction with SCAQMD? If so, it should state who is participating. Further, this identifies a need to expand SCAG's modeling capabilities to include greenhouse gas emissions. Please provide more information on whether this was the intent and, if so, what the work effort would be to implement such an initiative.	RTP Guidelines from the California Transportation Commission require SCAG to develop an Integrated Land Use and Transportation model that can help quantify greenhouse gases. The AB 32 Scoping Plan also identifies a role for regional agencies in helping the state meet its greenhouse gas goals through reductions in vehicle miles traveled. Future regional efforts related to AB 32 will be considered at the Regional Council's discretion.	None

	(p. 76)		
	Please restate such that these are actions that can be undertaken by agencies that would use this document as opposed to providing direction to agencies that do not fall under the SCAG region. For example, SCAG shall support each policy. (p. 76)	The comment is noted. This recommended edit would create inconsistencies with the rest of the document. The Regional Council can consider policy changes at their discretion.	None
	The policy implies that individuals will make a job and housing choice that will reduce energy consumption if only zoning were altered. Further, the OCCOG observes that the policy does not address the fact that only a small percentage of overall trips are work/home trips, as has been identified by SCAG. It is recommended that this policy recognize these factors (p. 76)	The policy will be clarified to avoid the stated implication.	Add the phrase to EN-10S: "…employ land use planning measures, such as zoning…"

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Security

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	Page 118 This chapter appears to propose a significantly expanded role for SCAG in the areas of security and emergency preparedness. It is recommended that this chapter be reworked to clearly identify what SCAG's current requirements should be in the realm of this topic area. Significant work in the areas of security and emergency preparedness are already undertaken by numerous other agencies, including first responders and emergency operations centers. It is recommended that SCAG's role be clearly identified as one of fulfilling requirements under SAFETEA-LU and to serve as a data provider for regional transportation data, as necessary and in coordination with County transportation commissions.	SCAG does not intend to take any role beyond its charter as a transportation planning agency.	None
	Page 118 The State Emergency Plan addresses these issues. It is recommended that the text present the information from the state plan instead of trying to restate it	Comment Noted	None
	Page 118 "Safety is defined as… Security is Defined as…" Please provide a source for this definition.	SCAG will insert footnote citing source. National Cooperative Highway Research Program, Report 525 Vol. 3. Incorporating Security into the Transportation Planning Process.	Insert Footnote.
	Page 119: Many of the benefits identified in all of the sidebars discussing multiple-benefits reference challenges and safety issues not discussed in the chapter and it is not clear how these benefits would be realized but the actions of the RCP and the various agencies in the region. Please rework all of the stated multiple benefits to reflect the discussion in the chapter.	Comment Noted	None
	Page 119: It is recommended that this be the focus of the chapter and as such, should be relocated to an earlier position in the chapter. "SAFETEA-LU specifies that Metropolitan Planning Organizations (MPOs) such as SCAG develop a metropolitan	Comment Noted	

	planning process that provides consideration for projects and strategies that will "increase the security of the transportation system for motorized and non-motorized users."		
	Page 120: This section appears to recommend that SCAG prepare a hazard mitigation plan. This is not required of SCAG. It is recommended that the entire section be reworked to reflect what the "Plan" would be reflective of SCAG's limited role in security and emergency preparedness.	The Security Supplemental Report of the Regional Transportation Plan reflects SCAG transportation security goals and objectives.	
	Page 120: It is not clear that SCAG could do this under current state and federal legislation. SCAG's role should be limited to what it has purview to do. *"This centers around coordinating the numerous plans, programs, organizations and infrastructure in place within the SCAG region to provide safety and security of the regional transportation system for many potential situations.*	Comment noted.	Edit to read "~~"~~This centers around coordinating the numerous plans, programs, organizations and infrastructure in place within ~~the~~ SCAG's ~~region~~ purview to provide safety and security of the regional transportation system for many potential situations.
	Page 120: SCAG currently does not have a role relative to homeland security. It is not clear that there is support for such an expanded role. Please clarify what the goal for this expansion of responsibility would be and why SCAG should be involved.	23CFR § 450.322 now requires MPOs to have a plan that *incorporates or summarizes the priorities, goals, countermeasures, or projects for the Metropolitan Planning Area contained in the Strategic Highway Safety Plan required under 23 U.S.C. 148 as well as (as appropriate) emergency relief and disaster preparedness plans and strategies and policies that support homeland security (as appropriate) and safeguard the personal security of all motorized and non-motorized users.* In addition, 23CFR § 450.306 Scope of the metropolitan transportation planning process, states "(a) The metropolitan transportation planning process shall be continuous, cooperative, and comprehensive, and provide for consideration and implementation of projects, strategies, and services that will address the following factors:…(3) Increase the security of the transportation system for motorized and non-motorized users.	
	Page 120: Please relate all comments to SCAG's current role in security and emergency preparedness.	Comment Noted	No
	Page 121: Please see previous comments regarding the	Comment Noted	No

	multiple benefit sidebar		
	Page 121: Please delete this paragraph. It is not recommended that SCAG insert itself into this existing process	The paragraph is a discussion what SCAG could or could not do in relation to its purview as a regional metropolitan planning organization and the federal requirements to incorporate security into the transportation planning process.	No
	Page 121: Please replace with "A"	Comment noted Delete "This enhanced leadership and" and replace it with "A"	Delete "This enhanced leadership and" and replace it with "A"
	Page 121: It is recommended that SCAG not act in a coordinating capacity but in a support capacity for the agencies already tasked with this work. SCAG could serve in an important capacity to provide regional data if, as an organization, data accuracy and maintenance is emphasized and made a priority. Because SCAG's regional data is currently updated on an "as-needed" basis, it may not be suitable for security and emergency preparedness purposes.	Comment Noted. Edit will be made.	Edit to read "The RCP proposes that SCAG ~~coordinate more with~~ support these front-line responders to ensure that planning and information are available to help the region deal with inevitable emergencies.
	Page 122: Please delete. This information is unnecessary as it is recommended that SCAG's role not be expanded. [Table summarizing SCAG's potential role in Security and Emergency Preparedness	Comment noted. Table summarizes earlier text that discusses not just what potential role SCAG could have, within the limitations of our role as a MPO and the new federal requirements.	None
	Page 123: Please see previous comments regarding the multiple benefit sidebars	Comment noted	None
	Page 123: While the threat of tsunamis is accepted, the lack of discussion regarding wildfires is perplexing. Wild fires present a significant risk in the region and annually cause significant damage and significantly impact the resources available in the region. Therefore, it is recommended that a section discussing wildfires be added to the chapter.	Comment Noted. Minor edit, summarizing wildfires and stating that in the event widlfires damage transportation infrastructure, SCAG would work with State and Federal governments to fast track the programming of transportation infrastructure repairs.	Edit to include the following: "**Wildfires**. Wildfires are the most frequent threat to the region. Depending upon the location and atmospheric conditions, wildfires could damage small amounts of vegetation or it could wipe out entire communities. Homes on hillsides or canyons are especially at risk, not just from the fire, but after a fire when the hillside is vulnerable to earthquakes (landslides) and downpours (mudslides). In addition, homes in these vulnerable areas often have few evacuation route options In response, local governments have begun

			using innovative emergency warning systems, such as reverse 911 to warn residents when the need to evacuate arises. New Intelligent Transportation System technologies can also aid the free flow of evacuees from a danger area. In the event a wildfire damages regionally significant transportation facilities, SCAG will work with local government, the State and federal governments to "fast track" the programming of transportation infrastructure repairs. “
	Page 124: This would be significant responsiblity for any one agency. Should this goal reflect the goals in the RTP and reflect SAFETEA-LU requirements? *SECURITY AND EMERGENCY PREPAREDNESS GOALS* • *Ensure transportation safety, security, and reliability for all people and goods in the region.*	Comment noted. This goal is listed in the 2008 Regional Transportation Plan.	None
	Page 124: Discussion of more recent flooding events would be more relevant and is recommended to be added. *In 1938, after a tremendous flood that killed 113 people, the Army Corps of Engineers began channelizing the major rivers in Los Angeles County, developing six catch basins and 14 smaller mountain dams in an effort to reduce flooding.*	Comment noted. Although there have been more recent floods, this one was noted for the impacts and the response.	None
	Page 124: Intelligent Transportation Systems (ITS) are not discussed in the chapter; therefore, this outcome has no relation to the text of the chapter. Please add a section addressing ITS to the chapter. *SECURITY AND EMERGENCY PREPAREDNESS OUTCOMES* • *Increase per capita funding for Intelligent Transportation Systems projects that enhance or benefit regional transportation*	Comment noted	None

	security.		
	Page 124: Please delete. This is already done throughout the region and is unnecessary to have as an outcome. The RCP will not influence this. *SECURITY AND EMERGENCY PREPAREDNESS OUTCOMES* • *100 percent of government agencies and organizations involved in planning, mitigation, response and recovery involved in improving emergency preparedness coordination, collaboration and flexibility.*	Comment noted.	None
	Page 124: Please identify whether this is a recommendation or if it is a process that already occurs. *In the event that flooding damages transportation infrastructure, SCAG would work with the State and federal government to "fast track" the programming of transportation infrastructure repairs.*	This is a recommendation if damaged transportation infrastructure is regionally critical, much like the process used after the 1994 Northridge Earthquake.	None
	Page 125: Please rework the policy recommendations to reflect the requested discussion in the chapter and limit to SCAG's existing role as required by SAFETEA-LU.	Comment noted. Each proposed policy is within SCAG's purview as a MPO, and is bound by the constraints of SCAG's purview	None

