

PUBLIC PARTICIPATION AND CONSULTATION

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS



SUB APPENDIX PART 2C OF 5
Letters from Agencies/Organizations
D-S

ADOPTED | APRIL 2016



SUB APPENDIX PART 2C OF 5
COMMUNITY INPUT | PUBLIC PARTICIPATION AND CONSULTATION
LETTERS FROM AGENCIES/ORGANIZATIONS D-S

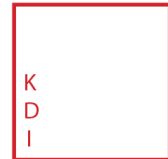
ADOPTED | APRIL 2016

SUB APPENDIX PART 2C OF 5

Letters from Agencies/Organizations D–S

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February 1, 2016

Submitted on-line as an attachment

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

Re: Comments on the 2016 Regional Transportation Plan and Sustainable Communities Strategy Update

Dear SCAG Regional Council members, Policy Committee members and staff:

We submit these comments on behalf of the undersigned organizations as part of our continuous engagement in the 2016 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) update process and our efforts to improve the environmental and economic well-being of communities in the Inland Empire and, in particular, the Eastern Coachella Valley. Through this correspondence we incorporate comments submitted by the Safe Routes to Schools National Partnership coalition letter and add additional suggestions below that reflect the needs and opportunities of the Inland Empire, Eastern Coachella Valley and other, lower income, more rural regions in the Southern California Association of Governments (SCAG) region.

SCAG's "Framework for Sustainable Growth" Does Not Include Models for Rural Regions

Hundreds of communities distributed throughout the SCAG region are simply not dense enough, nor will they qualify, for the models that SCAG lays out for sustainable development: Livable Corridors, High Quality Transit Areas (HQTAs) and Neighborhood Mobility Areas (NMAs), as they are currently defined. While the concept of NMAs expands the model of sustainable growth and development beyond the confines of an HQTA, it is not suitable for many small urban and rural

communities given anticipated population densities, intersection densities and level of retail connections.

We recommend SCAG undertake a comprehensive analysis of best practices and models for sustainable growth in more rural sub-regions and create appropriately scaled models for development and investment. SCAG should use this analysis to plan for and develop proper scale of retail and density, access to appropriate transit options, access to active travel, and best practices for rural infill development.

The SCS's Guiding Principle of Prioritizing Investment to Existing Multi-Modal Transportation Systems Will Perpetuate Underinvestment in Communities with Inadequate Transit and Infrastructure

SCAG's Guiding Policy 2 (pg. 61) is as follows: "Ensuring safety, adequate maintenance, and efficiency of operations on *the existing multimodal transportation system should be the highest RTP/ SCS priorities for any incremental funding in the region*" (emphasis added). This policy perpetuates historic patterns of underinvestment in communities with severely inadequate transportation infrastructure or void of multi-modal transportation.

Many of the region's rural unincorporated DACs are marked by dirt roads, inexistent bicycle and pedestrian facilities and deficient transit services. Severe poverty matched with chronic underinvestment has left many DACs, particularly rural DACs, without the basic features of healthy and sustainable communities. SCAG must prioritize improving and transit service and addressing lack of pedestrian and bike facilities in existing communities.

We recommend SCAG rewrite this guiding policy to prioritize investment in existing, or be inclusive of communities that lack infrastructure and multi-modal transportation. Funds should serve existing communities, especially the most disadvantaged, even when infrastructure does not currently exist in those places. In subsequent sections of this letter we identify programs and policies that will secure investments in communities most in need of transit and infrastructure investment and upgrades.

The SCS reflects insufficient investment in transit for disadvantaged, rural communities

The SCS does not reflect improved transit options and increased access to opportunity through alternate modes of transportation for residents of the Eastern Coachella Valley. Many residents have no adequate transit and have no access to employment and educational options in the western half of the Coachella Valley as a result.

As noted in the coalition letter, increases in transit investment throughout the SCAG region reflect increased investment primarily in Los Angeles County. The RTP does not reflect increased transit

investments as a share of overall RTP transportation investments in the Inland Empire, thus reinforcing reliance on personal vehicles and impeding opportunity for those without access to cars.

Our review of the project list for projects located in Eastern Riverside County reflects inadequate investments in communities most in need of improved transit and connectivity. Instead of robust investment in transit, the local transit agency seems to be investing more in the agency's own facility improvements than increased service. Furthermore, the project list illustrates greater investment and prioritization for transit projects linking West Coachella Valley residents with employment options in the western portion of Riverside County (Projects RIV30506 and RIV11407) as compared to transit projects linking East Coachella Valley residents with employment options in Palm Springs, Indian Wells and other cities in the western Coachella Valley (Project RIV130505).

SCAG in its RTP should include a breakdown of investment by mode by region to better illustrate the extent to which different counties and sub-regions are prioritizing alternative transportation modes. Similarly, SCAG should assess the extent that investments reflect needs and impacts identified in the EJ element and through other needs assessments. SCAG should also ensure that transportation and transit agencies provide transparent and open processes to receive feedback on proposed transportation projects. Finally, through programs and policies, SCAG should incentivize increased investment for transit in communities and regions that do not adequately serve their residents.

Efforts to Strengthen Regional Goods Movement Must Serve Local Communities as Well

Goods movement is a driving force behind transportation planning and investments in the Inland Empire, as 40% of the nation's goods travel through the Inland Empire. A myopic approach to prioritizing planning and investing in the movement of objects over people has put residents in the Inland Empire at a disadvantage, where goods can pass through the region, but those who live in the region have limited neighborhood level mobility and limited transportation options.

Goods movement investments target high speed trade corridors, SCAG fails to identify ample opportunities to improve resident mobility through pedestrian and bicycle retrofits. Furthermore, goods movement does and will have negative environmental and health impacts on nearby communities unless there are protections in place from emissions and other traffic impacts.

SCAG should highlight opportunities for improving pedestrian, bicycling and other forms of active travel as an integral component when fixing highways to transport goods while also looking at technologies and investments designed to eliminate negative local impacts of goods movement. We urge SCAG provide policy guidance and best practices that require repair, maintenance and rehabilitation projects to include meaningful Complete Streets project components. We

recommend SCAG include guidance for public participation in all of its strategies, initiatives, themes and implementation of guiding policies. The region could seize the opportunity to receive meaningful input from residents and ensure that investments serve dual purposes, fix crumbling systems, and provide improved mobility for residents.

