Letter ID	Agency	Author
08-074	Orange County Business Council	Lucy Dunn, President and CEO
08-075	Orange County Council of Governments (OCCOG)	Dennis R. Wilberg, Interim Executive Director
08-077	Orange County Transportation Authority (OCTA)	Arthur T. Leahy, Chief Executive Director
08-078	City of Orange	Anna C. Pehoushek, Principal Planner
08-079	County of Orange -- Resources and Development Management Department	Tim Neely, Planning and Development Services Director
08-080	County of Orange -- Resources and Development Management Department	Harry Persaud, Public Works and Road Programs Manager
08-082	City of Paramount	Diane J. Martinez, Councilmember
08-083	City of Pasadena -- Department of Transportation	Frederick C. Dock, Director
08-085	Port of Los Angeles	Kerry Cartwright, Director of Goods Movement
08-086	Public Law Center	Ezequiel Gutierrez Jr., Staff Attorney
08-087	City of Rancho Mission Viejo	Dan Kelly, Sr. V.P. of Governmental Relations and Corporate Communications
08-088	City of Rancho Santa Margarita	Nate Farnsworth, Planner
08-090	Riverside County Transportation Commission (RCTC)	-
08-091	City of Rolling Estates	David C. Wahba, Planning Director
08-092	County of San Bernardino -- Land Use Services Department	James M. Squire, Principal Planner
08-093	City of San Clemente -- Planning Division	George R. Buell, City Planner
08-094	San Gabriel Valley Council of Governments (SCVCOG)	Nicholas T. Conway, Executive Director
08-095	City of San Juan Capistrano	Steven A. Apple, Planning Director
08-096	City of San Marino -- Planning and Building Department	David A. Saldaña, Director
08-099	San Bernardino Associated Governments (SANBAG)	Ty Schuiling, Director of Planning and Programming
08-101	City of Santa Clarita	Robert G. Newman, Director of Public Works
08-102	Metrolink -- Southern California Regional Rail Authority	David Solow, Chief Executive Officer
08-103	City of Seal Beach	Charles Antos, Mayor
08-104	Sierra Club Harbor Vision Task Force	Tom Politeo
08-105	South Coast Air Quality Management District (AQMD)	Barry R. Wallerstein, Executive Officer

ORANGE COUNTY
BUSINESS COUNCIL

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February 19, 2008

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

SUBJECT: SCAG RTP Comments

Dear Mr. Ikhrata:

On behalf of the Orange County Business Council, representing the Southland's largest employers, we thank you for the opportunity to offer comments on the Southern California Association of Government's (SCAG) draft 2008 Regional Transportation Plan (RTP). The 2008 RTP is a comprehensive document that reflects the many transportation and funding challenges the region will face in the next 25 years.

The Business Council would like to provide specific support to three recommendations made by the Orange County Transportation Authority (OCTA) Board of Directors to the draft 2008 RTP. These policy issues are discussed below.

Orangeline High-Speed Magnetic Levitation Project (Orangeline Maglev)

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

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

ORANGE COUNTY'S LEADING VOICE OF BUSINESS

1. Request that SCAG remove the Orangeline Maglev from the financially constrained project listing of the 2008 RTP.
2. Request that SCAG include the Orangeline Maglev in the strategic plan of the 2008 RTP.
3. Recommend that Orange County host cities and other local and regional jurisdictions work with OCTA to examine transit alternatives on the Pacific Electric (PE) Railroad right-of-way.
4. Inform the Orangeline Development Authority that the PE Railroad and Metrolink rights-of-way will not be made available for use by the Orangeline Maglev.
5. Consider use of the PE Railroad right-of-way as part of the Go Local project being considered by the cities of Santa Ana and Garden Grove, a use that is incompatible with the Orangeline Maglev.

As currently proposed, the Orangeline Maglev does not meet the financial constraint requirements necessary for inclusion in the constrained plan of the 2008 RTP. OCBC supports the request by OCTA that SCAG remove the Orangeline Maglev from the financially constrained project listing in the final 2008 RTP.

Riverside County to Orange County Corridor

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

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

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

Growth Forecasts

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

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

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

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

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

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

The Orange County Business Council appreciates SCAG's work on the RTP to date and greatly appreciated the time that Alan Wapner, Chair of the SCAG Transportation Committee, recently took to brief the Business Council's Infrastructure Committee on the comprehensive draft plan.

If you have further questions about the positions supported by the Business Council, please contact Kris Murray, Vice President of Government Affairs at 949-794-7210.

Sincerely,

Lucy Dunn
President and CEO

LAD:klm:k

ORANGE COUNTY COUNCIL OF GOVERNMENTS

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Irvine Ranch Water District
OC Sanitation District
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OC Water District
Transportation Corridor Agencies

February 19, 2008

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

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

Dear President Ovitt:

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

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

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

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

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

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

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

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

<u>SCAG 2008 RTP Growth Forecast Alternatives:</u>

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

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

- A Baseline Growth Forecast, which represents the input of SCAG jurisdictions and subregions; and,

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

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

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

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

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

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

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

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

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

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

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

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

<u>SCAG 2008 RTP Draft Program EIR:</u>

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

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

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

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

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

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

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

and compact growth patterns; solid waste requirements and programs, school capacity analyses and recreation and open space planning, among others.

d) Certifying an RTP EIR that includes the types of mitigation measures as identified above, would complicate and delay transportation project environmental clearances, by requiring local agencies to respond to and comply with mitigation measures beyond the scope of transportation project delivery and which are more suited for consideration and implementation as local governments update their General Plans.

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

f) Mitigation measures recommended for deletion and for revision are presented in Exhibit 3. Further, two over-arching comments that preface the listing of mitigation measures in Exhibit 3, are that:

(1) The mitigation measures need to clarify and define the entity or entities that would be responsible for implementing each mitigation measure. Also, several of the mitigation measures identify entities that do not have authority to implement the measure.

(2) The mitigation measures need to reference consistent terminology to identify the responsible entities. For example, the terms “project sponsor” and “project implementation agency” are used interchangeably, but not consistently, in the mitigation measures.

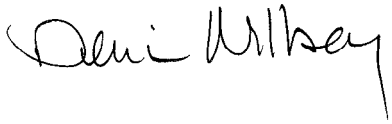
The eleven members of the OCCOG Board of Directors appreciate the opportunity to review the draft RTP growth forecasts and the draft RTP Environmental Impact Report, and respectfully offer this letter of comments for consideration in SCAG’s adoption of growth forecasts for the 2008 RTP and in the certification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

Respectfully submitted on behalf of:

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

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

By Dennis R. Wilberg,



Orange County Council of Governments Interim Executive Director

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

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

Center for Demographic Research

Exhibit 1

Sponsors:

California State University, Fullerton

Clerk-Recorder Department, County of Orange

County of Orange

Municipal Water District of Orange County

Orange County Council of Governments

Orange County Sanitation District

Orange County Transportation Authority

Orange County Water District

Transportation Corridor Agencies

February 14, 2008

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

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

Dear Ms. Meany,

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

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

Our comments are grouped as follows:

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

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

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

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

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

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

2600 Nutwood Avenue, Suite 750, Fullerton, CA 92831-6850 (714) 278-3009 Fax (714) 278-5091 www.fullerton.edu/cdr/

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

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

TABLE 1

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

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

2. Baseline is Not "business as usual"

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

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

TABLE 2

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

		adopting similar policies and zoning ordinances consistent with the Compass Principles and Growth Vision." Since the 2004 RTP, many Orange County jurisdictions have approved projects that are consistent with Compass Principles which are the foundation of the Plan forecast. These projects deviate from the long-time pattern of "urban sprawl" which is how the Baseline forecast is described. The characterization of the Baseline forecast as "business as usual" is misleading and should be removed. The Modified 2004 RTP, which is an extension of the 2004 RTP growth forecast out to Year 2035 (the horizon year for the 2008 RTP), is a more appropriate characterization of business as usual.

Business as Usual	RTP p. 87; Integrated Growth Forecast & Regional Land Use Policies Report p. 41	<u>RTP NARRATIVE:</u>
		"Based on the land use assumptions developed by SCAG and its local partners, the Regional Council adopted the following set of policies to be incorporated into Compass Blueprint and used in developing the 2008 RTP Policy Growth Alternative"
		
		"These policies were founded upon the Compass Principles developed through the regional growth visioning efforts in preparation for the 2004 RTP.
		• [1] Identify regional strategic areas for infill and investment.
		  o Transit Oriented Development
		  o Existing and emerging centers
		  o Small mixed use areas
		• [2] Structure the future plan on a three-tiered system of centers development: Existing, Planned, Potential
		• [3] Develop "complete communities"
		• [4] Develop nodes on a corridor
		• [5] Plan for additional housing and jobs near transit
		• [6] Plan for a changing demand in types of housing
		• [7] Continue to protect stable existing single family areas
		• [8] Ensure adequate access to open space and preservation of habitat
		• [9] Incorporate local input and feedback on future growth
		• [10] Promote land use patterns supportive of goods movement and logistics industries"
		
		"A summary of the primary tenets include:
		• [A] Improve the localized balance between jobs and housing
		• [B] Increase potential transit ridership by focusing growth to transit supportive areas – LRT, BRT, Metrolink
		• [C] Enhance existing and emerging employment and residential centers
		• [D] Shift the balance of new development from low density single-family housing to mixed-use and higher density housing
		• [E] Maintain stable single-family areas
		• [F] Minimize new separate use commercial or residential

		development in outlying areas • [G] Minimize very high density development in areas that are not effectively served by transit or are not within identified employment centers" COMMENT & RECOMMENDATION: Table 3 below contains an abbreviated list of projects contained within the Baseline forecast which serve as examples of implementation of the policies and tenets labeled above. The characterization of the Baseline scenario as "business as usual" should be removed.

TABLE 3

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

3. County and small area comments on the Growth Forecasts

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

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

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

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

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

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

TABLE 4

TOPIC	**PAGE REFERENCE**	**RTP NARRATIVE, COMMENT & RECOMMENDATION**
Policy growth forecast errors	Integrated Growth Forecast & Regional Land Use Policies Report p. 1	RTP NARRATIVE: "Using an integrated growth forecasting approach and consensus-built growth visioning process …The growth assumptions, vision and policies were all developed in coordination with technical analyses, local input, land use and growth experts, and on-the-ground "reality checks." COMMENT & RECOMMENDATION: The above narrative describes the process that created the Policy forecast/Plan scenario. Review of the Policy forecast dataset at the TAZ/Census tract level (released on November 1) shows the Policy forecast contains errors. Suggested corrections to these errors are contained in Attachment 3 (an Excel data file containing corrections to geographic areas within the Plan forecast). The following are examples of specific errors: • San Clemente: 7,621 jobs and 3,278 additional households placed into city where restrictions such as historical preservation districts, the Coastal Commission and topology would prevent this magnitude of additional growth (CT 421.06, 421.08) • Huntington Beach: 8,660 jobs and 2,843 households placed into city where growth is unlikely to occur, including wetlands areas. • Rossmoor, an unincorporated community in west Orange County: additional 1,288 jobs and 824 households into 1.6 square mile built-out community • Residential development in restricted areas within John Wayne Airport flight path

Policy growth forecast land use assumptions	Integrated Growth Forecast & Regional Land Use Policies Report p. 18	RTP NARRATIVE: "Prior to formulating the 2008 Plan Alternative and assessing its transportation benefits, the appropriate land use assumptions were established." COMMENT & RECOMMENDATION: Review of the land use maps associated with the Policy growth forecast has identified key problem areas. Examples are: • CT 866.01- fully built tract available only for reuse. Policy plan shows 562 additional households with main street uses, city residential, and city neighborhood. Uses are highly unlikely due to existing regional hospital, supporting medical offices, and high density residential (36 units/acre). Reuse to achieve +562 households would require densities greater than 36 units/acre or demolition of hospital and medical office site, both unlikely for area. In Irvine: • Approved General Plan Amendment has residential and mixed use in Spectrum, maps show only Office Park use • Great Park and Heritage Field have designated open space areas not listed • Woodbury should be all residential and open space reserve, not office park • IBC is high end office and going for town center; Policy shows all industrial and decreases in jobs that are unlikely.
Policy growth forecast errors	RTP p.41	RTP NARRATIVE: Development of the 2008 Policy Growth Forecast began with the Workshop Scenario, which represented the closest representation available of regional consensus on how and where growth should occur. COMMENT & RECOMMENDATION: Orange County workshop input overall reflected and requested the inclusion of the 2006 Orange County Projections. The Workshop Scenario does not reflect the feedback provided by the Orange County jurisdictions. For Orange County, the Workshop Scenario should be identical to the Baseline forecast.
Policy growth forecast errors	RTP p. 41	RTP NARRATIVE: "…the land use distribution [of the Plan forecast] is also informed by the results of research performed at a local scale during 2006 and 2007. The primary sources of this research include dozens of Compass Demonstration Projects, where SCAG supported local planning initiatives consistent with these regional goals, and a "reality check" process to explore, in depth, the relationship between local general plans, the RTP and recent demographic trends." COMMENT & RECOMMENDATION: One of the reality checks performed was on an Orange County jurisdiction: Anaheim city. Review of the policy forecast dataset

		shows a number of errors in growth projected. Attachment 3 contains an Excel data file highlighting significant differences between the local input (Baseline forecast) and the Plan's Policy forecast. Please change Policy forecast to reflect Baseline projections.

Policy growth forecast errors	RTP p. 42	RTP NARRATIVE:
		"The local knowledge was critical in documenting so called "pipeline" development that is either already underway or has gone significant distance toward entitlement. These pipeline projects are all but guaranteed to happen."
		
		COMMENT & RECOMMENDATION:
		The Plan scenario/Policy forecast used portions of the TOD/Centers and Envision growth alternatives yet in doing so, redistributed growth throughout the region such that the following approved and currently under development projects were significantly altered:
		• Large portions of growth in the adopted Ranch Plan (Rancho Mission Viejo) in unincorporated south county were relocated (320.23 & 320.56) to other Orange County locations:
		  o 11,300 jobs moved from the Ranch Plan into Irvine, Laguna Beach, Newport Beach, San Clemente, San Juan Capistrano
		  o 8,914 households moved from the Ranch Plan into Irvine, Lake Forest, Laguna Hills, Mission Viejo, Laguna Niguel, San Juan Capistrano, Dana Point, San Clemente
		• Irvine: approximately an additional 11,000 jobs and 6,600 households added into the city in areas under current development, planned through development agreements, or open space.
		• Anaheim's Platinum Triangle: Plan forecast has over 2,200 fewer households than projected in local plans; City expects significant increase in housing and employment as a result of recent amendment to Platinum Triangle Master Land Use Plan

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

Table 5

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

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

994.11	+260 housing +759 jobs	No vacant land left.
994.13	+1,039 housing +2,360 jobs	Area has recently redeveloped as part of a master plan and not likely to change any time soon. Maximum build out of vacant land left pursuant to General Plan designation will result in the addition of max. 62 dwelling units, 17,2000 s.f commercial and 130,000 s.f. of industrial
995.04	+399 housing	Area contains existing, stable, single family residential area, public facilities and a recently approved business park. Is built out and all remaining undeveloped areas are deed restricted by Coastal Development Permits to only allowing for wetland and upland habitat restoration projects.
995.04	-49 jobs	Contains new business park development recently completed; the 182 jobs allocated to CT995.10 should be allocated here.
995.10	+182 jobs	Area is 99% developed as a senior retirement living community. Jobs should be allocated to Census Tract 995.04.

5. Other Comments on the 2008 RTP

TABLE 6

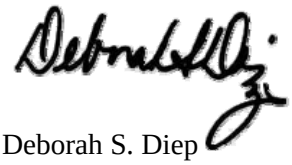
TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
Citation	RTP p. 10 RTP p.70	RTP NARRATIVE: 5,400 premature deaths COMMENT & RECOMMENDATION: Please city the study.
Citation	RTP p. 11	RTP NARRATIVE: "Mixed land uses (i.e., residential developments near work places, restaurants, and shopping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

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

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

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

Sincerely,



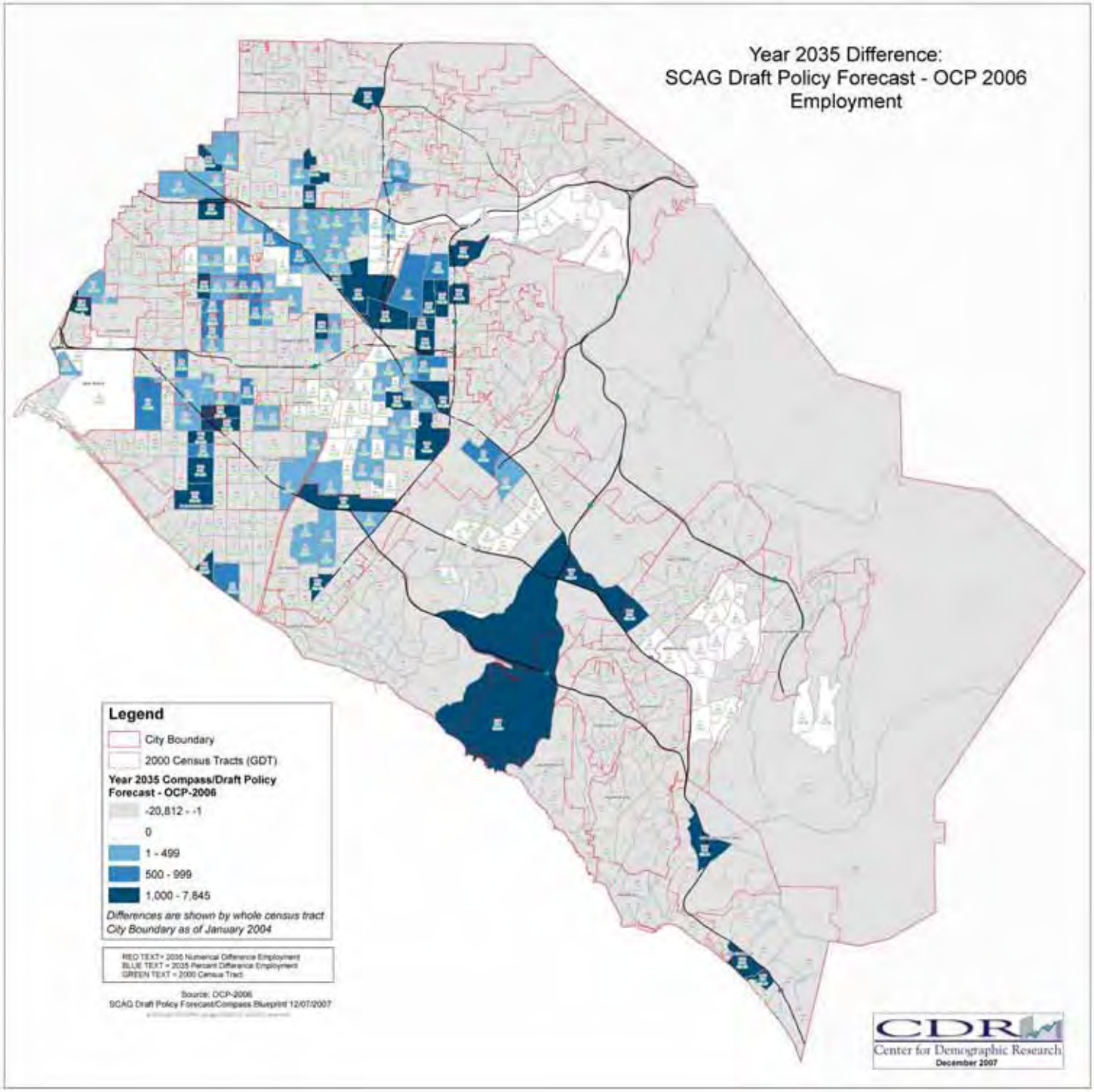
Deborah S. Diep
CDR Director

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

CC: CDR Management Oversight Committee
CDR Technical Advisory Committee

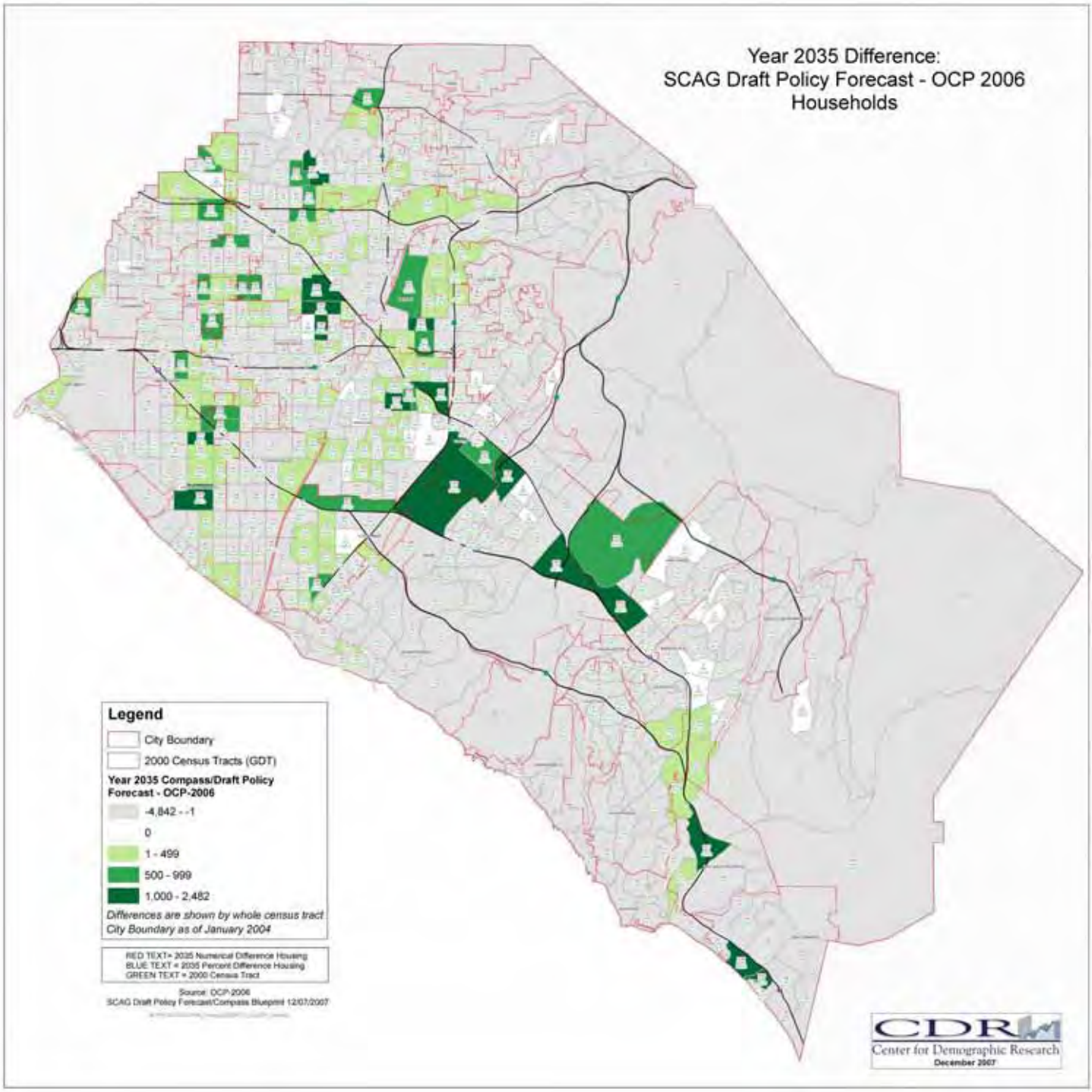
Ms. Meany
2008 RTP comment letter

Attachment 1



Ms. Meany
2008 RTP comment letter

Attachment 2



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

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

Highlighted numbers indicate differences greater than +/-100 or +/-10%

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Highlighted numbers indicate differences greater than +/-100 or +/-10%

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

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

Highlighted numbers indicate differences greater than +/-100 or +/-10%

Exhibit 2

Letters of Comment:
SCAG Regional Transportation Plan

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

City of Anaheim
PLANNING DEPARTMENT

February 15, 2008

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

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

Dear Mr. Ovitt:

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

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

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

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

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

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2. The Policy and Envision Growth Forecasts were developed following minimal consultation with local jurisdictions. The projected land uses and development intensities were finalized prior to review by local governments, resulting in land use assumptions that are in direct conflict with the growth distribution planned by the City.

3. The benefits of the Policy Growth Forecast, as identified in the RTP and the PEIR, are minimal with respect to Orange County while the impacts to the County's arterial highway speeds, which are reduced by this forecast, may be substantial.

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

Regional Transportation Plan ("RTP") Comments:

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

2. Page 62 refers to the growth identified in the Baseline Forecast, which incorporates the OCP-2006, as "supporting urban sprawl" and representing a growth scenario that is:

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

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

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

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

3. The City of Anaheim has partnered with the Orange County Transportation Authority (OCTA) to study new transit connections between major employment and activity centers in the City and its two Metrolink station facilities as part of OCTA's Go Local Program. The City's initiative is consistent with OCTA's Project S (High Capacity Transit Extensions to Metrolink), which earmarked up to $1 billion as part of Orange County's voter approved Renewed Measure M half-cent sales tax program. In December 2007, the Anaheim City Council adopted a Transit Master Plan which identified a number of new high-capacity transit systems in the City. Among those systems contemplated in the Plan is a proposed 3.4-mile elevated fixed-guideway system that would connect the Anaheim Regional Transportation Intermodal Center (ARTIC), The Platinum Triangle, and the Anaheim Resort. This system is anticipated to begin revenue operations by year 2015. The City anticipates conducting a federally defined Alternatives Analysis/Environmental Document/Preliminary Engineering as part of the next phase in Summer 2008. Therefore, the City requests that the proposed elevated fixed-guideway system be added to Table 3.5 Transit Corridor Projects on Page 108.

4. The City also requests that the planned ARTIC facility be added to Table 3.5 Transit Corridor Projects on Page 108. Located adjacent to the Orange (SR-57) Freeway in the Platinum Triangle area, ARTIC will be a gateway station connecting Metrolink commuter rail service, Amtrak, BRT, fixed-route bus service, an elevated fixed-guideway system connecting with the Anaheim Resort. The City is partnering with OCTA to solicit a private partner to help build, finance and maintain ARTIC. The facility is planned to build upon OCTA's Metrolink Expansion and Bus Rapid Transit (BRT) programs and is envisioned to become the transportation hub of Orange County. ARTIC will offer direct baggage check-in and express service to local airports, and potentially high-speed train service connecting Orange County to other regions within California and beyond. Moreover, ARTIC is planned to be integrated into a mixed-use development in a manner consistent with SCAG's Compass Blueprint Implementation Strategy of focusing high density development and growth around

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

Draft Program Environmental Impact Report Comments:

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

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

Sincerely,

Sheri Vander Dussen

Sheri Vander Dussen, AICP
Planning Director

svd:ts:sr
Enclosures 2
By e-mail
cc: Hasan Ikhrata, Southern California Association of Governments
Ryan Kuo, Southern California Association of Governments
Jessica Meaney, Southern California Association of Governments
Jessica Kirchner, Southern California Association of Governments
Frank Wen, Southern California Association of Governments
Dennis Wilberg, Orange County Council of Government
Natalie Meeks, City of Anaheim Public Works Department
Marty DeSollar, City of Anaheim External Affairs
Danny Wu, City of Anaheim Public Works Department

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

Overall Comments:

1. The City of Anaheim has actively participated in the development of the OCP-2006 and believes that it is the growth forecast that most accurately reflects the land uses anticipated in the City. The City, therefore, requests that any growth forecast adopted as part of the 2008 Regional Transportation Plan be fully consistent with the OCP-2006.

2. Specific comments are only provided for Census Tracts that had differences of greater than 100 residential units or employment totals when comparing the Policy Growth Forecast and the OCP-2006. However, nearly all Census Tracts in the City indicated differences between the two forecasts. Through preparation of the OCP-2006, staff anticipated and projected increases and decreases in both housing units and employment in Census Tracts throughout the City. These figures were based on local knowledge of pending development plans and available development sites. The majority of development projected within Anaheim is expected to occur on sites that are currently developed with other uses. The alternative Policy Growth Forecast is not representative of this anticipated growth.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Overall comments on the mitigation measures:

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

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

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

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

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

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

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Mitigation Measure	Comments and Recommendations
MM-EN.36: Project sponsors should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • 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	Land use strategies such as those indicated are the responsibility of local governments and not the responsibility of all project sponsors, such as county transportation commissions. Please remove the language relating to "Project sponsors" from the mitigation measure as it does not apply to all project sponsors. Additionally, it is not currently possible to fully "eliminate pollution." However, local governments could encourage the minimization of pollution to the extent practical and feasible. The following is offered for clarification: *MM-EN.36: ~~Project sponsors should incorporate and l~~**L**ocal governments should ~~include~~ **consider** the following land use principles that use resources efficiently, **and to the extent practical and feasible** ~~eliminate~~ **minimize** pollution and ~~significantly~~ reduce waste **generation:** ~~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*
MM-EN.37: Project sponsors and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:	Land use strategies are the responsibility of local governments. Please remove the language relating to "Project sponsors" from the mitigation measure as it does not apply to all project sponsors. Additionally, the following clarifications are offered: *MM-EN.37: ~~Project sponsors and l~~~~ocal~~ **Local** governments should **encourage the integration of** ~~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 **could** include **the following examples:….***

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

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

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

Mitigation Measure	**Comments and Recommendations**
MM-OS.35: Local governments should establish transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands. Local governments should also consider the following: • Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land. • Easing restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food. • Considering partnering with school districts to develop farm-to-school programs.	Transfer of development rights programs are complex and costly to implement. While they are a valuable tool for the preservation of open space, they are not the only tool available, as indicated by the list of options in the measure. The following changes are requested: *MM-OS.35: Local governments should establish* ***programs to*** *~~transfer of development rights (TDR) programs to~~ direct growth to less agriculturally valuable lands ~~(while considering the potential effects at the sites receiving the transfer)~~ and ensure****, where possible,*** *~~the continued~~ protection of the most agriculturally valuable land within each county ~~through the purchase of the development rights for these lands~~. ~~Local governments should also consider the~~* ***The*** *following* ***are offered as examples of programs****:* • ***The development or participation in transfer of development rights programs to encourage the preservation of agricultural lands*** • *Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land.* • *Easing restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food.* • *Considering partnering with school districts to develop farm-to-school programs.*

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

Mitigation Measure	**Comments and Recommendations**
MM-OS.43: Project sponsors should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	It is not clear how this measure mitigates the stated impacts and this measure duplicates MM-EN.36. As such, it is requested that the measure be deleted. However, if the measure is not deleted, the same comments as provided on MM-EN.36 apply. Specifically, the following clarification is requested: *~~Project sponsors should incorporate and l~~**L**ocal governments should ~~include~~ **consider** the following land use principles that use resources efficiently, **and to the extent practical and feasible** ~~eliminate~~ **minimize** pollution and ~~significantly~~ reduce waste **generation:** ~~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*
MM-OS.45: Project sponsors and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	This measure is most applicable to local governments as many project sponsors will have minimal, if any, ability to implement land use policy. The following clarification is offered: *MM-OS.45: ~~Project sponsors and l~~**L**ocal 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.*
Public Services	
General comments on MM-PS.8 through MM-PS.14 and MM-PS.21 through MM-PS.24	These measures are taken from the draft Regional Comprehensive Plan (RCP) which is still going through the public review process. The measures listed represent significant regional policy that has yet to be adopted by the region. As such, it is not appropriate to include the measures as mitigation in this document and it is requested that they be deleted. However, if the measures are not deleted, please incorporate the text changes below to reflect that the measures have not received regional approval and reflect the voluntary nature of the RCP.