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Economy

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	The OCCOG observes that California businesses face significant challenges and notes that there are significant costs on doing business in this state. The regulatory framework of California is a significant issue for our regional economy as such, it is recommended that this also be addressed in the discussion of SCAG's share of U.S. jobs. The OCCOG notes that it is not that these costs are all bad, but that they represent a challenge that should be addressed in this region. (OCCOG Technical Review Supplement 7-147) Additionally, identification of the myriad opportunities for economic development, as opposed to simply focusing on solely goods movement, would make the chapter more applicable to a wider array of jurisdictions or areas in the region. (OCCOG Technical Review Supplement 7-147) Finally, this chapter would benefit by a financial strategies section to identify the challenges and possible solutions for addressing those challenges. (OCCOG Technical Review Supplement 7-147)	Comment noted. The Economy chapter was developed under the guidance of the Community, Economic and Human Development committee and the RCP Task Force. The analysis of challenges, costs, and regulatory framework of doing business can be performed outside of the scope of the RCP. Goods movement is a significant regional planning effort. As suggested by the commentor, there are myriad opportunities. It is not possible to discuss all of them within the scope of the RCP. Specific direction is necessary to perform further analysis. Financial strategies can be performed outside of the scope of the RCP.	None
	The statement that it is the "region's challenge to add a projected three million jobs" implies that the three-million more jobs are "needed" in the region. Please provide an explanation of why these jobs are expected in the region. (OCCOG Technical Review Supplement 7-147)	Comment noted. This statement about employment growth is based on the growth forecasts adopted by the Regional Council for the Regional Transportation Plan.	None
	It is suggested that more data, including a table showing the percentages of foreign-born workers and their ages, would be helpful and add supporting information for this section to both define the need and identify opportunities that can be best addressed. (OCCOG Technical Review Supplement 7-148)	Comment noted. The information of labor force by place of birth, and by age is not immediately available. Further technical work can be performed outside of the scope of the RCP	None
	Please clarify and better define what is meant by "consistency with regional environmental health, mobility, and social justice goals." The OCCOG also notes that the statement is repeated throughout the Chapter and in this section to the extent that it looses its meaningfulness as opposed to presenting a thoughtful response to real conditions - such as pollution, activist citizens, etc. (OCCOG Technical Review Supplement 7-148)	Comment noted. Edit recommended.	Edit will be made to include the elaboration and explanation of regional environmental, health, mobility and social justice goals
	Please provide more information on the challenges and the possible solutions in	Comment noted. Improvement of the overall	Edit will be made to include discussion of the need to

	the Education and Workforce Section. The issue listed is to improve the system, however, government cannot force the public to use the system, which is also a significant challenge, but which is not discussed. (OCCOG Technical Review Supplement 7-148) Additionally, the section also emphasizes the need for improved educational attainment. Please include a discussion of the need to additional skilled labor training which is also facing a significant shortage of workers. (OCCOG Technical Review Supplement 7-148)	system will help to attract workers at different levels. The challenges of government can be performed outside of the scope of the RCP.	additional skilled labor training.
	Please clarify this statement as SCAG's extensive discussions relative to the impacts of goods movement on the region may not be widely known by all of the audiences for the RCP. (OCCOG Technical Review Supplement 7-149)	Comment noted. The purpose of the Economy chapter is to discuss the economic impacts of goods movement. Details about the program are included in the Transportation chapter.	None
	This statement gives the federal government direction to address the issue related to goods movement. Relative to the comments on the text earlier in the section, please expand on this to explain or clarify what the region can do to address the issue and what limitation the region faces. Specifically, it is recommended that the section include a discussion of why federal actions are necessary. (OCCOG Technical Review Supplement 7-149)	Comment noted. The purpose of the Economy chapter is to discuss the economic impacts of goods movement. Details about the program are included in the Transportation chapter.	None
	Please reword to make a stronger statement that goods movement burdens the region and clearly identify what the federal government needs to do - specifically through the provision of funding and legislative changes to address the impacts from this economic sector. Because the intended audience for the RCP may not be familiar with this topic, they will not have had the opportunity to have been involved in the many discussions on this topic that have taken place at SCAG. (OCCOG Technical Review Supplement 7-149)	Comment noted. The purpose of the Economy chapter is to discuss the economic impacts of goods movement. Details about the program are included in the Transportation chapter. Moreover, the RCP addresses planning and policy issues within the region. Detailed analysis of the responsibility, funding and legislative changes of the federal government can be performed outside of the scope of the RCP.	None
	The OCCOG observed that this section is confusing and repeats that environmental and quality of life goals without addressing economic goals. It is suggested that the section be reworded to refocus on the economic development strategies necessary to meet the challenges defined in the previous section. (OCCOG Technical Review Supplement 7-150)	Comment noted. The Economy chapter was developed under the guidance of the Community, Economic and Human Development committee and the RCP Task Force. The Regional Council may revisit the Economy goals and policies at their discretion	None
	It is noted that the wording of this statement from the working draft was stronger. It is suggested that the	Comment noted. Edit recommended	Edit as suggested in comment

	sentence be changed: "The region's economic viability and attractiveness depend upon mutually supportive economic development strategies, land use decisions, transportation investments, and educational improvements." Further, this is a key goal and, as such, is recommended to be emphasized and supported throughout the chapter. (OCCOG Technical Review Supplement 7-150)		
	Please delete these two statements as they are obvious requirements and as such, do not need to be stated in the text. (OCCOG Technical Review Supplement 7-150)	Comment noted. Edit recommended	Edit as suggested in comment
	Overall, the OCCOG notes that the goals statements are weakly worded and do not specifically address the economy or the economic development of the region, but appear to be more general in nature. Facts are noted in the statements but are not supported by strong policy statements or by information provided in the Chapter. It is recommended that to strengthen the goals that they should be strongly linked to the discussions of the Chapter. (OCCOG Technical Review Supplement 7-151)	Comment noted. The Economy chapter was developed under the guidance of the Community, Economic and Human Development committee and the RCP Task Force. The Regional Council may revisit the Economy policies at their discretion.	None
	It is recommended that this be the first goal of the chapter. (OCCOG Technical Review Supplement 7-151)	Comment noted. Edit recommended	Edit as suggested in comment
	Please delete as this is a quality of life goal that should perhaps be a overall goal or principle of the RCP; it is not an economic development goal. It may be appropriate elsewhere in the document, but not in this chapter. (OCCOG Technical Review Supplement 7-151)	Comment noted. Edit recommended	Edit as suggested in comment
	It is not clear why this is in the economy chapter as it is more a quality of life goal than an economy goal. (OCCOG Technical Review Supplement 7-151)	Comment noted. Edit recommended	Edit as suggested in comment
	Please delete as this is an obvious statement and begs the question of "as opposed to rewarding what." (OCCOG Technical Review Supplement 7-151)	Comment noted. Edit recommended	Edit as suggested in comment
	It was observed that this goal restates the previous goal and as such is unnecessary. It is recommended that it be deleted. (OCCOG Technical Review Supplement 7-151)	Comment noted. Edit recommended	Edit as suggested in comment
	The OCCOG observes that the identified outcome is really a goal as it is extremely unlikely that the RCP or SCAG could "eliminate" gaps in educational attainment between different racial and ethnic groups. It is recommended that the outcomes be things that could be achieve by the agencies that will carry out the actions identified in the chapter and that SCAG may have a policy to support the actions and activities of the	Comment noted. Edit recommended	Edit to change the word “eliminate” to “reduce”.