Create Targeted Programs and Policies to Direct Funding for Planning and Investment in Disadvantaged and Rural Communities

Many small urban and rural communities throughout SCAG lack comprehensive multi-modal transportation plans. Without plans in place, systematic improvements to active transportation infrastructure, improved first mile/last mile access and improved transit will be incomplete and ineffective. Furthermore, SCAG's local sustainability strategy should include best practices as well as clear and explicit guidance on planning practices to ensure rural disadvantaged community residents participate in and benefit from SCAG's climate resilience and sustainability strategies.

As noted in the Coalition letter, we recommend SCAG target Sustainability Planning Grants to disadvantaged communities, and especially rural, disadvantaged communities that lack plans, models and programs designed to secure and promote sustainable development. For example, funds could support: feasibility studies; walk and bike counts for data poor communities; travel needs assessments; and community-driven multi-modal mobility plans.

Also included in the Coalition letter, we recommend SCAG create a working group and dedicate full time staff to address equity issues throughout the region. Furthermore, we recommend SCAG create an equity or disadvantaged community advisory board with broad stakeholder representation.

SCAG Must Improve Transparency and Adequacy of Information to Allow for Fair and Informed Decision-Making Processes

Long term transportation and land use planning requires robust involvement from impacted communities. Such involvement can only happen with access to comprehensible data and information, and access to decision-making processes.

Definition of Urban Not Contextually Appropriate

SCAG's definition of "rural" communities, is inaccurate and inconsistent throughout the plan. The EJ element defines rural as communities with 2,500 residents. This definition is overly restrictive and excludes communities - like Thermal, Mecca and North Shore - that are rural by most definitions of rural used by state and federal agencies. At the same time, other sections of the RTP uses data for "rural" communities with no definition as to what constitutes a rural community. We recommend SCAG refine the definition of rural to be more consistent with state and federal

programs. For example, SCAG could use the definition established by the State's Cap and Trade Affordable Housing and Sustainable Communities (AHSC) Program as an example to inform its definition. We recommend SCAG define rural through robust public participation processed to create a definition unique and appropriate for the region.

Limited Analysis of Job Growth in the Region

The analysis presented on projected job growth lacks a sub-regional analysis or a job-sector analysis. SCAG emphasizes the differences between commute times for high wage and low wage workers and the commute times for residents of the inland regions as compared to workers in the coastal region, indicating that SCAG's job's growth analysis should consider jobs housing fit which, in turn, would require an analysis of job growth by section and by sub-region. SCAG's analysis of jobs growth fails to do so. We recommend that SCAG conduct an analysis that considers job type, distribution of jobs by sub-region, and job-readiness by sub-region. That analysis will, in turn, guide policies to promote jobs housing fit and economic development.

Lack of Long Range Transportation Plans in the Region

Currently only three of SCAG's County Transportation Commissions have a Long Range Transportation Plan (LRTP): The Los Angeles County Metropolitan Transportation Authority (LACMTA), the Orange County Transportation Authority (OCTA), the San Bernardino Associated Governments (SANBAG). Because the CTCs without an LRTP do not actively seek public input or have a transparent process for such feedback, the only chance to review projects is through the RTP/SCS review, which provides limited ground level detail. The absence of uniform planning in the region makes it difficult to assess the regional cohesion of the data presented in the Plan. Comparing data from a county with an LRTP to one lacking an LRTP does not provide clear comparable data. We recommend SCAG prioritize incentivizing LRTPs for the entire region.

Clarity of Information between FTIP Project List and Financially Constrained RTP List

The Project List is does not present clear information, some projects have two project IDs, (i.e. page 249, projects: 30M0701-RIV071263 and 3RL04-RIV110408). The lack of clarity makes it difficult to understand how distinct agencies prioritize their investments and project programming, calling into question accuracy and integrity of the lists.

Critical information is not included in the Plan

The Plan and the appendices do not adequately present transportation system expenditures per mode by county and sub-region. Information disaggregated per mode, county and sub-region facilitates improved understanding of expenditures per mode and how residents will have access to those modes.

The primary function of the RTP/.SCS is to present comprehensive growth projections for the entire region. The maps throughout the Plan are inadequate at best, they are small and do not

provide enough detailed information to properly asses where new growth and growth in existing communities is targeted.

We recommend SCAG present transportation expenditures broken down per COG and transportation modes (Bus, Bus Rapid Transit (BRT), Light Rail Transit (LRT), Heavy Rail, Commuter Rail, High Speed Rail, Active Transportation-bicycling and pedestrian, Transportation Demand Management-carpools, Vanpools, ridesharing) and improved, detailed growth and employment maps.

Finally, we recommend SCAG incorporate improved quantification methods to determine actual impacts and improvements of the RTP/SCS in environmental justice communities over the life of the Plan. Current tracking methods described in the EJ analysis are not sufficient nor do they provide meaningful information to determine actual impacts of the Plan.

* * * * *

We hope these comments inform SCAG and contribute to sustainable growth for all residents in the SCAG region. We welcome the opportunity to discuss these comments in person.

Sincerely,

Michele Hasson, Regional Director, Leadership Counsel for Justice and Accountability
Penny Newman, Executive Director, Center for Community Action and Environmental Justice
Karen Borja, Associate Director, Inland Congregations United for Change
Suguet Lopez, Executive Director, Lideres Campesinas
Bill Sadler & Demi Espinoza, Southern California Regional Policy Managers
Safe Routes to School National Partnership
Chelina Odbert, Executive Director, Kounkuey Design Initiative
Marven E. Norman, Policy Director, Inland Empire Biking Alliance



February 1, 2016

Southern California Association of Governments
818 W 7th St #1200
Los Angeles, CA 90017
2016PEIR@scag.ca.gov, RTPSCS@scag.ca.gov

RE: 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR)

Gentlepersons:

Endangered Habitats League (EHL) appreciates the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. EHL – Southern California’s only regional conservation group – is now a part of this growing coalition in 2016.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of “land use.” In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn’t be overlooked. We believe the opportunity before you isn’t to “plan for” the future of open space in the region—as that’s what you’ve been doing since the 2012 Plan. Instead, we believe SCAG can now start “implementing” a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We’ve reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG’s mission with the Natural and Farmland policies.

Implementation mechanisms

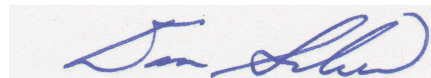
Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it helps pressure from the fringe but is not sufficient. Just because the pressure is relieved doesn't mean the land then automatically becomes protected. The Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.