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

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

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

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

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

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

Mitigation Measure	Comments and Recommendations
MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG's ongoing regional planning efforts. SCAG's Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions: • Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand. • Involve the region's water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions. • Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects. • Promote water-efficient land use development. • The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region's water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.	Because existing regional programs currently existing to address these issues, the following change to the text is requested: *MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG's ongoing regional planning efforts* ***in coordination with regional water agencies****. SCAG's Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions:* *• Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand.* *• Involve the region's water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions.* *• Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects.* *• Promote water-efficien****cy in land*** *~~t land use~~ development.* *• The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region's water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.*

City of Brea

February 7, 2008

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

SUBJECT: DEIR COMMENTS FOR THE 2008 REGIONAL TRANSPORTATION PLAN

Dear Ms. Kirchner:

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

1. It is the City's recommendation that SCAG use the 2006 Orange County Projections (OCP) in its environmental analysis and within any adopted RTP growth forecast. The 2006 OCP was developed by the Center for Demographic Research (CDR) and is the official dataset used by the Orange County Transportation Agency (OCTA) as well as the Orange County Coalition of Governments (OCCOG). The OCP provides Orange County agencies a consistent set of projections for population, housing, and employment developed through a bottoms-up process with cities within the County. Brea has provided valuable input into these projections and, consistent with OCTA policy and funding, use them for our infrastructure planning and implementation. As such, it would be the City's recommendation that the RTP analysis and final plan incorporate this valuable data. Please provide confirmation on how the RTP analysis incorporates the OCP data.

2. In order to clarify our concern with the proposed Policy Growth Forecast of the RTP (covered in pages 1-3, 2-11, and 4-1 to 4-39 of the DEIR), we would like to make the follow tract-specific comments:

    a. The household and job projections for Census Tract 15.04 and 15.05 (the area that generally surrounds the Brea Mall) are significantly higher with 2,282 more jobs and 762 additional households than anticipated by OCP 2006.

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

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

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

Sincerely,

Charles View, AICP
Development Services Director

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

CDR
Center for Demographic Research

Sponsors:

California State University, Fullerton

Clerk-Recorder Department, County of Orange

County of Orange

Municipal Water District of Orange County

Orange County Council of Governments

Orange County Sanitation District

Orange County Transportation Authority

Orange County Water District

Transportation Corridor Agencies

February 14, 2008

Southern California Association of Governments
Attn: Jessica Kirchner
kirchner@scag.ca.gov
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

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

Dear Ms. Kirchner,

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

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

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

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

Table 1

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

2600 Nutwood Avenue, Suite 750, Fullerton, CA 92831-6850 (714) 278-3009 Fax (714) 278-5091 www.fullerton.edu/cdr/

Table 1 (continued)

TOPIC	PAGE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
Reality checks for Policy growth forecast	PEIR Ch. 2 Page 11 (2-11)	PEIR NARRATIVE: "The growth assumptions, vision, and policies were all developed in coordination with technical analyses, local input, land use and growth experts, and on-the-ground "reality checks." " COMMENT & RECOMMENDATION: One of the reality checks performed was on an Orange County jurisdiction: Anaheim city. Review of the Policy forecast dataset shows a number of errors in growth projected based on approved plans, development agreements and projects under development. Attachment 2 contains an Excel data file highlighting significant differences between the Baseline forecast (local input) and the Plan's Policy forecast. Please change Policy forecast to reflect Baseline projections.
Characterization of Baseline as business as usual and not including land use strategies	PEIR Ch. 2 Page 11 (2-11)	PEIR NARRATIVE: "SCAG prepared two growth forecasts in preparation of the 2008 RTP, a "baseline" growth forecast that does not include land use strategies and a "policy growth alternative" (used in the Plan)" COMMENT & RECOMMENDATION: The statement above should be removed. Page 88 of the RTP states "the [Plan] policies reflect current development patterns in some portions of the region and nascent planning strategies in others." Page 40 of the Integrated Growth Forecast report states "with most cities that are undertaking General Plan updates moving towards adopting similar policies and zoning ordinances consistent with the Compass Principles and Growth Vision." Page 2-11 of the PEIR states "Compass Blueprint Growth Vision …Developed in close collaboration with cities throughout the region, the policies of the Vision are: • [1] Identify regional strategic areas for infill and investment • [2] Structure the future plan on a three-tiered system of centers development • [3] Develop "complete communities" • [4] Develop nodes on a corridor • [5] Plan for additional housing and jobs near transit • [6] Plan for a changing demand in types of housing • [7] Continue to protect stable existing single-family areas • [8] Ensure adequate access to open space and preservation of habitat • [9] Incorporate local input and feedback on future growth" Since the 2004 RTP, many Orange County jurisdictions have approved projects that are consistent with Compass Principles, the foundation of the Plan forecast, and deviate from the long-time pattern of urban sprawl. In addition, the Baseline forecast is developed through an iterative process, building upon

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

TABLE 2

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

Table 1 (continued)

TOPIC	PAGE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
Equal comparisons for accurate conclusions	PEIR Ch. 2 Page 12 (2-12)	PEIR NARRATIVE: "The comparison of the transportation modeling results between the "baseline growth alternative" and the "policy growth forecast" isolates the transportation benefits due to regional land use policy." COMMENT & RECOMMENDATION: Page 27 of the RTP states: "• Baseline 2035 scenario–Future conditions in 2035 based on the existing transportation system and near-term constrained projects • Plan 2035 scenario–Future conditions in 2035 based on the existing transportation system, near-term constrained projects, and long-term constrained projects" In order to isolate regional land use policy as the cause of transportation benefits in the Plan scenario, the transportation systems modeled must be

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

Thank you again for your consideration.

Sincerely,

Deborah S. Diep
CDR Director

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

CC: CDR Management Oversight Committee
CDR Technical Advisory Committee

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

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

Highlighted numbers indicate differences greater than +/-100 or +/-10%

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

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

Highlighted numbers indicate differences greater than +/-100 or +/-10%

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

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

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

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

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

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

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

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

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

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

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

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

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

Highlighted numbers indicate differences greater than +/-100 or +/-10%

CITY OF COSTA MESA

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

DEVELOPMENT SERVICES DEPARTMENT

February 14, 2008

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

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

Dear Mr. Wen:

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

HOUSEHOLDS

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

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

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

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

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

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

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

Sincerely,

Kimberly Brandt

KIMBERLY BRANDT, AICP
Assistant Dev. Svs. Director

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

Policy Growth Forecast Maps

Recommended Adjustments for the City of Costa Mesa

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

CITY of CYPRESS

5275 Orange Avenue, Cypress, California 90630

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

February 15, 2008

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

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

Dear Ms. Meaney:

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

1. It is our understanding that SCAG Policy Growth Forecast for the 2008 RTP would incorporate the 2008 Compass Blueprint Program. As previously described by SCAG, the Compass Blueprint Program focuses growth on key opportunity areas that would target the growth within two percent of the SCAG Region. Specifically, the Compass Blueprint Program redistributes projected jobs and housing into major transit centers and employment centers, as well as shifting planned growth out of areas with long commute times. When the City of Cypress participated in the review of the Compass Blueprint Program and the associated land use maps, we were told that the Program would be voluntary. We are concerned that the incorporation of the Program's growth projections into a regulatory document like the RTP would change its nature from voluntary to required - especially in light of the RTP consistency finding that is required to qualify for transportation funding.

2. As previously mentioned in our feedbag to SCAG at the Compass Blueprint Program map workshops, Cypress recommends the use of the 2006 Orange County Projections (OCP) as the most accurate growth forecast. The OCP incorporates extensive research and comments from the Orange County jurisdictions with regard to the land use designations and planned growth areas set forth in the adopted General Plans and Development Agreements, including the 2001 Cypress General Plan. Therefore, the City of Cypress recommends that the growth projections from the 2006 OCP be used for the purposes of transportation and air quality conformity in the RTP instead of SCAG's Compass Blueprint Program projections.

3. If SCAG does not use the 2006 OCP for the RTP growth projections, then the City recommends that the Compass Blueprint Program projections for the City of Cypress be revised to reflect the detailed revisions requested in the City's letter to Frank Wen at SCAG (dated February 14, 2008, under separate cover). The

Todd W. Seymore, Mayor

Leroy Mills, Mayor Pro Tem **Doug Bailey**, Council Member

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

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

4. It appears that many of the mitigation measures from SCAG Draft Regional Comprehensive Plan (RCP) that address growth impacts (not just transportation and road project impacts) have been incorporated into the draft RTP Program EIR. Since the Draft RCP has not gone through a complete public review, these measures may not be appropriate in the RTP EIR. Additionally, the City's General Plan EIR already addresses growth inducing impacts with mitigation measures for projects constructed within our jurisdiction. Therefore, we recommend the removal of mitigation measures in the draft RTP Program EIR that are not related to transportation project implementation, as well as the removal or revision of mitigation measures with questionable growth related requirements (i.e. provisions for open space, green building, and solid waste facilities).

5. If some of the growth related mitigation measures for the RTP are necessary to address State requirements regarding greenhouse gases, we recommend that the measures contain the term "should" (recommended) rather than "shall" (required).

6. Many of the RTP EIR mitigation measures (i.e. solid waste) list requirements that would not apply to projects conducted by regional transportation agencies, such as the Orange County Transportation Authority (OCTA). For example, OCTA has no influence regarding the siting of new landfills, the building of local markets for waste reduction, or the development of waste reduction facilities (MM-PS.8 through 14). In these cases we recommend that SCAG staff consider whether the listed impact is appropriate or correctly worded for transportation projects. Accordingly, such measures should be deleted or revised to designate an appropriate responsible agency for the measures.

Sincerely,

Kori Nevarez

Kori Nevarez
Associate Planner
Community Development Department

KN/nv

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

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

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

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

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

City of Huntington Beach

2000 MAIN STREET CALIFORNIA 92648

DEPARTMENT OF PLANNING

Phone 536-5271
Fax 374-1540

December 21, 2007

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

Subject: Draft 2008 SCAG Policy Forecast

Dear Dr. Wen:

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

Household Growth (Census Tracts)	Employment Growth (Census Tracts)
992.20	992.20
992.42	993.07
993.05	994.02
993.07	994.11
994.02	994.13
994.11	
994.13	

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

Sincerely,

Ricky Ramos
Associate Planner

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

G:\Ramos\Demographics\Compass\SCAG Policy Forecast.doc

City of Huntington Beach

2000 MAIN STREET CALIFORNIA 92648

DEPARTMENT OF PLANNING

Phone 536-5271
Fax 374-1540

January 17, 2008

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

Subject: Draft 2008 SCAG Policy Forecast

Dear Dr. Wen:

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

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

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

Sincerely,

R. Ramos

Ricky Ramos
Associate Planner

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

City of Mission Viejo

Office of the City Manager

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

February 18, 2008

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

Dear Mr. Ikhrata:

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

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

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

The City's comments focus on two key areas:

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

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

City of Mission Viejo Policy Recommendation #1: SCAG's RTP Growth Forecast:
SCAG's adoption of a regional growth forecast for the 2008 RTP shall utilize, for Orange County, the Orange County Projections-2006 (OCP-2006) database, as adopted by the Orange County Council of Governments (OCCOG) on November 30, 2006.

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

a) SCAG adoption of a regional growth forecast that incorporates OCP-2006 is consistent with adopted policy directive from the boards of directors of OCCOG and the Orange County Transportation Authority to use OCP-2006 as the basis for Orange County demographics in the 2008 RTP.

b) OCP-2006 accurately represents both the distribution and amount of population, households and employment that are forecast individually for the City of Mission Viejo and for Orange County as

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

c) Through the "bottoms-up" collaboration and development of OCP-2006, OCP-2006 is the only database that has been approved by Orange County jurisdictions to accurately represent the latest available estimates and assumptions for population, land use and employment through Year 2035 in Orange County.

d) The Center for Demographic Research at CSU Fullerton, which conducts the Orange County Projection Series, has identified a series of errors in the SCAG RTP Policy Growth Forecast that will require significant correction and amendment to appropriately represent Orange County's future growth. Orange County's future growth is accurately accounted for in OCP-2006 and is accurately accounted for in the SCAG RTP Baseline Growth Forecast.

e) The OCP-2006 projections incorporate the review of Orange County landowners such as Rancho Mission Viejo, and appropriately represent the future growth of Rancho Mission Viejo's landholdings.

f) SCAG adoption of an alternate amount and distribution of growth for Orange County, contrary to OCP-2006, would fail to represent Orange County local and General land use plans, especially in relation to the 14,000 housing units and 16,000 jobs approved in the Ranch Plan Planned Community in South Orange County unincorporated area, which borders the City of Mission Viejo.

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

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

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

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

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

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

City of Mission Viejo Policy Recommendation #2: 2008 RTP Draft EIR Mitigation Measures
SCAG shall remove those mitigation measures in the draft RTP EIR that would be applied to RTP transportation projects but which have no bearing on transportation project mitigation or transportation project delivery.

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

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

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

b) The draft RTP EIR states that Lead Agencies such as cities are required to provide SCAG with documentation of compliance with EIR mitigation measures, through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process.

c) Included in the listing of draft RTP EIR mitigation measures are measures relating to housing need, land use and re-zoning strategies to promote mixed use and compact growth, solid waste requirements and programs, school capacity analyses and recreation and open space planning, among others.

d) Included in the listing of draft RTP EIR mitigation measures are measures that are duplicative of existing state law and mitigation measures that assign SCAG authority and responsibilities that are not in SCAG's purview.

e) Included in the listing of draft RTP EIR mitigation measures are measures that recite draft Regional Comprehensive Plan policies. The draft Regional Comprehensive Plan has just been released for public review and comment, a separate environmental impact report is being prepared on the draft Regional Comprehensive Plan, and the Regional Comprehensive Plan policies have yet to be discussed and endorsed as regional policy by SCAG's Regional Council. Thus, the City of Mission Viejo believes it may be premature to include these policies as mitigation measures in the draft RTP. Further, while the Regional Comprehensive Plan has been proposed as an elective set of policies, several of these policies are identified as mandatory requirements in their counterpart mitigation measures.

f) Included in the listing of draft RTP EIR mitigation measures are measures that impose requirements upon local government General and Specific Plans and individual development projects relating to open space considerations, separate from transportation project environmental assessment.

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

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

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

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

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

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

Dennis R. Wilberg,
City Manager
City of Mission Viejo

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

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

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

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

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

SCAG Draft EIR Mitigation Measure	*Issue of Concern*	*Recommendation*
lands. Local governments should also consider the following: • Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land. • Easing restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food. • Considering partnering with school districts to develop farm-to-school programs.		
MM-OS.36: 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 hose lands on which the continued viability of agricultural production has been compromised by surrounding urban development on the loss of local markets.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSA-7, page 45) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.36
MM-OS.39: Local government should consider the most recent annual report on open space conservation in planning and evaluating projects and programs in areas with regionally significant open space resources.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSN-12, page 33) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.39
MM-OS.40: Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-8, page 39) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.40
MM-OS.41: Project sponsors and local governments should increase the accessibility to natural areas lands for outdoor recreation.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-9, page 39) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.41
MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to revitalize existing communities.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-10, page 39) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.42
MM-OS.43: Project sponsors should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-11, page 39) that has yet to be adopted by SCAG's Regional Council.	Delete MM-OS.43

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

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

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

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

OCTA

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Arthur T. Leahy
Chief Executive Officer

February 15, 2008

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

Dear Mr. Ikhrata:

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

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

Orangeline High-Speed Magnetic Levitation Project (Orangeline Maglev)

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

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

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

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

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

Riverside County to Orange County Corridor

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

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

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

Growth Forecasts

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

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

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

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

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

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

Emission Reductions from Freight Rail

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

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

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

OCTA Project List for 2008 RTP

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

Regional Transportation Improvement Program (RTIP) Project Listing

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

Technical Corrections

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

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

Sincerely,

Arthur T. Leahy
Chief Executive Officer

ATL:ml
Attachments

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

C: Gail Shiomoto-Lohr

CITY OF ORANGE

DEPARTMENT OF COMMUNITY DEVELOPMENT www.cityoforange.org

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January 29, 2008

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

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

Dear Mr. Wen,

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

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

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

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

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

Employment

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

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

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

- ***Census Tracts 758.12:*** This Census tract consists of an established single-family residential area on the east side of the 55 Freeway, and a mix of strip commercial and mutli-family residential development on the west side of the freeway. Therefore, it is unlikely that the 1,012 jobs above and beyond the OCP projection (additional 33 more than existing) will materialize. Existing development in this area is not expected to change significantly in the future due to size and character of land parcels west of the freeway.

- ***Census Tract 758.13:*** Because this Census tract is primarily an established single-family residential area, with the exception of limited strip commercial property on the east side of the 55 Freeway, and consists of a mix of strip commercial and mutli-family residential development on the west side of the freeway, the City believes that the 1,335 jobs above and beyond the OCP projection (additional 14 more than existing) for 2035 is unrealistic. While intensified commercial development would be possible in the future, it is unlikely to generate the additional jobs identified in the Policy Growth Forecast.

- ***Census Tract 760.00:*** The expanding St. Joseph Hospital and Children's Hospital of Orange County are located in this tract. Both of these hospitals are major medical centers in the region and are in the process of implementing or preparing master plans for significant future expansion. The Town and Country commercial area is also within this tract. This is an area of the City that is proposed through the pending comprehensive General Plan update to be redesignated from office professional to a higher intensity mixed-use land use classification. Furthermore, due to the area's proximity to the hospitals, there is ongoing demand for medical office space in this area, which is expected to result in site redevelopment and job creation in the future. Therefore, we disagree with the Policy Growth Forecast determination that there will be approximately 1,200 fewer jobs in this tract than what the City believes to be possible in 2035 as reflected in OCP 2006 (additional 483 more than existing).

- ***Census Tract 761.01:*** The level of job growth in this Census tract appears high with respect to the City of Orange. Presumably, much of the job growth identified in the Policy Growth Forecast relates to build out of Anaheim's Platinum Triangle area. We would like confirmation of that, particularly given the fact that the Policy Growth Forecast projects over 5,300 more jobs for the tract than accepted by the City in OCP 2006 (additional 27 more than existing). The portion of this tract that is located in Orange is a built out mix of single-family residential, light industrial, and strip

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

- ***Census Tract 761.02:*** This Census tract is home to the expanding UCI Medical Center, major County of Orange criminal justice facilities, high-rise office development, and The Block at Orange. The proposed land use alternatives under consideration as part of the City's comprehensive General Plan update identify this area for a future higher density mixed-use district. This area not only is one of the City's major employment hubs, but is also served by transit with regional bus service as well as bus linkage to the Orange and Anaheim Metrolink stations. It is also easily accessible from both the Interstate 5 and State Route 22 Freeways. Therefore, it is unclear why the Policy Growth Forecast shows nearly 1,000 fewer jobs than the OCP for 2035 (additional 2,526 more than existing).

- ***Census Tracts 762.05 and 762.06:*** While a segment of the Tustin Street and Katella Avenue commercial corridors pass by and through these tracts, this is a largely single-family residential area. Therefore, the 2,285 additional number of jobs projected in the Policy Growth Forecast in relation to those identified in OCP 2006 (additional 201 more than existing) is unlikely.

- ***Tracts 758.05, 758.06, 768.07, 758.16, 219.14, 219.18, and 219.24:*** The City is concerned about the job reduction reflected in the Policy Growth Forecast for these tracts. Specifically, Chapman Avenue, one of the City's major commercial corridors, passes through the tracts. While we do not necessarily anticipate significant job growth along this corridor in the future, we also do not expect notable job loss.

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

Households

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

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

- ***Census Tracts 759.01 and 759.02:*** As noted previously, these two tracts encompass the City's National Register listed Old Towne Orange Historic District and are subject to the same constraints related to the development of new housing units as they are to new employment. The number of housing units the City accepted through the OCP process in Old Towne considered the work on the General Plan and Santa Fe Depot Specific Plan updates. Therefore, the City objects to the identification of another 2,500 households projected in the Policy Growth Forecast for 2035 on top of the 114 additional households projected in OCP 2006 for Old Towne.

- ***Tracts 758.11 and 758.12:*** On the east side of the 55 Freeway, these tracts are built-out single-family residential neighborhoods. West of the freeway, a substantial portion of Tract 758.11 is taken up by a large Southern California Edison transmission facility. The remaining area of the two tracts consists of multi-family residential development, a mobile home park, strip commercial and shopping center development. These tracts are not expected or planned to redevelop with significant new residential development. Therefore, the 192 units identified in the Policy Growth Forecast above and beyond those expected in the OCP (additional five (5) more than existing) is unlikely.

- ***Census Tract 758.13:*** As noted above, the City had been considering re-designation of the portion of the Tustin Street corridor passing through this tract for a future mixed-use land use designation. Given that this is no longer the case, and the portion of the tract east of the freeway is an established single-family neighborhood, the 75 additional units anticipated in the Policy Growth Forecast beyond the OCP 2006 data are not likely to materialize.

- ***Census Tract 761.01:*** The City's OCP input reflected a slight increase in the number of housing units in this tract (additional 83 more than existing) by 2035 given the mix of single-family, multi-family, commercial, office, and industrial land use designations in the area. Because the portion of the tract that is within the City of Orange is built out, new housing would occur through redevelopment activity. It is unclear why the Policy Growth Forecast projects 1,124 fewer units than existing conditions, particularly given the City of Anaheim's plans for the Platinum Triangle.

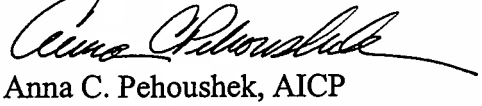
- ***Census Tract 761.02:*** As noted in the comments on employment, this Census tract is expected to experience land use policy changes that would accommodate higher density mixed-use development in the future through the comprehensive General Plan update. Therefore, the City believes that the Policy Growth Forecast should reflect the housing data the City accepted in OCP 2006 (additional 418 more than existing) rather than a reduction in units (222 fewer units than exist today) identified by SCAG. Consistent with the Policy Growth Forecast objectives, the City would like to encourage the development of housing near employment and transportation facilities. As noted above, this area benefits from transit service, freeway proximity, and is a significant employment node.

- ***Census Tracts 762.05, 762.06, and 762.08:*** These tracts encompass a predominantly single-family residential area, as well as commercial properties on Tustin Street and Katella Avenue. Therefore, the additional number of households projected in the Policy Growth Forecast (1,005 more than existing) in relation to those identified in OCP 2006 (additional 10 more than existing) is unlikely.

- ***Tracts 219.12, 219.24, and 524.20:*** The City is concerned about the household reduction reflected in the Policy Growth Forecast for these tracts. These tracts encompass an approved approximately 3,900 unit Irvine Company development project. The City is currently processing tract maps for a portion of this development, and has no reason to believe that there will be fewer units constructed that those reflected in the OCP 2006 data. Therefore, we disagree with the Policy Growth Forecast's representation of approximately 700 fewer units than what is reflected in the OCP for these tracts.

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

Sincerely,



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San Joaquin Hills
Corridor Agency

Chairman:
Jim Dahl
San Clemente

TRANSPORTATION CORRIDOR AGENCIES

Foothill/Eastern
Corridor Agency

Chairman:
Lance MacLean
Mission Viejo

January 22, 2008

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

Subject: Draft Policy Forecast for South Orange County

Dear Mr. Butala:

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

1. SR 241/FTC-S has been included SCAG's Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) since 1991 as a toll road project that will be constructed and operating before 2035.

2. SR 241/FTC-S is not depicted consistently on SCAG's draft 2035 Policy Forecast maps. For example, SR 241/FTC-S has been mistakenly left off "TAZs Showing Draft Policy Growth Forecast Greater Than Draft Baseline (Employment) Orange County Council of Governments" or on "TAZs Showing Draft Policy Growth Forecast Greater Than Draft Baseline (Housing) Orange County Council of Governments." Instead, the maps show SR 241 terminating at Oso Parkway. Both of these maps are used by SCAG in public presentations and are available on SCAG's website.
(http://www.scag.ca.gov/forecast/downloads/maps/TAZ_GF_Employment_Orange.jpg, and
http://www.scag.ca.gov/forecast/downloads/maps/TAZ_GF_Household_Orange.jpg)

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

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

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

- We request that all RTP base maps, including the Policy Forecast base maps, accurately depict the SR 241/FTC-S alignment in South Orange County.

- We further request that SCAG convene a stakeholder meeting prior to the RTP comment deadline on February 18th to resolve this issue. The meeting should include representatives from TCA, the County of Orange, OCTA, the Orange County Council of Governments, and any other South Orange County jurisdictions affected by the redistribution of the draft Policy Forecast.

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

Sincerely,

TRANSPORTATION CORRIDOR AGENCIES

Valarie McFall
Acting Deputy Director
Environmental Planning

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

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Overall comments on the mitigation measures:

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

Mitigation Measure	**Comments/Recommendations**
Energy	
MM-EN.15: Local agencies should streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.	1. Change language to: *MM-EN.15: Local ~~agencies~~ **governments** should**, as practical and feasible,** streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.*
MM-EN.16: Local agencies should adopt a "Green Building Program" to promote green building standards. Green buildings can reduce local environmental impacts, regional air pollutant emissions and global greenhouse gas emissions. Green building standards involve everything from energy efficiency, usage of renewable resources and reduced waste generation and water usage. For example, water-related energy use consumes 19 percent of the state's electricity. The residential sector accounts for 48 percent of both the electricity and natural gas consumption associated with urban water use. While interest in green buildings has been growing for some time, cost has been a main consideration as it may cost more up front to provide energy-efficient building components and systems. Initial costs can be a hurdle even when the installed systems will save money over the life of the building. Energy efficiency measures can reduce initial costs, for example, by reducing the need for over-sized air conditioners to keep buildings comfortable. Undertaking a more comprehensive design approach to building sustainability can also save initial costs through reuse of building materials and other means.	1. More clearly define and clarify "local agencies". *2.* Replace language with: *Local governments should develop programs to reduce overall energy consumption.* *3.* Additional text in the mitigation measure after the first sentence should be included in the text of the document and it unnecessary in the mitigation measure.