	educational system to achieve this goal. (OCCOG Technical Review Supplement 7-152)		
	The OCCOG expresses concern that the policies and strategies identified do not address many economic issues and focus primarily on quality of life, goods movement and education to the exclusion of other economic development strategies. It is recommended that this section be reworked to include more and broader ranging economic develop strategies that could be applied throughout the region. (OCCOG Technical Review Supplement 7-154)	Comment noted. The Economy chapter was developed under the guidance of the Community, Economic and Human Development committee and the RCP Task Force. The Regional Council may revisit the Economy policies at their discretion.	None
	It is not clear how SCAG would carry out many of the programs identified in this section as many of the policies and actions are under the purview of other entities. It is recommended that each policy be reviewed as to whether it should be an action of SCAG directly or reworded such that SCAG would support efforts by other organizations and that SCAG possibly could serve in the capacity to provide the opportunity for a regional forum. (OCCOG Technical Review Supplement 7-154)	The Comment noted. The Economy chapter was developed under the guidance of the Community, Economic and Human Development committee and the RCP Task Force. The Regional Council may revisit the Economy policies at their discretion.	None
	This is a responsibility of the state education system and is not supported by the text in the chapter to identify how it relates to the economy or economic development. As such, it is recommended for deletion. (OCCOG Technical Review Supplement 7-154)	Comments noted. The Economy chapter was developed under the guidance of the Community, Economic and Human Development committee and the RCP Task Force. The Regional Council may revisit the Economy policies at their discretion.	None
	The OCCOG notes that it is limiting to only look to the development process for solutions. Local governments are already subject to the permit streamlining act under California state law. The chapter did not present any discussion addressing the overall costs that businesses and industry face due to on-going regulation. It is recommended that this also be addressed in the chapter as opposed to only focusing on the permit process. (OCCOG Technical Review Supplement 7-156)	Comments noted. The Economy chapter was developed under the guidance of the Community, Economic and Human Development committee and the RCP Task Force. The Regional Council may revisit the Economy policies at their discretion. The technical analysis of the overall costs of business and industry can be performed outside of the scope of the RCP.	None

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Water

Commenter	Comment	Recommended Response	Recommended RCP Edits
Orange County Council of Governments	The Metropolitan Water District of Southern California specifically offered the following comment to the OCCOG TAC: "Metropolitan strongly endorses SCAG's premise that future regional development must be built on a foundation of sustainability, water use efficiency and the creative use and development of water management strategies. Uncertainties introduced by the current drought, climate change, and the fragile condition of the Sacramento-Bay Delta, underscore the importance of prudent planning by water agencies and watershed districts within Southern California. Metropolitan supports SCAG's continuing role as a regional resource and information facilitator. In this way, SCAG assists Metropolitan in its efforts to assure a reliable, high quality and well-managed future of water for the Southern California region." (From letter dated _____ to the OCCOG TAC, attached for reference.)	Comment noted. SCAG developed the water chapter of the Regional Comprehensive Plan with insight and assistance from the Metropolitan Water District and is appreciative of their support for its principles.	None.
	It is claimed that about 75% of potable water in the "SCAG region" comes from imported supplies. The Metropolitan Water District of Southern California suggests lowering this to between 66% and 70% as the reference in the text seems a bit high.	Comment noted.	Edit as per comment.
	It is requested that sources of imported water supply listed please include the Los Angeles Aqueduct.	Comment noted.	Edit as per comment.
	Because this document is intended to be used by a wide audience who may not have knowledge of the SCAG region or the growth projections, it is recommended that to be more helpful and meaningful to this audience that the sentence be reworded to include an actual numerical growth statement and not reference to a statewide number that is not known.	Comment noted.	Edit to read: "Recent projections indicate that over 24 million people will reside in the 6-county SCAG region by the year 2035."
	Please identify a the link between the population and the need to be sensitive to the ecological "imperatives" and the emphasis on sustainable development. These are subjects that are not commonly understood and the linkage may not be obvious to all readers.	Comment noted.	None.
	Please insert a comma.	Comment noted.	None.
	Regarding formatting for this section, is the "Local Supplies" section a subset of "Water Supply"? If so, should the formatting be different?	Comment noted.	Request formatting change for text "Water Supply".
	It is noted that the term "impairments" as used in this section is a new term. That OCCOG asks if this is a term used in the water industry and is it becoming the common terminology for pollutants and other water problems? It is noted that using	Comment noted. The term 'impaired' does have a technical meaning when discussing water quality; however, it is not used here as a technical term, it is meant to be interpreted literally,	None.

	a term that is only presented in this one document will be confusing to the wide variety of agencies that may use it unless it is clearly defined.	as 'any substance that would impair water quality.'	
	Please replace with "pollution".	Comment noted.	Edit as per comment.
	Please replace with "are required to be appropriately addressed".	Comment noted.	Edit as per comment.
	Please insert the word "strict" to reflect the strict regulations that govern local water agencies. (p.48)	Comment noted.	Edit as per comment.
	It is recommended that the sentence please be deleted for the following reasons. The sentences states, "Minimizing impervious surfaces reduces greenfield development." The cause and effect relationship assumed in this statement is not clear. In this simplified statement of the recommendations for the minimization of impervious surfaces, the sentence could be interpreted in its most simple form to require more undeveloped land surrounding what is built. If used as a policy, without consideration of regional and larger-scale development planning, it could, in fact, result in large lot development with significant distances between structures. Such a situation, would in turn, lead to inefficient use of infrastructure, increased need to use automobiles and reduction of habitat and open space. Further, the statement makes the assumption that roadway construction and "large-lot commercial development" induces growth, which is noted by the OCCOG to not necessarily be the case. As is presented in ULI's book "Growing Cooler" and discussed in the OCCOG's overall comments on the RCP, the use of the term "growth inducing" is defined as selecting the location for which growth that would have occurred somewhere in the region will occur. The OCCOG notes that this essentially represents the identification of where growth should occur through the investment in the roadways. Due to this definition, it is requested that the term "induced growth" please be clearly defined for its used in the RCP. Please clarify what is meant by "large-lot commercial development." It is suggested that the reader may be confused because large-lot commercial development typically goes hand-in-hand with residential growth already occurring in an area because it requires a population that will use and purchase its goods.	Comment noted.	Edit to read: "An area-wide policy of minimizing impervious surfaces reinforces policies aimed at reducing development, growth inducing road projects, and large-lot commercial development on valuable open space and the exurban fringe. Discouraging both expensive new water infrastructure and development in water-stressed areas of the region encourages concentrated growth.
	Please include Orange County Water District's Groundwater Replenishment System that recharges a significant quantity of highly treated recycled water to the Orange County Groundwater Basin either the Groundwater or the Recycling section	Comment noted.	Include mention of Orange County Water District's trail-blazing system in water recycling section.

	(information can be found on OCWD's website or through OCWD staff.)		
	The use of the term "disposed" seems awkward because recycled water is reused and not disposed of. It is suggested that an alternative word or statement be included such as, "Recycled water can be either be reused or discharged as ocean outfall or into streams.	Comment noted.	Edit to read: "Recycled water is either discharged into oceans and streams or is reused."
	The following is offered to clarify the sentence: Reuse includes irrigation...	Comment noted.	Edit to read: "Reuse of recycled water may include…"
	The following is offered to clarify the sentence: Reuse of water frees up...	Comment noted.	Edit as per comment.
	Please clarify what is meant by the statement "other peak demand resources."	Comment noted.	Edit to read: "…storage or shifting water from other uses."
	Please clarify why statement is singled out for inclusion in the text and not included in the list below? For easier reference, it is suggested that the statement be included in the list below the paragraph.	Comment noted.	Edit to read: "…realizing this potential will require:" (begin bulleted list)
	Because the situation in the Delta has not yet been discussed in this chapter. For clarity, it is recommended that either "the precarious situation is" be defined in this paragraph or reference to the explanation/discussion later in the chapter be added. Further, please use consistent terminology for the "Bay-Delta" throughout the chapter. Because this is the first mention of the Delta, it would be appropriate to use the full name "Sacramento Delta (Delta)."	Comment noted. Although SCAG anticipates a wide readership, this document is intended primarily for use by planners and policy-makers, who will be familiar with the issues in the Delta.	Edit to read: "…the precarious situation in the Sacramento-San Joaquin River Delta (Delta), …"
	Should this be word "With"	Comment noted.	Edit to read: "Our growing population, … climate change scenarios, all point … increased storage capacity; however, obstacles remain."
	The following clarification is offered: Identifying funding sources to aid in the promotion and use of recycled water.	Comment noted.	Edit as per comment.
	The word "the" is missing from the statement. (p.49)	Comment noted.	Edit as per comment.
	This sentence references "over-watering yards" as "another significant challenge." Although this is a challenge and because this is the section addressing the California Urban Water Conservation Council's Memorandum of Understanding (CUWCC MOU), it is suggested that it would be appropriate to mention other significant BMP-related issues that the CUWCC has been working on. For example, this could include BMP's such as the analysis/minimization of water losses within retail water supply systems (BMP # 3; system water audits) and conservation rate	Comment noted. Although all 14 of the BMPs mentioned are considered important, over-watering of lawns is targeted as a highly visible and often controversial water management issue. It therefore requires more effort than, for example, retail losses.	None.