Regional wildlife corridors

The current federal transportation bill, FAST Act, supports understanding transportation impacts on natural resources. The previous bill, MAP-21, supported restoring and maintaining environmental functions (i.e., wildlife corridors) affected by the infrastructure projects in the RTP. SCAG has even supported efforts in Los Angeles County to create a wildlife corridor over the 101 Freeway. Many efforts are underway across the region to connect landscapes to one another. This is very important to the region and its biodiversity. Wildlife corridors allow species to migrate and forage and expand genetic diversity. These corridors also allow ecosystems to maintain ecological functions, act as sources for repopulation after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan should support the enhancement of and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by infrastructure projects.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands. In addition, we request to be included on any notifications (electronic or otherwise) for this project.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver", is placed over a light gray rectangular background.

Dan Silver
Executive Director

January 29, 2016

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

RE: Comments on the 2016 Draft RTP/SCS and PEIR

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and associated policies within the SCAG plan. This 2016 Coalition was specifically formed to focus on the Natural and Farmland policies and its associated Appendix. It is more diverse, more inclusive, and more geographically distributed than the 2012 Coalition. Our alliance includes unincorporated community groups at the local level all the way up to national conservation non-profits.

We are pleased to see Natural and Farmlands have been included as its own Appendix in the 2016 Plan. We believe this is a step in the right direction. We've reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify or strengthen the language in the Appendix, as well as link the goals of the RTP to SCAG's mission.

SCAG's Existing Successes and Its Future

Much work has been done over the last four years by the SCAG staff and consultants as it relates to the Open Space Program. One important success was the coordination of an Open Space Work Group by SCAG, in which FHBP and others in this Coalition have been participating for the last few years. An additional success is the research and time that went into developing the Combined Habitat Assessment Protocol (CHAPs). Further, the creation and refinement of the Natural Resource Inventory Database—a geographic information system database—was well received and well timed. Congratulations on how far you've come since the 2012 Plan.

SCAG has a tremendous opportunity with the 2016 Plan. Much of the last four years has been spent researching, gathering and vetting the data, surveying local jurisdictions, completing an assessment, and planning a comprehensive six-county wide Conservation Program. The Coalition believes SCAG has the leadership in place, the homework done, the support by the conservation community, and the interest and attention of the resource agencies to now transition to actually implementing the Conservation Program.

An Implementation Example of a Multi-County Conservation Program

The Bay Area's Metropolitan Transportation Commission (MTC) spans nine counties. The Commission plans, invests, and coordinates to ensure a mobile, sustainable, and prosperous Bay Area. Through a creative partnership with the Association of Bay Area Governments (ABAG) a program called "Plan Bay Area 2040" was developed to promote conservation and infill projects simultaneously. Plan Bay Area allows cities and counties to plan for transportation needs and preserve the character of its communities while accommodating future population growth.

The Plan anticipates population growth of over two million people, one million jobs and more than 650,000 housing units over the next 30 years. Because of Plan Bay Area, two types of priority areas were identified. First, Priority Development Areas (PDAs) are areas designated by local jurisdictions to be appropriate for residential or commercial development. These are infill development sites located near transit. Eighty percent of the anticipated growth in this Plan will happen in the PDAs. Second, Priority Conservation Areas (PCAs) were created based on consensus and with local assistance from the regional non-profit Greenbelt Alliance. PCAs include four designations: Natural Landscapes, Agricultural Lands, Urban Greening, and Regional Recreation. These greenfield lands are in need of protection due to urban development pressures. (See **Attachment 1 – Map of Bay Area PDAs and PCAs**) Each designation type has an instrumental role in supporting the region's natural systems, rural economy, and human health.

To fund this work, MTC created the One Bay Area Grant program. It essentially aligns the MTC investments with support for focused growth—it is both a regional and county program. One Bay Area Grants allow MTC to meet its regional transportation priorities while simultaneously advancing the regions land use and housing goals. The Grant program targets investment in PDAs and rewards cities that (1) approve new housing construction, and (2) accept allocations through the Regional Housing Needs Assessment process. The rewards come in the form of funds to allow other conservation-focused investments, such as the permanent protection of PCAs.

In 2013, funded through federal dollars made available to MTC and additional funds from the State Coastal Conservancy), 23 PCA projects were funded totaling nearly \$12 million. For use in 2018, MTC has already authorized \$16.4 million for PCA funding with an anticipated call for projects in early 2017. The PCAs are also eligible for other sources of local, regional, state, and federal funding to leverage the MTC One Bay Area Grant program dollars.

SCAG with its natural lands and infill focus is uniquely situated to replicate this type of program for the Southern California region. If you do this, you will be the second region in the nation that we know of that has such a program in place. Much of the baseline work of understanding where the high value habitat areas are located has already been completed since the last RTP/SCS. While there continue to be other filters that can inform decisions, SCAG has a nearly complete Regional Conservation Plan that could be used to launch a similar program here. Additionally, the majority of development sites targeted for the anticipated population growth here are less than a mile from transit. This piece is also already in place. The 2016 Southern California Conservation Coalition wholly supports this type of unique program and funding mechanism to achieve both compact infill developments where transit and employment centers already exist, while simultaneously funding conservation work to protect greenfield sites at the fringe (where less dense, more auto-dependent and fire-prone development pressures exist).

While we recognize that MTC is both a Metropolitan Planning Organization and a regional transportation agency for the nine-Bay Area Counties and has taxing authority, it is actually utilizing federal funds to meet the needs of the grant program. We believe SCAG could also use federal funds and other state funding sources to create such a program. This is an opportunity for creative and innovative funding to develop such a program in Southern California. We believe tools and funding mechanism are available to build off existing local efforts, coordinate the entire region, and get conservation moving forward in this unique and highly biodiverse area of the world. This coalition is willing to provide information, tools, and help identify possible funding through our own expertise. Let's partner to get this done.

Proposed Revisions to the Natural and Farmland Policies

The Coalition supports the inclusion of natural and farmland policies, but offers the following suggestions on the existing policy language:

Policy #1 - Expanding on the Natural Resource Inventory Database and Conservation Framework & Assessment by incorporating strategic mapping layers to build the database and further refine the priority conservation areas. Specifically:

- Further investing in mapping and habitat and farmland data tracking.
- Working with County Transportation Commissions to support their county-level efforts at database building.