Mitigation Measure	**Comments/Recommendations**
A comprehensive study of the value of green building savings is the 2003 report to California's Sustainable Building Task Force. In the words of the report: "While the environmental and human health benefits of green building have been widely recognized, this comprehensive report confirms that minimal increases in upfront costs of about 2% to support green design would, on average, result in life cycle savings of 20% of total construction costs -- more than ten times the initial investment. For example, an initial upfront investment of up to $100,000 to incorporate green building features into a $5 million project would result in a savings of $1 million in today's dollars over the life of the building."	Statement is not a mitigation measure. 1. Move text to the discussion section of the document and remove from the mitigation monitoring program.
MM-EN.17: Local governments should alter zoning to improve jobs/housing balance and creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel. Creating walkable, transit oriented nodes would generally reduce energy use and greenhouse gas emissions. Residential energy use (electricity and natural gas) accounts for 14 percent of California's greenhouse gas emissions. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods. In addition, mixed land uses (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation have been shown to save consumers up to 512 gallons of gasoline per year. Furthermore, studies have shown that the type of housing (such as multi-family) and the size of a house have strong relationships to residential energy use. Residents of single family detached housing consume over 20 percent more primary energy than those of multifamily housing and 9 percent more than those of single-family attached housing.	*1.* Change language to: *MM-EN.17: Local governments should ~~alter zoning~~ ~~to improve~~ **consider** jobs/housing balance and**, to the extent practical and feasible, encourage the development of** ~~creating~~ communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel.* 2. All text after first sentence is descriptive not necessary to include it in the mitigation monitoring program as it is not an action placed on a responsible agency. Move to impact discussion and results sections

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-EN.23: Project sponsors should consider the most cost-effective alternative and renewable energy generation facilities.	1. This is most applicable to energy providers and is outside the authority of SCAG. Therefore, please delete this measure.
MM-EN.24: Project sponsors should ensure that new buildings incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	1. More clearly define and clarify "Project sponsors". 2. Change text to: *MM-EN.24: Project sponsors should ensure that**, to the extent feasible,** new buildings incorporate solar panels ~~in roofing~~ and ~~tap~~ other ...*
MM-EN.25: Project sponsors should require energy efficient design for buildings. This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.	1. More clearly define and clarify "Project sponsors". 2. Change text to: *MM-EN.25: Project sponsors should ~~require~~ **encourage** energy efficient design for buildings. ~~This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.~~*
MM-EN.26: Project sponsors should fund and schedule energy efficiency "tune-ups" of existing buildings by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, hot water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.)	Project sponsors do not have authority over existing buildings. This mitigation measure is not related to growth from transportation projects. 1. This mitigation measure should be removed.
MM-EN.27: Project sponsors should provide individualized energy management services for large energy users.	This mitigation measure is not under the purview of SCAG, transportation agencies, or local governments. This would need to be a requirement of electric utility providers. 1. This mitigation measure should be removed.
MM-EN.28: Project sponsors should require the use of energy efficient appliances and office equipment.	1. More clearly define and clarify "Project sponsors". 2. Change text to: *MM-EN.25: Project sponsors should ~~require~~ **encourage** the use of …*

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-EN.32: Project sponsors should incorporate on-site renewable energy production (through, e.g., participation in the California Energy Commission's New Solar Homes Partnership). Require project proponents to install solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.	This measure should be specific as to the types of projects it applies to. All development and redevelopment projects are currently subject to Title 24 requirements for energy efficiency. 1. More clearly define and clarify "Project sponsors". 2. Change text to: *Project sponsors should* ***encourage*** *on-site renewable energy production* ~~*(through, e.g., participation in the California Energy Commission's New Solar Homes Partnership). Require project proponents to*~~ ***such as the*** *install****ation of*** *solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.*
MM-EN.34: Project sponsors should provide public education and publicity about energy efficiency programs and incentives.	1. Change text to: ~~*Project sponsors*~~ ***Local governments*** *should* ***encourage*** *public education and publicity about energy efficiency programs and incentive* ***in cooperation with local utility providers.***
MM-EN.35: In some instances, a project sponsor may find that measures that will directly reduce a project's greenhouse gas emissions are insufficient. A lead agency may consider whether carbon offsets would be appropriate. The project proponent could, for example, fund off-site projects (e.g., alternative energy projects) that will reduce carbon emissions, or could purchase "credits" from another entity that will fund such projects. The lead agency should ensure that any mitigation taking the form of carbon offsets is specifically identified and that such mitigation will in fact occur.	1. Change text to: … **If a regional carbon trading system is established a** ~~*A*~~ *lead agency may consider whether carbon offsets would be* ***an*** *appropriate* ***means of project mitigation.****.*

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-EN.36: Project sponsors should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • 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	1. Please delete this measure as it is a duplicate of MM-EN.17.
MM-EN.37: Project sponsors and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:	Land use strategies are the responsibility of local governments. 1. Change language to *~~Project sponsors and~~ local governments should* ***encourage*** *green building measures in~~to~~ 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* ***could*** *include* ***the following examples****:…*
Land Use	
MM-LU.11: Local governments should adopt and implement General Plan Housing Elements that accommodate the housing need identified through the RHNA process. Affordable housing should be provided consistent with the RHNA income category distribution adopted for each jurisdiction.	This measure is not necessary as it duplicates the mitigation stated in MM-LU.10 1. Please delete this duplicate measure.
MM-LU.13: Local governments and subregional organizations should develop ordinance and other programs which will enable and assist in the cleanup and redevelopment of brownfield sites.	Subregional organizations do not have the authority to develop ordinances. 1. Change language to: *Local governments ~~and subregional organizations should develop ordinances and other~~ programs ~~which will to enable and~~ ~~assist in~~* ***to*** ***encourage*** *the cleanup and redevelopment of brownfield sites.*

Mitigation Measure	**Comments/Recommendations**
MM-LU.14: Local governments and subregional organizations should develop adaptive reuse ordinances and other programs that will enable the conversion of vacant or aging commercial, office and some industrial properties to housing and mixed-use housing.	Subregional organizations do not have the authority to develop ordinances. Additionally, local governments should determine the best use of the site based on conditions and constraints present at the site. 1. Change language to: *MM-LU.14: Local governments ~~and subregional organizations~~ should develop ~~adaptive reuse ordinances and~~ ~~other~~ programs**, where practical and feasible,** that will enable the conversion of ~~vacant or aging~~ **underutilized** commercial, office and/or industrial properties **for** ~~to~~ housing ~~and~~ **or** mixed-use ~~housing~~ **developments**.*
Open Space	
MM-OS.23: Project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth that accompanies transportation projects/improvements.	This mitigation measure was derived from the Regional Comprehensive Plan which has not completed a public review process nor has the Regional Council approved the RCP or adopted all of the policies contained within. This measure is not necessary as it duplicates the mitigation stated in MM-O.15 1. Please delete this duplicate measure.
The mitigation measures listed above for impacts 3.10-1 through 3.10-3 shall be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.	1. Please clarify what are Tier 2 projects 2. Please clarify how these measures would be applied. 3. Please change language to: *The Mitigation measures listed above for impacts 3.10-1 through 3.10-3 ~~shall~~ **would** be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.*

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-OS.34: Project level mitigation for significant cumulative and growth inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG.	At this time, SCAG does not have the authority to facilitate compacts or agreements regarding open space and, as such, the language should be removed from the measure. 1. Please change language to: *Project level mitigation for significant cumulative and growth inducing impacts on open space resources ~~will~~ **should** 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~~.*
MM-OS.35: Local governments should establish transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands. Local governments should also consider the following: • Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land. • Easing restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food. • Considering partnering with school districts to develop farm-to-school programs	Transfer of development rights programs are complex and costly to implement. While the are a valuable tool for the preservation of open space, they are not the only tool available, as indicated by the list of options in the measure. 1. Please change language to: *MM-OS.35: Local governments should establish **programs to** ~~transfer of development rights (TDR) programs to~~ direct growth to less agriculturally valuable lands ~~(while considering the potential effects at the sites receiving the transfer)~~ and ensure**, where possible,** ~~the continued~~ protection of the most agriculturally valuable land within each county ~~through the purchase of the development rights for these lands~~. ~~Local governments should also consider the~~ **The** following **are offered as examples of programs**:* • ***The development or participation in transfer of***

Mitigation Measure	Comments/Recommendations
	development rights programs to encourage the preservation of agricultural lands....(Include all other items listed *• Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land.* *• Easing restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food.* *• Considering partnering with school districts to develop farm-to-school programs*
MM-OS.41: Project sponsors and local governments should increase the accessibility to natural areas lands for outdoor recreation.	This mitigation measure was derived from the Regional Comprehensive Plan which has not completed a public review process nor has the Regional Council approved the RCP or adopted all of the policies contained within. This mitigation measure does not address the stated impact and could create additional impacts with implementation. 1. Please remove per statements above.
MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to revitalize existing communities.	It is not clear how this will mitigate the impact. 1. More clearly define and clarify "Project sponsors". From Anaheim: It is not clear how this will mitigate the impact. The following is offered as clarification: *MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to ~~revitalize existing communities~~* ***encourage the efficient use of land and minimize the development of agricultural and open space lands.***

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-OS.43: Project sponsors should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	This mitigation measure is not related to stated impact. This measure is not necessary as it duplicates the mitigation previously addressed in MM-EN.36 1. Please delete this duplicate measure.
MM-OS.45: Project sponsors and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	This measure is most applicable to local governments as many project sponsors will have minimal ability to affect land use. 1. Please change language to: *MM-OS.45: ~~Project sponsors and l~~**L**ocal governments …*
Public Services	
Overall comments on MM-PS.8 through MM-PS.14 and MM-PS.21 through MM-PS.24	These measures are taken from the draft Regional Comprehensive Plan which has not yet completed its full public review process. The measures listed represent significant regional policy that has yet to be adopted by the region. As such, it is not appropriate to include the measures as mitigation in this document. 1. Please delete these measures. 2. If the measures are not deleted, please incorporate the text changes indicated below to reflect that the measures have not received regional approval.

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-PS.7: Project implementation agencies shall integrate green building measures into project design such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures would include the following: • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • The inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing structure and shell in renovation projects. • Design for deconstruction without compromising safety. • Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components. • Development of indoor recycling program and space.	1. Please change the language to: *MM-PS.7: Project implementation agencies ~~shall~~ **should** integrate green building measures into project design such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures ~~would~~ **could** include the following: …*
MM-PS.8: Project implementation agencies shall discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, landfills should be sited with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.	Most project implementation agencies, including most local governments and the county transportation commissions do not have authority or purview over the siting of new landfills. This measure would need to be applicable to the appropriate agency. 1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. Please change the word "shall" to "should."

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-PS.9: Project implementation agencies shall discourage exporting of locally generated waste outside of the SCAG region. Disposal within the county where the waste originates shall be encouraged as much as possible. Green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMP and RTP policies should be required.	1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. In all locations, please change the word "shall" to "should."
MM-PS.10: Project implementation agencies shall adopt Zero Waste goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.	1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. Please change the language to: *MM-PS.10: Project implementation agencies ~~shall~~ ~~adopt~~ **should encourage** ~~Zero Waste~~ **waste reduction** goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.*
MM-PS.11: Project implementation agencies shall build local markets for waste prevention, reduction, and recycling practices.	1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. Please change the language to: *MM-PS.11: ~~Project implementation agencies shall~~ **Waste management agencies and companies should encourage** ~~build~~ **the development of** local markets for waste prevention, reduction, and recycling practices.*
MM-PS.12: Project implementation agencies shall develop ordinances that promote waste prevention and recycling such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and instituting ordinances to divert food waste away from landfills and toward food banks and composting facilities.	1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. Please change the language to: *MM-PS.12: Project implementation agencies ~~shall develop ordinances that promote~~ **should encourage** waste prevention and recycling ~~such as: requiring~~ **such as developing programs for** waste prevention and recycling efforts at all large events and venues; ~~implementing~~ **implementation of** recycled content procurement programs; and ~~instituting ordinances to~~ **developing opportunities to** divert food waste away from landfills ~~and~~ toward ~~food banks and~~ composting facilities.*

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

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

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-PS.23: Project implementation agencies shall prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities in conjunction with existing waste management or material recovery facilities.	1. Per the discussion on MM-PS.8, please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. Please change the language to: *MM-PS.23: Project implementation agencies ~~shall~~ **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.*
MM-PS.24: Project implementation agencies shall increase programs to educate the public and increase awareness of reuse, recycling, composting, and green building benefits and raise consumer education issues at the county and city level, as well as at local school districts and education facilities.	1. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency. 2. Please change the word "shall" to "should."
Water	
MM-W.20: Local governments should encourage Low Impact Development and natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments.	*2.* Please change language to: *MM-W.20: Local governments should**, where practical and feasible,** encourage Low Impact Development and **the incorporation of** natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments.*
MM-W.21: Local governments should implement green infrastructure and water-related green building practices through incentives and ordinances. Green building resources include the U.S. Green Building Council's Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.	1. Please change language to: *MM-W.21: Local governments should implement**, where practical and feasible,** green infrastructure and water-related green building ~~practices~~ **programs** through incentives and ordinances. Green building resources include the U.S. Green Building Council's Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.*

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

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

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

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

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

OCCOG Comments on Mitigation Measures included in Program Environmental Impact Report

Mitigation Measure	Comments/Recommendations
MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG's ongoing regional planning efforts. SCAG's Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions: • Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand. • Involve the region's water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions. • Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects. • Promote water-efficient land use development. • The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region's water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.	1. Because existing regional programs currently exist to address these issues, please change language to: *MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG's ongoing regional planning efforts* ***in coordination with regional water agencies****. SCAG's Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions:* *• Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand.* *• Involve the region's water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions.* *• Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects.* *• Promote water-efficien****cy in land*** *~~t land use~~ development.* *• The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region's water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.*

OCTA

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Arthur T. Leahy
Chief Executive Officer

February 15, 2008

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

Dear Mr. Ikhrata:

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

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

Orangeline High-Speed Magnetic Levitation Project (Orangeline Maglev)

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

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

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

Orange County Transportation Authority
550 South Main Street / P.O. Box 14184 / Orange / California 92863-1584 / (714) 560-OCTA (6282)

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

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

Riverside County to Orange County Corridor

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

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

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

Growth Forecasts

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

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

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

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

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

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

Emission Reductions from Freight Rail

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

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

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

OCTA Project List for 2008 RTP

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

Regional Transportation Improvement Program (RTIP) Project Listing

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

Technical Corrections

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

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

Sincerely,

Arthur T. Leahy
Chief Executive Officer

ATL:ml
Attachments

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

CATEGORY	RTP ID	RTE	DESCRIPTION	Route/Program	From	To	Existing Configuration	Start Year	Comp Date	(A) TOTAL COST ($'s in $1,000's)	Fed Funding ($'s in $1,000's)	Fed. Funding Source	State Funding ($'s in $1,000's)	State Funding Source	(B) SHOPP Funding ($'s in $1,000's)	Local Funding ($'s in $1,000's)	Local Funding Source	Private Funding Type	(C) Private Funding ($'s in $1,000's)	Total Funding ($'s in $1,000's)	Funding Comments	Source of Project	CITY / AGENCY	AIR BASIN
Arterial	2A0703	0	Completion of Measure M Roadway Projects	M1 Roadway Projects	Countywide			2008	2011	$30,000						$30,000	M1 County Sales Tax			$30,000		2006 OCTA LRTP	Local Agencies	SCAB
Arterial	2A0704	0	Complete MPAH, improve arterial capacity	Regional Capacity Program	Countywide			2010	2030	$1,017,675						$1,017,675	M2 County Sales Tax			$1,017,675	M2=814300 City=203375	2006 OCTA LRTP	Local Agencies	SCAB
Arterial	2A0705	0	Synchronize signals across jurisdictions and smart streets	Signal Synchronization Program	Countywide			2008	2030	$543,720						$543,720	M2 County Sales Tax			$543,720	M2=453100 City=90620	2006 OCTA LRTP	Local Agencies	SCAB
Arterial	2A0712	0	Street Maintenance and Rehabilitation	Street Maintenance	Countywide			2008	2030	$ 1,088,864	$800,000	FHWA STP								$843,000		2006 OCTA LRTP	Local Agencies	SCAB
Grade Crossing	2GL04	0	Construct Grade Separations at select locations along the LOSSAN and BNSF corridors	Grade Crossing	LOSSAN/BNSF			2008	2030	$353,600						$353,600	M2 County Sales Tax			$353,600		2006 OCTA LRTP	OCTA	SCAB
ITS	2L221	0	Invest in Intelligent Transportation Systems Programs	ITS	Countywide			2008	2015	$20,000	$20,000	Prop 1B								$20,000		2006 OCTA LRTP	OCTA	SCAB
Other Highway	Misc Hwy	0	Other Highways	Highways	Countywide	Countywide		2008	2030	$446,141										$0		2006 OCTA LRTP	OCTA	SCAB
Other	2SL04	0	Ongoing corridor studies and other studies included in FY 07-08 Work Program	Corridor Studies				Prior	2015	$3,129			$3,129	STIP						$3,129		2006 OCTA LRTP	Various	SCAB
Other	2L149	0	Freeway Service Patrol and Callbox Program	Motorist Services	Countywide			2011	2030	$234,487			$66,000			$150,000	M2 County Sales Tax			$216,000		2006 OCTA LRTP	OCTA	SCAB
Other	2L190	0	Retrofit Soundwall Program	Soundwalls	Countywide			Prior	2030	$35,000			$330	STIP						$0		2006 OCTA LRTP	OCTA	SCAB
Other	2L224	0	Transportation Enhancement Activities	Other TEA	Countywide			2008	2030	$166,000	$166,000	FHWA TEA								$166,000		2006 OCTA LRTP	Various	SCAB
Other	2S1	0	Study feasibility of adding high speed rail between Anaheim and Ontario Airport	Cal Nevada HS Rail	Anaheim	Ontario Airport		2013	2020	$1,000	$1,000	FHWA TEA								$1,000		2006 OCTA LRTP	OCTA	SCAB
TDM	2L200	0	Build the Commuter Bikeways Strategic Plan	Non-motorized	Countywide			2008	2030	$53,872										$0		2006 OCTA LRTP	Local Agencies	SCAB
Transit	2L206	0	Countywide Fixed Route, Express, Rapid Bus, Paratransit. Expand local service to achieve up to 10 minute headways in the core of the county	Fixed Route Bus	Countywide			2008	2030	$1,486,000			$90,320	STIP		$1,395,601	Other			$1,486,000		2006 OCTA LRTP	OCTA	SCAB
Transit	2L207	0	Riverside to Fullerton (11); Riverside to Anaheim (11); Riverside/Corona to Irvine (11); San Clemente to Laguna Hills (10); San Clemente to South Coast Metro (12); Long Beach to South Coast Metro (12); Rancho Santa Margarita to Irvine (12); Long Beach to	Express Bus	Countywide (inter county and intra-county)			2008	2030	costs included in Fixed Route Bus category										$0		2006 OCTA LRTP	OCTA	SCAB
Transit	2L208	0	Rail Feeder - Add service to support Metrolink expansion	Rail Feeder Bus	Countywide			2008	2030	costs included in Fixed Route Bus category										$0		2006 OCTA LRTP	OCTA	SCAB
Transit	2TR01209 C, 2TR04209 D, 2TR04209 E, 2TR04209 F	0	Add mixed flow Bus Rapid Transit with signal priority on the following lines: Katella, Edinger, Beach and La Palma	Bus Rapid Transit	Countywide		No existing BRT service	2010	2017	costs included in Fixed Route Bus category										$0		2006 OCTA LRTP	OCTA	SCAB
Transit	2TR01212	0	Expand service - Orange Line to 30 daily trains, IEOC to 21 daily trains, 91 line to 21 daily trains. Plan for midday intracounty service Laguna Niguel to Fullerton	Metrolink Commuter Rail	Orange Line/IEOC Line/91 Line			2008	2015	$0										$0		2006 OCTA LRTP	OCTA	SCAB
Transit	2TR0702	0	Deploy Community-based Shuttles	Community-based Shuttles	Countywide			2008	2030	$97,610						$90,600	M2 County Sales Tax			$90,600		2006 OCTA LRTP	OCTA	SCAB

CATEGORY	RTP ID	RTE	DESCRIPTION	Route/Program	From	To	Existing Configuration	Start Year	Comp Date	(A) TOTAL COST (07$ in $1,000's)	Fed Funding (07$ in $1,000's)	Fed Funding Source	State Funding (07$ in $1,000's)	State Funding Source	(B) SHOPP Funding (07$ in $1,000's)	Local Funding (07$ in $1,000's)	Local Funding Source	Private Funding Type	(C) Private Funding (07$ in $1,000's)	Total Funding (07$ in $1,000's)	Funding Comments	Source of Project	CITY / AGENCY	AIR BASIN
Transit	2TR0703	0	Expand transportation choices for Seniors and the Disabled	Elderly & Handicapped Assistance	Countywide			2010	2030	$146,446						$135,920	M2 County Sales Tax			$135,920		2006 OCTA LRTP	OCTA	SCAB
Transit	2TR0704	0	High-Frequency service to LA & Riverside and Corridor Improvements	Metrolink Commuter Rail				Prior	2030	$606,924						$563,300	M2 County Sales Tax			$563,300		2006 OCTA LRTP	OCTA	SCAB
Transit	2TR0708	0	Program to develop city-initiated projects to improve access to Metrolink stations (Go Local)	Extensions to Metrolink	Countywide			Prior	2030	$1,000,000						$1,000,000	M2 County Sales Tax			$1,000,000		2006 OCTA LRTP	OCTA	SCAB
Transit	2TR0709	0	Improve safety and amenities at transit stops	Safe Transit Stops	Countywide			2010	2030	$26,936						$25,000	M2 County Sales Tax			$0		2006 OCTA LRTP	OCTA	SCAB
Transit		0	Entrance station to accommodate metrolink, amtrak, fixed-route bus service, and the Irvine guideway	Irvine Station Improvements				2009	2015	$205,000	$88,000					$82,000	Other	Dev Mit Fee	$5,000	$175,000	$82M from City funds	City Initiated	IRVINE	SCAB
Transit	2TR0711	0	5-mile Transit system in the Great Park/Spectrum area. Links Irvine Station with Spectrum and others	Irvine Guideway Demonstration Project			No guideway	2007	2012	$265,000	$138,101	FTA 5309	$121,299	Other		$25,600	Other			$25,600	25600 City 121299 Prop116	City Initiated	IRVINE	SCAB
Auxiliary	2M01109	5	Extend auxiliary lane through interchange	I-5 SB	La Paz Road	Oso Parkway	Existing Configuration aux drops at La Paz, and resumes south of La Paz	2020	2030	$2,171										$0		2006 OCTA LRTP	Caltrans	SCAB
Auxiliary	2M01110	5	Extend auxiliary lane through interchange	I-5 SB	Alicia Parkway	La Paz Road	Existing Config: aux drops at Alicia, and resumes south of Alicia	2020	2030	$7,599										$0		2006 OCTA LRTP	Caltrans	SCAB
HOV	2HG1143	5	Add 1 HOV lane each direction	I-5	Coast Highway	Pico	Existing Configuration no HOV Lanes	2004	2017	$150,696						$139,000	M2 County Sales Tax			$139,000		2006 OCTA LRTP	Caltrans	SCAB
HOV	2H0702	5	Barranca Parkway HOV interchange improvement	I-5	Barranca Parkway		NB HOV on-ramp, SB HOV off-ramp	2013	2021	$14,784										$0		2006 OCTA LRTP	Caltrans	SCAB
HOV	2H0703	5	Add 1 HOV lane each direction	I-5	SR-55	SR-57	1 to 2 HOV Lanes	2022	2023	$217,117						$200,000	M2 County Sales Tax			$200,000		2006 OCTA LRTP	Caltrans	SCAB
IC/Ramps	2M01107	5	Reconfigure interchange to reduce weaving - interim project	I-5	SR-55		Existing Configuration 2 lanes on all MF connectors, 1 lane HOV for NB SR55 & SB SR55	2022	2031	$293,108						$270,000	M2 County Sales Tax			$270,000		2006 OCTA LRTP	Caltrans	SCAB
IC/Ramps	2M01111	5	Avery parkway ramp relocation, reconfiguration upgrades	I-5	Avery Parkway		Existing Config: 1 to 2 lane on- and off-ramps	2013	2021	$83,899						$77,100	County Sales			$77,100		2006 OCTA LRTP	Caltrans	SCAB
IC/Ramps	2M01100	5	Re-construct interchange to increase storage capacity of ramps	I-5	La Paz Road		Existing Configuration 1 to 2 lane on-ramps, 1 to 3 lane SB off-ramp, 1 to 4 lane NB off-ramp	2013	2021	$88,175						$82,800	County Sales			$82,800		2006 OCTA LRTP	Caltrans	SCAB
IC/Ramps	2M04106A	5	Add southbound I-5 off-ramp at Stonehill	I-5	Stonehill Dr		Existing Config: No SB off-ramp	2013	2020	$71,649										$0		2006 OCTA LRTP	Caltrans	SCAB
IC/Ramps	2M0709	5	Alicia Pkwy interchange improvement	I-5	Alicia Parkway		1-2 lane on-ramps, 1-3 lane off-ramps	2013	2021	$70,020										$0		2006 OCTA LRTP	Caltrans	SCAB

	CATEGORY	RTP ID	RTE.	DESCRIPTION	Route/Program	From	To	Existing Configuration	Start Year	Comp Date	(A) TOTAL COST (T in $1,000's)	Fed Funding (T in $1,000's)	Fed Funding Source	State Funding (T in $1,000's)	State Funding Source	(B) SHOPP Funding (T in $1,000's)	Local Funding (T in $1,000's)	Local Funding Source	Private Funding Type	(C) Private Funding (T in $1,000's)	Total Funding (T in $1,000's)	Funding Comments	Source of Project	CITY / AGENCY	AIR BASIN
	IC/Ramps	2M0711	5	Oso Parkway interchange improvement	I-5	Oso Parkway		Existing Config: To I-5 NB, 1 lane ramp from WB Oso, 2 lane ramp from EB Oso; No SB aux lane	Prior	2010	$23,014	$20,189	Other								$20,189		2006 OCTA LRTP	Caltrans	SCAB
	IC/Ramps	2M0717	5	Add ramps at Los Alisos at Ave. De La Carlota	I-5	El Toro Road (Los Alisos)		Existing Config: No ramps between El Toro & Alicia	2013	2021	$73,277						$67,500	M2 County Sales Tax			$67,500		2006 OCTA LRTP	Caltrans	SCAB
	IC/Ramps	2M0718	5	Add new interchange at Marguerite Parkway (Saddleback CC Connection)	I-5	Marguerite Parkway		Existing Config: No interchange	2013	2020	$113,118										$0		2006 OCTA LRTP	OCTA	SCAB
	Mixed Flow	2M0731	5	Add 1 MF lane each direction	I-5	SR-133	SR-55	Existing Config: 5 lanes each direction	2018	2029	$319,502						$294,000	M2 County Sales Tax			$294,000		2006 OCTA LRTP	Caltrans	SCAB
	Mixed Flow	2M0732	5	Add 1 lane each direction	I-5	SR-57	SR-91	Existing Config: 4 to 6 lanes each direction	2020	2030	$406,602										$0		2006 OCTA LRTP	Caltrans	SCAB
	Mixed Flow	2M0730	5	Add 1 MF lane each direction	I-5	SR-73	El Toro Rd	Existing Config: 4 to 5 lanes each direction	2028	2035	$411,980						$379,500	M2 County Sales Tax			$379,500		2006 OCTA LRTP	Caltrans	SCAB
	Auxiliary	2M0704	55	Add Auxiliary Lane	SR-55 NB	Dyer	Edinger	Existing Config: 5 lanes each direction	2018	2027	$65,135						$60,000	M2 County Sales Tax			$60,000		2006 OCTA LRTP	Caltrans	SCAB
	IC/Ramps	2M01129	55	Delete left turn access from NB Bristol to SB I-405. Provide right turn on-ramp from NB Bristol to SB I-405 via a new braid that also provides direct access to NB SR-55	I-405 SB/SR-55 NB	South Bristol Braid		Left turn access from Bristol NB to 405 SB, 5 lanes & 1 aux lane to 55 NB I/C	2026	2035	$56,450										$0		2004 RTP	Caltrans	SCAB
	Mixed Flow	2M0733	55	Add 1 lane each direction, fix chokepoints	SR-55	I-405	I-5	Existing Config: 4 to 5 lanes each direction	2018	2027	$238,829						$220,000	M2 County Sales Tax			$220,000		2006 OCTA LRTP	Caltrans	SCAB
combine w/ above?	Mixed Flow	2M0734	55	Add MF lane in each direction	SR-55	SR-22	I-5	Existing Config: 4 to 5 lanes each direction	2018	2027	$28,000						$26,000	M2 County Sales Tax			$26,000		2006 OCTA LRTP	Caltrans	SCAB
	HOV	2HG706	57	HOV Drop Ramp	SR-57	Cerritos		Existing Config: No HOV drop ramp	2026	2035	$61,419										$0		2006 OCTA LRTP	CaltranE	SCAB
	IC/Ramps	2M0724	57	Lambert interchange improvement	SR-57	Lambert St		Existing Config: 1 to 2 lane ramps	2026	2035	$7,925	$985	FHWA TEA				$6,315	County Sales			$7,300		2006 OCTA LRTP	Caltrans	SCAB
	Truck Climbing	2TK01116	57	Truck Climbing Lane	SR-57 NB	Lambert	Tonner Canyon Road	Existing Config: 4 lanes	2026	2028	$90,800						$90,800	M2 County Sales Tax			$90,800		2006 OCTA LRTP	Caltrans	SCAB
	HOV	2HG708	73	HOV Connector	SR-73	I-405		Existing Config: No HOV Connector	2026	2035	$135,406										$0		2006 OCTA LRTP	Caltrans	SCAB
	HOV	2HG707	73	Add 1 HOV lane each direction	SR-73	I-405	MacArthur	Existing Config: No HOV lanes	2026	2035	$69,478										$0		2006 OCTA LRTP	OCTA	SCAB
	IC/Ramps	2M0726	73	Complete Glenwood interchange to/from south	SR-73	Glenwood Drive		Existing Config: No interchange to/from the South	2026	2035	$27,140										$0		2006 OCTA LRTP	Caltrans	SCAB
	Auxiliary	2M01125	91	ADD 1 AUX LANE WESTBOUND	SR-91 WB	NB SR-55	WB SR-91 at Tustin	Existing Config: 3 lanes & 1 aux lane	2007	2014	$88,100						$88,100	M2 County Sales Tax			$88,100		2006 OCTA LRTP	Caltrans	SCAB
	IC/Ramps	2M01137	91	Construct barrier-separated on-ramp (2 lanes) from SB Lakeview to WB SR-91	SR-91	Lakeview Interchange		Existing Config: 1 to 2 lane ramps w/ no barrier	2026	2035	$72,563						$65,000	M2 County Sales Tax			$65,000		2006 OCTA LRTP	Caltrans	SCAB

CATEGORY	RTP ID	RTE	DESCRIPTION	Route/Program	From	To	Existing Configuration	Start Year	Comp Date	(A) TOTAL COST ($1,000's)	Fed Funding ($1,000's)	Fed Funding Source	State Funding ($1,000's)	State Funding Source	(B) SHOPP Funding ($1,000's)	Local Funding ($1,000's)	Local Funding Source	Private Funding Type	(C) Private Funding ($1,000's)	Total Funding ($1,000's)	Funding Comments	Source of Project	CITY / AGENCY	AIR BASIN
IC/Ramps	2M0727	91	Improve interchange	SR-91	SR-55		Existing Config: 2 to 3 lane ramps	2013	2020	$211,397						$250,000	M2 County Sales Tax			$250,000		2006 OCTA LRTP	Caltrans	SCAB
Mixed Flow	2M01126	91	ON SR-91 WB FROM SR-57 TO I-5, TIE EXISTING AUX LANES TOGETHER TO FORM A NEW 4TH MF LANE	SR-91 WB	SR-57	I-5	Existing Config: 3 lanes	2007	2016	$151,982						$140,000	M2 County Sales Tax			$140,000		2006 OCTA LRTP	Caltrans	SCAB
Mixed Flow	2M0736	91	Add 1 MF Lane	SR-91 EB	SR-57	SR-55	Existing Config: 3 lanes	2013	2022	$14,547						$13,400	M2 County Sales Tax			$13,400		2006 OCTA LRTP	OCTA	SCAB
Mixed Flow	2M0737	91	In Orange County, add a WB MF lane from 241 off ramp to Gypsum Canyon and Aux lanes each direction between 241 and Green River. Site Riverside County for additional improvements	SR-91	SR-241	I-15	3-4 MF lanes, 1-2 HOV/HOT lanes. No HOT/HOV connector, no WB HOT lanes E of county line. No EB HOT lanes E of 71	2007	2015	$177,100						$177,100	M2 County Sales Tax			$177,100		2006 OCTA LRTP, 2007 SR 91 Implementation Plan	OCTA/RCTC	SCAB
Toll	2T04128	91	CONSTRUCT NEW PARTIAL OVERCROSSING AT FAIRMONT BLVD TO PROVIDE NORTHERLY ACCESS FOR YORBA LINDA TO/FROM SR-91 EXPRESS LANES, DROP RAMPS ON EAST SIDE OF OVERCROSSING, TO EB AND FROM WB EXPRESS LANES	SR-91	Fairmont Drive		No express lane access	2008	2015	$70,000						$70,000	M2 County Sales Tax			$70,000		2006 OCTA LRTP, 2007 SR 91 Implementation Plan	Caltrans	SCAB
Toll	2T01135	91	HOV/HOT connector NB 241 to EB 91, WB 91 to SB 241	SR-91	SR-241		No HOV/HOT connector	2014	2020	$240,000						$240,000	M2 County Sales Tax			$240,000		2006 OCTA LRTP, 2007 SR 91 Implementation Plan	OCTA/RCTC	SCAB
Auxiliary	2M04130	405	Add 2nd auxiliary lane	I-405 SB	SR-133	Irvine Center Drive	Existing Config: 4 lanes & 1 aux lane	2013	2020	$6,622						$6,100	M2 County Sales Tax			$6,100		2006 OCTA LRTP	OCTA	SCAB
Auxiliary	2M04131	405	Add auxiliary lane	I-405 NB	Jeffrey	Culver	Existing Config: 4 lanes	2013	2020	$6,468						$7,600	M2 County Sales Tax			$7,600		2006 OCTA LRTP	Caltrans	SCAB
HOV	2H01148	405	HOV Drop Ramp	I-405	at Von Karman		Existing Config: no drop ramp	2013	2020	$84,676							Other			$0	Funding shared with Bear and Gene Autry HOV ramps	2006 OCTA LRTP	Caltrans	SCAB
HOV	2H0701	405	HOV Drop Ramp	I-405	Bear		Existing Config: no drop ramp	2013	2020	$81,415	$30,000	FHWA CMAQ				$15,000	Other			$45,000	Funding shared with Von Karman and Gene Autry HOV ramps	2006 OCTA LRTP	Caltrans	SCAB
IC/Ramps	2M0708	405	Add 2nd NB truck lane	I-405 NB	Lake Forest Drive	Irvine Center Drive	Existing Config: 1 truck lane	2008	2015	$3,040						$2,600	M2 County Sales Tax			$2,600		2006 OCTA LRTP	Caltrans	SCAB
Mixed Flow	2M0728	405	Add 1 MF lane each direction	I-405	I-5	SR-55	Existing Config: 4 to 6 lanes each direction	2024	2035	$328,933						$303,000	M2 County Sales Tax			$303,000		2006 OCTA LRTP	Caltrans	SCAB
IC/Ramps	2M0719	605	Improve interchange	I-605	Katella on-ramp		Existing Config: 1 to 2 lane NB on-ramp. 1 lane for other ramps	2022	2030	$21,712						$20,000	M2 County Sales Tax			$20,000		2006 OCTA LRTP	Caltrans	SCAB