	structure issues (BMP # 11; retail conservation pricing).		
	It is suggested that the use of the word "will" is more appropriate because projects are required to address these additional impacts.	Comment noted.	Edit as per comment.
	It is recommended that the significance of conservation projects (compared with other local and regional water supply projects) should be enhanced, specifically in regard to climate change/ greenhouse gases benefits. The issues are covered in the sidebars on pages 53 and 55; however, it is recommended that more emphasis should be put within the "Conservation" section itself as opposed to relying on the reader to consider the sidebar in combination with this text.	Comment noted.	Edit to emphasize the significance of conservation, using language similar to sidebars on pages 53 & 55.
	Please reword to better define the meaning of the sentence; as written the sentence is awkward and its meaning is not clear. (p.50)	Comment noted.	Edit to read: "Water saved through conservation can be made available for use during dry years or dry seasons, if it is stored as surface or groundwater. Water may be saved through a mechanism called groundwater banking, where one agency with groundwater capacity 'holds' water conserved by a different agency for future use."
	It is recommended that the relationship between the CALFED program and the Delta Vision Task Force be better defined as this is a significant issue.	Comment noted.	None.
	Please insert a space.	Comment noted.	Edit as per comment.
	The OCCOG TAC offers that the text only provides a very brief discussion that does not address the significant challenges faced with the Colorado River. It is recommended that this discussion be expanded to include addressing some of the extensive regulatory and ecological challenges faced by this water supply.	Comment noted.	Expand discussion to include drought and over-allowances on the Colorado River.
	The statement reads that discouraging new impervious surfaces reduces new roads and surface parking lots, which in turn would encourage walkable neighborhoods and transit use. The OCCOG TAC has noted that is not accurate without additional context and discussion and, in fact, could result in large lot development discouraging the use of transit and the inefficient use of infrastructure. It is recommended that the sentence be deleted and a different benefit identified.	Comment noted.	Edit to read: "Policies discouraging new impervious surfaces, including new roadways and surface parking lots, reinforce policies that emphasize dense walkable neighborhoods and transit use.
	Please insert the word "the"	Comment noted.	Edit as per comment.
	It is not clear if this a reference to Metropolitan Water District and clarification is reuqested.	Comment noted.	Edit to read: "MWD".
	It is suggested that it may not be	Comment noted.	Delete "and expand".

	appropriate to expand the water supply from the Colorado River as it is an already seriously impacted water resource with multiple users and as such it is requested that either the text "and expand" be deleted or an explanation be provided explaining why expansion is appropriate. It is recognized that it is appropriate to stabilize this water source, but the OCCOG notes that expansion of this source would involve significant federal policy and it is arguable that this even something the region would want to undertake.		
	Please replace with "to"	Comment noted.	Edit as per comment.
	Please replace with "or" (p.51)	Comment noted.	Edit as per comment.
	Please insert a colon, ":"	Comment noted.	Edit as per comment.
	The OCCOG notes that the section titled, Climate Change, provides only a very brief overview of a significant regional problem and suggests that the section would benefit from additional discussion to support the issues listed. Aditionally, it is recommended that the chapter would benefit if a discussion were included of actions to be taken to reduce the challenge as opposed to simply addressing actions reacting to it relative to water. (p.52)	Comment noted. The water chapter is not an appropriate place for a comprehensive discussion of climate change, especially regarding other resource areas. The focus on water-related challenges is deliberate, and potential actions are presented in the policies contained at the end of the chapter.	None.
	Please insert the word "the"	Comment noted.	Edit as per comment.
	Please see comment on page 48 regarding the change in the percentage of sources of water.	Comment noted.	Edit as per comment.
	It is recommended that the statement "and reducing beach closures" be deleted because the cause and effect in this sentence are not necessarily linked. The sentence is correct without the phrase.	Comment noted.	Edit to read: “Reducing pollution levels in streams, rivers, and swimming beaches will reduce…”
	Please replace the word "are" with "is"	Comment noted.	Edit as per comment.
	Because all impacts, not just health impacts would be reduced from reducing pollution levels, it is recommended that the word "health" be deleted.	Comment noted. As directed by the RCP Task Force, the sidebars highlight co-benefits of a specific policy or resource area.	None.
	Please delete the word "a" as it is grammatically incorrect.	Comment noted.	Edit as per comment.
	Please delete the word "is" as it is grammatically incorrect.	Comment noted.	Edit as per comment.
	For clarification, please replace the word "demands" with "requirements of transporting itthroughout California."	Comment noted.	Edit as per comment.
	Please include the word "typically" because a compact growth pattern may not always require less water. It should be noted that it also depends on the construction standards, landscaping standards, and type of growth.	Comment noted.	Edit as per comment.
	It is suggested that the cause and effect referenced in this statement is not necessarily true as increasing green space for the management of water quality does not necessarily lead to an increase of parks in park-poor neighborhoods. It may do so, but conversely it could also lead to recreational opportunities in park rich areas. As the statement does not need the phrase	Comment noted.	Edit to read: “…increased use of green space, they can help…”

	"into park-poor neighborhoods" it is recommended that it be deleted.		
	Please insert the word "seasons"	Comment noted.	Edit as per comment.
	It is suggested that the statement that existing facilities "will be increasingly strained as the region continues to grow" assumes no expansion of these facilities or the addition of new facilities. It is recommended for clarity that if the facilities will be strained, there should be reference to a lack of any ability to expand the facilities capacity and/or a discussion of the issues relative to the expansion of the facilities. (p.53)	Comment noted.	Edit to read: "...will be increasingly strained as the region continues to grow, unless the facilities are expanded or new facilities are constructed".
	It is requested that the number of units missing from this statement be included.	Comment noted.	Edit to read: "(less than 10 mgd)"
	It is suggested that this paragraph is confusing to the reader. Please clarify how the general quality of groundwater is degraded by land uses and water management practices. The examples of agriculture and septic systems only occur in limited areas of the region. Further, it is requested that the water management practices that degrade water quality please be identified. Further, regarding this paragraph and WA-17 on page 59, it is suggested that a significant discussion appears to be missing. It is recognized that these impaired groundwater basins need treatment; however, a number of these impaired aquifers (e.g. specifically nitrogen fertilizer contaminated aquifers) can be mitigated through alternate means such as the use of shallow groundwater wells to extract the impaired groundwater for direct reuse, such as irrigation. Please include a discussion of these issues.	Comment noted. Although septic systems and agricultural chemicals are only used in certain areas, the groundwater basins that are contaminated underlay larger areas of the region. Therefore the discussion remains significant. A discussion of urban runoff pollutants is included in the sidebar on page 57.	Add sentence after "Septic systems and leaking underground storage tanks can also impact groundwater." New sentence reads: "Groundwater recharge in urban areas is limited by high levels of impervious surface; however, water that does enter the groundwater from urban areas also carries high levels of pollutants from roads, lawns, and other urban sources." Edit WA-17 to read: "…unless specific beneficial uses for contaminated groundwater are identified."
	Please insert: "have the unintended consequence of concentrating and transferring"	Comment noted. Intent is not implied.	None.
	Please insert the word "effective"	Comment noted.	Edit as per comment.
	Please define the term "salinity."	Comment noted.	None.
	Please reference the source of the estimates.	Comment noted.	Edit as per comment.
	For clarity, it is suggested that the statement be reworded to read as "from diffuse sources"	Comment noted.	Edit as per comment.
	Please replace the word "pollution" with "urban" to be more specific.	Comment noted.	Edit as per comment.
	Please insert the word "is"	Comment noted.	Edit as per comment.
	Please include clarification in the text to indicate that the health affects are not directly on the thyroid (i.e. such as being cancer causing) but that the perchlorate inhibits the function of the thyroid - specifically it inhibits iodide uptake by the thyroid. (p.54)	Comment noted.	Edit to read : "…on Thyroid function."
	The OCCOG suggests that this section on uranium in water is misleading discussion	Comment noted.	None.