We propose:

1. Modifying the first bullet as "tracking" implies you'll only note changes and maybe not incorporate them. We believe those changes should be incorporated into the existing Natural Resource Inventory Database. Modifying the first bullet by specifically (*additions shown in italics and deletions shown as ~~strikethrough~~*):
 - Further investing in mapping *of and* habitat and farmland, *including* data tracking *and gathering*.
2. Adding two new bullets to this policy, specifically:
 - Coordinate data sharing with partners and stakeholders to assist with regional conservation planning efforts.
 - Use the Combined Habitat Assessment Protocol data as an overlay to integrate regional land use planning and ensure that future growth avoids greenfield sites, especially those identified as high value habitat lands.

Policy #2 - Encouraging CTCs to develop advance mitigation programs or include them in future transportation measures. Specifically:

- Funding pilot programs that encourage advance mitigation including data and replicable processes

- Participating in state level efforts that would support regional advanced mitigation planning in the SCAG region
- Supporting the inclusion of advance mitigation programs at county level transportation measures

We propose:

1. Modifying the policy language to leverage existing advance mitigation programs. Specifically (*additions shown in italics and deletions shown as ~~strikethrough~~*):
 - Encouraging CTCs to develop advance mitigation programs, ~~or~~ include them in future transportation measures, *and leverage existing programs.*
2. Modifying the first bullet to focus on CTCs that do not already have advance mitigation programs and focusing on Greenprints. Proposed language is (*additions shown in italics and deletions shown as ~~strikethrough~~*):
 - Funding pilot programs *for CTCs that do not have advance mitigation programs*, including data gathering for Greenprint creation ~~and replicable processes.~~
3. Adding a bullet at the end of the list that incentivizes existing advance mitigation programs through matching funds, specifically:
 - Provide matching dollars to CTCs with advance mitigation programs to acquire, restore, and manage natural lands.

Policy #3 - Aligning with funding opportunities and pilot programs to begin implementation of the Conservation Plan through acquisition and restoration. Specifically:

- Seeking planning funds, such as Cap-and-Trade auction proceeds that could help prepare for local action on acquisition and restoration.
- Supporting county transportation commissions and other partners.
- Continuing support of the State Wildlife Action Plan 2015 Update¹³ and its implementation.

We propose:

1. Modifying the policy language to begin implementation of the Conservation Plan. This would be the launch of a similar program to MTC's One Bay Area. Specifically (*additions shown in italics and deletions shown as ~~strikethrough~~*):
 - Aligning with *and seeking* funding opportunities and pilot programs to begin implementation of the Conservation Plan through acquisition and restoration.
2. Modifying the first bullet to expand opportunities and include implementation using a variety of funding sources. Proposed language is (*additions shown in italics and deletions shown as ~~strikethrough~~*):
 - Seeking ~~planning~~ funds, such as *planning grants and* Cap-and-Trade auction proceeds, that could ~~help prepare~~ *allow for local or regional action* on acquisition and restoration.
3. Adding another bullet to allow for programs similar to the Sonoma County Climate and Conservation Initiative:
 - Seek funding for a pilot program to digitally map and quantify carbon in the vegetation and soils.

Policy #4 - Providing incentives to jurisdictions that cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries. Specifically:

- Working with stakeholders to identify incentives.
- Considering providing sustainability planning grants or seeking funding that help protect habitat corridors, especially across county boundaries.

We propose:

1. Expanding the language in the first bullet to include collaboration opportunities. Specifically (*additions shown in italics*):
 - Working with stakeholders to identify incentives *and collaboration opportunities.*
2. Adding one additional bullet to again focus on implementation. Specifically:
 - Encourage projects that provide a net environmental benefit to wildlife connectivity.

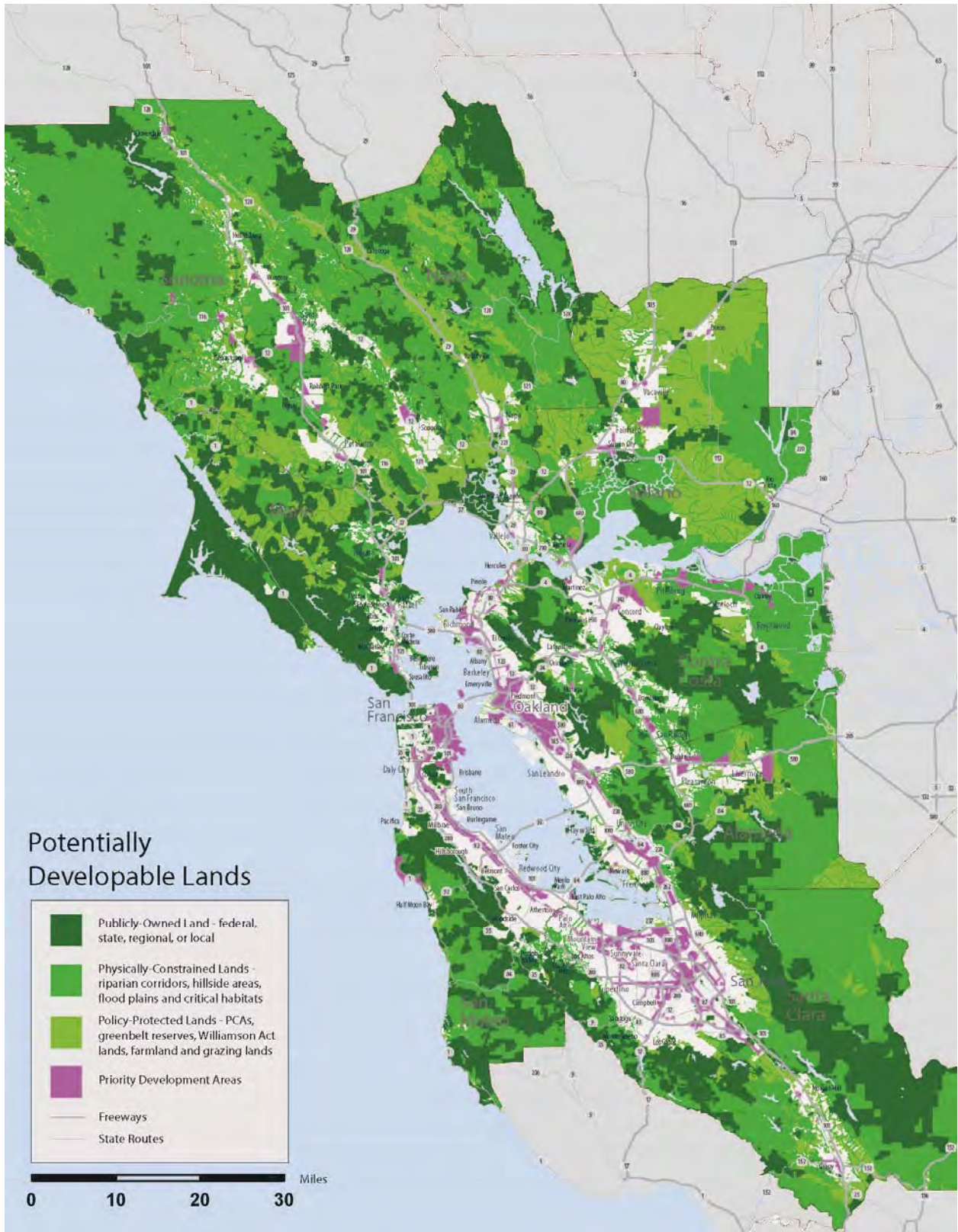
As you can see, our main interest focuses on actual implementation of the Conservation Program developed by SCAG. We individually and collectively offer our assistance to SCAG as this process unfolds and as the Plan gets implemented. We urge SCAG to consider implementing a program similar to the One Bay Area Grant program to get this effort moving forward.