Matrix of Technical Corrections for 2008 Regional Transportation Plan (RTP)

SCAG ID#	Facility	Current Description in draft RTP	Status/Issue	Changes
ORA120513	Euclid	Widen from Warner to Edinger	Cancelled	Remove from RTP project list and model
2M0708	I-405	Add 2nd northbound (NB) truck lane	Change description	Change category from "Truck Climbing Lane" to "Truck Lane"
ORA120318	-	Regional Gateways Program - Capacity expansion @ ARTIC	Change description/Not a TCM	Change description to "Anaheim Regional Transit Intermodal Center (ARTIC)". **Not a Transportation Control Measure (TCM)**. Year of expenditure (YOE) Cost (in thousands) = $1,106,500. Completion = 2015
2M0703	I-405	Add auxiliary lane from SR-133 to Jeffrey	Complete	Remove 2M0703 from project list
ORA000152	SR-74	Widen from Rancho Viejo to I-5	Complete	Remove ORA000152 from project list
ORA020111	I-5	Improve interchange @ Avenida Pico	Complete	Remove ORA020111 from project list
ORA55286	-	Buena Park Metrolink Station	Complete	Remove ORA55286 from project list
2M0731	I-5	Add 1 mixed flow (MF) each direction, SR-133 to SR-55	SCAG cost is high	YOE Cost (in thousands) = $550,000
2M0736	SR-91	Add 1MF eastbound (EB) from SR-57 to SR-55	SCAG cost is high	YOE Cost (in thousands) = $25,000
2M0734	SR-55	Add 1MF each direction, SR-22 to I-5	Include in 2M0733	Remove 2M0734 from project list. Change 2M0733 to "add 1 mf lane each direction & fix chokepoints from I-405 to SR-22". YOE Cost (in thousands) = $343,147
2M0702	I-405	Auxiliary each direction, Euclid to Magnolia	Include in ORA030605	Remove 2M0702 from project list. No changes to ORA030605 needed.
2M0714	I-5	Reconfigure interchange @ Avenida Pico	Not listed	Add to constrained project list. YOE Cost (in thousands) = $57,845. Completion year = 2017
needs #	-	Regional Gateways Program - Capacity expansion at ARTIC and other transit centers	Not listed	Add to constrained project list. YOE Cost (in thousands) = $564,000. ARTIC portion to be determined. Completion year = 2035
needs #	SR-57	Add 1MF NB, Lincoln to Orangethorpe	Not listed	Add to constrained project list SR-57 - add 1 MF lane NB from Lincoln to Orangethorpe & interchange improvements @ SR-91 2015-2020 YOE Cost (in thousands) = $35,073
needs #	SR-57	Add 1MF NB, Orangewood to Katella	Not listed	Add to constrained project list SR-57 - add 1 MF lane NB from Orangewood to Katella 2011-2015 YOE Cost (in thousands) = $13,558

Matrix of Technical Corrections for 2008 Regional Transportation Plan (RTP)

SCAG ID#	Facility	Current Description in draft RTP	Status/Issue	Changes
	SR-241	Add interchange @ Weir Canyon	Not listed	Include as part of ORA050 and add to model
	SR-241	Add interchange @ Jeffrey	Not listed	Include as part of ORA050 and add to model
	SR-241	Ramp improvements in east Orange	Not listed	Include as part of ORA051
needs #	Irvine Center Drive	Widen overcrossing at I-405	Not listed	Add to constrained project list 2020-2025 YOE cost (in thousands) = $11,000 - local/devoper fee
needs #	I-5	North Irvine Transportation Mitigation (NITM) ramp improvements (Alton, Bake, Culver, El Toro, Jamboree, Jeffrey, and Sand Canyon)	Not listed	Add to constrained project list prior-2025 YOE cost (in thousands) = $80,000 - local/developer fee
2A0704	-	Regional Capacity Program	Not modeled	Add to model. Build-out in 2035
2A0705	-	Signal Synchronization Program	Not modeled	Add to model
2H0702	I-5	Ramp improvements @ Barranca high-occupancy lanes (HOV)	Not modeled	Add to model
2L206	-	Fixed-Route Bus Expansion (capital)	Not modeled/SCAG cost high	Add to model. YOE Cost (in thousands) = $2,254,315
2L208	-	Rail-Feeder Expansion	Not modeled	Add to model
2M01129	SR-55	South Bristol Braid	Not modeled	Add to model
2TR0702	-	Community-Based Shuttles	Not modeled	Add to model
ORA020115	Cabot	Bridge to Camino Capistrano	Not modeled	Add to model
ORA100510	SR-22	Replace interchanges in Garden Grove	Not modeled	Add to model
ORA120305	La Palma/ Del Amo	Widen over Coyote Creek	Not modeled	Add to model
ORA120525	Del Obispo	Alipaz to Camino Capistrano	Not modeled	Add to model
2L221	-	Proposition 1B Intelligent Transportation Systems Projects	Replaced by 2A0705	Remove 2L221 from project list. 2A0705 YOE Cost (in thousands) = $967,357
2M0711	I-5	Ramp improvements @ Oso Pkwy	Replaced by ORA020112	Remove 2M0711 from project list and model
ORA000141	I-5	Ramp improvements @ Crown Valley	Replaced by ORA030604	Remove ORA000141 from project list and model
ORA120507	Ortega Hwy	Calle Entradero to Antonio Pkwy	Moved to State	Moved from local to state, SR-74 and replaces ORA120535
2M0725	SR-57	Add deceleration lane @ SR-90	State Highway Operation Protection Plan (SHOPP) project	Remove from RTP project list since it is a SHOPP project.
10254	SR-73	Add 1 MF each direction, plus climbing and auxiliary lanes as required, by 2015	Update project data	Update according to the Transportation Corridors Agencies' (TCA) comments

Matrix of Technical Corrections for 2008 Regional Transportation Plan (RTP)

SCAG ID#	Facility	Current Description in draft RTP	Status/Issue	Changes
ORA050	SR-241	Add 1 to 2 MF each direction, plus climbing and auxiliary lanes as required by 2015	Update project data	Update according to the TCA comments
ORA051	SR-241	Add 2 MF each direction, plus climbing and auxiliary lanes as required by 2015	Update project data	Update according to the TCA comments
ORA052	SR-241	Add 2 MF each direction by 2010, and add 1 MF each direction, plus climbing and auxiliary lanes as required by 2020	Update project data	Update according to the TCA comments

CITY OF ORANGE

DEPARTMENT OF COMMUNITY DEVELOPMENT www.cityoforange.org

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January 29, 2008

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

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

Dear Mr. Wen,

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

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

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

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

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

Employment

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

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

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

- ***Census Tracts 758.12:*** This Census tract consists of an established single-family residential area on the east side of the 55 Freeway, and a mix of strip commercial and mutli-family residential development on the west side of the freeway. Therefore, it is unlikely that the 1,012 jobs above and beyond the OCP projection (additional 33 more than existing) will materialize. Existing development in this area is not expected to change significantly in the future due to size and character of land parcels west of the freeway.

- ***Census Tract 758.13:*** Because this Census tract is primarily an established single-family residential area, with the exception of limited strip commercial property on the east side of the 55 Freeway, and consists of a mix of strip commercial and mutli-family residential development on the west side of the freeway, the City believes that the 1,335 jobs above and beyond the OCP projection (additional 14 more than existing) for 2035 is unrealistic. While intensified commercial development would be possible in the future, it is unlikely to generate the additional jobs identified in the Policy Growth Forecast.

- ***Census Tract 760.00:*** The expanding St. Joseph Hospital and Children's Hospital of Orange County are located in this tract. Both of these hospitals are major medical centers in the region and are in the process of implementing or preparing master plans for significant future expansion. The Town and Country commercial area is also within this tract. This is an area of the City that is proposed through the pending comprehensive General Plan update to be redesignated from office professional to a higher intensity mixed-use land use classification. Furthermore, due to the area's proximity to the hospitals, there is ongoing demand for medical office space in this area, which is expected to result in site redevelopment and job creation in the future. Therefore, we disagree with the Policy Growth Forecast determination that there will be approximately 1,200 fewer jobs in this tract than what the City believes to be possible in 2035 as reflected in OCP 2006 (additional 483 more than existing).

- ***Census Tract 761.01:*** The level of job growth in this Census tract appears high with respect to the City of Orange. Presumably, much of the job growth identified in the Policy Growth Forecast relates to build out of Anaheim's Platinum Triangle area. We would like confirmation of that, particularly given the fact that the Policy Growth Forecast projects over 5,300 more jobs for the tract than accepted by the City in OCP 2006 (additional 27 more than existing). The portion of this tract that is located in Orange is a built out mix of single-family residential, light industrial, and strip

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

- ***Census Tract 761.02:*** This Census tract is home to the expanding UCI Medical Center, major County of Orange criminal justice facilities, high-rise office development, and The Block at Orange. The proposed land use alternatives under consideration as part of the City's comprehensive General Plan update identify this area for a future higher density mixed-use district. This area not only is one of the City's major employment hubs, but is also served by transit with regional bus service as well as bus linkage to the Orange and Anaheim Metrolink stations. It is also easily accessible from both the Interstate 5 and State Route 22 Freeways. Therefore, it is unclear why the Policy Growth Forecast shows nearly 1,000 fewer jobs than the OCP for 2035 (additional 2,526 more than existing).

- ***Census Tracts 762.05 and 762.06:*** While a segment of the Tustin Street and Katella Avenue commercial corridors pass by and through these tracts, this is a largely single-family residential area. Therefore, the 2,285 additional number of jobs projected in the Policy Growth Forecast in relation to those identified in OCP 2006 (additional 201 more than existing) is unlikely.

- ***Tracts 758.05, 758.06, 768.07, 758.16, 219.14, 219.18, and 219.24:*** The City is concerned about the job reduction reflected in the Policy Growth Forecast for these tracts. Specifically, Chapman Avenue, one of the City's major commercial corridors, passes through the tracts. While we do not necessarily anticipate significant job growth along this corridor in the future, we also do not expect notable job loss.

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

Households

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

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

- ***Census Tracts 759.01 and 759.02:*** As noted previously, these two tracts encompass the City's National Register listed Old Towne Orange Historic District and are subject to the same constraints related to the development of new housing units as they are to new employment. The number of housing units the City accepted through the OCP process in Old Towne considered the work on the General Plan and Santa Fe Depot Specific Plan updates. Therefore, the City objects to the identification of another 2,500 households projected in the Policy Growth Forecast for 2035 on top of the 114 additional households projected in OCP 2006 for Old Towne.

- ***Tracts 758.11 and 758.12:*** On the east side of the 55 Freeway, these tracts are built-out single-family residential neighborhoods. West of the freeway, a substantial portion of Tract 758.11 is taken up by a large Southern California Edison transmission facility. The remaining area of the two tracts consists of multi-family residential development, a mobile home park, strip commercial and shopping center development. These tracts are not expected or planned to redevelop with significant new residential development. Therefore, the 192 units identified in the Policy Growth Forecast above and beyond those expected in the OCP (additional five (5) more than existing) is unlikely.

- ***Census Tract 758.13:*** As noted above, the City had been considering re-designation of the portion of the Tustin Street corridor passing through this tract for a future mixed-use land use designation. Given that this is no longer the case, and the portion of the tract east of the freeway is an established single-family neighborhood, the 75 additional units anticipated in the Policy Growth Forecast beyond the OCP 2006 data are not likely to materialize.

- ***Census Tract 761.01:*** The City's OCP input reflected a slight increase in the number of housing units in this tract (additional 83 more than existing) by 2035 given the mix of single-family, multi-family, commercial, office, and industrial land use designations in the area. Because the portion of the tract that is within the City of Orange is built out, new housing would occur through redevelopment activity. It is unclear why the Policy Growth Forecast projects 1,124 fewer units than existing conditions, particularly given the City of Anaheim's plans for the Platinum Triangle.

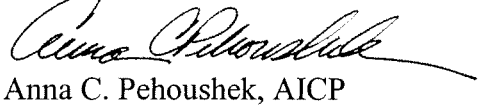
- ***Census Tract 761.02:*** As noted in the comments on employment, this Census tract is expected to experience land use policy changes that would accommodate higher density mixed-use development in the future through the comprehensive General Plan update. Therefore, the City believes that the Policy Growth Forecast should reflect the housing data the City accepted in OCP 2006 (additional 418 more than existing) rather than a reduction in units (222 fewer units than exist today) identified by SCAG. Consistent with the Policy Growth Forecast objectives, the City would like to encourage the development of housing near employment and transportation facilities. As noted above, this area benefits from transit service, freeway proximity, and is a significant employment node.

- ***Census Tracts 762.05, 762.06, and 762.08:*** These tracts encompass a predominantly single-family residential area, as well as commercial properties on Tustin Street and Katella Avenue. Therefore, the additional number of households projected in the Policy Growth Forecast (1,005 more than existing) in relation to those identified in OCP 2006 (additional 10 more than existing) is unlikely.

- ***Tracts 219.12, 219.24, and 524.20:*** The City is concerned about the household reduction reflected in the Policy Growth Forecast for these tracts. These tracts encompass an approved approximately 3,900 unit Irvine Company development project. The City is currently processing tract maps for a portion of this development, and has no reason to believe that there will be fewer units constructed that those reflected in the OCP 2006 data. Therefore, we disagree with the Policy Growth Forecast's representation of approximately 700 fewer units than what is reflected in the OCP for these tracts.

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

Sincerely,



Anna C. Pehoushek, AICP
Principal Planner

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

County of Orange
Resources & Development Management Department

BRYAN SPEEGLE
DIRECTOR

300 N. FLOWER ST.
SANTA ANA, CALIFORNIA

MAILING ADDRESS:
P.O. BOX 4048
SANTA ANA, CA 92702-4048

February 18, 2008

Jessica Meaney
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

RE: Draft 2008 Regional Transportation Plan, Draft Baseline Growth Forecast and Draft Policy Growth Forecast

Dear Ms. Meaney:

This letter transmits the County of Orange's comments related to the: Draft 2008 Regional Transportation Plan (RTP), Draft Baseline Growth Forecast and Draft Policy Growth Forecast. Based upon our review, we conclude the Baseline forecast most accurately reflects the projected growth in the unincorporated area; and therefore, the County recommends approval of the Baseline forecast by the Community, Economic and Human Development Committee (CEHD) and the Regional Council for use in the 2008 RTP.

This recommendation is supported by the Orange County Transportation Authority (OCTA), the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) and other Orange County agencies whose comments also request the approval of the Baseline forecast, which includes the 2006 Orange County Projections as Orange County's local input, in the 2008 RTP.

The County was not provided the opportunity to review and comment on the Policy forecast data for the unincorporated area prior to its release on November 1, 2007 as part of the growth forecast "alternative" for the 2008 RTP. When released, the Policy forecast data was only available at a SCAG TAZ-level and was depicted on a map without jurisdictional, TAZ or census tract boundaries, which made the review of the data difficult because of the lack of consistent boundaries. CDR subsequently created maps utilizing census tract boundaries that were very useful to depict the differences between the Baseline and Policy forecasts, but still did not reflect local jurisdictional boundaries.

Jurisdictional boundaries are of concern to the County due to the number of annexations that have occurred over since 2000. The maps created by CDR are based on 2004 boundaries and therefore do not reflect recent annexations. The County will not submit comments on projected growth in areas which are no longer under the County's jurisdiction. County staff overlaid current jurisdictional boundary maps in order to complete its review of the Policy forecast.

A review of the Policy forecast map revealed that it appears to be very similar to the "Compass Map/RTP 2035 Test Scenario" produced by SCAG in 2006 for use in the RHNA Pilot Program. The Policy forecast map contains many of the same flaws that were in the 2035 Test Scenario. For example, in TAZs that include both unincorporated area and adjacent cities, there are many instances where the most intense uses and forecasted growth only occur in the unincorporated portion of the TAZ. Also, unrealistic employment growth has been forecasted in areas with little, or no, existing or potential employment opportunities. In other areas, lesser employment has been projected in areas of greater anticipated job growth. Finally, many of the areas with forecasted intense uses are not associated with transportation corridors which SCAG has cited as a central strategy of its Compass Blueprint program.

Spreadsheets depicting all inconsistencies between existing uses and proposed uses are attached. Below are examples of the flaws in the Policy forecast:

Census Tract	**Area**	**Comments regarding the unincorporated portion of the census tract**
11.01	La Habra	This area is developed with single family homes. There is very little commercial zoned area that cannot accommodate the proposed "city center, main street and office park" uses.
218.17	Yorba Linda	There is very little commercial zoned area that cannot accommodate the proposed "activity center and office park" uses. The remaining is built-out as residential.
219.13	El Modena	There is very little commercial zoned area that cannot accommodate the proposed "town center, main street and highway commercial" uses. The remaining is built-out as residential and is unlikely to be rezoned to commercial uses.
219.14	Panorama Hill	This area is developed with single family homes and is located on land with extreme slopes. There is no commercial zoned land to accommodate the proposed "town center" and the area is inappropriate for higher density uses such as "town residential and city neighborhood."
219.17	Orange Park Acres	This area contains a long-established rural equestrian neighborhood with larger estate lots. It is unlikely that this area would transition into the proposed high-density "city neighborhood."
320.49	Foothills	This area contains extreme slopes and is adjacent to existing rural residential areas and protected open space. It is unlikely that this area would transition into the proposed high-density "city neighborhood."

755.04, 755.06, 756.03, 756.04, 756.06, 757.02, 757.03	North Tustin	This area is developed with single-family homes and contains extreme slopes with no areas zoned for commercial uses. This area is not appropriate for more intense and higher density uses and is unlikely to transition to the proposed "town center, office park, main street, city center and city neighborhood" uses.
1100.06	Rossmoor	This area is developed with single-family homes with limited commercial zoned area. This area is unlikely to transition to the proposed "city center and town center "uses.
878.06, 879.02, 877.03	West Anaheim	This area is developed with single-family homes and contains limited commercial zoned area. This area will not accommodate the proposed increase in employment for "town center, main street, office park, town residential or city neighborhood" development.
320.56, 320.23	Ladera Ranch and Ranch Plan PC	Proposed employment is less than expected in two planned communities which have been approved and entitled. The number of proposed households is substantially less than approved and entitled. The employment and households expected in these communities are reflected in OCP 2006.
626.10, 755.15	John Wayne Airport	Substantial employment growth has been proposed on the site where John Wayne Airport is located. Substantial household growth has also been proposed in the crash zone for JWA.
524.04	Musick Jail	Substantial household growth has been proposed on the site where Musick Jail is located. Relocation of the jail is not anticipated.

The Policy forecast is clearly based upon the 2006 "Compass Map/RTP 2035 Test Scenario" which did not accurately depict anticipated growth in the unincorporated area. The Policy forecast does not take into consideration constraints due to land formations, current public facility uses that are unlikely to change, local land use policy or entitlements which have been approved by the Board of Supervisors.

However, the Baseline forecast is based upon the 2006 Orange County Projections (OCP 2006) which the County supports as the superior growth forecast for use in the 2008 RTP. OCP 2006 was developed in consultation with local Orange County jurisdictions and accurately reflects the anticipated household and employment growth in the unincorporated area between 2005 and 2035. Therefore, the County recommends that SCAG staff support the Baseline forecast for use in the 2008 RTP.

Thank you for your consideration. If you have any questions please contact Ruby Maldonado of my staff at (714) 834-4414.

Sincerely,

for Tim Neely, Director
Planning and Development Services

Attachments

cc: Tom Mauk, CEO
Members, Board of Supervisors
Bryan Speegle, Director, RDMD
Tom Daly, Clerk-Recorder
Julia Bidwell, Interim Director, HCS
Hasan Ikhrata, Executive Director, SCAG

COUNTY OF ORANGE
SCAG POLICY FORECAST VS OCP 2006
HOUSEHOLDS AND EMPLOYMENT 2035
(UNINCORPORATED AREA)

SCAG 12/7/07 Policy Forecast Households 2035	OCP 2006 Households 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	SCAG 12/7/07 Policy Forecast Employment 2035	OCP 2006 Employment 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	2000 Census Tracts Split by following jurisdictions (2004 city boundaries for OCP 2006)				PROPOSED LAND USE (SCAG Draft Policy Growth Forecast Map)	EXISTING LAND USE
1,510	373	-4	-1%	1,141	80	-57	-5%	LA HABRA	UNINCORPORATED			City Center, Main Street, Office Park	Developed existing single-family neighborhood.
1,292	311	-16	-2%	350	137	0	0%	YORBA LINDA	UNINCORPORATED			Activity Center, Office Park	Developed existing single-family neighborhood.
1,977	685	-10	-1%	743	136	-7	-1%	ORANGE	VILLA PARK	UNINCORPORATED		Town Center, Main Street, Highway Commercial	Developed existing single-family neighborhood with limited commercial.
1,337	433	-7	-1%	1,003	238	-9	-1%	ORANGE	TUSTIN	UNINCORPORATED		Town Center, Town Residential, City Neighborhood, Residential Subdivision	Developed existing single-family neighborhood with extreme slopes and no commercial.
1,287	363	-11	-1%	648	110	-18	-3%	ORANGE	UNINCORPORATED			City Neighborhood	Developed existing single-family equestrian, rural neighborhood.
3,010	609	-159	-6%	327	121	-6	-2%	MISSION VIEJO	RANCHO SM	UNINCORPORATED		City Neighborhood	Developed existing single-family rural neighborhood adjacent to protected to open space.

COUNTY OF ORANGE
SCAG POLICY FORECAST VS OCP 2006
HOUSEHOLDS AND EMPLOYMENT 2035
(UNINCORPORATED AREA)

SCAG 12/7/07 Policy Forecast Households 2035	OCP 2006 Households 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	SCAG 12/7/07 Policy Forecast Employment 2035	OCP 2006 Employment 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	2000 Census Tracts Split by following jurisdictions (2004 city boundaries for OCP 2006)				PROPOSED LAND USE (SCAG Draft Policy Growth Forecast Map)	EXISTING LAND USE
1,598	229	-3	-1%	6,399	68	-81	-2%	SANTA ANA	TUSTIN	UNINCORPORATED		Town Center, Office Park	Developed existing single-family neighborhood with some landform constraints.
1,193	296	0	0%	1,528	96	-18	-2%	TUSTIN	UNINCORPORATED			City Neighborhood, Office Park	Developed existing single-family neighborhood with some landform constraints.
1,438	1,320	-4	-1%	744	270	-10	-2%	TUSTIN	UNINCORPORATED			City Center, City Neighborhood, Main Street, Office Park	Developed existing single-family neighborhood with some landform constraints.
2,630	1,737	-24	-1%	1,128	799	-43	-4%	ORANGE	TUSTIN	UNINCORPORATED		Town Center, Town Residential, City Neighborhood, Main Street	Developed existing single-family neighborhood with some landform constraints.
2,184	1,494	-10	-1%	692	422	-33	-5%	TUSTIN	UNINCORPORATED			Town Center, City Neighborhood, Main Street	Developed existing single-family neighborhood with some landform constraints.
1,123	1,097	0	0%	1,194	848	-22	-2%	TUSTIN	UNINCORPORATED			City Neighborhood	Developed existing single-family neighborhood with some landform constraints.

COUNTY OF ORANGE
SCAG POLICY FORECAST VS OCP 2006
HOUSEHOLDS AND EMPLOYMENT 2035
(UNINCORPORATED AREA)

SCAG 12/7/07 Policy Forecast Households 2035	OCP 2006 Households 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	SCAG 12/7/07 Policy Forecast Employment 2035	OCP 2006 Employment 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	2000 Census Tracts Split by following jurisdictions (2004 city boundaries for OCP 2006)				PROPOSED LAND USE (SCAG Draft Policy Growth Forecast Map)	EXISTING LAND USE
1,371	1,385	-4	-1%	883	911	-28	-4%	UNINCORPORATED				City Neighborhood, Main Street	Developed existing single-family neighborhood with some landform constraints.

COUNTY OF ORANGE
POLICY FORECAST VS OCP 2006
HOUSEHOLDS 2035
(UNINCORPORATED AREA)

2000 Census Tract	SCAG 12/7/07 Policy Forecast Households 2035	OCP 2006 Households 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	2000 Census Tracts Split by following jurisdictions (2004 city boundaries for OCP 2006)				PROPOSED LAND USE (SCAG Draft Policy Growth Forecast Map)	EXISTING LAND USE
755.15	9,574	0	1,132	14%	COSTA MESA	IRVINE	SANTA ANA TUSTIN	UNINCORPORATED		John Wayne Airport
524.04	5,073	0	938	23%	IRVINE	LAKE FOREST	UNINCORPORATED			Musick Jail
997.03	2,539	139	885	54%	HUNTINGTON BEACH	WESTMINSTER	UNINCORPORATED			Developed existing neighborhood
1100.06	1,931	1,100	841	78%	LOS ALAMITOS	UNINCORPORATED			Town Residential, City Neighborhood, Town Center, Main Street	Developed existing neighborhood
877.03	2,197	1,284	792	57%	ANAHEIM	UNINCORPORATED			Town Center, Office Park, Town Residential, City Neighborhood	Developed existing neighborhood
879.02	2,222	413	713	48%	GARDEN GROVE	STANTON	UNINCORPORATED		Town Residential, City Neighborhood	Developed existing neighborhood
997.02	3,114	1,121	595	24%	HUNTINGTON BEACH	WESTMINSTER	UNINCORPORATED		Town Center, Town Residential	Developed existing neighborhood
878.06	2,447	359	570	31%	ANAHEIM	GARDEN GROVE	STANTON	UNINCORPORATED	Town Center, Main Street	Developed existing neighborhood
626.04	7,141	535	-594	-8%	IRVINE	LAGUNA BEACH	NEWPORT BEACH	UNINCORPORATED		Developed existing neighborhood
524.26	8,794	7,461	-610	-7%	IRVINE	LAKE FOREST	UNINCORPORATED			Protected open space, public facilities.
636.03	3,321	930	-1,141	-26%	COSTA MESA	NEWPORT BEACH	UNINCORPORATED			Undeveloped residential and existing public facilities.
863.03	7,333	0	-1,186	-14%	ANAHEIM	UNINCORPORATED				Only unincorporated area is Santa Ana River.
626.10	6,325	0	-1,886	-23%	COSTA MESA	IRVINE	NEWPORT BEACH	UNINCORPORATED		John Wayne Airport

COUNTY OF ORANGE
POLICY FORECAST VS OCP 2006
HOUSEHOLDS 2035
(UNINCORPORATED AREA)

2000 Census Tract	SCAG 12/7/07 Policy Forecast Households 2035	OCP 2006 Households 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	2000 Census Tracts Split by following jurisdictions (2004 city boundaries for OCP 2006)				PROPOSED LAND USE (SCAG Draft Policy Growth Forecast Map)	EXISTING LAND USE
626.21	3,952	0	-2,291	-37%	IRVINE	LAGUNA HILLS	LAGUNA WOODS	UNINCORPORATED		Unincorporated area is protected open space.
320.23	3,555	5,178	-4,072	-54%	SAN CLEMENTE	SAN JUAN CAPISTRANO	UNINCORPORATED			Ranch Plan Planned Community with 14,000 approved and entitled dwelling units.
320.56	5,641	10,028	-4,842	-47%	RANCHO SM	UNINCORPORATED				Ladera Ranch and Ranch Plan Planned Communities with approved and entitled dwelling units.