	because it does not address the full issue. It is suggested that the discussion should include references to the fact that uranium is also a naturally occurring pollutant from geology and that contamination in the local groundwater sources also occurs. While the contamination from the mine tailings in Moab, Utah is an issue for the region's water supply, a full discussion of all of the sources of uranium in the regions water supply would be more appropriate (e.g. referencing the naturally occurring pollution from uranium, similar to the discussion of arsenic, since it is a more significant issue in this region.)		
	It is recommended that a section addressing "Nitrogen" be added.	Comment noted. A discussion of nitrogen is included in the 'urban runoff pollutants' sidebar on page 57.	None.
	It is identified that the reference to "MTBE has caused a serious problem" is not clear to the reader because the impacts from MTBE have not been defined in the text. It is recommended that the text include a discussion of the "problems" it causes.	Comment noted.	None.
	It is noted that the land use discussion in this section is very limited and, as such, may not provide adequate information or background for a more general audience. It is recommended that the text should expand on the options available for better watershed management planning and include land use planning and development options.	Comment noted. The water chapter is not an appropriate place for a comprehensive discussion of land use. Although SCAG anticipates a wide readership, this document is intended primarily for use by planners and policy-makers, rather than a general audience. Land use related options and potential actions are presented in the policies contained at the end of this chapter and the Land Use chapter. The multi-benefit matrix was created specifically to address these types of co-benefits without repeating them in every chapter.	None.
	Please delete the word "in"	Comment noted.	Edit to read: "…often found in…"
	Water resource agencies throughout that region are subject to significant federal and state regulation regarding the various pollutants discussed in this chapter. As such, it is suggested thatfor clarification to the reader, the chapter include in this and other sections a recognition that current federal and state laws regulate the amount of these contaminants in the water.	Comment noted. Strict regulations on local water agencies are noted at the beginning of the chapter. Even under regulation, pollutants remain an area of concern.	None.
	The OCCOG recognizes that compact, mixed-use development can lead to an overall smaller urban footprint and thus reduce per capita urban water demand. However, the statement lacks the discussion necessary to explain how and why this would occur. For this result to be acheived will require a wide variety of actions throughout the region to be undertaken. It is suggested that the section be expanded to discuss this and	Comment noted. The water chapter is not an appropriate place for a comprehensive discussion of compact development. Land use related options and potential actions are presented in the policies contained at the end of this chapter and other RCP chapters. The emphasis on water is deliberate, as this chapter is	None.

	that references to the variety of information sources on this topic be included in the text.	not meant to address all of the complexities of urban development. The multi-benefit matrix was created specifically to highlight these types of complexities.	
	Please insert the text, "in the regions geology that leaches into" (p.55)	Comment noted.	None.
	This appears to be the primary goal of the chapter and it is therefore recommended that this be emphasized throughout the text of the chapter.	Comment noted. The goals of the water chapter are considered equal in importance.	None.
	Because the growth in the region is not fact, it is recommended that the words "the anticipated" be added.	Comment noted.	Edit as per comment.
	This goal is extremely broad in context and coupled with the lack of expansive discussion in the text of the chapter, it is suggested that it would benefit from being more concise. Further, it is generally accepted that it is not possible to "eliminate" water impairments and waste. Because this document is intended to be used in IGR and as a regional policy document, please change the statement to read "to minimize to the maximum extent practicable and feasible."	Comment noted. The goals presented in the chapter are bold, as directed by the RCP Task Force. They represent aspirations for a sustainable region. Goals, outcomes, or policies may be changed at the discretion of the Regional Council. Goals are necessarily broad in nature, as opposed to more targeted policies.	None.
	Based on the discussion of the text, it is suggested that this should be the first goal. Further, it is noted that it is a key goal that SCAG could undertake while the other goals listed would require actions of other agencies. (p.56)	Comment noted. Goals are not listed in order of priority. It is presumed that all goals would be undertaken in partnership with other agencies.	None.
	As this is a key outcome, it is recommended that this be the primary outcome in the list.	Comment noted. Outcomes are not listed in order of priority.	None.
	Metropolitan Water District of Southern California noted to the OCCOG TAC that the stated goal of reducing "regional per capita" water use by 25% through waterwise land use an local management policies" seems a bit too ambitious. Further, the City of Anaheim's Public Utilities staff noted that any goal such as this should be accompanied with recognition that some retail agencies have already implemented aggressive water conservation program/projects over the years. Therefore, due to "saturation" of programs/projects, have demand hardening impacts (i.e. it is more difficult for them to further reduce demands to specified targets due to their existing saturation of projects within their service area).	Comment noted. The goals presented in the chapter are bold, as directed by the RCP Task Force. They represent aspirations for a sustainable region. Goals, outcomes, or policies may be changed at the discretion of the Regional Council.	None.
	It is recommended that any outcomes identified in this chapter, and the overall document, be outcomes that are achievable. Because it is not possible to fully eliminate water impairments, it is recommended that the language be changed to read to state that impairments will be "reduced to the maximum extent practicable."	Comment noted. The goals presented in the chapter are bold, as directed by the RCP Task Force. They represent aspirations for a sustainable region. Goals, outcomes, or policies may be changed at the discretion of the Regional Council.	Edit to read: "…infiltration systems. Eliminate impairments from agricultural and open space runoff "

	Secondly, the outcome is limited to the specified systems. It is suggested that the inclusion of managing run off from agriculture and open space is also necessary as they both contribute to water impairments if not managed appropriately.		
	Please insert: ", filtration, " (p.57)	Comment noted.	Edit as per comment.
	It is not clear that SCAG is the most appropriate agency to undertake this work effort. It is offered that it may be more appropriate for SCAG to serve as a clearinghouse clearinghouse for the information and use its regional role to provide the information compiled by the water agencies in the region.	Comment noted. This policy directs SCAG to serve as such a clearinghouse by compiling existing information from its partner agencies.	None.
	Please delete the word "region."	Comment noted.	Edit as per comment.
	Please clarify what data would be provided by SCAG. It is suggested that an emphasis in such a statement of policy identify that data used for this purpose must be deemed accurate and be consistently maintained. The OCCOG also notes that it should also be recognized that this, in and of itself, is a significant work effort and could require a significant amount of resources and asks if SCAG already has the resources for such a work effort of if they will seek additional resources to undertake such a task.	Comment noted. The Regional Council has the discretion to prioritize these policies by providing direction to staff on which issues they should focus their attention and resources.	None.
	As stated above, it is suggested that SCAG's role in this arena is more appropriate as a forum as opposed to serving as a liaison. It is requested that the policy be restated to reflect that SCAG could serve as a forum for these discussion to take place.	Comment noted.	Edit as per comment.
	This statement is currently a primary function of SCAG and it is suggested that it could be emphasized.	Comment noted.	None.
	This is not necessary if SCAG undertakes the actions in WA-4, as it should already be addressed. It is suggested that it could be more appropriate for the policy to read that SCAG will help facilitate the provision of consistent information between local water agencies and localjurisdictions. Further, it is noted that it is not currently SCAG's role to prepare Urban Water Management Plans as is stated in the second part of the policy. That function is the responsibility of the water purveyors. It is requested that the text be modified to reflect this situation.	Comment noted. The policy recommends information sharing, not to preparation of UWMPs.	None.
	This policy would expand the purpose of the Compass Blueprint and, as such, in relation to the goals of the Land Use Chapter, it is suggested that it be discussed in the chapter text. The discussion in the chapter is recommended to also discuss what the implications of such an action would be.	Comment noted. The water chapter explicitly mentions land use and compact development in relation to water resource issues.	None.
	Please replace the word "attendant" with "resultant." (p.58)	Comment noted.	Edit as per comment.
	Please replace text with "reduced use"	Comment noted.	Edit as per comment.