Again, thank you for the opportunity to comment and provide substantive input.

Sincerely,

Banning Ranch Conservancy • Bolsa Chica Land Trust • California Chaparral Institute • California Cultural Resource Preservation Alliance • California Native Plant Society - Orange County Chapter • Canyonland Conservation Fund • Center for Biological Diversity • Defenders of Wildlife • Endangered Habitats League • Friends of Blue Mountain • Friends of Coyote Hills • Friends of Harbors, Beaches and Parks • Hills For Everyone • Huntington Beach Residents for Responsible Desalination • Huntington Beach Tree Society, Inc. • Inter-Canyon League • La Habra 2025 Centennial Founders' Day Celebration Committee • Laguna Canyon Foundation • Laguna Greenbelt Inc. • Los Angeles/Santa Monica Mountains Chapter of the California Native Plant Society • Los Cerritos Wetlands Land Trust • Natural Resources Defense Council • Naturalist For You - Santa Ana Mountains Wild Heritage Project • Orange County League of Conservation Voters • Puente-Chino Hills Task Force of the Sierra Club • Rural Canyons Conservation Fund • Saddleback Canyons Conservancy • Sea and Sage Audubon • Sierra Club • Silverado-Modjeska Recreation and Park District • The Trust for Public Land • Ventura Hillsides Conservancy

Figure 16 Public Ownership, Physical and Policy-Based Constraints on Land



Source: Derived from Maps 2 and 3 in *Plan Bay Area*, with PDAs added



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February 1, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Subject: Comments regarding the Draft 2016 RTP/SCS

Dear Ms. Aguirre,

Five Point Communities, on behalf of Heritage Fields El Toro, LLC ("Heritage Fields"), has reviewed the Draft 2016 RTP/SCS and offers the following comments.

Heritage Fields is the master developer and owner of the residential and non-residential development on the portions of Planning Area 51 in the City of Irvine referred to as the "Great Park Neighborhoods" other than those portions of residential entitled land Heritage Fields has sold to its community builders and commercial entitled land it sold to a Broadcom Corporation subsidiary for a research and development corporate campus. The balance of Planning Area 51, known as the "Orange County Great Park" is owned by the City of Irvine. As approved by the City in 2013, our existing entitlement includes 9,500 residential units and 6,135,200 square feet of non-residential uses for Planning Area 51. Our concerns, as discussed below, are that the Draft 2016 RTP/SCS does not reflect our current entitlements for Great Park Neighborhoods. As a result, the Draft 2016 RTP/SCS underestimates the amount of development planned for Planning Area 51 in the City of Irvine. In addition, given the forecast year of 2040, the plan's emphasis on locating housing and employment near transit, and the existence of a train station in Planning Area 51, we suggest it makes sense for the PEIR and the associated RTP to consider the benefits of planning for additional growth in this area.

As discussed in the 2013 certified Second Supplemental EIR for our Project, a total of 9,500 dwelling units, a population of 23,728 persons and 16,510 jobs are projected for the Great Park Neighborhoods' portion (i.e., the private development area) of Planning Area 51. Additional employment growth is also planned for the Orange County Great Park, owned by the City. Heritage Fields has completed a review of the Draft 2016 RTP/SCS growth forecasts at the Traffic Analysis Zone (TAZ) level and it is not consistent with our existing, vested, entitlements, and substantially underestimates the amount of growth planned for the area, and does not capitalize on the potential for future growth consistent with the strategies in the

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RTP. In addition, there are uses planned for the Great Park itself, which do not appear to be reflected in the RTP's estimates of future land uses. We are concerned that the PEIR does not accurately analyze potential impacts.

We understand that the City of Irvine has expressed similar concern through written correspondence and at various meetings of the Community, Economic and Human Development Committee and Regional Council, that the June 24, 2015 Policy Growth Forecast has significant errors and does not accurately reflect existing development agreements, entitlements and projects recently completed or under construction. Heritage Fields recommends that the 2016 RTP/SCS and all alternatives be based on the Policy Growth Forecast that includes the technical corrections provided by the Center for Demographic Research, on behalf of the City of Irvine. The growth forecast included in the Intensified Land Use alternative is not based on the technically corrected Policy Growth Forecast, is in conflict with the local growth forecast provided to SCAG through OCP 2014, and is inconsistent with the City of Irvine General Plan.

We are concerned that the Intensified Land Use Alternative growth forecast includes a reduction of approximately 5,000 planned housing units from the City of Irvine's Northern Sphere and Great Park Neighborhoods development areas. These units are approved and fully vested through legally binding Development Agreements, and cannot be reduced by the City. Additionally, these areas are being developed in a manner that SCAG would classify as "complete communities", with the Great Park Neighborhoods specifically being located adjacent to the multimodal Irvine Station.