COUNTY OF ORANGE
POLICY FORECAST VS OCP 2006
EMPLOYMENT 2035
(UNINCORPORATED AREA)

2000 Census Tract	SCAG 12/7/07 Policy Forecast Employment 2035	OCP 2006 Employment 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	2000 Census Tracts Split by following jurisdictions (2004 city boundaries for OCP 2006)				PROPOSED LAND USE (SCAG Draft Policy Growth Forecast Map)	EXISTING LAND USE
863.03	37,907	0	4,776	15%	ANAHEIM	UNINCORPORATED				Unincorporated area is Santa Ana River
626.04	10,699	370	4,266	67%	IRVINE	LAGUNA BEACH	NEWPORT BEACH	UNINCORPORATED		Developed existing neighborhood
997.03	6,906	105	2,433	55%	HUNTINGTON BEACH	WESTMINSTER	UNINCORPORATED			Developed existing neighborhood
997.02	3,983	886	1,661	72%	HUNTINGTON BEACH	WESTMINSTER	UNINCORPORATED		Town Center, Town Residential	Developed existing neighborhood
1100.06	2,097	485	1,294	162%	LOS ALAMITOS	UNINCORPORATED			Town Residential, City Neighborhood, Town Center, Main Street	Developed existing neighborhood
878.06	1,782	70	896	102%	ANAHEIM	GARDEN GROVE	STANTON	UNINCORPORATED	Town Center, Main Street	Developed existing neighborhood
879.02	1,345	78	799	147%	GARDEN GROVE	STANTON	UNINCORPORATED			Developed existing neighborhood
877.03	1,101	378	594	118%	ANAHEIM	UNINCORPORATED			Town Center, Office Park, Town Residential, City Neighborhood	Developed existing neighborhood
636.03	6,972	442	-690	-10%	COSTA MESA	NEWPORT BEACH	UNINCORPORATED			Undeveloped residential land and existing public facilities
755.15	129,084	98	-1,711	-2%	COSTA MESA	IRVINE	SANTA ANA TUSTIN	UNINCORPORATED	Town Center	John Wayne Airport
320.56	6,432	11080	-4,784	-43%	RANCHO SM	UNINCORPORATED				Ladera Ranch and Ranch Plan Planned Communities
524.04	25,946	1841	-4,819	-16%	IRVINE	LAKE FOREST	UNINCORPORATED			Musick Jail

COUNTY OF ORANGE
POLICY FORECAST VS OCP 2006
EMPLOYMENT 2035
(UNINCORPORATED AREA)

2000 Census Tract	SCAG 12/7/07 Policy Forecast Employment 2035	OCP 2006 Employment 2035	Year2035 Numerical difference whole CT from CDR map	Year2035 % difference whole CT from CDR map	2000 Census Tracts Split by following jurisdictions (2004 city boundaries for OCP 2006)				PROPOSED LAND USE (SCAG Draft Policy Growth Forecast Map)	EXISTING LAND USE
320.23	5,615	7191	-6,525	-54%	SAN CLEMENTE	SAN JUAN CAPISTRANO	UNINCORPORATED			Ranch Plan Planned Community with approved entitlements
626.21	12,788	0	-6,657	-35%	IRVINE	LAGUNA HILLS	LAGUNA WOODS	UNINCORPORATED		Unincorporated area is protected open space
626.10	73,913	2887	-9,560	-12%	COSTA MESA	IRVINE	NEWPORT BEACH	UNINCORPORATED		John Wayne Airport

COUNTY OF ORANGE

RESOURCES & DEVELOPMENT MANAGEMENT DEPARTMENT

Bryan Speegle, Director
300 N. Flower Street
Santa Ana, CA

P.O. Box 4048
Santa Ana, CA 92702-4048

Telephone: (714) 834-2300
Fax: (714) 834-5188

February 11, 2008

Greg Nord, Transportation Analyst
Orange County Transportation Authority
550 S. Main Street
Orange, California 92863-1584

Re: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
2008 REGIONAL TRANSPORTATION PLAN

Dear Mr. Nord:

Thank you for the opportunity to review Southern California Association of Governments 2008 Regional Transportation Plan (RTP). The County has reviewed the listing of the projects within the unincorporated area of Orange County and offer the following comments:

- ORA120504 – La Pata Avenue Widening– Estimated project cost should be changed to $70,000,000.

- ORA120507 – Ortega Highway Widening (from 2 – 4 lanes) – Estimated project should be changed to $74,625,000.

We would also like to request the addition of the following projects to the RTIP project list:

- Moulton Parkway (Via Lomas to Santa Maria) with a cost estimate of $8,200,000.

- Moulton Parkway (Santa Maria to El Pacifico) with a cost estimate of $8,500,000 (Right-of-Way and Construction.

- Cow Camp Road (Antonio Parkway to Ortega Highway) with a cost estimate of $94,000.000.

Please use this information to update the RTIP.

Should you have any questions regarding this correspondence please call me at (714) 834-2694.

Sincerely,

Harry Persaud, Manager
Public Works, Road Programs

HP/mmc

cc: Bryan Speegle, Director, Resources and Development Management Department
Tim Neely, Director, Planning and Development Services
Ignacio Ochoa, Director, Chief Engineer, Public Works
Kia Mortazavi, Executive Director of Development, Orange County Transportation Authority

PARAMOUNT
The City

City Council
(562) 220-2223

PEGGY LEMONS
Mayor

GENE DANIELS
Vice Mayor

DR. TOM HANSEN
Councilmember

DARYL HOFMEYER
Councilmember

DIANE J. MARTINEZ
Councilmember

January 10, 2008

The Honorable Richard Dixon
1st Vice President, SCAG
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Dear Vice President Dixon:

The City of Paramount, a member city of the Orangeline Development Authority, thanks you for introducing the motion at the Southern California Association of Governments (SCAG) meeting of December 6, 2007 to retain the Orangeline High Speed Maglev Project in the Draft 2009 Regional Transportation Plan (RTP). We recognize that you had a number of questions and concerns about the Project at earlier SCAG meetings at which the Draft RTP was discussed. Your support at the conclusion of the deliberations, after the facts were presented and your questions were answered and after the level of support for the Project was demonstrated, made your positive action that much more meaningful.

We are concerned however, that some would undermine the progress that has been made to move the Orangeline High Speed Maglev forward. Our city's support for the Orangeline High Speed Maglev is based largely on the private funding approach that is being pursued to pay for the project, and on the recognition that there are tremendous transportation needs in our city and throughout the region that cannot be met with public funds alone. As such, the Project helps to ensure that other needed projects that rely primarily on public funds are not threatened.

Yet, we recognize that some would still prefer to see the Orangeline High Speed Maglev Project removed from the RTP. We look forward to your continued and active support of the Project at SCAG and in Orange County, and for its retention in the RTP. As a key member of SCAG's leadership, you represent all of SCAG's member cities in advancing all of the projects in the Regional Transportation Plan, including the Orangeline High Speed Maglev Project. As such, we rely on your leadership to represent our interests. Any efforts to remove the Orangeline High Speed Maglev from the Draft 2009 RTP would be a major setback to the spirit of cooperation among the local officials who represent their cities' interests at SCAG and between the elected leadership of the two counties. It would also undermine the efforts to achieve meaningful transportation solutions.

Be assured that your efforts in support of the Orangeline High Speed Maglev and other projects of interest to the City of Paramount will be kept in mind as we look to maintaining strong, representative leadership at SCAG in the years ahead.

Sincerely,

Diane J. Martinez

Diane J. Martinez
Councilmember

1957-2007 50th ANNIVERSARY

H:\CityManager\LETTERS\COUNCIL\DM\Dixon.doc

16400 Colorado Avenue • Paramount, CA 90723-5012 • Ph: 562-220-2000 • Fax: 562-630-6731
www.paramountcity.com

DEPARTMENT OF TRANSPORTATION

February 14, 2008

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

Transmitted Via Email to meaney@scag.ca.gov

Re: Comments on the Draft 2008 Regional Transportation Plan

Dear Ms. Meaney:

Thank you for the opportunity for the City of Pasadena to provide comments on the Draft 2008 Regional Transportation Plan (RTP). The City of Pasadena's General Plan promotes the priority of non-auto trips and sets the tone for the Mobility Element with the Guiding Principle "Pasadena will be a city where people can circulate without cars." The Mobility Element relies upon an integrated and multi modal transportation system that provides choices for everyone living and working in the city. Implementing the Mobility Element will assist Pasadena in becoming a more livable city for the 21st Century.

The extension of the Gold Line from its existing terminus in Pasadena to Montclair is an integral component of the infrastructure needed for Pasadena to promote a livable community and encourage non-auto travel. Pasadena continues to actively support the extension of the Gold Line and we support the project's inclusion in the RTP.

I believe you are aware of the active role Pasadena has played over a long period regarding any freeway connection that traverses our community. The issue of the freeway gap closure, albeit being a tunnel alternative as opposed to a surface freeway, continues to be a sensitive topic among our elected officials, neighborhood groups and city residents.

221 East Walnut Street, Room 210 · Pasadena, CA 91101
(626) 744-8747

The upcoming preliminary engineering and technical studies must consider all the routes studied as part of the previous Feasibility Assessment, in addition to any other route that may be deemed practicable as part of the next study. This concept, which is "route neutral", is in conformance with the provision for the SAFETEA-LU technical corrections bill you authored and passed by the House on March 26, 2007. The Draft RTP includes the 710 tunnel gap closer as a toll facility. We request that the RTP recognize the on-going studies for this facility and not presuppose the ongoing studies by defining a route for the 710 gap closure project.

Thank you for your consideration of this request.

Sincerely,

F. C. Dock

FREDERICK C. DOCK
Director

February 15, 2008

Antonio R. Villaraigosa, *Mayor*
City of Los Angeles

Board of Harbor Commissioners

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President

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Executive Director

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Post Office Box 151

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

RE: Draft 2008 Regional Transportation Plan (RTP)

Dear Mr. Ikhrata:

The Port of Los Angeles has the following additional comments on the *Draft 2008 Regional Transportation Plan,* dated December 6, 2007:

Project Lists:

1. Modify LA0D390:
   - Description: Arterial street and freeway-to-freeway interchange improvements at SR 47 (Vincent Thomas Bridge) and I-110; and modification to I-110 NB on-off ramps termini at John S. Gibson Boulevard (the nature of this change should not require revisions to the air quality conformity analysis).
   - Benefits:
     - Daily traffic delay reductions (Year 2030): total vehicular and truck delay - 5,174 vehicle-hours and 1,423 truck-hours, respectively.
     - Annual emissions reductions (Year 2030): 361 tons/year.
   - Cost/Funding:

Total Project Cost	State TCIF Request	Identified Matching Funds	Match Source
$67.8 M	$24.7 M	$4 M	SAFETEA-LU
		$14.02 M	Proposition C
		$23.58 M	POLB/POLA cargo fees
		$1.5 M	Port revenue

   - Deliverability:

Phase-Milestone	Start	End
PA/ED	April 2008	June 2009
PS&E	July 2009	June 2010
Construction & ROW	July 2010	April 2013

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2. Modify LA960179 – Modify the name to South Wilmington Grade Separation:

   - Cost/Funding:

Total Project Cost	State TCIF Request	Identified Matching Funds	Match Source
$61.5 M	$17 M	$19.288 M $25.212 M	LA METRO Prop C POLB/POLA cargo fees

3. Add the following project, which is part of the Southern California Consensus Group TCIF requests:

   SR 47/Navy Way Interchange - $47.8M

   - Description: This project eliminates the last traffic signal located on a high-speed State highway that connects I-110 and I-710, via construction of an interchange. Both the SR 47 and I-110 are National Highway System routes. The I-110 and SR 47, combined with I-710, carry approximately 30% of all U.S. waterborne container volume (the I-110 alone carries approximately 10% of all U.S. waterborne containers). This program will reduce congestion, emissions, and improve safety.

   - Benefits:
     - Daily traffic delay reductions (Year 2030): total vehicular and truck delay - 1,900 vehicle-hours and 144 truck-hours, respectively.
     - Annual emissions reductions (Year 2030): 51.4 tons/year

   - Cost/Funding:

Total Project Cost	State TCIF Request	Identified Matching Funds	Match Source
$47.8 M	$20M	$27.8M	Port revenue/cargo fees

- Deliverability:

Phase-Milestone	Start	End
PA/ED	January 2009	January 2010
PS&E	January 2010	January 2011
Construction & ROW	July 2010	July 2013

If you have any questions, or need additional information please contact me at 310-732-7702.

Sincerely,

Kerry Cartwright
Director of Goods Movement

KC:s

LOS ANGELES COUNTY RTIP PROJECTS				
SYS-TEM*	RTP ID	ROUTE	DESCRIPTION	PROJECT COST ($1,000'S)
L	LA450022	0	LUMP SUM PROJECT FOR HIGHWAY SAFETY, REHABILITATION & RECONSTRUCTION, OPERATION, AND SYSTEM BETTERMENTS ACTIVITIES.	$212,515
L	LA57000	0	OCEAN BLVD/TERMINAL ISLAND FREEWAY INTERCHANGE (PORT OF LONG BEACH -- PADP #30) (T21-#742)	$24,636
L	LA960001	0	ANAHEIM ST FROM FARRAGUT AVE TO DOMINGUEZ CHNL WIDENING WIDEN FROM 4 TO 6 LANES (E/P,PS/E ONLY)	$480
L	LA960002	0	BARRINGTON AVE – ALLEY NORTH OF GORHAM AVE TO DARLINGTON AVE WIDENING TO PROVIDE LEFT TURN LANE WIDEN FROM 2 TO 4 LANES	$790
L	LA960005	0	FIGUEROA ST N/O 146TH ST TO W COMPTON BL WIDENING, CURB & GUTTER WIDEN FROM 4 TO 6 LANES	$706
L	LA960018	0	BEVERLY BOULEVARD MONTEBELLO BLVD TO W/O REA DRIVE RECONSTRUCT & WIDEN WIDEN FROM 4 TO 6 LANES	$3,650
L	LA960021	0	PECK ROAD OVER 605 FWY WIDEN BRIDGE WIDEN FROM 2 TO 4 LANES	$3,772
L	LA960134	0	AVENUE S HIGHWAY 14/DOWNING ST (WIDEN 4 TO 6 LANES) 3 LANES IN EA. DIR.).	$8,606
L	LA960142	0	LINDERO CANYON ROAD FROM AGOURA RD TO VIA COLINAS RAMP WIDENING, RAMP/BRIDGE RECONFIGURATION, CONSTRUCT BIKE PATH, RESTRIPE STREET, INTERSECTION WIDENING, SIGNAL COORDINATION (TEA21-#65). FROM 3 NB/2 SB TO 3 NB&SB.	$13,817
L	LA960170	0	MAGIC MOUNTAIN PARKWAY EXTENSION FROM SAN FERNANDO RD TO VIA PRINCESSA: CONSTRUCT A NEW ROAD WITH 3 LANES IN EACH DIRECTION	$21,660
L	LA960176	0	HARRY S BRIDGES BLVD RELOCATION/CONSOLIDATION OF STREETS, STREET INTERSECTIONS, TRAFFIC CHANNELIZATION AND SIGNALIZATION (TEA21-#978)	$101,119
L	LA960179	0	FRIES AVE GRADE SEPARATION (RAILROADWAY)	$53,318
L	LA962314	0	EAST SAN GABRIEL VALLEY SOM PILOT PROJECT TRAFFIC SIGNALS INTERCONNECT PROJECT	$9,071
L	LA962316	0	SELAC-TRAFFIC SIGNAL SYNCH. CORRIDORS PROJECT SIGNAL SYNCH & BUS SPEED IMPROVEMENT PROJECT	$31,112
L	LA9708004	0	SANTA CLARITA PARKWAY FROM BOUQUET CYN RD/SOLEDAD CYN INSTALL NEW ROADWAY (0 TO 4 LANES) (2.5 MILE)	$18,015
L	LA9708289	0	AVE G, FROM RT 14 TO 25TH ST WEST WIDEN FROM 2 TO 6 LANES (0.2 MIME) (TOTAL 6 LANES BOTH DIR). INCLUDES INTER CHANGE IMPROVEMENTS.	$10,434
L	LA9711031	0	CASTAIC CUTOFF FROM LAKE HUGHES RD TO SAN FRANCISQUITO CANYON RD CONTRUCT NEW ROAD 4 12-FOOT LANES AND 10-FOOT SHOULDERS	$8,434
L	LA974083	0	CHANDLER/BURBANK BIKE PATH-WHITEOAK TO PIERCE COLLEGE A 3.2 MILE CLASS I BIKEWAY ON MTA'S CHANDLER/BURBANK RAIL RIGHT-OF-WAY WILL IMPROVE NON-MOTORIZED ACCESS (COMBINED W/LA974078)	$3,749

LOS ANGELES COUNTY RTIP PROJECTS				
SYS-TEM*	RTP ID	ROUTE	DESCRIPTION	PROJECT COST ($1,000'S)
L	LA0D323	0	ACQUISITION AND CONSERVATION OF APPROXIMATELY 15 ACRES OF UNDEVELOPED OPEN SPACE LANDS TO PROVIDE FOR WILDLIFE HABITATS AND IMPROVED NONMOTORIZED RECREATIONAL TRAIL OPPORTUNITIES	$350
L	LA0D324	0	I-5 CORRIDOR ARTERIES-LAKEWOOD IMPROVEMENT BETWEEN I-105 FWY NEAR DALEN ST. & GARDENDALE ST. IMPRVMNTS INCL RECONSTRUCTION OF RDWAY PAVEMNT, WIDEN EXISTING LANE WIDTH.	$2,479
L	LA0D326	0	DEPARTMENT OF PARKS & RECREATION-KENNETH HAHN TRAIL/WALKWAY PROJECT RT 19-021 PROJECT WILL PROVIDE A ONE MILE TRAIL CONNECTING THE PARK ACCESS BRIDGE WITH VISTA PACIFICA;	$89
L	LA0D330	0	RIO HONDO TRAIL-GARVEY ST. BRIDGE RT19-022. REFURBISHMENT OF A 160X12 BRIDGE & CONSTRUCT 3 FT CONCRETE RETAINING WALL & ADDITION OF COMPACTED GRANITE (NON-CAPACITY PROJECT).	$200
L	LA0D333	0	ANAHEIM STREET PLANNING, COORDINATION AND DESIGN OF OPERATIONAL & STREETSCAPE (NON-CAPACITY IMPROVEMENTS).	$566
L	LA0D336	0	SR14/AVENUE K INTERCHANGE IMPROVEMENTS. WIDEN NORTHBOUND OFFRAMP AND 15TH STREET WEST. WIDEN NB OFFRAMP & 15TH STREET WEST& WIDEN N/B OFFRAMP FROM 3 TO 4 LANES AT AVE K/15TH ST-W.	$9,308
L	LA0D344	0	WIDENING OF THE REYES ADOBE ROAD OVERCROSSING OF THE 101 FREEWAY FROM 3 LANES TO 6 LANES, ALONG WITH BIKE LANES AND SIDEWALKS	$8,118
L	LA0D388	0	PARAMOUNT BLVD BETWEEN COVEN ST. AND CANDLEWOOD ST-PAVEMENT REHAB. RAISED MEDIAN AND LANDSCAPE SAFETEALU # 2288	$1,423
L	LA0D390	0	I-110/SR 47/HARBOR BLVD-INTERCHANGE IMPROVEMENTS-PHASE 1-ENHANCEMENTS OF THE OPERATION AND SAFETY OF THE INTER-CHANGE. SAFETEA-LU HPP # 2885	$12,447
L	LA0D391	0	VINCENT THOMAS BRIDGE STUDY – DEVELOP AND ANALYZE ALTERNATIVES TO INCREASE NEEDED CAPACITY. SAFETEA-LU HPP # 297 NON-CAPACITY	$2,165
L	LA0D392	0	GRAND AVE BEUTIFICATION/BETTERMENT PHASE II	$1,587
L	LA0D393	0	GRAND AVENUE/SR 57/60 INTERCHANGE RECONSTRUCTION MODIFY GRAND AVENUE TO ADD ADDITIONAL LANES FOR NB AND SB TRAFFIC, WIDEN THE EXISTING GRAND AVE OVERPASS	$34,780
L	LA0D420	0	SUNSET OVERLOOK TRAILHEAD AREA IN HAHAMONGNA WATERSHED PARK NEAR THE DEVIL'S GATE DAM (GRANT FROM RECREATIONAL TRAILS PROGRAM)	$271
L	LA0D434	0	SHERMAN WAY MEDIAN ISLAND INSTALLATION-DE SOTO TO TOPANGA CANYON: THIS SAFETY ENHANCEMENT PROJECT WILL PROVIDE FOR CONCRETE MEDIAN ISLANDS ALONG THE PROJECT LIMITS TO DETER VEHICLE	$318
L	LA0D439	0	INTELLIGENT TRANSPORTATION SYSTEM LOGISTICS & SYSTEMS MANAGEMENT, WILL PRODUCE AN ITS MASTERPLAN FOR THE GATE-WAY CITIES SUBREGION WITH AN EMPHASIS IN GOODS MOVEMENT	$513
L	LA0D440	0	RETROFIT THE EXISTING CROSSROAD PARKWAY BRIDGE OVER THE UPRR RAILROAD TRACKS AT ROUTE 605 FREEWAY AREA.	$1,078

PUBLIC LAW CENTER
PROVIDING ACCESS TO JUSTICE
FOR ORANGE COUNTY'S LOW INCOME RESIDENTS

Via Facsimile and Electronic Mail

February 19, 2008

ATTN: Jessica Meaney
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Re: Comments to the *2008 Regional Transportation Plan: Making the Connection* of the Southern California Association of Governments

Dear Ms. Meaney:

The Public Law Center (PLC) is a not-for-profit organization that provides free civil legal service to low income individuals and community-based organizations in Orange County.

PLC's clients are low-income and very-low income persons who live and/or work in jurisdictions throughout Orange County which are members of SCAG, including member jurisdictions with transit facilities within their boundaries.

PLC submits these comments (Reply) to the SCAG ***2008 Regional Transportation Plan: Making the Connection (RTP)*** on behalf of such individual clients, and organizational clients, who may be adversely impacted as a result of the RTP and/or as a result of how the policies of the RTP may be either implemented or ignored by its member jurisdictions.

PLC, on behalf of its client community, strongly urges that SCAG include, *as part of its environmental justice policies*, that new residential land uses planned around transit stations include affordable housing, as a portion of the overall housing planned around such transit stations. Such an explicit and articulated environmental justice policy within the RTP would be consistent with federal law and policy which SCAG is charged with implementing. It is well established that very often areas with transit oriented development (TOD) planning fails to include affordable housing as part of its residential land uses. Without a policy by SCAG requiring the inclusion of affordable housing in such TOD districts, which member jurisdictions would require of developers, state and federal environmental justice policies will not be achieved. Moreover, some member jurisdictions in their local planning decide as a policy not to have mixed-income housing within their TOD areas.

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As known to SCAG, the low and very-low income communities, representing a large percentage of ethnic and racial minorities, tend to use public transit facilities more often than in the general population. Densification of residential uses around transit stations without including housing which can serve these potential riders results in suboptimal and inefficient use of a public transit system which, *on the level of a deliberated public policy and a wise expenditure of public funds,* including federal funds which SCAG administers, would be irresponsible. SCAG should not limit its policies to residential plans, if and when proposed, *but should as part of its RTP policies,* affirmatively promote TOD around transit facilities for environmental reasons, including for the mitigation of traffic and air quality impacts resulting from new or renewed urban land uses.

The construction of parking garages, as part of an overall transit facility, is consistently the most expensive part of the overall project. As a pricing mechanism, some authorities have charged a parking premium on those who drive to the transit facility and leave their vehicle parked in the facility while taking advantage of the public transit. Low and very-low income persons who would not be able to live in proximity to the station have no other choice but to pay the premium or ignore public transit entirely. The relative distance of the facility when not living in proximity may prohibit walking, or even a ride to the station, on a daily basis. *Ironically*, those who can pay for housing around such a facility are not the demographic expected to actually use public transit, using regional transportation only on an occasional or recreational basis. Proximity to such transit becomes at best an asset for eventual sale of the residence.

Senate Bill 12

SCAG recently sponsored new legislation in the form of Senate Bill 12, amending Government Code section 65584 and adding section 65584.08. As you know, SB 12 directs SCAG *inter alia* both through its regional housing needs allocations (its RHNA numbers) to increase the mix of housing types, tenure and affordability; promote infill development and social equity; encourage efficient development patterns; and promoting an improved intraregional relationship between jobs and housing; and through its regional transportation plan growth forecasting process to integrate housing planning with projected population growth and transportation.

According to the author of SB 12, Senator Alan Lowenthal, Chairman, Senate Transportation and Housing Committee, SCAG needs to coordinate the RHNA with its regional transportation plan in order to meet federal transportation and air quality mandates.

In a press release at the time of the legislation, SCAG explained that the RHNA pilot program is designed to achieve "smart growth" principles by integrating the growth forecast process into the housing allocation process. SCAG also explained that the planning approach in the legislation provides for greater local input and SCAG flexibility for member jurisdictions to participate in the process that will determine each jurisdiction's housing allocation. Thus, inherent in the new legislation is a mandate for SCAG to adopt such policies which require affordable housing in local TOD planning, as an environmental justice policy and as *an essential implementing measure* for such policies. Through their participation, member jurisdictions would be expected to carry out allocations in relation to their transportation planning and the SCAG regional transportation plan.

Among other duties, SCAG is expected to self-certify to the federal Department of Transportation for highway expenditures and investments that its member jurisdictions are complying with SCAG environmental justice policies, as part of its regional transportation plan. Without such concerted, local implementation measures, the mandate of SB 12 would be meaningless, and SCAG self-certifications could be subject to challenge.

In its 2006-2007 Annual Report (page11), SCAG explained that SB 12 streamlined the RHNA process to for the SCAG region by tying housing to transportation planning, representing the most desired growth scenario for southern California; and that the measure also provides for greater local input by member jurisdictions regarding the planning factors to be used in determining each jurisdiction's housing allocation.

Senate Bill 1689

Other recent legislation is consistent with providing affordable housing within TOD residential areas, in order to achieve environmental justice through the SCAG regional transportation plan. Senate Bill 1689, adding Part 12 (commencing with section 53540) and Part 13 (commencing with section 53560) to Division 31 of the state Health and Safety Code, provides in pertinent part for capital outlays related to infill development, transportation improvements related to infill development projects, and Brownfield cleanup that promotes infill development, through its Regional Planning, Housing and Infill Incentive Account. The legislation also establishes and funds the Transit-Oriented Development Implementation Program to be administered by the state Department of Housing and Community Development. Under the TOD Implementation Program, assistance is provided for the purpose of developing or facilitating the development of higher density uses within close proximity to transit stations that will increase public transit riderships. Loans will be made for housing development within close proximity to a transit station if at least 15 percent of the units are affordable housing for persons of low and very-low income and restricted for a period of 55 years. In considering loan applications, HCD shall consider the extent to which the project or development will increase public transit ridership and minimize automobile trips and the department shall grant bonus points to projects or developments that are in an area designated by the appropriate council of governments (SCAG) for infill development, *as part of a regional plan*.

Fruitvale Transit Village Project

An example of this type of regional transportation planning is planning, funding and development of the Fruitvale Transit Village Project in the City of Oakland. It has become a case study of the U.S. Department of Transportation focusing on *incorporation of environmental justice principles* into the planning and design of the Fruitvale Transit Village, including incorporation of affordable housing units into the residential portion of the TOD project, as a community building tool for the formerly distressed area. The project is instructive on the issues raised in this comment. SCAG is encouraged to study this Bay Area project on various levels ranging from intergovernmental cooperation from federal level to the state level and throughout the Bay Area to design and site planning measures undertaken in the project. It clearly illustrates that the issues raised in this comment can be achieved with appropriate regional planning and implementation measures.

Thank you for your time and consideration of these issues.

Respectfully submitted,

PUBLIC LAW CENTER

Ezequiel Gutierrez, Jr.
Staff Attorney

RANCHO MISSION VIEJO

February 19, 2008

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

Dear Mr. Ikhrata:

RE: Rancho Mission Viejo Comments: SCAG Draft 2008 Regional Transportation Plan, Draft RTP Program Environmental Impact Report, and Draft RTP Growth Forecasts

On behalf of Rancho Mission Viejo I wanted to take this opportunity to comment on the policy-level comments on the draft 2008 Regional Transportation Plan (RTP), draft EIR, and draft RTP growth forecasts.

Rancho Mission Viejo wishes to inform you that entitlement was granted in 2004 by the County of Orange for the "Ranch Plan." This entitlement consisted of a General Plan Amendment, Planned Community Zoning and a Development Agreement which was entered into by the County of Orange and Rancho Mission Viejo. Further, this entitlement provides for the implementation of the Ranch Plan over a period estimated to be 20 to 25 years and includes the potential for development of 14,000 dwelling units (including 6,000 age qualified units) and up to 5 million square feet of non residential development. This entitlement is specific to land owned by Rancho Mission Viejo and is located entirely in unincorporated Orange County.

The assumption that any of this entitlement could be reallocated to any other jurisdiction is incorrect, and any attempt to reallocate it would be opposed by Rancho Mission Viejo.

We would be happy to provide you with additional information on this matter at any time, and look forward to working with you in the future.

Sincerely,

Dan Kelly
Sr. V.P. Governmental Relations
& Corporate Communications

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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

February 14, 2008

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

Subject: Comments on the Draft Regional Transportation Plan and the Policy Growth Forecast

Dear Mr. Wen:

The City of Rancho Santa Margarita is sending this letter to express concerns related to the growth assumptions within the City in SCAG's Policy Growth Forecast as it relates to the draft Regional Transportation Plan (RTP). Staff has reviewed the maps and data provided by SCAG and the Center for Demographic Research and disagrees with SCAG's results. Since the Policy Growth Forecast is one of the variables used in the RTP, the City believes that these issues need to be addressed prior to the adoption of the RTP.

Development in Rancho Santa Margarita began in the 1980s and the City is now essentially built-out. Only a few minor in-fill projects remain within the City. Therefore, major changes in number of households and employment are not expected. Additionally, the City has taken an active role in employment generation and retention and does not anticipate a net loss of any jobs within its commercial establishments. Furthermore, the City has established zoning restrictions that prohibit or restrict specific types of businesses that do not increase the City's employment base. For example, storage facilities and churches are prohibited from the City's Business Park Zoning District and commercial recreation uses, such as dance studios and children's activity centers are restricted within the Business Park. In reviewing the Policy Growth Forecast maps, the City is providing the following comments related to employment and housing broken down by Census Tract:

Census Tract 320.34

The Policy Growth Forecast shows a reduction in 3 households (1%) below the 2006 Orange County Projection (OCP 2006). As stated above, the City is completely built-out within this Census Tract with a relatively young housing stock; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

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It also shows a reduction in 1 job (1%) below the OCP 2006. The City of Rancho Santa Margarita does not have any commercial establishments within this Census Tract; therefore, the City presumes that a reduction in employment is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

Census Tract 320.37

The Policy Growth Forecast shows a reduction in 7 households (1%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

Census Tract 320.38

The Policy Growth Forecast shows a reduction in 3 households (1%) below the OCP 2006. The portion of the Census Tract located within the City's boundary is located within O'Neill Regional Park and no households are expected within this Census Tract; therefore, it is assumed that this reduction in households will not be absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 4 jobs (1%) below the OCP 2006. The City of Rancho Santa Margarita does not have any commercial establishments within this Census Tract; therefore, the City presumes that a reduction in employment is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

Census Tract 320.41

The Policy Growth Forecast shows a reduction in 203 households (32%) below the OCP 2006. The portion of the Census Tract located within the City's boundary is built out; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 10 jobs (4%) below the OCP 2006. The City of Rancho Santa Margarita does not have any commercial establishments within this Census Tract; therefore, the City presumes that a reduction in employment is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

Census Tract 320.42

The Policy Growth Forecast shows a reduction in 154 households (8%) below the OCP 2006. The portion of this Census Tract that is located within the City's boundary is completely built-out with the exception of an eight-unit subdivision, which was approved by the City, but has not been constructed. The remainder of this Census Tract consists of the property within the City's Sphere of Influence. The Rancho Santa Margarita General Plan anticipates 612 dwelling units to be constructed within this area; however, it is not known when this development will occur.

OCP 2006 estimates an increase in eight households by 2035 within this Census Tract. It is unclear to the City why SCAG's Policy Growth Forecast would assume a reduction in the total number of households by 154, when the City estimates an increase in the total number of households.