	Please delete the identified statement as this is the responsibility of water agencies. It is suggested that local governments should provide opportunities for the infromation to be made available to the public and it offered that this could be included in the statement.	Comment noted. 'opportunities for information to be made available' is considered corollary to education in this case.	None.
	Please delete the identified statement as it is not necessary. Local governments and developers are already required to consider the no net loss provisions of federal law.	Comment noted. The Federal provision does not apply to all of the resource areas mentioned in this policy.	None.
	Please include a check in the legislation box as retail agencies would need additional regional assistance to attain these goals. Specifically, regional assistance would necessary to provide incentives and to be able to mandate dual plumbing.	Comment noted.	Move X from IGR to Legislation.
	Please designate the appropriate agency. This is not under the purview of local governments.	Comment noted.	Change 'local governments' to 'water agencies'
	Please designate the appropriate agency. This is not under the purview of local governments.	Comment noted.	Change 'local governments' to 'water agencies'
	The removal of salts and other contaminants is not possible. Please reword to indicate that salts and other contaminants should be removed to the maximum extent practicable.	Comment noted.	Edit to read: "…should reduce salinity and remove contamination…"
	It is recognized that this is a good policy for water agencies and local governments, but many retail agencies may need financial assistance to complete rate/cost of service studies (and database programming/software) to implement tiered pricing structures. It is requested that the policy reflect this need.	Comment noted. RCP policies should be pursued when funding is available to carry out the policy.	None.
	Please define the existing regulatory approach referenced in this policy and the problems with it as this is not a challenge identified or discussed in the chapter.	Comment noted. Although SCAG anticipates a wide readership, this document is intended primarily for use by planners and policy-makers, rather than a general audience.	None.
	Please add a discussion of Low Impact Development into the chapter. The terminology has not been previously discussed and it is not clear to the reader what this would involve or why this is important.	Comment noted. Although SCAG anticipates a wide readership, this document is intended primarily for use by planners and policy-makers, rather than a general audience.	None.
	It is noted that this is already a requirement of the NFIP and FEMA regulations and, as such, the Proposed Policy WA-24 is possibly unnecessary. However, if it is to remain in the policies, it is requested that the statement be reworded to state that local governments should be following the federal regulations. (p.59)	Comment noted. Federal regulations may be insufficient to prevent loss of life and other negative outcomes of development in alluvial fan areas. It is the opinion of the state of California that stronger measures are needed, hence the creation of the Alluvial Fan Task Force, whose work on the issue is ongoing.	None.
	Because of the changing environment and the organizations that are being created to address "green" issues, it is not necessary	Comment noted.	Edit as per comment.

	to list these resources. A discussion of the resources available today would be appropriate to include in the Chapter text but, it is suggested, that it also recognize that new information and standards that would be appropriate to meet this policy could be developed over the life of the RCP.		
	Please explain what the benefits and shared costs would be as referenced as resulting for the integration of water resources planning with other local initiatives as in proposed Policy WA-26.	Comment noted.	None.
	Please define what is meant by the inclusion of parking lot conversions? Specifically, please explain what they would be converted to in order meet the intent of this policy.	Comment noted.	Edit to read: "…tree planting, and conversion of impervious surfaces to porous surfaces, to maximize…."
	Please define what the in-lieu fees would be used for in the context of proposed Policy WA-27 and explain why a fee is appropriate.	Comment noted.	None.
	Please change the word "possible" to "practicable."	Comment noted.	None.
	It is noted that this policy is very vague and it is recommended that it would benefit from additional detail to clarify what is hoped to be acheived.	Comment noted.	None.
	It is suggested that additional discussion of what is anticipated as an outcome from proposed Policy WA-29 be provided in the text of the chapter. Please clarify the possible outcomes.	Comment noted. The anticipated outcome is stated in the text of the policy: "to properly manage cumulative impacts within the watershed."	None.
	Please reword to recognize that stormwater runnoff should be minimized to the maximum extent practicable. (p.60)	Comment noted.	Replace "cannot" with "does not"
	In some watersheds, the OCCOG notes that this will not be possible without the removal of significant amounts of existing development. If this initiative is to be included, it is suggested that the initiative should read "90 percent effective pervious surface equivalent to pre-development conditions" to indicate that other technologies can be used to capture stormwater and retain it on site, such as in cisterns.	Comment noted. The policy makes explicit mention of "new development models and materials" to accomplish this strategy.	Edit as per comment.
	Because there is not identification of this issue or reference to the public school system, it is suggested that the statement "SCAG will encourage the implementation of these policies at schools (K-12)" is out of context with the chapter. It is recommended, that because it does not add to the initiative, it be deleted or that text be added to the chapter to discuss what the initiative would entail and why it is needed. (p.61)	Comment noted. Implementation in schools is a necessary aspect to education and outreach efforts, especially to encourage change over time.	None.

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Air Quality

Commenter	Comment	Response	Recommended Revision
Orange County Council of Governments	Please reword as it is difficult for the reader to understand. The following is offered for clarification: ...health and welfare, regulations at the federal, state, and regional levels have reduced...	Comment noted.	
	It is recommended that the text be phrased with more neutral langauge. The following is suggested "continues to be a problem in" to replace the text "continually plagues"	Comment noted.	None
	Please explain what damage is caused to crops, forests, and native plants. Also, please start a new paragraph after this sentence to break up the information into smaller, easier to read sections.	Comment noted. This will be clarified in the final document.	Add sentence to clarify crop/plant damage.
	Please identify as a number the amount referenced by the statement "substantial portion" that is attributable to cars, busses, trucks, and other mobile sources.	Comment noted. This will be clarified in the final document.	“substantial portion” will be changed to “approximately half of which”
	It is observed that this sentence describes "approximately half of the solution" to address air quality impacts; however, the other half is not discussed. Please describe the other half of the solution is.	Comment noted. This will be clarified in the final document.	While approximately 60% the reductions are specified by stationary and mobile source control measures in the 2007 South Coast Air Quality Management Plan, approximately 40% of the solution relies on long-term (“black box”) measures that are undefined.
	Please clarify if the statement that the Los Angeles-Long Beach-Riverside region is ranked number one as the most polluted area in the United States is referencing all pollutants or only air pollutants? (p.80)	Comment noted. The reference is to air pollution.	None
	Please ensure that the citation is correct. The National Safety Council attributes the statement, "Driving a motor vehicle is the single most polluting thing that most of us do" to the Environmental Protection Agency (please see http://www.nsc.org/ehc/mobile/mse_fs.html)	Comment noted.	Will ensure correct citation.
	It is recommended that this section discuss and reference more current information such new CARB data or the 6 Kyoto pollutants. The sentence highlighted is referencing a 1993 study and it is suggested that if this is the most current information, that it be so noted. Further, the paragraph has primarily been discussion CO2 emissions as opposed to CO as included in the sentence. Therefore, the sentence about CO appears out of context and could be	Comment noted.	Minor revisions will be made to clarify this general information.

	confusing to readers.		
	It is suggested that it would be appropriate to state that the region "is" becoming more densely populated as opposed to state that it "will become".	Comment noted.	Edit will be made.
	Please reword. The sentence is very broad and could be difficult for the reader to understand. (p.81)	Comment noted.	Potential edit.
	The term "unabated" is unnecessarily negative in this chapter. It implies that growth is negative and should be stopped (i.e. no growth is the option), which is contrary to other chapters in this document which propose "smarter growth" strategies to accommodate growth. Further, the use of this term does not recognize the significant regional planning efforts that have been undertaken throughout the region to address and plan for growth.	Comment noted. The text will be revised.	Remove the word "unabated."
	This sentence references the AQMP prepared by SCAQMD as the source for population and employment growth projections. However, this is SCAG's forecast for the RTP and it is recommended that the forecast be referenced to the agency that prepared the forecast, namely SCAG.	Comment noted. Reference will be changed.	Change reference.
	It is suggested that the use of the term "sprawling" in the most densely developed region in the United States is perhaps unnecessarily negative and does not recognize the significant planning and infill development occurring in the region. It is suggested that the word "sprawling" be replaced with the word "increasing."	Comment noted. The text will be revised.	Replace the word "sprawling" with "increasing."
	Please clarify if the reference to increasing VMT, represents the overall growth in VMT that would be anticipated from increasing population or if it is representing per capita growth. (p.82)		
	Please clarify the intent of this statement. As has been noted in previous comments, the OCCOG is concerned with the prospect of SCAG prioritizing funding for transportation projects consistent with the RCP, most specifically relative to the projects under the current and renewed Measure M in Orange County. As such, it is requested that the sentence be restated to read: "SCAG should encourage county transportation commissions and other local agencies to prioritize funding for projects that are consistent with RCP principles." (p.83)	Comment is noted. The RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would be subject to additional discussion.	None
	Please explain which land uses are addressed by the goal that states, "Minimize land uses that increase risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM10 and PM2.5 ultrafine), and carbon monoxide.	Comment noted. See AQ-7 which references the ARB's and SCAQMD's land use guidance documents.	None