Recent Supreme Court cases place additional emphasis on evaluating consistency of a project with regional GHG emissions strategies in CEQA analyses, such as consistency with an applicable SCS adopted pursuant to SB 375. To comply with recent rulings, projects may need to evaluate whether or not the project is consistent with the demographic assumptions in the SCAG 2016 RTP Model TAZ zone. It is our understanding that there are different levels of TAZ data (Regional TAZ, Sub-Regional [COG] TAZ, and Scenario Planning Zones) and that the Scenario Planning TAZ level demographic assumptions in the SCAG 2016 RTP Model may differ greatly from cities/counties existing and General Plan forecasts. If the SCAG 2016 RTP Model is not consistent with local forecasts at the Scenario Planning TAZ, then future projects would be consistent with a City's General Plan, but would not be consistent with the SCS, meaning that it may not achieve the SCAG's region's SB 375 targets. The large margin of error between the SCAG 2016 RTP Model and local demographic forecast would be problematic with regards to future consistency findings in CEQA documents. A project that is consistent with the General Plan may not be consistent with the SCS, which is contrary to the intent of the SCS. As a result, these discrepancies between the 2016 RTP/SCS and the adopted Irvine General Plan must be corrected prior to adoption of the 2016 RTP/SCS.

We also do not understand why Exhibit 5.1 of the Draft 2016 RTP/SCS does not designate Irvine Station as a High Quality Transit Area (HQT) in 2040. We understand that a HQT is generally a walkable

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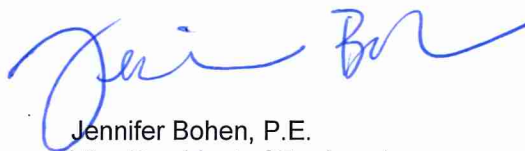
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transit village or corridor, consistent with the adopted RTP/SCS , that has a minimum density of 20 dwelling units per acre and is within a ½ mile of a well-served transit stop with 15-minute or less service frequency during peak commute hours. The area around the Irvine Station is designated as 8.1B Trails and Transit Oriented Development, which allows mixed-use development up to 50 units per acre and unlimited building heights within ½ mile of Irvine Station. As a result, we believe that consistent with SCAG's definition of a HQTAs, Irvine Station should be designated as such in the Draft 2016 RTP/SCS for 2040.

We would also like to note that the land around the Irvine Station provides substantial opportunities for intensification of land uses beyond that currently allowed by the Irvine General Plan due to its location near the multimodal Irvine Station. We understand that the purpose of the Intensified Land Use Alternative is to analyze a scenario with more intensified integration of transportation and land use projects and policies aimed at further reducing vehicle miles traveled and GHG and criteria pollutant emissions to improve mobility, accessibility, and sustainability. This Alternative would include more mixed-use, infill development, increased densities in urban cores, new technological innovations, and/or additional transit and active transportation strategies. Considering that the Great Park Neighborhoods is located adjacent to the multimodal Irvine Station, is served by an extensive bicycle and pedestrian trails network, and is planned to be served by the City's iShuttle program, we recommend that the Intensified Land Use Alternative include additional growth beyond Heritage Fields' current entitlement in the area surrounding Irvine Station. Based upon the available land area, and the types of densities the RTP contemplates to be appropriate near transit, this area is appropriate for mixed-use development of up to 50 units per acre.

We would encourage coordination between SCAG and Heritage Fields so that the 2016 RTP/SCS accurately reflects population, housing, and employment growth consistent with our existing entitlements. Please feel free to call me at (949) 349-1076 with any questions regarding our comments contained herein.

Sincerely,



Jennifer Bohen, P.E.
Vice President of Engineering
Five Point Communities Management, Inc.
Development Manager for Heritage Fields El Toro, LLC



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RE: Comments on the 2016 Draft RTP/SCS and PEIR

Supporting Organizations

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Audubon, Sea & Sage Chapter
Bolsa Chica Conservancy
Earth Resource Foundation
Huntington Beach Wetlands
Conservancy
Laguna Canyon Conservancy
Laguna Canyon Foundation
Laguna Greenbelt, Inc.
Newport Bay Conservancy
Sierra Club, Orange County
Surfrider Foundation,
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Dear Mr. Ikhmeta:

Friends of Harbors, Beaches and Parks (FHBP) has been engaged with the Southern California Association of Governments (SCAG) for many years—most recently through its ongoing Open Space Working Group. In 2012, we formed a coalition that promoted open space policies and advance mitigation programs at the SCAG level. These policies were ultimately adopted by SCAG leadership in the 2012 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). More recently, we've formed a new, more inclusive, and more diverse 2016 Southern California Conservation Coalition and are supporting the 2016 RTP/SCS Natural and Farmlands policies.

While FHBP mainly focuses its work in Orange County, we have been able to relay our experiences with the successful advance mitigation program under the Orange County Transportation Authority's Renewed Measure M to other county transportation agencies. Measure M's Environmental Mitigation Program has permanently protected 1300 acres and restored nearly 400 acres throughout Orange County. This innovative program allows 13 freeway projects to move forward unimpeded by small individual environmental mitigation efforts. It streamlines the process, allows projects to come in under budget, builds a positive working relationship with resource and permitting agencies, allows more thoughtful science-based conservation planning to occur, and is supported by many conservation and community organizations. This, and our involvement in the creation of the Natural Lands Policy in the Orange County SCS, drew our attention and focus to the SCAG RTP/SCS and opportunities for a more regional effort there. We are honored to be involved in the process and to have developed a great working relationship with SCAG leadership and staff.

Coalition Support for Natural Lands Implementation Program

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. FHBP and other coalition members would gladly assist with this implementation effort.

We applaud SCAG's effort since the 2012 Plan and the great work in the 2016 Plan. With this in mind, FHBP offers the following comments to the RTP/SCS and Program Environmental Impact Report (PEIR).

Program EIR Comments

Natural Communities Conservation Plans (NCCP) and Habitat Conservation Plans (HCP) (PEIR and Natural and Farmlands Appendix)

Within the Section 3.4 – Biological Resources (starting on page 3.4-52) 12 Conservation Plans are identified in the table spanning nearly every county—all but Ventura have one or more. Conservation Plans are also described in the Land Use Section 3.11 (starting on page 3.11-21).

There seem to be plans missing from the Land Use section that were identified in the Biological Resources section. This should be corrected. The document should be internally consistent.