Additionally, the City has received a proposal to develop a commercial retail center within this Census Tract. The site consists of a 2-acre lot with a single family home. The proposal would include the removal of the single family home and the construction of approximately 21,000 square feet of retail and general office space.

The Growth Forecast Policy assumes a reduction in 5 jobs (1%) from this Census Tract. However, the City disagrees with this forecast as it is assumed that the site would create additional jobs if the proposed development is approved. An assumption of employment reduction within this Census Tract would be premature.

Census Tract 320.43

The Policy Growth Forecast shows a reduction in 4 households (1%) below the OCP 2006. The portion of the Census Tract located within the City's boundary is located within O'Neill Regional Park and no households are expected within this Census Tract; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 20 jobs (7%) below the OCP 2006. As stated previously, the City has taken an active role in employment generation and retention and does not anticipate a net loss of any jobs within its commercial establishments; therefore, the City presumes that a reduction in employment is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

Census Tract 320.44

The Policy Growth Forecast shows a reduction in 7 households (1%) below the OCP 2006. The portion of the Census Tract located within the City's boundary is located within O'Neill Regional Park and no households are expected within this Census Tract; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 14 jobs (2%) below the OCP 2006. The City does not have any commercial establishments within this Census Tract; it is a regional park.

Census Tract 320.48

The Policy Growth Forecast shows a reduction in 5 households (1%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 1 job (1%) below the OCP 2006. The City does not have any commercial establishments within this Census Tract; therefore, the City presumes that a reduction in employment is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

Census Tract 320.49

The Policy Growth Forecast shows a reduction in 159 households (6%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 6 jobs (2%) below the OCP 2006. The City does not have any commercial establishments within this Census Tract; therefore, the City presumes that a reduction in employment is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

Census Tract 320.50

The Policy Growth Forecast shows a reduction in 2 households (1%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract; therefore, the City presumes that a reduction in employment is

either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 42 jobs (7%) below the OCP 2006. The City does not agree with this assumption, since the only commercial establishment located within this Census Tract is currently proposing major improvements to the site for the sole purpose of attracting businesses. As stated previously, the City has taken an active role in employment generation and retention and does not anticipate a net loss of any jobs within its commercial establishments; therefore, the City presumes that a reduction in employment is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita. In fact, the City would actually anticipate a net increase in the number of jobs created within this Census Tract.

Census Tract 320.51

The Policy Growth Forecast shows a reduction in 6 households (1%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract with a housing stock that is approximately 20 years old; therefore, since this Census Tract is located completely within the City's boundaries, it is unclear why the policy growth forecast would show a reduction in households.

It also shows a reduction in 8 jobs (2%) below the OCP 2006. The City does not have any commercial establishments within this Census Tract; therefore, it is unclear how SCAG has determined a net loss in 8 jobs within this Census Tract.

Census Tract 320.53

The Policy Growth Forecast shows a reduction in 8 households (1%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 332 jobs (6%) below the OCP 2006. The City does not agree with this assumption, since this Census Tract comprises the City's Business Park. As stated previously, the City has taken an active role in employment generation and retention and does not anticipate a net loss of any jobs within its commercial establishments. In fact, the City would actually anticipate a net increase in the number of jobs created within this Census Tract.

Census Tract 320.54

The Policy Growth Forecast shows a reduction in 7 households (1%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract with a housing stock that is approximately 15-20 years old; therefore, since this Census Tract is located completely within the City's boundaries, it is unclear why the policy growth forecast would show a reduction in households.

It also shows a reduction in 143 jobs (10%) below the OCP 2006. The City does not agree with this assumption, since this Census Tract comprises the majority of the City's commercial and retail establishments. As stated previously, the City has taken an active role in employment generation and retention and does not anticipate a net loss of any jobs within its commercial establishments. In fact, the City would actually anticipate a net increase in the number of jobs created within this Census Tract.

Census Tract 320.55

The Policy Growth Forecast shows a reduction in 2 households (1%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract with a housing stock that is approximately 15-20 years old; therefore, since this Census Tract is located completely within the City's boundaries, it is unclear why the policy growth forecast would show a reduction in households.

It also shows a reduction in 4 jobs (2%) below the OCP 2006. The City does not have any commercial establishments within this Census Tract; therefore, it is unclear how SCAG has determined a net loss in 4 jobs within this Census Tract.

Census Tract 320.56

The Policy Growth Forecast shows a reduction in 4,842 households (47%) below the OCP 2006. As stated above, the City is completely built-out within this Census Tract; therefore, the City presumes that a reduction in households is either inaccurate or not a reduction absorbed by the City of Rancho Santa Margarita.

It also shows a reduction in 4,784 jobs (43%) below the OCP 2006. The City does not have any commercial establishments within this Census Tract; therefore, it is assumed that any reduction in jobs would not be absorbed by the City of Rancho Santa Margarita.

The City of Rancho Santa Margarita appreciates the opportunity to comment on the Regional Transportation Plan and the Policy Growth Forecast. We hope that these adjustments can be incorporated in to the RTP and Policy Growth Forecast prior to its final adoption. Should you have any questions regarding these comments, please call me at (949) 635-1800 x6704.

Sincerely,

Nate Farnsworth
Planner, AICP

cc: Steven E. Hayman, City Manager
Kathleen Haton, Development Services Director
Richard Dixon, SCAG District 13
Tracy Sato, OCCOG TAC
Gail Shiomoto-Lohr, OCCOG TAC

Draft 2008 Regional Transportation Plan
Comments from the
Riverside County Transportation Commission

The Draft 2008 RTP is a monumental planning document that covers a vast geographic region and densely populated area with many transportation and air quality challenges. The RTP identifies strategies to maintain and foster a vibrant economy, healthful air quality, acceptable traffic congestion levels, and overall quality of life. We would like to commend SCAG staff for their outstanding work in preparing this document.

Given that the RTP covers many transportation modes, regions, and subregions, staff is providing comments that represent Riverside County policies and plans that support the RTP vision, goals and objectives.

Our comments are provided under various sections of the plan.

Overview

There is no mention of streamlining processes currently required to deliver transportation projects. This should be one of the goals of the plan. There are too many restrictions in the delivery process which prevent projects from being delivered in a reasonable timeframe. Without a concentrated effort to work with federal and state agencies in reducing red-tape, projects will continue to be delayed and costs will continue to increase due to unnecessary "process" delays.

The President and Congress established the Section 1909 Committee to review and make recommendations regarding the implementation, practices, and policies identified in SAFETEA LU. The report was released last month and there are significant recommendations that, if implemented, would result in changes to project delivery processes to reduce the time to deliver projects, and provide additional sources of revenues needed to fund transportation projects. .

Highways and Arterials Report

Page 1 – There is discussion that the improvements and additions to the system have not kept pace with the region's increasing population and transportation demand due to rising costs of materials, increased environmental awareness, and community opposition. However, additional factors to rising costs include lack of stable funding, lack of streamlining federal and state project delivery processes, and state and federal laws that lengthen the project delivery cycle.

Page 6 – A statement is made that the average speed on an HOV lane is lower than on a mixed flow lane. Is this true for each county? Would like to see the breakout for each county.

Page 27 – Delete statement regarding proposed temporary conversion of HOV lanes on Route 60 from full-time to part-time. This project was rejected by FHWA.

Page 45 – The document describes the need to preserve right-of-way in laying the groundwork for advancing long-range transportation improvement projects and refers to CETAP as a template for other agencies and jurisdictions seeking to preserve rights-of-way for long-range transportation needs. We appreciate SCAG's reference of the CETAP process.

There is additional work needed on identifying long range transportation corridor projects in the Plan. Current interpretation among federal agencies require long-range transportation projects to be financially constrained. However, it is difficult to predict the costs, design, and right-of-way needs for projects that are planned for 20-30 years in the future. Yet, it is extremely important to have these projects included in the transportation model to assess impacts and benefits of these projects on the regional system.

There is also an understanding on behalf of federal agencies and legislators, that if projects are not included in the Plan, then the project may not be eligible for federal funds. The need to clarify the standing of long term projects in the Plan is critical so that these projects can be developed and eligible for all funding sources and for each project phase.

Further, federal agencies require projects to be modeled in order to receive federal approval of the environmental document. Since this information is provided to SCAG prior to the environmental completion, educated guess work on behalf of planners and engineers regarding the preferred alignment, design plans, and cost of the project must be provided. As projects get closer to implementation and phases are completed, it is certain that there will be changes to the original estimates, and amendments to the RTP will be required. There needs to be more flexibility on behalf of the federal agencies to decrease the amount of amendment needed for each project. The Plan and the Regional Transportation Improvement Program are not accounting documents, however; project descriptions, cost, and schedules continue to be scrutinized for absolute consistency causing many months of delays to amend the Plan and TIP.

In essence, transportation planners and engineers are required to submit preferred alternatives and design elements of a project for modeling and conformity purposes prior to the completion of environmental documents, and yet are prohibited to streamline or expedite the project delivery cycle at the time of project implementation. We recommend that SCAG facilitate discussions with federal agencies, county transportation commissions, and Caltrans to eliminate rules that conflict with the region's ability to deliver projects expeditiously so that the project benefits in the Plan can be realized sooner and at reasonable costs.

Goods Movement

In general, Goods Movement strategies identified in the Plan need further analysis. Each strategy needs to be thoroughly reviewed to obtain stand-alone benefits and to evaluate the feasibility of the strategies from a technical, implementation, institutional, political, and financial standpoint. To date, the more significant strategies have not been reviewed and adequately addressed in this manner, particularly the high speed freight train and rail electrification.

For example, inclusion of a high speed freight train at a cost of $18 billion warrants further review. This cost is significant and the feasibility of this proposal needs to be analyzed and compared with more effective and cleaner systems for moving freight. It is also unclear if the $18 Billion includes all the grade separation needed to make current rail lines usable for a HSRT system.

Regarding electrification of trains, the RTP identifies a significant amount of goods movement via electrification of trains and other modes of transit. However, the Plan does not address the additional power needs to supply all these new modes of transportation. There needs to be more analysis regarding the feasibility of electrifying the rail lines and the institutional framework needed to make this a reality. We suggest this be included in the Strategic Plan so that a funding and implementation plan is developed and adopted by all affected agencies.

On page 125, Exhibit 3.13, the Avenue 50 grade crossing has been grade separated and can be removed from this list.

Transit/Rail

The Perris Valley Line commuter rail extension is included in the plan and we received notification that President Bush's FY 08/09 budget contains $50 million for the project with an understanding that the remaining $25 million will be included in the following year's budget, thus providing the entire federal government commitment of $75 million for the entire project. This demonstrates a high level of confidence and support of the project from the Federal Transit Administration and should be reflected in the text of the RTP.

On pages 3, 105, and 108 of the transit section, please add the following Bus Rapid Transit Service projects for RTA:

Magnolia Corridor Phase 1 (city of Riverside)
Moreno Valley Corridor Phase 2 (city of Moreno Valley)

In addition, on page 13, please change the status of the Metrolink: Perris Valley Line from "planned" to "project development".

Travel Demand Management

Transportation Strategy –

Page 92, Add to sentence, "Knowledge about current travel conditions on the transportation system can be used by travelers to select among alternatives to driving alone *or by avoiding making the trip altogether, which is also known as congestion avoidance*."

Page 92-93, Under "Increasing Rideshare":

Bullet 1: How can programming public funds in the RTIP maintain the public sector share of the existing market and increase carpools? We disagree with this statement and suggest deleting.

Bullet 2: Add "*Work with county transportation commissions and partners to* provide "seamless" intra- and inter-county carpool services……."

Bullet 5: How will a dedicated funding source for planning and implementing vanpool programs and services be established? Suggest rewording to: *"Identify current dedicated funding sources and work with county transportation commissions and partners on identifying additional new funding sources".*

Bullets 6 and 7: It is unclear how the expansion of vanpool services will be provided or how staffing and resources will be increased. This proposal needs to be fully vetted with county transportation commissions and partners. Further, how and who will facilitate a regionally coordinated marketing strategy? Need to discuss this proposal with all involved to get buy off. County transportation commissions have already been coordinating and funding such programs.

Travel Demand Management Report

Page 1, Second paragraph states that the staying power of soft TDM strategies often fades over time. We disagree with this statement as this is not the case in Riverside County. Suggest rewording or state Riverside County as an exception. Our data indicates that the number of trips reduced in Riverside County increases every year.

Page 2, under "Increasing Rideshare", these bullets and the bullets outlined above do not incorporate the current efforts undertaken by county transportation commissions. Therefore, it is unclear if SCAG wants to resurrect their involvement in rideshare as they did a few years ago, or become more involved in current activities. Need clarification.

Page 4, examples given under Trip Generation are Telecommuting, web-based retail. Suggest adding "congestion avoidance thru real time traffic data on the web so that commuters understand conditions."

Examples under Route Selection include traffic calming and vehicle navigation systems. Suggest adding "real time traffic data on the web so that commuters can understand conditions."

Overall discussion on pages 1-4 does not address the marketing strategy of the county transportation commissions, which is to corporate partners. The county transportation commissions market to business and their employees, not end user commuters. This should be reflected in the document.

Page 5, under "Scale Congruence", the statement of "But geographic focus of the TDM program and the relatively small share of regional vehicle trips mean that regional congestion levels are unlikely to be affected" seems to undercut the effort of mitigating congestion at local levels, which is still vitally important.

Page 8, under "Understanding the Logic of TDM:…" it states that the effectiveness of soft TDM programs tends to diminish over time". However, the State of the Commute report shows a different result for Riverside County.

Overall discussion tends to downplay importance of TDM soft programs. Suggest adding language that addresses the need for soft and hard programs, and that regions vary and need a "tool box" containing both sets of strategies to support the different needs of the different regions.

Page 10, there is no mention of the "State of the Commute Report", which provides a more positive light on TDM. Need to incorporate State of the Commute report in this section. Currently, sending mixed messages with the commute report more positive then the RTP TDM section.

Page 12, there is a statement that says that "carpooling has declined over the past decade….." Again, this is not true in Riverside County, which is also indicated in the "State of the Commute".

<u>Intelligent Transportation Systems Report</u>

Page 3, RCTC supports the recommended policies and actions for ITS. The third policy/action that states "Identify funding sources to assure that transportation system operations are funded", it is suggested to add language indicating that this effort needs to be coordinated with the county transportation commissions, Caltrans, and other agencies implementing ITS systems.

Growth Forecast

Executive Summary

Page 13, Integrated Land Use - Since SCAG does not have any land use authority greater emphasis needs to be placed on educating local officials and the public on the need to change current land use policies in order for the strategies to be implemented.

The Policy Growth Forecast needs to be revisited to ensure that the Compass Strategies developed by local agencies have been incorporated into the Policy Growth Forecast. The Compass Strategies identify high density and transit oriented development so that trip lengths are reduced, which benefit inland counties. The Policy Growth Forecast should reflect a balance in the number of additional households required for each county (by income type) and the number of jobs in each county.

Financial Plan

Support the finance mechanisms identified in the RTP Financial Plan, including those identified for long-range projects such as CETAP, and our proposed toll facilities on I-15 and SR 91. However, we ask that the revenue source of Riverside County Measure A (Bond Anticipation Notes) be removed until such time our long range plan includes this source of revenue.

FRANK V. ZERUNYAN
Mayor
JUDY MITCHELL
Mayor Pro Tem
JOHN C. ADDLEMAN
Council Member
SUSAN SEAMANS
Council Member
STEVEN ZUCKERMAN
Council Member
DOUGLAS R. PRICHARD
City Manager

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February 11, 2008

Dr. Simon Choi, AICP
Southern California Association of Governments
818 West 7th Street 12th Floor
Los Angeles, CA 90017

Re: City of Rolling Hills Estates - Analysis of Population Estimates and Projections

Dear Dr. Choi,

The purpose of this letter is to further analyze the City population estimates and projections that we discussed on our telephone conversation of February 4, 2008. The City would like to confirm its population estimates and projections to ensure that population associated with approved and proposed housing units in the City will result in a population increase that is substantially consistent with the population estimated and projected by the Southern California Association of Governments (SCAG).

The 2000 U.S. Census reported a City population of 7,676 persons which is reflected in Table E-5 of the State of California, Department of Finance (DOF), *E-5 Population and Housing Estimates for Cities, Counties and the State, 2001-2007, with 2000 Benchmark, Sacramento, California, May 2007*. In the same table, DOF estimates a 2007 City population of 8,099 persons, an increase of 423 persons.

The noted DOF table further indicates that the housing increase in the City from the period 2000-2007 consisted of 43 single-family detached units. Given the City's household population per detached single-family unit of 2.91 persons (Rolling Hills Estates Municipal Code Title 16.08.030, Population Density Determination) which is based on the 2000 U.S. Census, it is estimated that 125 persons would have been added to the City population between 2000 and 2007. When added to the City's 2000 Census population, the City population in 2007 would, therefore, be estimated at 7,801 persons which is 298 persons less than estimated by DOF in 2007.

In 2010, SCAG projects a City population of 8,131 persons according to projections in the 2004 Regional Transportation Plan. Approved City housing projects that would reasonably be occupied in the period 2008-2010 consists of 133 multi-family units. A summary of approved and proposed development as well as their estimated population and year of occupancy is indicated in the table below.

Project	Single-Family Detached	Single-Family Attached	Multi-Family	Estimated Year of Occupancy
Approved Projects				
627 Deep Valley Drive			58	2010
901 Deep Valley Drive (Rolling Hills Villas)			41	2010
981 Silver Spur Road (Silver Spur Court)			18	2010
827 Deep Valley Drive			16	2010
Subtotal			*133*	
Proposed Projects				
927 Deep Valley Drive (Mediterranean Village)			75	2015
Butcher Ranch Subdivision	12			2015
1 Tanglewood Lane	2			2015
655-683 Deep Valley Drive and 924-950 Indian Peak Road		69	100	2015
2901 Palos Verdes Drive North	2			2015
26311 and 27000 Palos Verdes Drive East (Chandler Ranch/Rolling Hills Country Club)	112			2015
Subtotal	*128*	*69*	*175*	
Total Units	**128**	**69**	**308**	

Given the City population per household of 1.84 persons for multi-family units (Rolling Hills Estates Municipal Code Title 16.08.030, Population Density Determination), it is estimated that 245 persons would occupy the 133 new units by 2010 (see table below). When added to the City population of 7,801 estimated in 2007, the City's population would be 8,046 persons in 2010, which is 85 persons less than the SCAG projection of 8,131.

Unit Type	# of Units	Persons/ Household	Additional Population
Multi-Family	133	1.84	245
City Staff Projected 2010 Population			**8,046**
SCAG Projected 2010 Population			**8,131**

The City is currently in the public hearing phase of the Mediterranean Village multi-family project which would add 138 persons to City population (75 units x 1.84 persons/household). While it is not envisioned that these units would be occupied by 2010, staff wishes to note that an increase in 138 persons would result in a population of 8,184 persons, only 53 persons more than the SCAG projection of 8,131 (less than 1% increase).

In 2015, SCAG projects a City population of 8,162 according to projections in the 2004 Regional Transportation Plan. It is estimated that 128 single-family detached, 69 single-family attached (townhomes), and 175 additional multi-family units (including the 75 units from the Mediterranean Village project) could be occupied in the period 2011-2015 based upon projects currently in application with the City. The table below summarizes the additional City population estimated from these units.

Unit Type	# of Units	Persons/Household	Additional Population
Single-Family Detached	128	2.91	373
Single-Family Attached	69	2.10	145
Multi-Family	175	1.84	322
Total Additional Population (2011-2015)			840
City Staff Projected 2015 Population			**9,024**
SCAG Projected 2015 Population			**8,162**

When added to the projected City population of 8,046 persons in 2010, the City's population would be 9,024 persons in 2015, which is 862 persons more than SCAG projections. This discrepancy would extend to at least the 2030 SCAG projection which currently projects City population at 8,248 persons according to the 2004 Regional Transportation Plan.

As you know, there are intervening variables that will affect the City's 2015 population projections. First, and perhaps most significantly, the 2010 U.S. Census will update City person per household ratios for different unit types, and the population growth from projects in application will either become greater of lesser accordingly. Secondly, the City will have an opportunity to work with SCAG to update its population projections for 2015 and beyond as part of the Regional Transportation Plan process in 2011. Finally, it may be the case that one or several of the currently foreseeable projects are not ultimately pursued, or that additional projects are submitted for City consideration.

In summary, the analysis presented herein indicates that it does not appear that population resulting from the City approved projects accompanied by the Mediterranean Village project currently under City consideration would add significantly more population (less than 1%) than projected by SCAG through the year 2010. While population may exceed SCAG population projections in 2015 and beyond, several variables will ultimately affect population growth including updates to the persons per household ratio based on the 2010 U.S. Census, City staff input into the 2011 Regional Transportation Plan efforts, and changes to the amount or type of projects under review by the City.

Staff appreciates the opportunity to coordinate population projections with you and would appreciate any comments that you may have regarding this letter. As mentioned previously, the Mediterranean Village project is currently in the public hearing phase with the next public hearing scheduled for February 19, 2008. Given that population projections are one component of the environmental analysis of this project, your comments would be most appreciated prior to February 19, 2008. Thank you for your consideration.

Sincerely,

David C. Wahba
Planning Director.

choi.2.7.08

LAND USE SERVICES DEPARTMENT

COUNTY OF SAN BERNARDINO
PUBLIC AND SUPPORT
SERVICES GROUP

ADVANCE PLANNING DIVISION
385 North Arrowhead Avenue • San Bernardino, CA 92415-0182 (909) 387-4147
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JULIE RYNERSON ROCK
Director

February 14, 2008

Southern California Association of Governments
Attn: Jessica Meaney, Assistant Regional Planner
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

RE: Comments on the Draft 2008 RTP

Dear Ms. Meaney:

Attached is a list of our comments on the Draft 2008 Regional Transportation Plan. If you have any questions on our comments, please write to me at the address above or call me at (909) 387-4180.

Sincerely,

James M. Squire

JAMES M. SQUIRE, AICP, Principal Planner
Advance Planning Division

Attachment

2008 Draft Regional Transportation Plan
San Bernardino County Comments
February 14, 2008

The following comments are submitted for your consideration. Some of them are simply editorial and some are more substantive.

Pages 9 and 10:

The subsections of text in the Executive Summary entitled "Aging Infrastructure" and "Explosive Growth in Goods Movement" are repeated word-for-word on pages 66 and 67 in Section II of the document. This could be truly "summarized" and shorten the Executive Summary.

Page 18, first column, lines 8-12

Add an "s" to "it." Change sentence to read:

"SCAG is also working with the newly-reactivated Southern California Regional Airport Authority (SCRAA) in its ongoing efforts to restructure and redefine its mission, with the focus of helping to implement the Regional Aviation Decentralization Strategy through facilitating key airport ground access improvements."

Page 28, first column, and page 173, second column

Update language relative to ARB's "plans to release the early action plans for public review in mid-December 2007 for adoption in January 2008" since we are already past those dates.

Page 28, first column

The last sentence of the first paragraph under 'Environmental Justice" and the first sentence of the next paragraph are almost identical. Combine the two to make it more readable.

Page 44, first column, last paragraph, first sentence

Add an "s" to "contraint." Change sentence to read:

"Finally, while recognizing financial constraints, the Plan puts forth a suite of new and innovative funding strategies that are realistic, practical, and achievable within the time frame of the Plan."

Page 51, first column, last paragraph, fourth sentence

Delete "been." Change sentence to read:

After adjusting for inflation, per capita income of the region has declined from 1999 to 2006 (-5.7%).

Deleted: been

Page 52, Figure 2.6

It would help readability of the graph to add the amounts above each column.

Page 65, first column, first paragraph under "Growing, But Still Modest Public Transit Usage"

Add the word "million" after "622." Change sentence to read:

"Between 2000 and 2005, regional transit use increased by more than 16 percent, from 622 million annual unlinked passenger trips to more than 722 million, as shown in Figure 2.10."

Pages 72, first column, first paragraph and Figure 2.13:

Data for 2004 Greenhouse Gas Emissions is available. The figure and associated text in the first column could be updated to more current information.

Pages 78, 87, 94:

The policies listed in "Transportation Security" section are not in the same format (numbered vs. bulleted) as the policies listed on page 87 but they are similar to those on page 94. It would be helpful and would increase readability to display policy in the same manner for all sections.

Pages 79, first column:

Policies 5 and 6 are almost identical. Can they be combined?

Page 106 and 107:

Legends on Figures 3.5 and 3.6 (and similar maps) are too small.

Pages 122:

Should the BNSF third main line project for the Cajon subdivision be added to the map?

Pages 131, first column:

Should a reference to the State Alternative Fuels Plan be added to the second paragraph?

Pages 131, second column:

Add a brief explanation for a "parking cash-out" to the second bullet or some place that makes sense?

Pages 132, first column:

Add a comma after "programs" in the first line of the "Air Quality and Climate Change" section. Also, perhaps add a reference to the State ARB's "early action measures to reduce greenhouse gas emissions: in this section.

Pages 133, first column:

In the first paragraph under "Land Use" the plan states, ". . . nor do all cities have general plans." Is this correct? I thought state law required all jurisdictions to have a general plan.

Pages 135, first column:

In the first sentence under "Geology, Soils, and Seismicity" the term "geologic unit" is used. A definition should be included to make it more readable for those who are unfamiliar with the term.

Pages 137, first column:

The third sentence under "Noise" starts out with "Impacts to noise . . . ." The impacts are not to noise but to the public from noise.

City of San Clemente
Planning Division

George Buell, City Planner
Phone: 361-6185; Fax: 366-4750
buellg@san-clemente.org

February 19, 2008

Ms. Jessica Kirchner and Ms. Jessica Meaney
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

Subject: Comments on SCAG 2008 Regional Transportation Plan and Program Environmental Impact Report (EIR)

Dear Ms. Kirchner and Ms. Meaney:

The City of San Clemente has significant concerns with the level and distribution of growth assumed in our community in SCAG's Policy Growth Alternative Forecast as referenced in the draft 2008 Regional Transportation Plan and Program EIR. After reviewing the maps and data provided by both SCAG and the Center for Demographic Research, we have widespread disagreement with discrepancies between the Orange County Projections (OCP) 2006 and SCAG's Policy Growth Alternative Forecast pertaining to households and employment. While, from a planning perspective, it seems reasonable to forecast growth in the number of new housing units and jobs to be near existing transit stations and employment areas, there are certain realities within San Clemente that cannot be ignored in the Policy Growth Alternative Forecast.

During the City's review of the OCP 2006 data, great efforts were made to arrive at what we reasonably expected to occur in the way of growth in San Clemente based on our existing and possible future land use policies, development activity, and knowledge of our community. In a number of areas, what we now see represented in the Policy Growth Alternative Forecast has limited bearing on existing and future conditions in San Clemente.

It is important to note that the San Clemente General Plan includes policies that strive to realize a healthy jobs/housing balance. Through careful planning and implementation a 1.5 to 1 jobs/housing balance has been realized over the past fifteen years. SCAG's Policy Growth Forecast ignores these planning and associated community-wide benefits.

Additionally, the SCAG Policy Growth Forecast, as a policy document, is clearly at odds with California Coastal Commission objectives and resulting law regarding open space and coastal resource preservation. The City encourages SCAG to carefully consider this important conflict.

In general, it is of great concern that SCAG's sophisticated GIS/computer model forecast a reduction of hundreds of housing units and hundreds of jobs in an area that was developed less than twenty-five years ago and a number of lots have yet to be developed within a thriving business park (i.e. Census Tract 421.09). Another over-arching concern is the apparent omission of ~14,000 housing units and numerous jobs that will be generated by the County of Orange's 2006 approval of The Ranch Plan (Rancho Mission Viejo – RMV). Unfortunately, if errors such as these exist, it would call into question the reliability of the data and methodological underpinnings used in the model.

Table 1 describes specific concerns to the City of San Clemente:

Table 1
City of San Clemente Concerns with SCAG's 2008 Policy Growth Forecast

Census Tract	Comments
All Census Tracts with the exception of 320.23, 421.06 and 421.07	The City of San Clemente strongly objects to the forecast reduction of housing units and jobs in these areas. With the exception of some undeveloped lots, these areas are completely built-out with stable residential, commercial and industrial developments. The forecast reductions in both jobs and housing is unrealistic, as these areas will likely remain stable through the Policy Forecast period as expressed in OCP 2006.
Census Tract 320.23	This tract encompasses the City of San Clemente's Talega Specific Plan Area and a portion of The Ranch Plan (within unincorporated Orange County). All development in these areas is fully entitled, with development rights vested pursuant to development agreements. Though 4,500 dwelling units are vested, a total of 3,870 housing units will likely be constructed in Talega at build-out, and an additional estimated 1,700 housing units are approved within Planning Area 8 of The Ranch Plan. In total, about 5,570 housing units will be constructed by year 2035. This represents 2,105 more units than estimated by SCAG in the Policy Growth Forecast. The number of jobs forecast in OCP 2006 in San Clemente's portion of this tract appear to be accurate. Please review The Ranch Plan EIR for the number of jobs forecast in Planning Area 8.

Census Tract 421.06	The City of San Clemente strongly objects to the forecast increase of 2,245 housing units and 6,128 jobs in this area. While a cursory review of the City's Land Use and Zoning maps show a considerable amount of undeveloped land, the existence of approximately 20 acres of open space between El Camino Real and the coastline and over 116 acres of open space within the Marblehead Coastal Specific Plan area has likely been overlooked. The open space within the Marblehead Coastal Specific Plan area is dedicated in perpetuity as natural habitat, and both areas are also under the jurisdiction of the California Coastal Commission. See Exhibits A and B for detailed views of these areas. While there will certainly be a marked increase in both housing units and jobs in this area, the extent to which they are currently forecast is unrealistic. Once built-out, this area will likely remain consistent through the Policy Forecast period as currently expressed in OCP 2006.
Census Tract 421.07	The City of San Clemente strongly objects to the forecast increase of 1,033 housing units and 1,493 jobs in this area. This area encompasses long-established commercial, industrial and relatively densely-populated residential areas. In addition, as shown on Exhibit C, a coastal canyon runs along the southern edge of this area. The presence of this canyon limits development on approximately 12 acres of land; and under the purview of the California Coastal Commission and the City of San Clemente, it is unlikely that this land will be developable in the foreseeable future. In addition, there are thirty-eight historic structures, four of which are local Landmarks in this area. These properties are also depicted on Exhibit C. In consideration of the Secretary of Interior's Guidelines that generally call for development in close proximity to historic structures to not overwhelm the historic context of each of these structures, typical maximization of development on every lot would not be consistent with that historic preservation design principle. Also, as shown on Exhibit C is the City's North Beach Study Area, which is also located within this area. As a means to preserve and enhance the historic fabric in this area, all new development and significant redevelopment must be in keeping with the City's Spanish Village-by-the-Sea thematic district, and all construction must conform to Spanish Colonial Revival

Census Tract 421.07, *continued*	architecture. As a result, densities realized with modern architectural design are typically not possible. Based on the aforementioned, once built-out, this area will likely remain consistent through the Policy Forecast period as currently expressed in OCP 2006.