	The chapter does not include any discussion relating to green building or the air emissions from energy generation. It is suggested that a section be added to the chapter discussing this issue and describing the green building practices that would reduce the impacts on air quality in order to link the goal to the challenges list in the chapter. (p.84)	Fuel combustion is a major contributor of emissions, such that reduced energy use results in reduced emissions. Green building practices are discussed in the Energy Chapter.	None
	Please indicate that this outcome is consistent with State standards included in AB 32.	Comment noted. The text will be revised.	Revise to indicate the outcome is with State standards included in AB 32.
	Please indicate that this outcome is consistent with the standards established by CARB. It is further suggested that the outcome should include in the e.g. statement, rail lines and major transportation corridors other than freeways.	Comment noted. The text will be revised.	Revise to indicate the outcome is with State standards included in AB 32.
	The OCCOG seeks clarification as to why each city should adopt standards that may differ from the state and that this be included as a measure for the region? The state is implementing significant green building standards. It is requested that the outcome be a measure of cities and counties implementation of state requirements for green building. It is also noted that county governments should be included in the measurement as they also have and implement building standards that could apply to a significant amount of new development in the region. (p.85)	Comment noted. The RCP was developed in a lengthy, deliberative, and open process. The air quality chapter, including the outcomes and policies, were developed under the guidance of the RCP Task Force and approved for review by the Energy and Environment Committee. The Regional Council may revisit the Air Quality Outcomes and Policies at their discretion. It is noted that the intention is not that each city develop their own standards, but rather that local governments should recognize that green building standards as an appropriate and necessary requirement for development within their jurisdictions.	Include counties as well as cities in this outcome.
	Please delete as it is unnecessary to restate the state law. Further, because state law could be changed, it would be appropriate to simply include a reference to state law to minimize the need to amend the RCP in the future.	Comment noted. The RCP will be revised to consolidate the policies relative to working with our stakeholders and ARB on implementing climate change laws and initiatives.	Consolidate policies related to climate change.
	Please delete this statement. Because of the rapidly changing body of information and technology, it is unnecessary to include examples as they may be considered "out of date" before the next update of the RTP/RCP documents.	The comment is noted. The information provided in the policy is intended to assist local governments. The Regional Council can consider policy changes at their discretion.	None
	Please delete. See comments for AQ-2.2.	Comment noted. The RCP will be revised to consolidate the policies relative to working with our stakeholders and ARB on implementing	Consolidate policies related to climate change.

		climate change laws and initiatives.	
	Please explain where and in what documents the policy SCAG would develop would be included. Specifically it is requested that the text of the RCP identify if the policies that would be developed would they be included in any mandated document?	Comment noted. The draft resolution to adopt the RCP contains language explicitly excluding its use in implementing State and Federal mandates or programs not anticipated at the time of adoption. While policies in the RCP could influence future SCAG planning and associated funding decisions, it is not intended for this purpose, and any use of the RCP in future programming decisions would be subject to future Regional Council action.	None
	The examples listed should include all rail lines to be consistent with CARB and AQMD recommendations. (p.86)	Comment noted. The text will be revised.	Replace the term rail yards with rail facilities.
	Please delete. See comment AQ-2.2.	The comment is noted. The Regional Council can consider policy changes at their discretion	None
	The OCCOG observes that this policy would possibly be more appropriate in the Land Use Chapter as it is not specifically addressing air quality issues. Limiting it to the Air Quality chapter implies that this is the primary arena that would benefit from green building practices, which may not be the case.	Comment noted. The policy will be incorporated in other chapters as appropriate.	Edits will be incorporated as appropriate
	It was identified by the OCCOG TAC that any effort by SCAG to help agencies create green business certification programs would duplicate existing efforts undertaken by other agencies and entities. In recognition that this is already underway, it is recommended that this be deleted.	The comment is noted. The policy would call on SCAG to coordinate efforts already underway.	None
	Please reword to state "be consistent with state guidelines and requirements."	Comment noted. The text will be revised.	Edit recommended
	Please delete. See comment for AQ-2.2 (p.87)	The comment is noted. The Regional Council can consider policy changes at their discretion	None

Draft Regional Comprehensive Plan Comments and Revisions Log

Orange County Council of Governments
Sorted by Chapter

Transportation

Commentor	Comment	SCAG Response	RCP Edits needed
OCCOG	Because transportation and transportation planning are considered to be primary functions of SCAG and that are reflected in the goals of the RTP, it is recommended that this chapter more closely reflect the RTP and clearly identify where it is different or expands upon the RTP.	Comment noted	None
	There are references to various documents and programs that are not defined (blueprint, RTP, etc…) It would be helpful to include a glossary/list of definitions/acronyms in the document and in this chapter, specifically, include a sidebar with the definitions of the different acronyms.	Comment noted. SCAG can include a glossary	Edit recommended.
	Please update all referenced to the "pending 2008 RTP" to reflect is currently adopted status.	Comment noted Changes will reflect the current status of the RTP	Edit recommended. Updates to reflect final RTP
	The following rewording is offered for clarification: "people, the regional economy, and the environment would be unacceptable." (The impacts would not be to growth, but to the people.)	Comment noted. Will modify statement	Edit recommended. Reword to "People, traffic congestion and the environment
	This sentence is made in reference to transportation improvements and is an opinion statement. It is also not accurate for all improvements, locations, or situations. It is recommended that it read "often" instead of "usually."	Comment noted. Will change "usually" to "often."	Edit recommended. .
	Please explain what is meant by "reduces the economic cost of living our lives" ? Efficient transportation systems provide opportunities or choices for which people can then choose from to minimize the economic costs – but it will not necessarily reduce those costs – whether in a single occupant vehicle or by transit.	Comment noted. Will change "reduce" to "minimize"	Edit recommended.
	Please explain if this is in reference to per capita measurements. Transit ridership is reported to be increasing in the region.	Comment Noted. Removing sentence.	Edit recommended. Remove sentence. ~~While recent higher gas prices have helped reduce congestion growth, the region still shows a continuing trend towards reduced carpooling and transit ridership.~~
	Typically, roads are not extended for the sake of extending a road and also are induced by planned growth, as opposed to the other way around. A discussion of what is meant by "induced growth" would be helpful in this section. Please explain if it is used in the context presented by ULI in their book "Growing Cooler."	Comment noted.	No.
	Additionally, it is not clear what is meant by "often can't handle it." If growth is planned in areas that do not have adequate infrastructure, it is not an issue of the transportation system, but an issue of planning for the growth.	Comment noted.	Edit recommended, change "often can't handle it" to "..by inducing growth in areas that may have inadequate

			transportation facilities."
	This statement is misleading and may not reflect the goals of other chapters. *[Traffic congestion is largely a symptom of the growth patterns and population density of our region.]* Specifically, the land use chapter advocates for land use patterns that would increase population density in specific areas. This sentence states that it will cause increased traffic congestion.	Comment noted. Will clarify by deleting "population density."	Edit recommended, delete "population density."
	Additionally, it is recommended that the discussion regarding growth patterns and their influence on traffic congestion be expanded.	Comment noted	No
	It is not clear that there is a there a lack of public support to develop our transportation system? Public support is a constraint when it involves the expansion of the transportation infrastructure into new areas or that would result in the purchase of private property, but it is not clear that there is general lack of public support for the development of the transportation system. Please clarify the intent of the statement.	Will clarify by deleting "and public support"	Edit recommended for clarification
	The statement implies that transportation is the main focus of the RCP and it such a statement is more appropriate in the introduction or Executive Summary of the document. The following statement is offered as an alternate: "The RCP recognizes that the transportation system and mode choice affect many aspects of the quality of life in the region."	Comment noted. Will clarify as requested.	Edit recommended. Revising sentence to read "The RCP Transportation Chapter is founded on the premise..."
	Editing: Insert "a"	Comment noted	Edit recommended, insert "a"
	Please define.	Comment noted. Will insert sentence after the mention of TEU. "A Twenty Foot Equivalent Unit is a measurement based on a 20 foot container commonly connected to a commercial vehicle	Edit recommended, inserting definition
	Editing: "anticipated"	Comment noted. Replace with anticipated	Edit recommended.
	It is not clear that drive is the appropriate word. Should it be "influence?"	Comment noted. Replace drive with influence	Edit recommended.
	Please add the following to the sentence: "unless changes are also made to our transportation infrastructure resulting in changes in the way that people travel in the region."	Will add phrase, "If current population and employment trends continue as projected, regional daily traffic delay is expected to more than double to 3.6 million hours by 2030, unless travelers change their travel behavior."	Edit recommended.
	The following is recommended for clarification: "unconventional means of addressing transportation, including"	Will add clause	Edit recommended.