Specifically, the following NCCPs/HCPs are missing from the Land Use Section:

- Imperial Irrigation District NCCP/HCP (Imperial County)
- Palos Verdes Peninsula NCCP/HCP (Los Angeles County)
- Orange County Transportation Authority NCCP/HCP (Orange County)
- Town of Apple Valley MSHCP (San Bernardino County)
- City of Colton HCP (San Bernardino County)

And as it relates to the Natural and Farmlands Appendix, there are also errors there as well. The following Plans are missing from the approved or implemented section within this document (pages 1-2):

- Lower Colorado River Multi-Species Conservation Plan (approved in 2005)
- West Mojave HCP (approved in 2006)
- Orange County Southern HCP (approved in 2007)
- City of Colton HCP (approved in 2015)

The Appendix states the following Plans are approved or are in implementation, but they are not:

- Desert Renewable Energy Conservation Plan (DRECP) (expected approval in March 2016)
- OCTA Measure M2 NCCP/HCP (expected approval June 2016)

Conservation Plans vs. Planning Areas (PEIR and Natural and Farmlands Appendix)

There appears to be confusion in the Biological Resources Section 3.4 (page 3.4-52) and Appendix (pages 1-2) as to the land “afforded long term protection” under existing NCCPs and HCPs. For example, the PEIR identifies that more than 20 million acres are protected because of these plans. There is no consistent way each plan is reviewed or explained and no calculations laid out as to how the 20 million acres was reached.

In fact, there seems to be a misunderstanding of what a Conservation Plan does and does not cover. Specifically, Conservation Plans (NCCPs, HCPs, Multiple Species HCPs, etc.) create a boundary (the Plan Area) that includes the entire geography of the area where both the project impacts and mitigation will occur. It is NOT what is protected or planned for protection. It simply designates the geography of where the project impacts occur and where properties are located that *could be* protected. For example, the Appendix notes (page 2) that the Orange County Transportation Authority’s (OCTA) NCCP/HCP protects 510,000 acres. This simply is not true. Those 510,000 acres are the Plan Area. In other words, the County of Orange is the Plan Area. What has actually been protected is 1,300 acres—a big difference. (See **Attachment 1 – OCTA Plan Area** and **Attachment 2 – OCTA Conserved Lands**) Further confusing the matter, the OCTA NCCP/HCP isn’t even covered the Land Use section of the PEIR, but is covered in the Biological Section (page 3.4-53). Again, internal consistency is important.

Additionally, lands within the Central-Coastal NCCP/HCP and Southern HCP have their own Plan Areas that are wholly contained within the OCTA NCCP/HCP and like OCTA’s Plan don’t have the entirety of the lands protected within the plan area. (See **Attachment 3 – OCTA, Central-Coastal, and Southern Plan Areas**). To simply rely on the Plan Area acreages as what is protected is not only inaccurate but very misleading. The acreage protected within the Plan Areas is what should be reported. And areas that overlap should not be double counted. So, we ask: where are the facts to document that 20 million acres are actually protected because of all of these plans?

We also offer the following suggestions to clarify this sections (Land Use and Biological Resources) for readers of the PEIR:

- Determine the difference between the actual plan area and what has been protected,
- Keep the measurement units the same (either acres or square miles, not both) [*Note: This comment also applies to the Natural and Farmland Appendix*]
- Keep the reporting mechanism the same (include what has been protected within Plan),
- Include a map that shows where the plan areas are located geographically, and
- Include a caveat that explains to the reader that some of the plan areas overlap.

Executive Summary Concerns (PEIR)

There are six policies guiding the development of the proposed land use strategies. One of the policies is:

- “Ensure adequate access to open space and preservation of habitat.” (page 2-17)

Our concerns around this statement are threefold. First, existing studies on parks and recreational opportunities demonstrate that many regions within the SCAG region are considered “park poor,” meaning there aren’t enough park acres to accommodate the existing residential population. And yet, secondly, SCAG proposes to ensure adequate access to those existing parks, while no new parks are proposed for creation or even have funding committed. Thirdly, there is a significant difference between local and regional parks (open space) and the types of parks and reserves (habitat) created as mitigation for residential development or transportation infrastructure, which generally have limited or managed access to ensure the reason it was protected (the species and habitats) are preserved in perpetuity.

Natural Lands Preservation Inclusion (PEIR)

We are very pleased to see Natural Lands Preservation as one of the six strategies listed in this PEIR (p. 2-18). This reaffirms a commitment to encourage infill development near transit, jobs, housing, and other community amenities while at the same time discouraging growth at the sensitive and often times natural hazard prone Wildland-Urban Interface (WUI) areas. That said, a mechanism and plan to actually preserve important landscapes is missing.

Figure 3.11.2-7 (PEIR)

Surprisingly, this Figure fails to align with the findings in the Natural Resource Inventory Database with the SCAG Region Open Space, Recreation and Agricultural Uses. At a minimum the California Protected Areas Database (CPAD) should be the base layer for this map and then SCAG’s Natural Resource Inventory Database overlaid on it. All of the National Forests (i.e., Angeles, San Bernardino, Cleveland, etc.) for example are listed as “vacant,” as is the newly created San Gabriel National Recreation Area and the Santa Monica Mountains National Recreation Area. The reality is they are open space and recreational lands and the map should accurately reflect these varying statuses. If layers or land use types were consolidated then that needs to be mentioned in the figure.

Maps (PEIR)

Because of the work on the Combined Habitat Assessment Protocol (CHAP) and Natural Resource Inventory Database it is surprising to see that so few of those layers were actually used in the documents. For example, on one map (Figure 3.11.2-7 SCAG Region Open Space, Recreation and Agricultural Uses) there is one depiction of the open spaces within the region. Compared to another map (Figure 3.4.2-5 Open Space in the SCAG Region) it includes the same categories (regional open space) and yet the same lands are not open spaces. How is this possible? The following maps should be revised using the SCAG’s Natural Resource Inventory Database or CPAD layers as the baseline of protected (permanently or privately) and the maps should be internally consistent, including:

- Figure 3.1.1-2 Land Use Patterns in the SCAG Region (*Rural is not the same as open space. Open space should be its own category or it should be noted as an asterisk/footnote.*)
- Figure 3.2.2-1 Regional Distribution of Important Farmlands and Grazing Lands
- Figure 3.4.2-5 Open Space in the SCAG Region
- Figure 3.11.2-2 Existing Land Uses
- Figure 3.11.2-3 Public and Private Land Ownership
- Figure 3.11.2-5 General Plan Land Use Designations (*It would be helpful to note that the land use designation of “open space” could be temporary but more importantly, it doesn’t mean it is actually protected.*)
- Figure 3.16.2-1 Regional and Local Recreation and Open Space
- Figure 3.16.4-1 Regional Recreation and Open Space Areas within a 45-Mile Radius of 2040 HQTAs
- Figure 3.16.4-2 Local Recreation and Open Space within a 30-Mile Radius of 2040 HQTAs

RTP/SCS Comments

Introduction (RTP/SCS)

In the opening pages of the RTP/SCS readers are reminded of SCAG’s mission:

“Developing long range regional plans and strategies that provide for efficient movement of people, goods and information, enhance economic growth and international trade, and improve the environment and quality of life.”