Should you need any additional information please contact me. The City of San Clemente welcomes additional dialogue on these important issues.

Sincerely,

George R. Buell
City Planner

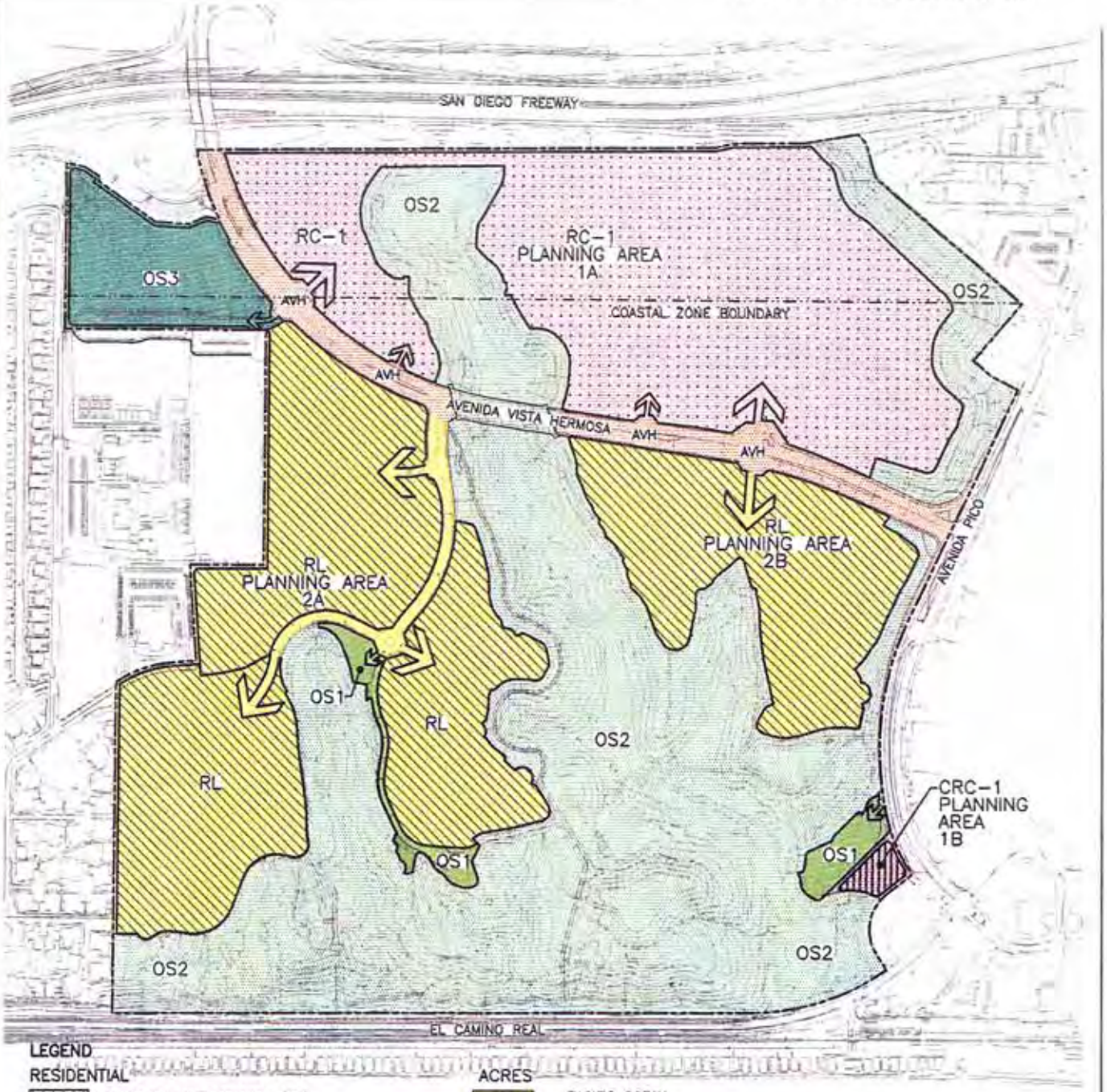
Exhibits:

A- Areas with Open Space Zoning Designations within Census Tract 421.06
B- Marblehead Coastal Specific Plan Area Showing Areas Designated for Development and Open Space (Census Tract 421.06)
C- North Beach Study Area, Historic Resources and Coastal Canyon Properties within Census Tract 421.07

cc: Mayor and City Council
George Scarborough, City Manager
Jim Holloway, Community Development Director
Gail Shimoto-Lohr, Orange County Council of Governments

SHORECLIFFS JR. HIGH SCHOOL
P (CZ)
SHORECLIFF GOLF COURSE
FRSP (CZ)
VIA VERBENA
RL-11 (CZ)
VIA VISTOSA
VIA SANDITA
VIA LADO
VIA MONTEGO
VIA ALEGRE
VIA MONECITO
RL-11
SHORECLIFF GOLF COURSE
FRSP (CZ)
VIA NADA
AVENIDA
VAQUERO
NC 1.1 (CZ)
NC 1.2 (CZ)
RML PRD (CZ)
P (CZ)
VIA CASCADITA
VIA SENDA
CALLE TINAJA
VIA BALLENA
RL-12 (CZ)
VIA SAN ANDREAS
VIA SOCORRO
CHURCH OF JESUS CHRIST OF LATTER DAY SAINTS
RML PRD (CZ)
MARBLEHEAD COASTAL
SP (CZ)
SAN CLEMENTE
CAMINO SAN CLEMENTE
RML PRD (CZ)
PALM DRIVE
CLUB HOUSE
PACIFIC COAST HWY
OS2 S2 (CZ)
PACIFIC COAST HWY.
AT & SF R.R.
OS2 S2 (CZ)
PACIFIC OCEAN

ATTACHMENT B



LEGEND

	ACRES
RESIDENTIAL	
RESIDENTIAL DEVELOPMENT (RL)	70.0
COMMERCIAL	
REGIONAL COMMERCIAL (RC-1)	51.5
COASTAL/ RECREATION COMMERCIAL (CRC-1)	1.0
OPEN SPACE	
PUBLIC OPEN SPACE (PARK) (OS1)	3.4
PRIVATELY OWNED OPEN SPACE (OS2)	104.1
GENERAL OPEN SPACE (OS3)	8.6
CIRCULATION	
AVH ARTERIAL/ENTRIES (AVH/PICO)	9.3
	247.9

PACIFIC OCEAN

0' 500' 1 ACRE

Prepared by RBF Consulting for the

City of San Clemente

Planning Division 910 Calle Negocio
Suite 100
San Clemente, CA 92672
Tel (714) 498-2533
Fax (714) 361-8281

MASTER LAND USE PLAN

MARBLEHEAD COASTAL
SPECIFIC PLAN/GPA

EXHIBIT 2-1

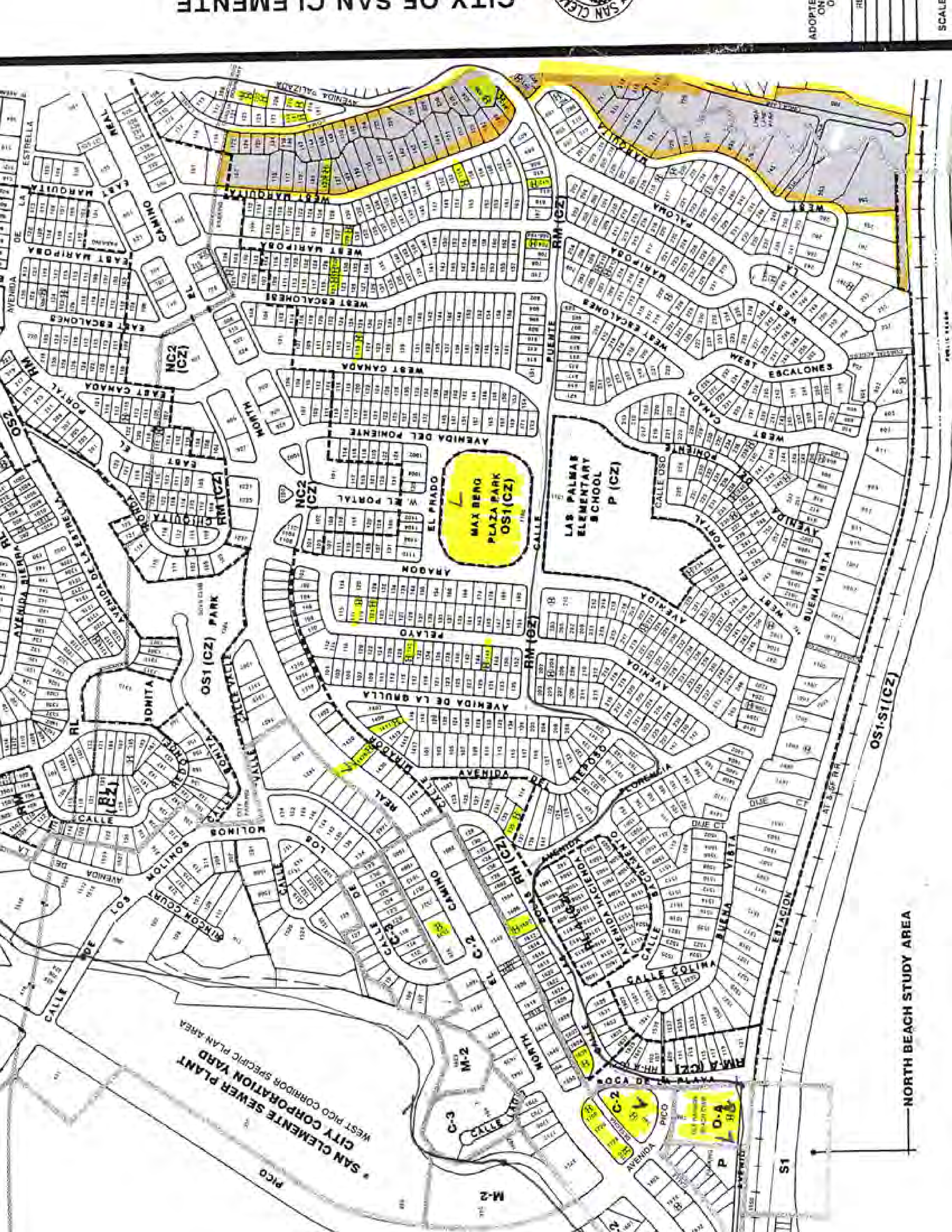
RL-8
NC3
OS1 (CZ)
RVL-IC
RL-1
CALLE ALCAZAR
EAST AVENIDA CORDOBA
VIA LA JOLLA
VIA CATALINA
INTERSTATE 5
AVENIDA DEL PRESIDENTE
NC2
CAMINO REAL
SOUTH EL CAMINO REAL
WEST AVENIDA DE LOS LOBOS MARINOS
W. AVE DE LOS LOBOS
SOUTH OLA VISTA
RL (CZ)
AVENIDA PRINCESA
WEST AVENIDA VALENCIA
WEST AVENIDA GAVIOTA
AVENIDA CORDOBA
PASEO DE CRISTOBAL
WEST AVENIDA SANTIAGO
CALLE TOLEDO
ESPLANADE
BARCELONA
CADIZ
WEST AVENIDA
TRAFALGAR LANE
RM
RL-1
CALLE PATRICIA
RM (CZ)
MONTEREY
MADRID
AVENIDA MATEO
AVENIDA ALGODON
SANTA BARBARA
AVENIDA ROSA
VICTORIA
ELENA LANE
MU3-A (CZ)
RM-A (CZ)
AVENIDA GRANADA
CALLE SEVILLE
CERRO LANE
AVENIDA DEL MAR
MU3-CB-A (CZ)
CABRILLO
ALAMEDA LANE
COMMUNITY CENTER
P-A (CZ)
MU3-A
MU3-CB-A
ESTRELLA

CITY OF SAN CLEMENTE

ADOPTED BY
ON FEB
ORD.

REVISI

SCALE


CITY OF SAN CLEMENTE
NORTH BEACH STUDY AREA
MAX BERG PLAZA PARK OS1(CZ)
LAS PALMAS ELEMENTARY SCHOOL P (CZ)
SAN CLEMENTE SEWER PLANT
CITY CORPORATION YARD
WEST PICO CORRIDOR SPECIFIC PLAN AREA
OS1-S1(CZ)
OS1 (CZ)
NC2 (CZ)
RM (CZ)
RH (CZ)
RM-A (CZ)
C-2
C-3
M-2
O-4
S1
P
OS2
RL
WEST MARQUITA
WEST MARIPOSA
WEST ESCALONES
WEST CANADA
AVENIDA DEL PONIENTE
W. EL PORTAL
ARAGON
PELAYO
AVENIDA DE LA GRULLA
AVENIDA DEL REPOSO
CALLE PUENTE
EL PRADO
CAMINO REAL
NORTH EL CAMINO REAL
BUENA VISTA
ESTACION
CALLE COLINA
BOCA DE LA PLAYA
AVENIDA PICO
PICO
CALLE VALLE
CALLE SACRAMENTO
AVENIDA HACIENDA
DUE CT
LOS MOLINOS
RINCON COURT
AVENIDA DE LA ESTRELLA
EAST MARQUITA
EAST MARIPOSA
EAST ESCALONES
EAST CANADA
EAST EL PORTAL
CHIQUITA
CALLE BONITA
AVENIDA PALIZADA

San Gabriel Valley Council of Governments

3452 East Foothill Blvd., Suite 810, Pasadena, California 91107-3970 Phone: (626) 564-9702 FAX: (626) 564-1116 E-Mail SGV@sgvcog.org

January 17, 2008

Mr. Hasan Ikhrata,
Chief Executive Officer
SCAG
818 W. Seventh Street, 12th Floor
LA, CA 90017-3435

Dear Mr. Ikhrata:

The San Gabriel Valley Council of Governments appreciates the opportunity to submit comments on SCAG's draft 2008 Regional Transportation Plan (RTP). Overall, the plan clearly identifies the significant challenges faced by our region in addressing the transportation needs of our residents and businesses. We look forward to working with SCAG on implementing the proposed plan and key transportation projects to keep mobility for our residents and businesses. Key SGVCOG comments are summarized below:

1. ***Coordination with Metro's Long-Range Transportation Plan (LRTP)*:** The Los Angeles County Metropolitan Transportation Authority (Metro) has yet not adopted its LRTP and are not planning to do so until June 2008. The SGVCOG is concerned that there could be projects in SGV that are in the RTP and not included in the Metro LRTP. Metro advised that they are not adding new projects in the draft 2008 LRTP and that the schedule of existing projects could be impacted. This could affect air quality conformity assumptions as well as federal eligibility.

   SGVCOG would like to work closely with both agencies to avoid any inconsistency and to ensure that SGVCOG adopted high priority projects are included in both agencies' financially constrained plans. After reviewing SCAG and Metro's draft plans both 710 tunnel and the Gold Line Phase II are projects that could be in jeopardy.

2. ***Proposed I-710 Truck Lanes:*** One of the projects included in the financially constrained portion of the RTP is the development of truck lanes on the I-710 from the San Pedro Port to SR-60. The completion of these truck lanes out to the I-15 has only been included in the strategic plan. This project scope presents the same dilemma that arose with the initial Alameda Corridor project. Given that the first section of this project is completed, there will be direct and severe impacts on the San Gabriel Valley.

   Furthermore, SGVCOG has previously taken an action to support a feasibility study of truck lanes on SR-60 between 710 and 57. The RTP plan indicates that a major corridor study has been completed for SR 60. SGVCOG has not seen that report or its cities participated in any review of the analysis. SGVCOG is aware that the Multi-County Goods Movement Action Plan recommends further analysis of a parallel east/west freight corridor including alternative technology analysis. While the Action Plan does not identify a specific route, Technical Memorandum 6B of the Action Plan states that SR-60 would be the preferred option. The SGVCOG believes that this is an incomplete analysis that requires much further study and discussion.

Based on these issues, SGVCOG is requesting SCAG take the following actions.

1.) Continue to study all possible east/west corridor at 91, 60, 10, 210 freeways and high desert corridor as potential alignments.
2.) Take a comprehensive approach on any potential truck lanes and consider possible community impacts. As the project currently stands, the San Gabriel Valley risks being faced with a truck route that terminates on the edge of the Valley.

Once again, we appreciate the opportunity to comment on the 2008 RTP, and look forward to working with SCAG in addressing the above comments. Please contact me 626/564-9702 should you have any questions.

Sincerely,

Nicholas T. Conway

Nicholas T. Conway
Executive Director

32400 PASEO ADELANTO
SAN JUAN CAPISTRANO, CA 92675
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(949) 493-1053 FAX
www.sanjuancapistrano.org

MEMBERS OF THE CITY COUNCIL
SAM ALLEVATO
THOMAS W. HRIBAR
MARK NIELSEN
JOE SOTO
DR. LONDRES USO

RECEIVED
FEB 14 2008
By

February 12, 2008

Assistant Regional Planner Jessica Meaney
Southern California Association of Governments (SCAG)
818 W. 7th Street, 12 Floor
Los Angeles, Ca 90017

SUBJECT: Comments on The Draft 2008 Regional Transportation Plan (RTP)

Dear Assistant Regional Planner Jessica Meaney:

The City of San Juan Capistrano thanks SCAG for the opportunity to provide comments on the Draft 2008 RTP as well as taking the time to provide PowerPoint presentations to both our Planning Commission, on January 22, 2008 and City Council on February 5, 2008. As shown on the attached maps presented to our Planning Commission (but not our City Council) both the SCAG Draft Policy Employment and Household forecasts propose significant increases in San Juan Capistrano. Of concern to our community is that such an implementation implies land use densities and design strategies inconsistent with our rural and historical sense of community.

More specifically, the first sentence of the first page of the Preamble to our General Plan states *"The underlying philosophy of the General Plan should be to preserve the present character of a small village-like community with abundant open space."* Our community has worked hard to preserve its community character as acknowledged by our citizens voting in 1990 to tax themselves to purchase open space land, as well as the designation of the Mission San Juan Capistrano on the National Register of Historic Places. Additionally, last night the City announced it had entered into escrow to purchase an additional 109 acres of open space. Significantly increasing densities and employment as indicated on the RTP plans would not be in conformance with our community character. While the concept of linking land use planning and transportation is indeed an important one, the uniqueness of our individual community's calls for a more finesse, fine tuned approach. The utilization of Transit Oriented Developments (TODs) must be carefully reviewed as one size does not fit all.

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We are also concerned that while an argument may be presented that Cities are not obligated to follow the plan, future funding may be linked to the voluntary compliance to the plan. As such, and at this time, the City of San Juan Capistrano can not support the Draft RTP until adjustments, corrections and/or adequate "safety valves" are incorporated balancing the uniqueness of each City while still proactively addressing our regions future. We look forward to working with you as we progressively and together work towards enhancing each of our individual communities while also addressing the regions future.

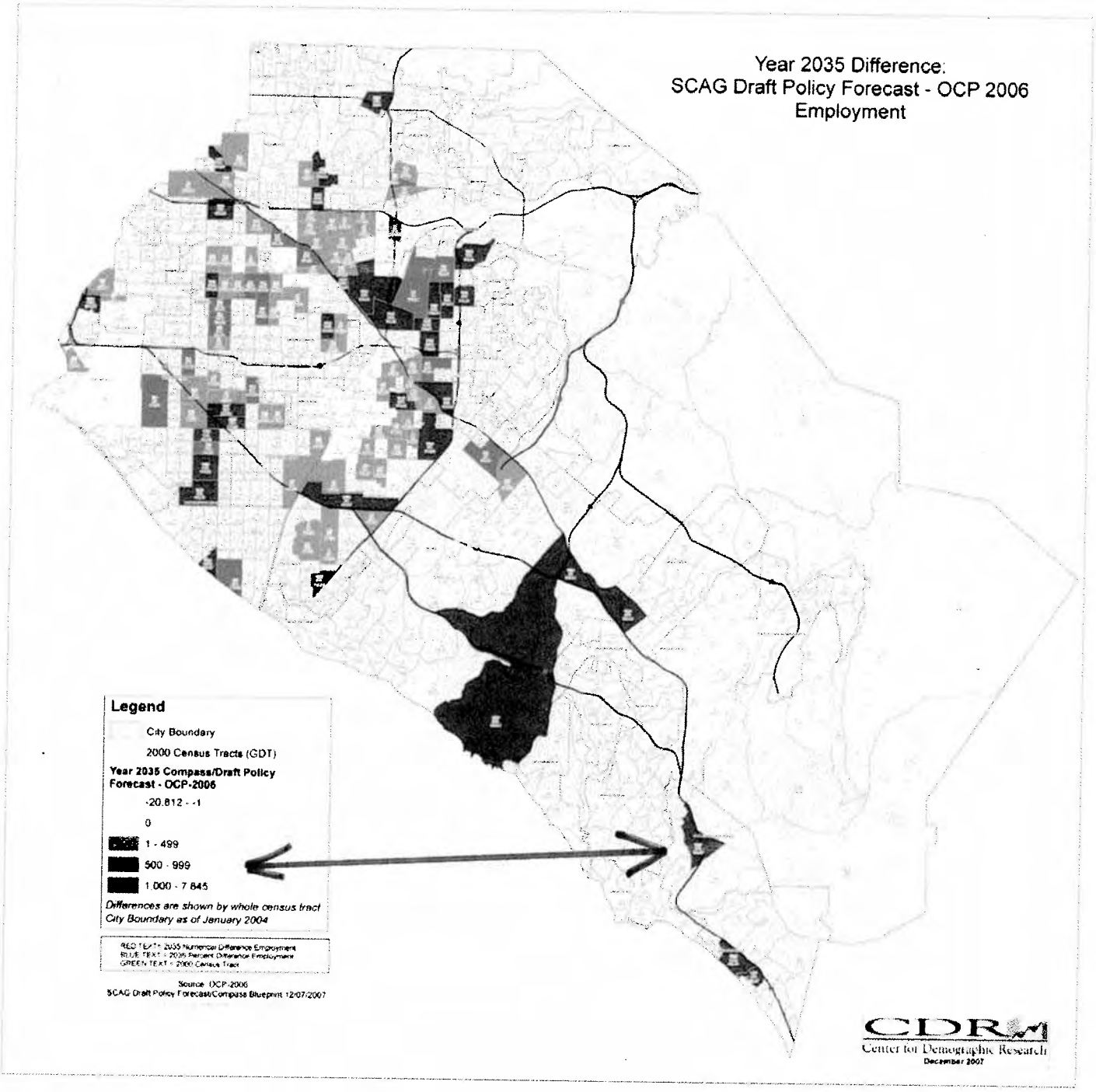
Respectfully,

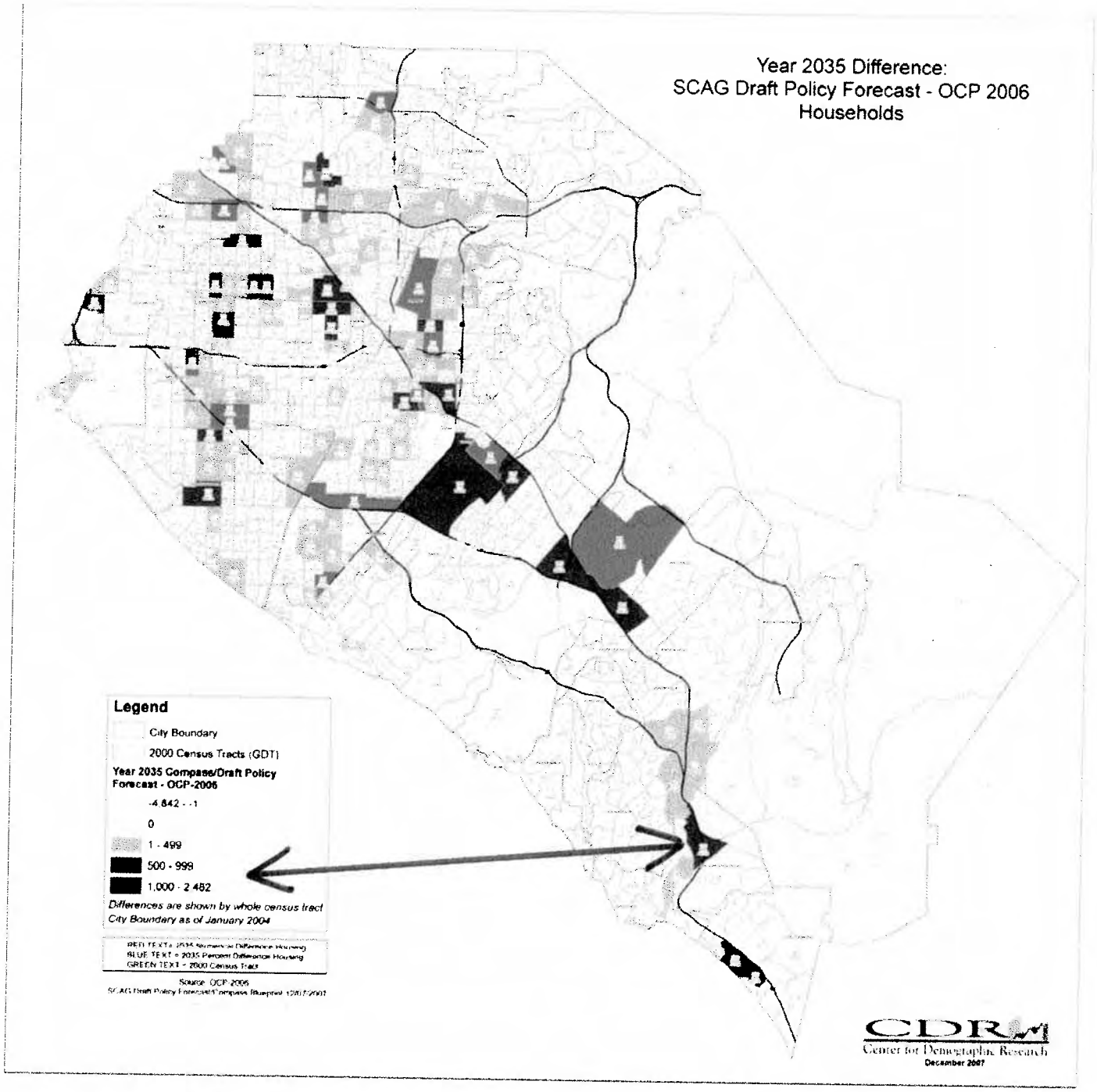
Steven A. Apple, AICP
Planning Director

Cc: City Manager
City Engineer

Attachments

PDF Maps can be downloaded at www.fullerton.edu/cdr/draftdata.asp
Full size= 40" x 40"
Maps display differences in total counts for Year 2035.




Year 2035 Difference:
SCAG Draft Policy Forecast - OCP 2006
Households
Legend
City Boundary
2000 Census Tracts (GDT)
Year 2035 Compass/Draft Policy Forecast - OCP-2006
-4,842 - -1
0
1 - 499
500 - 999
1,000 - 2,482
Differences are shown by whole census tract
City Boundary as of January 2004
BLUE TEXT = 2035 Percent Difference Housing
GREEN TEXT = 2000 Census Tract
Source: OCP 2006
CDRM
Center for Demographic Research
December 2007

City of San Marino

Planning & Building Department

January 31, 2008

Jessica Kirchner
Southern California Association
of Governments
818 West 7th Street
Los Angeles, CA 90017-3435

SUBJECT: RESPONSE TO THE DRAFT PROGRAM EIR FOR THE 2008 REGIONAL TRANSPORTATION PLAN

Dear Ms. Kirchner:

Thank you for the opportunity to review and comment on the Draft Program EIR for the Regional Transportation Plan.

The City of San Marino is in support of the proposed future project regarding the completion of the 710 Freeway. The City, however, opposes any on or off ramp at Huntington Drive. The City has no other comments at this time regarding the proposed project.

Please feel free to contact me should you have any questions.

Sincerely,

DAVID A. SALDAÑA, AICP
Director, Planning and Building Department

2200 Huntington Drive, San Marino, CA 91108-2639 • Phone: (626) 300-0711 Fax: (626) 282-3587

Governments SANBAG Working Together

San Bernardino Associated Governments
1170 W. 3rd Street, 2nd Floor San Bernardino, CA 92410-1715
Phone: (909) 884-8276 Fax: (909) 885-4407 Web: www.sanbag.ca.gov

TRANSPORTATION MEASURE I

■ San Bernardino County Transportation Commission ■ San Bernardino County Transportation Authority
■ San Bernardino County Congestion Management Agency ■ Service Authority for Freeway Emergencies

February 19, 2008

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

Subject: San Bernardino Associated Governments (SANBAG) comments on the SCAG draft 2008 Regional Transportation Plan

Dear Mr. Ikhrata:

Thank you for the opportunity to review the draft 2008 Regional Transportation Plan (RTP) prepared by the Southern California Association of Governments (SCAG) and released for review on December 6, 2007. SANBAG has provided comments at the January 22, 2008 RTP public hearing and is offering the following written comments.

Growth Forecast - Comments were provided at the January 22 hearing regarding SANBAG's concern about the growth forecasts. In August 2007 SCAG staff unveiled a policy growth forecast designed to yield reduced travel delay, congestion, and air pollution by redirecting growth away from areas with long average commute times, and concentrating growth into developed areas that are already well served by transit. Although regional totals are held constant, the net effect of this redistribution of growth was approximately 300,000 fewer people forecast to reside in the Inland counties, and a commensurate increase in the coastal counties. Concerns about the policy growth forecast were expressed during our public comments, and it is now understood by SANBAG staff that the policy growth forecast will not be used by SCAG as the adopted forecast for the RTP.

To reiterate, SANBAG suggests that while an "optimized" growth forecast can be useful to inform efforts to better integrate transportation, land use, air quality, and other planning considerations, it should not become an adopted regional forecast without far more opportunity for review, comment, and consideration of its implications by our local governments than has been the case in this instance. It may be more prudent to adopt the baseline as the regional growth forecast, and continue the dialogue with local jurisdictions and subregions through the next planning cycle to achieve a reasonable consensus.

Hi080219-ty

Goods Movement – SANBAG has noted that goods movement figures prominently in the Draft 2008 RTP as it has for the last decade. However, whereas RTPs since 1998 have included a dedicated truck lane system from the ports to the Victor Valley in the fiscally constrained plan, the 2008 Plan includes only "dedicated truck lanes for clean technology trucks" on I-710 from the ports to SR-60. The rest of the truck lane system that was included in past plans is relegated to the unconstrained "Strategic" section. Rail capacity is increased and cleaner locomotives are proposed, but a new "High Speed Regional [Freight] Transport System" is also proposed within the financially constrained plan to parallel both the Alameda Corridor rail lines and the I-710 as far north as I-10, and from there east to San Bernardino to a proposed Inland Port at a total cost of nearly $18 Billion.