	Please delete as it is unnecessary.	Delete historical	Edit recommended.
	Please reword. The funding shortfall is not resulting in the aging of the transportation infrastructure, as is stated in the sentence.	Re-word sentence to read "However, we have a funding shortfall of over $26 billion, meaning that as the transportation infrastructure ages and there is less money for maintenance and preservation, it will ultimately require more money to restore it.")	Edit recommended.
	Please provide more information on the intent of the RCP to provide "less modest" goals than the constrained goals of the RTP.	reword sentence to read "While the RCP calls for unprecedented goals and actions, it is primarily advisory. The 2008 RTP comprises the constrained, or funded foundation of any more ambitious long term plan. The RTP relies on...")	Edit recommended.
	The following is offerred for clarification: "there remains a substantial shortfall in the funding for the $40 billion in needs."	Reword for clarification *"However, there remains a substantial shortfall in funding the $40 billion in needs."*	Edit recommended.
	Should this be "arterial system"?	Page 111: Second column, add "system" after arterial	Edit recommended.
	Please insert the following for clarification: "for these improvements"	will insert "for these improvements"	Edit recommended.
	Please explain what is meant by "almost an order of magnitude higher."	re-word sentence to read " The total amount of funding for these improvements represents less than one percent of the overall RTP expenditures, but the benefits, when compared to the costs, is expected to be significant."	Edit recommended.
	If a list of policies is to be included in this section, it should reflect the full text adopted by the Regional Council in August 2007. That list included the necessary explanations for each of the bullets. A more general discussion considering the influences that land use and transportation have on one another is possibly more appropriate here.	Comment noted.	Edit recommended.
	Please insert the word "voluntary"	(re-word to read "The 2008 RTP will continue to promote voluntary land use policies that have been demonstrated to potentially be both regionally beneficial, and reflective of their transportation performance...")	Edit recommended.
	Please replace with "are demonstrated" as the policies have not yet been proven on a	(re-word to read "The 2008 RTP will continue to	Edit recommended.

	regional scale to provide the benefits listed.	promote voluntary land use policies that have been demonstrated to potentially be both regionally beneficial, and reflective of their transportation performance...")	
	The following is offered for clarification: "there performance in the regional transportation system, and reflective of"...	(re-word to read "The 2008 RTP will continue to promote voluntary land use policies that have been demonstrated to potentially be both regionally beneficial, and reflective of their transportation performance...")	Edit recommended.
	Because the land use chapter discusses the land use strategies, it is unnecessary to include the list of strategies in this chapter. The bullet points listed do not have context and are not defined here; hence they are confusing for the reader and it is not clear what each of them means. A discussion of the policies in relation to transportation is recommended.	Comment noted.	
	Please replace with "the development of a"	Will replace as requested	Edit recommended.
	Please insert, "(HSRT)" or include the full name in the following sentence.	Will input in title	Edit recommended.
	Please identify what this plan is and how it is adopted in the region, as was done regarding the RTP.	Insert a new introductory under aviation. "SCAG's regional aviation strategy was developed as part of the regional transportation planning process and was adopted as part of the RTP."	Edit recommended.
	This is a significant policy statement. Please identify who recognizes this.	Re-word sentence deleting "it is recognized."	Edit recommended.
	The outcomes do not address goods movement, which is expected to increase substantially in the next 20 years. Further, relative to all of the outcomes, please explain how they are attainable when compared to the goals of the RTP (e.g. goods movement, etc…)	Comment noted. While SCAG has no control over emissions requirements for passenger and cargo vehicles, the goods movement strategies listed, including the use of High Speed Rail Technologies, can work toward overall emission reduction outcomes.	No
	Please explain how these outcomes were developed and what the rationale was for them. The first outcome identifies a reduction of VMT and fuel consumption to 1990 levels. This appears to be an application of the target formula for greenhouse gas emissions but for VMT and fuel consumption. However, there is	While SCAG has no control over emissions requirements for passenger and cargo vehicles, the goods movement strategies listed, including the use of High Speed Rail	No

	no discussion in the chapter of how this could be achieved and it seems unrealistic when considered relative to the anticipated increases in population during the same time frame?	Technologies can work toward the overall emission reduction outcomes	
	It is recommended that the outcomes consider shifts in the use of alternative modes of transportation. The emphasis on measures to reduced carbon-based fuels leads the reader to assume these outcomes are only intended to address air quality issues as opposed to transportation issues. Their application may be more appropriate in the Air Quality Chapter.	While SCAG has no control over emissions requirements for passenger and cargo vehicles, the goods movement strategies listed, including the use of High Speed Rail Technologies, truck climbing lanes, and the Pier Pass Off-Peak Program can help work toward the overall emission reduction outcomes.	No
	One of SCAG's primary purposes for the RCP is to use it in intergovernmental review. The goals, outcomes and policies should include those of the RTP which is one of SCAG's fundamental programs and reasons for existing. Further, there is very little linkage between these goals and the text of the chapter. The goals should reflect the emphasis of the discussion in the chapter. For example, there are no goals identified for cargo and diesel-fueled vehicles, goods movement, or airports? It is recommended that these be included for consideration of this chapter Additionally, it would be appropriate for this chapter to address in its text and goals issues such as alternative modes of transportation, increasing transit ridership, etc…	Comment noted. The outcomes are in response to AB-32. While SCAG has no control over emissions requirements for passenger and cargo vehicles, the goods movement strategies listed, including the use of High Speed Rail Technologies (for both passenger and freight), truck climbing lanes, and the Pier Pass Off-Peak Program can help work towards achieving the overall outcomes	No
	This is a very significant goal and it is not clear that this is a goal for the region. *[A more efficient transportation system that reduces and better manages vehicle activity]* Please include a discussion in the chapter identifying that this goal is responding to a challenge in the region and that it is supported regionally.	The overall goal is to reduce carbon fueled vehicle activity via methods under SCAG's purview.	No
	Please identify what "vehicle activity" is included in this goal. For example, does it include trucks, trains, airplanes, and ships?	The overall goal is to reduce carbon fueled vehicle activity via methods under SCAG's purview.	No
	Please identify and define what the "Regional Performance Indicators" are.	SCAG uses performance indicators to judge how it is performing in meeting the federally mandated planning factors. These	No

		are outlined annually in SCAGs overall work program and in the Regional Transportation Plan.	
	The policy does not appear to reflect the goals or the outcomes. Please identify what goal this is fulfilling. *TR-2 SCAG shall ensure safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system will be RTP priorities and will be balanced against the need for system expansion investments.*	SCAG is required to incorporate safety into its transportation planning process.	
	Please replace with the following text: "SCAG shall develop a collaborative outreach and educational program that identifies the encouraged voluntary actions and policies necessary to implement the RTP's voluntary land use and growth strategies that differ from expected trends."	Comment noted. The RCP was developed in a lengthy, deliberative, and open process. The transportation chapter policies included in the Draft RCP were developed under the guidance of the RCP Task Force and approved for review by the Transportation Committee. The Regional Council may revisit the Transportation policies at their discretion.	No
	The following recommended for clarification: "SCAG shall monitor progress of the RTP and its strategies, including timely implementation of projects and transportation project related programs.	Comment noted	No
	Because the Compass Blueprint was established and remains an entirely voluntary land use concept, it is inappropriate to indicated that funding for future transportation projects should be tied to its implementation. Please delete this policy initiative. *TR-1S SCAG, transportation commissions, local governments, and other project proponents should use the Compass Blueprint to influence the funding of future transportation planning and investments*	Comment noted. The initiative as currently written includes the phase “should use,” indicating a recommendation not a requirement.	No
	SCAG should be assisting other agencies, including county transportation commissions and the SCAQMD. Please reword to reflect that other agencies are responsible for the coordination and that SCAG's role is to work with them.	Comment noted. The initiative as currently written includes a coordination assistance role for SCAG.	No