SANBAG has several concerns, including the apparent redundancy of having conventional rail, dedicated truck lanes, and high speed regional transport in the same ports-to-central-LA corridor, the demise of the full truck lane system beyond the I-710, and the feasibility of another extremely expensive technology that would, in fact, have many of the economic limitations of short-haul rail but no existing infrastructure or rights-of-way comparable to conventional rail. Staff suggests that retention of dedicated facilities for clean technology trucks that will continue to be needed to support the vast warehousing and distribution centers within Southern California's logistics districts is more critical than a new high speed technology for inclusion in the financially constrained element of the plan. The plan must also recognize that the location of these dedicated facilities will need to be defined through additional project development activity and cannot be located in a specific corridor at this time.

We look forward to working with SCAG to finalize the RTP and to continue the implementation of important transportation projects in San Bernardino County.

Sincerely,

Ty Schuiling

Ty Schuiling
Director of Planning and Programming

Hi080219-ty

City of
SANTA CLARITA

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196
Phone: (661) 259-2489 • FAX: (661) 259-8125
www.santa-clarita.com

February 19, 2008

Ms. Jessica Meaney
Assistant Regional Planner
Southern California Association of Government
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Dear Ms. Meaney:

Subject: 2008 Regional Transportation Plan Draft and Reports

The City of Santa Clarita (City) has reviewed the subject document and supports the document as is.

The City is pleased to see the inclusion of several recommendations for improvements along Interstate 5 and State Route 14, which were brought forward by the North County Combined Corridor Study. The City is also in full support for the inclusion of the Orangeline Mag-Lev. The Mag-Lev will provide an alternative transportation need to the North County region where population growth projections are the highest in Los Angeles County. This transportation technology produces low to no pollution, which will further benefit Southern California Association of Government's North County region in managing air quality. The City also supports the inclusion of the Non-Motorized Plan, which the City believes will play a critical role in improving transportation needs in the future.

Should you have any comments or the need to discuss this matter further, please contact Andrew Yi, City Traffic Engineer, at (661) 255-4326.

Sincerely,

Robert G. Newman
Director of Public Works

RGN:AY:twb
s/pw/traffic/SCAG2-15-08

cc: Andrew Yi, City Traffic Engineer

METROLINK®

Southern California Regional Rail Authority
700 South Flower Street, 26th Floor
Los Angeles, California 90017-4101

January 18, 2008

Jessica Meaney
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

RE: SCRRA Comments on the Draft 2008 RTP

Dear Ms. Meaney:

The Southern California Regional Rail Authority (SCRRA), operator of Metrolink commuter rail service appreciates the opportunity to provide comments on the Draft 2008 RTP.

First we are pleased to see that electrification has been taken off the table for the Draft 2008 RTP. There are many impediments to implementation of electrification and CARB and AQMD are currently working with the industry to develop technologies that reduce emissions from locomotives. While Tier 3 locomotives would generate only 4.5 of the required 50 tons/day, Tier 4 locomotives are a much more cost effective approach than electrification and they both provide similar reduction for 2020 (about 21 tons/day).

SCRRA will be participating in several demonstrations, but neither Tier 3 nor Tier 4 technologies are available today. The RTP assumes that Tier 4 will be fully implemented by 2020, which would mean the technology must be available by 2015.

There are many impediments to timely implementation of the capital improvements and grade separations for Business Case: Rail Expansion, Emissions Reduction, and grade Spearation Project. They include the following:

- Many of the capital improvements are outside of the railroad ROW and would have to be individually environmentally cleared.
- It is questionable that the 122 grade separations identified by SCAG could be environmentally cleared and built by 2020.
- All the proposed construction in would severely impact freight and passenger rail operations.

Part of the funding package for Rail Expansion and Emissions Reduction includes $1 billion in Metrolink bonds. SCRRA does not have revenue to back any bonds; the revenues would have to come from its member agencies. As the Business Case acknowledges, the $1 billion would require an annual debt service of $61.2 million; an unreasonable increase in operating expenses given the current funding commitment to Metrolink. For the period of the Draft 2008 RTP, the

SCRRA member agencies have programmed all their available funds to other projects and would have to defer other mobility projects and air quality strategies to implement these measures. Mention is made that federal formula funds such as FTA Section 5307 might be a possible source for these projects, but all member agencies have already programmed these funds to other projects.

If you have any questions, please contact Joanna Capelle at (213) 452-0209 or capellej@scrra.net.

Sincerely,

David Solow
Chief Executive Officer

Cc: SCRRA Executive Directors
Hasan Ikhrata
SCRRA TAC

City of Seal Beach

CITY HALL 211 EIGHTH STREET
SEAL BEACH, CALIFORNIA 90740
(562) 431-2527 • www.ci.seal-beach.ca.us

February 12, 2008

Southern California Association of Governments
Attn: Jessica Meany
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Dear Ms. Meany:

SUBJECT: **CITY OF SEAL BEACH COMMENTS ON "DRAFT 2008 REGIONAL TRANSPORTATION PLAN"**

The City of Seal Beach has reviewed the Executive Summary and other portions of the Draft 2008 Regional Transportation Plan ("2008 RTP"), and has several comments and concerns relating to the subject document. This document provides a clear and concise overview of the transportation problems, opportunities, and proposed programs and projects to meet the demands upon the transportation system, given fiscal and air quality constraints within the SCAG region through the year 2035.

The City wishes to initially recognize and express appreciation to SCAG staff for their efforts to assist the cities within the Orange County Council of Governments in gaining a better understanding of the program proposals and the "growth forecast' implications of the various policy options contained within the 2008 RTP regarding growth forecasts. Those efforts have been well received and allow for us to provide focused comments to SCAG on issues of concern as identified by our Director of Development Services.

The remainder of the comment letter will address the following major points:

- ***Long-Range Growth Projections***
- ***"Baseline" and "Policy Growth" Population, Housing, and Employment Forecasts***
- ***Conformity Analysis***
- ***Support of OCTA's List of Transportation Projects***, and
- ***Support for Identified "Goods Movement" Projects Related to Port Activities***

Long-Range Growth Projections:

The primary concern of the City of Seal Beach is related to the issue of long-range growth projections that are not in conformance with local agency growth projections, particularly in the years after 2015. The issue of acceptable growth patterns in the region, and particularly at the local city and county level is an area of extreme sensitivity to the local residents of those particular communities. The Executive Summary states on pages 13 and 14:

> "*Using an integrated forecasting approach and a consensus-built growth visioning process, SCAG developed growth policies that shape the 2008 RTP Policy Growth Alternative in order to influence development patterns that reduce driving. The growth assumptions, vision, and policies were all developed in coordination with technical analyses, local input, land use and growth experts, and on-the-ground "reality checks." The resulting 2008 RTP Policy Growth Alternative indicates that modified growth patterns based on these policies are modeled to show a direct positive impact on air quality in the region. SCAG's Compass Blueprint Program, in addition to legislative efforts, shapes the implementation program for enacting these policies and programs through partnerships with and services offered to cities, counties, subregions and county transportation commissions to ensure these positive effects on air quality.*"

"Baseline" and "Policy Growth" Population, Housing, and Employment Forecasts:

Review of the 2008 RTP growth forecast datasets shows the growth forecasts developed and transmitted by all SCAG sub-regions as local input have been incorporated into the 2008 RTP Baseline forecasts. For Orange County, the Orange County Projections 2006 (OCP-2006) database, which was developed in coordination with the Center for Demographic Research (CDR) at Cal State Fullerton, Orange County Transportation Authority (OCTA), and all local governmental agencies within Orange County, is included in the 2008 RTP "*Baseline*" forecast at Year 2003 (the RTP base year) and for Year 2035 (horizon).

SCAG has also included within the 2008 RTP a "*Policy Growth*" forecast that promotes an advisory and voluntary re-direction of future growth in the SCAG region. This "*Policy Growth*" forecast proposes intensifying land use near transit stations and employment centers and reducing growth in outlying areas to achieve objectives such as reduced congestion and reduced vehicle miles. This "*Policy Growth*" forecast is consistent with OCP-2006 projections through 2015, but after that a redirection of population, housing and employment is projected that is not consistent with the OCP-2006 approved projections for the County of Orange.

Any dataset other than the Baseline forecast that is adopted by SCAG's Regional Council as the official growth forecast for the SCAG region for the 2008 RTP would supersede the 2006 Orange County Projections, and raises concerns on the integrity of Orange County's transportation projects. Local governments and agencies that rely on the OCP and the RTP projections for future planning would be impacted. For example, identifying growth in areas where no growth is likely to occur could result in a required allocation of funds to improve infrastructure that will not be used and/or a lengthy justification for not doing so. It also may impact funding and revenue projections as growth is shifted. There is also the potential for environmental litigation against an agency not implementing the growth vision identified in a regional plan to alleviate air pollution impacts that when not implemented result in health impacts.

CDR has conducted a comparative analysis of the "*Policy Growth*" forecast and has determined that it is not consistent with OCP-2006 as follows:

- ❑ The county level projections for population, households, and employment at Year 2035 differ within Orange County to the extent of an additional 45,000 persons, 15,000 households, and 9,500 jobs above the OCP-2006 projections, and
- ❑ Within Orange County at the census tract/traffic analysis zone level, the locations of future growth sometimes are shifted significantly among the census tract/traffic analysis zone levels, up to a 377% increase over the OCP-2006 projections.

The Seal Beach Department of Development Services has reviewed the "*Policy Growth*" forecasts for each census tract in Seal Beach and is of the opinion that the following "*Policy Growth*" forecasts are overstated and not consistent with the adopted growth policies of Seal Beach, as articulated in its General Plan and Zoning Land Use development standards as indicated below.

The City of Seal Beach requests that SCAG modify it "Policy Growth" Forecast as indicated in the following Table.

All remaining census tracts within the City are within 1% of the OCP-2006 projections and our City staff has no concerns regarding those very slight modifications.

At a meeting of SCAG, CDR, OCTA, and OCCOG representatives on January 15, 2008 the growth forecast issues were again discussed and SCAG committed to working with Orange County to make all necessary corrections to the growth forecast. The City of Seal Beach appreciates SCAG staff's willingness to work with OCCOG, CDR, and OCTA to ensure that the growth assumptions for Orange County population, households and employment in the 2008 Draft RTP are consistent with the locally approved growth forecasts. A consistent set of growth projections between SCAG and Orange County is critical for major planning projects, environmental documentation, and transportation modeling efforts. That cooperation is greatly appreciated.

2008 RTP "POLICY GROWTH" FORECAST INCONSISTENCIES		
Census Tract (City Area)	**Growth Type**	**Basis for Inconsistency**
995.04	Households	Projects an additional 399 housing units in an area developed with an existing, stable, single family residential area, public facilities and a recently approved business park. Area is built out and all remaining undeveloped areas are deed restricted by Coastal Development Permits to only allowing for wetland and upland habitat restoration projects. The OCP-2006 information should be retained.
995.04	Employment	Projects a loss of 49 jobs. The 182 jobs allocated to Census Tract 995.10 (Leisure World) should be allocated to this Census Tract as a new business park development has recently been completed which would create the additional employment opportunities.
995.10	Employment	Projects an additional 182 jobs in an area that is 99% developed as a senior retirement living community. Jobs should be allocated to Census Tract 995.04, as discussed above.

Conformity Analysis:

The Draft 2008 RTP forecasts transportation needs through 2035. SCAG must include all regionally significant transportation improvements for these projects to be eligible for Federal or State funding or to receive the necessary approvals for implementation. In addition, the RTP must identify reasonably available funding sources for all projects (financially constrained) and demonstrate "conformity" with the air quality requirements of the State Implementation Plan (SIP). SCAG indicates the following regarding "Transportation Conformity Analysis":

> *"This Plan must pass the following tests and analyses to meet the requirements for a positive conformity finding:*
> - *Regional Emission Analysis*
> - *Timely Implementation of Transportation Control Measures (TCMs) Analysis*
> - *Financial Constraint Analysis*
> - *Interagency Consultation and Public Involvement Analysis*
>
> *The draft conformity analysis indicates a positive conformity finding for the Draft 2008 RTP based on the draft emission budgets received by the Air Resources Board and the other required tests. The formal conformity*

> *finding will be based on the finalized emission budgets analyzed in comparison to the RTP as prepared for adoption. The detailed transportation conformity analyses for the 2008 RTP are included in the 2008 RTP Conformity Report.*"
>
> (2008 RTP, Executive Summary, pages 27 and 28)

The above discussion regarding "Conformity Analysis" within the 2008 RTP seems to indicate that the 2008 RTP "*Baseline*" Project meets the conformity requirements. However, at the December 11, 2007 OCCOG-TAC Meeting, a response from Jacob Lieb, SCAG Acting Manager of Environment, was read to the attendees indicating that:

> "*given all the moving pieces associated with the 2008 RTP projects, that there is every indication that the Baseline growth forecast will meet air quality conformity, and further, that the baseline growth forecast will be modeled and run. At present, SCAG staff cannot state that the Baseline growth forecast meets conformity because the modeling runs have yet to be completed.*"

This statement was issued 4 days after the release of the 2008 RTP.

It is imperative that the SCAG decision-makers adopting the 2008 RTP clearly know if the "*Baseline*" growth forecast meets the necessary conformity requirements. If the "*Baseline*" growth forecast does not meet the conformity requirements, then the SCAG region would not be eligible for receipt of Federal and State transportation funds and the larger issue of land use and the "*Policy Growth*" forecasts (discussed in greater detail below) will need to be re-visited.

Support of OCTA's List of Transportation Projects:

Throughout the RTP development process, OCTA, as Orange County's Transportation Commission, has been working with SCAG and the neighboring county transportation commissions, to ensure that Orange County's list of transportation projects – as adopted in OCTA's Long Range Transportation Plan and the Renewed Measure M Major Investment Plan – is appropriately identified and designated in the 2008 RTP, and that OCTA-adopted policy directives regarding these documents is maintained.

Seal Beach supports the inclusion of Orange County's list of transportation projects, as adopted in OCTA's Long Range Transportation Plan and the Renewed Measure M Major Investment Plan in the 2008 RTP.

Support for Identified "Goods Movement" Projects Related to Port Activities:

Seal Beach has provided comments over the past few years to the Ports of Long Beach and Los Angeles, SCAG, the South Coast Air Quality Management District, and the State

Air Resources Board in support of programs to reduce air emissions related to both ship and vehicle transport activities at the Ports of Los Angeles and Long Beach. The RTP identifies a total of $36.3 billion in projects to address "Goods Movement" activities throughout the SCAG region, with many of those actions and projects directly related to the Ports of Los Angels and Long Beach.

Seal Beach is clearly identified within the April 2006 ARB report titled "*Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach*" as being impacted adversely by the health risks identified within the study, and is almost totally located within the identified 100-200 isopleths for all emission sources from the port facilities[1]. In addition to the general exposure to citizens discussed in the document a large portion of Seal Beach is developed with a 7,700 person senior living community, Seal Beach Leisure World. This senior living community is completely located within the identified 100-200 isopleths for all emission sources from the port facilities. Leisure World comprises approximately 6,000 housing units, with a population of approximately 6,600 persons 65 or older, or approximately 86.5% of the total population of Leisure World.

The impacts of the port complex diesel particulate emissions upon our community, and particularly within the Leisure World retirement community are of extreme concern to our citizens. The April 2006 ARB report indicates on page 4 that "*The most vulnerable populations are those with preexisting respiratory or cardiovascular disease especially the elderly*". The identified health effects on the young, elderly, and infirm are of particular concern to our residents.

Because of the above-discussed impact, Seal Beach continues to support those activities and projects which address the congestion and air quality impacts related to the goods movement activities that are focused on the ports and the supporting highway and railroad transportation systems.

Thank you for your consideration of the comments of the City of Seal Beach. We look forward to positive responses from your organization regarding the above concerns.

Please do not hesitate to contact Mr. Lee Whittenberg, Director of Development Services, City Hall, 211 Eighth Street, Seal Beach, 90740, telephone (562) 431-2527, extension 1313 if you have any questions regarding this matter. Mr. Whittenberg can also be contacted at lwhittenberg@ci.seal-beach.ca.us.

In addition, please provide four (4) copies of the adopted 2008 Regional Transportation Plan to Mr. Whittenberg for distribution to the appropriate Commissions and the City Council when it is available.

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[1] Figure 1, "Estimated Diesel PM Cancer Risk from POLA and POLB", page 8, "Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach – Final Report," April 2006

Sincerely,

Charles Antos
Mayor, City of Seal Beach

Mario Voce
Chairman, Environmental Quality Control Board

Distribution:

Seal Beach City Council
Seal Beach Environmental Quality Control Board

Seal Beach Planning Commission

City Manager

Director of Development Services

Troy Edgar, SCAG Regional Council, District 20 Representative
Orange County Council of Governments
Orange County Transportation Authority
Center for Demographic Research

SCAG Draft RTP PEIR

February 18, 2008

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

to have adequate development standards that would:

1) Build balanced-use neighborhoods that provide housing and employment for al the walks-of-life needed to make a community work, from doctors to janitors, from corporate executives to independent businessmen. We need to ensure that work for both mom and dad can be and *is* close to home, so that neither is forced into a long commute.

2) Make it easier to do redevelopment and infill development than it is to do new development in outlying areas.

3) Provide local schools, parks and shopping opportunities that are in walking distance of home. Better availability of local shopping, entertainment and recreation opportunities that (when out of walking distance) are only a short drive from home (less than 3 Km).

4) Roadway designs that do not create obstacles for public transit.

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

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

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

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

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

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

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

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

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

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

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

Thank your for your time and effort,

Tom Politeo
tom@politeo.net

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January 25, 2008

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

Dear Mr. Ikhrata:

Thank you for the opportunity to provide comments on the Draft 2008 Regional Transportation Plan (RTP) prepared by the Southern California Association of Governments. The South Coast Air Quality Management (AQMD) applauds your agency's efforts to forge forward with the development and timely release of this document which includes many innovative ideas. We are committed to partnering with SCAG to meet the Plan's overall objectives.

Similar to the policies and programs included in the 2007 Air Quality Management Plan (AQMP) for the South Coast Air Basin (Basin), which was recently approved as part of the State Implementation Plan (SIP) for California, we also anticipate that the transportation policies, projects, and programs included in the RTP will be a critical component of the region's collaborative advancement towards our mutual goals for clean air, mobility and efficient land use. Improved land use and transportation policies are also critical components to the success of California's climate change initiatives.

As you know, the health impacts of air pollution on residents in the Basin are staggering. Exceedance of the PM2.5 federal health-based standards is the cause for a significant number of premature deaths, lost work days and reduced quality of life. Thus, it is in this context, and mindful of our declared state of emergency, that we submit the following comments to the Draft 2008 RTP, primarily focusing on air quality-related transportation issues. Our comments below specifically focus on the achievement of air quality and transportation goals while addressing issues associated with the rail transport system, its proposed expansion, High Speed Regional Transport (HSRT), conformity and Strategic Land Use/Growth Vision.

Issue #1: Tier 4 Diesel Locomotive Engines vs. Rail Electrification

The Draft 2008 RTP relies heavily on the benefits of accelerated upgrades to Tier 4 diesel locomotive engines.

Comment: *In March of 2007, the U.S. EPA proposed, as included in the Draft Plan, new standards to reduce emissions from diesel locomotives calling for Tier 4 exhaust emission standards for newly built engines with high efficiency catalytic after treatment technologies, achieving over 80% reduction in PM and NOx emissions beyond the existing emission standards.*

While the deployment of Tier 4 engines is needed to reduce emissions from diesel locomotives, emission reductions from full implementation of those emission standards will not be sufficient to meet state and federal air quality mandates. The U.S. EPA Tier 4 proposed locomotive standards will not occur until after 2015 and do not require railroads to replace existing locomotives. As a result, no reductions will be realized from the proposed regulation toward attainment of the federal annual PM2.5 standard by the 2014 deadline. In recognition of this shortcoming, the 2007 State Implementation Plan for the Basin calls for significant reductions from locomotives, equivalent to the accelerated deployment of 100% Tier 4 locomotives by 2014. The corresponding emissions benefits for both freight and passenger locomotives from this strategy are estimated at 17 tons per day of NOx by 2014. While these reductions are substantial, system-wide rail electrification could achieve even higher reductions, as much as 22 tons per day of NOx and .08 ton per day of PM reductions, surpassing the overall long-term benefits of such a system over Tier 4 engines. ***Given the fast approaching 2015 deadline for the annual PM2.5 standard and the level of emission reductions needed by 2015 and beyond, as well as climate change impacts of diesel use, our region has no choice but to seriously consider the reduction of emissions from diesel locomotives through electrification.***

Further, preliminary discussion between AQMD, SCAG and CARB leading to the development of the white paper identifying long term "black box" strategies to reduce 200 tons per day of NOx and the upcoming 24-hour PM2.5 standards must be considered in this context as well. Direction proposed in the white paper will include strategies that fully support zero and near zero emission systems.

We agree that where electrification is not feasible, that Tier 4 is the preferred strategy. However, we recommend that SCAG proceed to analyze zero emission technologies including anticipated costs, benefits, timelines, etc. for the electrification of the existing rail system (entire and partial) as an alternative to Tier 4 engines. Given the environmental, mobility, and health impacts that our region's residents are currently experiencing, equal consideration must be given to options that will likely prove much more beneficial.

Thus, rail electrification must be evaluated and presented in more detail before full RTP policy and financial support of Tier 4 engines is adopted.

Issue #2: Rail Expansion

The Draft Plan indicates that current rail lines will soon reach capacity (some before the end of the decade), thereby necessitating triple-and quadruple-tracking. Also, the tripling of container volumes calls for the building of new rail yards and reliance on Tier 3 and Tier 4 Locomotive engines.

Comment: *The AQMD fully recognizes the pressure for additional rail capacity due to ever expanding container volume. However, for the reasons described above, the AQMD is very concerned about the proposed rail expansion impacts throughout Southern California, but especially in environmental justice communities. The AQMD recommends the development of more on-dock rail of sorted and unsorted containers at the ports. Unsorted containers can be taken to new rail yards outside of the region in areas where there are no residential communities. The AQMD is concerned about locating new rail yards in existing communities. BNSF has released a Notice of Preparation for the proposed Southern California International Gateway (SCIG) rail yard in Long Beach. This proposed near-dock rail yard would be next to an elementary school, high school, homeless veteran's center, and extensive residential communities. The AQMD is concerned about the health risk to school children and neighboring communities. The California Air Resources Board recently conducted health risk assessments on rail yards in California and found elevated cancer risks from locomotives and diesel equipment used in and around the rail yards. This far exceeds cancer risk from permitted facilities such as refineries and power plants whose cancer risks is generally well below 25 in a million. To ensure health risks from new rail yards, if built, are minimized, all feasible mitigation measures must be implemented for all sources within the rail yard. Also, the RTP should require on-dock rail, to the degree feasible, rather than projects near port rail yards, which are located near sensitive receptors. The AQMD would like to work with SCAG regarding mitigation measures for these projects.*

AQMD fully recognizes the need for additional rail capacity to address the ever expanding container volume. Given the air quality and health impacts of such expansion and environmental justice concerns expressed above, AQMD would strongly recommend that any expansion to the existing rail capacity be based on electric-ready, zero- or near zero-emission technologies.

Issue #3: High Speed Regional Transport (HSRT)

The Draft Plan includes a vision for regional transport based on high performance, high-speed, and environmentally sensitive alternatives. A HSRT system is pointed to as being constructed on three core components: goods movement/logistics; aviation; and a surface transport system component to link urban activity centers throughout the region. The HSRT system is described in the Plan as a long-term vision, for 2020 and beyond, that can be constructed in multiple stages, with expenses estimated at approximately $52.7 billion for the passenger component and $18 billion for the freight component. The exploration of new alternative technology based systems is expected to provide greater throughput and reliability with near zero emissions.

Comment: We applaud SCAG staff for recognizing and including into the Draft RTP innovative concepts, such as the HSRT as a means of moving goods and relieving congestion in our region. Given the disproportionate exposure of our residents to harmful air pollution, AQMD would strongly recommend that a future HSRT system should be designed and deployed by relying on zero- or near zero-emission technologies. *While we are encouraged that the RTP encompasses the vision for a HSRT system, the RTP emphasizes the challenges with implementation prior to 2030, portrayed in the draft RTP as not very practical. There is appropriate discussion regarding this project as being one of several that face significant challenges in terms of local consensus and funding. However, there are no clear timelines presented for the development and implementation of this system by phase or as a completed project. Further, the information presented throughout the Draft Plan regarding the HSRT lacks continuity, making it difficult to clearly understand the project in its entirety. In light of these shortcomings, AQMD recommends that a more detailed action plan be developed for this project which delineates activities with milestones and responsible agencies to monitor its progress to ensure timely delivery of intended local air quality and climate change benefits. The region must start now on planning and implementation of strategies that will be needed to accommodate future growth.*

Issue #4: Transportation Conformity

A positive conformity finding has been made, based on the draft emission budgets received by the Air Resources Board and other required tests. The formal conformity finding will be based on the finalized emission budgets analyzed in comparison to the RTP as prepared for adoption.

Comment: AQMD is pleased that the Draft 2008 RTP is able to demonstrate conformity with the transportation budgets for the Basin. AQMD would like to reiterate and emphasize the importance of including all proposed future expansions to our current infrastructure, including HSRT, in the conformity demonstration. *Also,*

AQMD is pleased that SCAG is taking responsibility for the tracking and timely implementation of the Transportation Control Measures (TCMs). Furthermore, since the transportation budgets only reflect the short term measures in the CARB-approved 2007 SIP and there is still a significant reduction shortfall in the "black box", additional pollutant reductions from the transportation sector are an integral part of long term strategy to achieve clean air for this region. Therefore, AQMD recommends that SCAG staff to maximize its TCM commitment where feasible.

Issue #5: Dedicated Truck Lanes for Clean Technology Trucks

The Draft 2008 RTP includes a dedicated truck lane concept for clean technology trucks, including a North-South Corridor along I-710 extending 78 lane miles (round trip) to and from the Ports and the SR-60 interchange, representing an investment of over $5 billion. The longer term strategic vision includes an East-West Corridor and the I-15 FWY to Barstow distribution centers.

Comment: The concept of having dedicated truck lanes for clean truck technologies is an innovative approach, and the proposed strategy (North-South and East-West) should yield a desirable outcome to our region. The Draft Plan, however, indicates that substantial financial constraints as well as environmental impact considerations could hinder project implementation. *As a result of these challenges, only the I-710 proposed segment is to be funded in the Draft RTP until a preferred alternative is identified by the EIR/EIS, which is currently underway. The concept of dedicated truck lanes for clean technology trucks appears aligned with the goals of the 2007 SIP. In its current status, the proposed dedication of $5 billion toward a segment of the system which has yet undergone preliminary environmental study may very well be premature. Further, the draft RTP does not provide any discussion on the system as trucks converge onto SR-60. Appropriate analysis of traffic and air quality impacts is needed to avoid worsening of air quality along SR-60. AQMD recommends that the Draft 2008 RTP needs to take a system approach and does not improve a segment of transportation at the expense of another.*

Issue #6: Compass Blueprint

The Draft Plan states that while growth alternatives provide a significant step towards meeting the region's mobility and air quality goals, much more can be done through land use policy to maximize the efficiency of our transportation infrastructure. The Compass Blueprint Growth Vision lays out principles that seek to integrate land use and transportation with the goals of accommodating the six million additional residents expected by 2035, while improving mobility for all residents and fostering livability in all communities.

Comment: The AQMD supports the overall Compass Blueprint principles. We encourage SCAG to lay out a mechanism to ensure that enough cities will adopt this strategy in order to achieve reductions assumed in the baseline. However, we need to be cognizant about the specific locations that local jurisdictions will be directed to for creating compact development as well as the areas where residents will be subject to increased diesel emissions from the anticipated expansion of transportation corridors and locomotives activities. *Stacked locomotives powered by Tier 4 diesel engines are of concern as well. The recently completed MATES III Study shows that diesel is by far the most dominant driver of the overall cancer risk from toxic air contaminants released in this Basin, contributing more than 80 percent of the estimated cancer risk.* ***To the extent that Compass 2% development occurs in areas disproportionately close to diesel emission sources, negative health impacts may result and must be analyzed and mitigated to the maximum extent.***

The Draft Plan states that since ambient pollutant concentration levels that are directly linked to localized emissions (VOC, NOx and SOx) could not be easily estimated, the geographic emissions distribution presented focuses on pollutants that tend to have localized effects which are only generally proportionate to emissions. Further, the Draft Plan assumes that all residents in a given traffic analysis zone (TAZ) are equally exposed. If differentials in emissions within TAZs are not addressed by this analysis (only differences between TAZs), there are potential detrimental air pollution exposures to some residents that did not surface as a part of this analysis. Thus, the Plan's statement that the methodology selected presents a reasonable gross measure of air quality impacts of mobile sources in the region is inadequate given the potential exposure for residents that are particularly vulnerable to the effects of air pollution. Finally, the statement contained in the performance measure table in the Draft Plan's Executive Summary indicating that the Plan results in no disproportionate negative impacts on individuals based on income, race, color or national origin appears unfounded at this time.

Other General Comments

The Draft 2008 RTP provides the framework and will be the basis for the next update to the Air quality Management Plan. To that end, the short and long term goals of both Plans should be consistent and promote feasible projects that lead to substantial emission reduction from near term timelines. Expenses associated with the Draft Plan need to be balanced with corresponding funding allocations and sources. Nonetheless, as noted in our comments, the advancement of feasible, cost-effective projects should include early introduction of zero and near-zero emissions strategies. Moreover, such strategies are required to meet California's climate change reduction goals.

Relative to Transportation Conformity, we have noted SCAGs determination that the Draft 2008 RTP provides for the timely implementation of TCMs in the applicable SIP for the Basin and that committed TCM projects in the RTIP, subject to Timely Implementation Reporting, have been given funding priority and are expected to be implemented on schedule.

Thank you again for the opportunity to comment on the Draft 2008 RTP. The details covered in the document and its appendices reflect tremendous dedication to our regional planning process and to the continued improvement of air quality and mobility for the SCAG region. Please direct any follow up questions regarding the AQMD's comments to Dr. Elaine Chang, Deputy Executive Officer of Planning, Rule Development, and Area Sources at (909) 396-3186.

Sincerely,

Barry R. Wallerstein, D.Env.
Executive Officer

EC:LT:CG:KH

cc: AQMD Governing Board