The document acknowledges (page 2) that the Plan “balances the region’s future mobility and housing needs with economic, environmental and public health goals.” This is certainly a step in the right direction. Thank you for recognizing the inter-connection between our health, environment, economy, housing, and transportation. The identified vision (also page 2) that more compact communities with abundant options and opportunities for housing, jobs, and transportation is not only a viable option, but also one that residents support. Southern California—from its

Mediterranean climate and beautiful beaches to its varied housing stock and diverse employment opportunities—offers something that very few other places can offer. Our geographic location puts us at an advantage for potential employers and residents, making thoughtful and forward thinking land use planning even more important.

We are pleased to see that Goal #6 of the RTP/SCS (page 60) “Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)” bring transportation, health, and the environment together cohesively. Furthermore, Goal #8 (also page 60) to “Encourage land use and growth patterns that facilitate transit and active transportation” supports mainly infill development and also simultaneously has the co-benefit of discouraging urban and suburban sprawl patterns typically seen at the WUI. This interface is the most critical in terms of advancing habitat protection due to many factors: distance from transportation and employment centers, adjacency to existing protected preserved lands, wildfires and the likely increase in frequency as the effects of climate change are felt, increase in greenhouse gas emissions from new residents and infrastructure needs, etc.

Southern California is a global hotspot of biodiversity and thus, careful planning must be recognized and implemented. In recent years, it has become more apparent that land conservation and well-planned transportation and infill housing projects can peacefully co-exist. By planning future growth in areas that are already urban and already have the infrastructure in place—the sprawling, auto-intensive development pressures at the WUI are lessened. That said, real attention needs to be paid to those lands at the WUI since many of these undeveloped and unprotected lands have an extremely important role in the future of the region’s ecological systems and their ability to remain functional and resilient.

Misconceptions about Land Preservation (RTP/SCS)

We agree that certain geographies are more vulnerable to development pressure than others. We also support focusing development away from the high value habitat, but strongly disagree with the statement that many “edge” lands do not have plans for conservation. What is the basis for this statement? What evidence do you have that substantiates this conclusion? What type of conservation plan is being included or excluded?

This is an important reminder that NCCP/HCPs are not the end all in conserving important lands. They are voluntary and property owner driven, typically only applying to larger ownerships/geographies. Just because it isn’t within an existing NCCP/HCP (a formal conservation plan) doesn’t mean it isn’t important to conserve. Many local, regional, state, and federal agencies may have other mechanisms, processes, programs, plans, documentation, and goals for regional conservation not captured in an NCCP/HCP. For example, the California Department of Fish and Wildlife (CDFW) has a process called the Conceptual Area Protection Plan (CAPP). CAPPs provide an initial evaluation of properties considered for acquisition and when funds are available, if the CAPP is approved, lands can be acquired through state funding. CAPPs are a formal process for CDFW, but likely do not overlap with an NCCP/HCP.

Many non-profits have ongoing efforts to acquire and preserve important landscapes that are also not included in a formal or informal conservation plan yet. In fact, most non-profits exist and focus their work on a specific geography. For example, using FHBP’s Greenprint, called the Green Vision Map, the entirety of Orange County has been coded in a tiered system creating a wish list of properties—many of which are at the WUI. This Greenprint covers an entire county. Many non-profits, and state and federal agencies have also already done a lot of the leg work for preservation of habitat lands, but may not have publically identified lands along the urban fringe. In other words, unless the conservation plan/effort is tied to a County Transportation Commission or local land use authority (city or county) that puts the Plan forward, it appears to be dismissed by SCAG. However, the reality is conservancies (public and private) exist to protect lands in their natural state. For example, The Trust for Public Land may have an option to buy important lands that are neither in a CAPP or formal conservation plan, but agencies funding the project agree it should be protected. State and federal agencies also focus on important areas to build a reserve, connect to another reserve, protect specific species, etc. This should be seen as an opportunity to partner and work collaboratively. Therefore, the definition of “conservation plan” in the RTP/SCS statement can have a lot of implied meanings and should be clarified.

Suggested Language (page 8, 21 and 73)

We suggest the following revisions (addition shown as *italics* and deletions shown as ~~strikethrough~~): “Many natural land areas *especially those* near the edge of existing urbanized areas ~~do not have plans for conservation and~~ are vulnerable to development pressure. *While some areas have formal conservation plans in place, other geographies rely on state and federal resource agencies and non-profits for inclusion in conservation efforts.*”

Existing Edge Habitats (PEIR)

We expressed the same concern in the PEIR, which states that existing edge habitats don't have conservation plans (p. 2-18) but does not provide substantial evidence that this is true.

Suggested Language (page 2-18)

We suggest the same language as proposed above: "Many natural land areas especially those near the edge of existing urbanized areas are vulnerable to development pressure. While some areas have formal conservation plans in place, other geographies rely on state and federal resource agencies and non-profits for inclusion in conservation efforts."

The PEIR also states (page 3.4-54) that "The Plan describes a substantial effort to identify resource areas and encourage shifts in future development away from natural habitat areas. In doing so, the Plan includes land use strategies that aim to preserve natural habitats, minimize the potential for disturbance of biological resources, and support redirecting growth away from high value habitat areas to existing urbanized areas such as high quality transit areas (HQTAs)." Again the PEIR fails to identify how the Plan will "encourage" these shifts or actually "preserve natural habitats."

Increasing Population and Limited Parks (RTP/SCS and Natural and Farmland Appendix)

With an anticipated population growth of 20% (nearly 3.8 million people) by 2040 (page 47) this adds considerable pressure to our existing parkland. *[Note: the Appendix states 17% on page 1 – the documents should be internally consistent.]* Studies conducted by Friends of Harbors, Beaches and Parks (See **Attachment 4 – FHBP Park Score Study for Orange County**) and The City Project ([go to: www.MapJustice.org](http://www.MapJustice.org)) demonstrate our communities do not have enough parkland to meet the existing demand. Local land use authorities have an obligation to meet the Quimby Act (which aims for three acres of parkland per 1,000 residents). With an anticipated population boom of 3.8 million more people, this equates to more than 11,400 acres that should automatically be added to the local and regional park system as the growth occurs. These parks tend to be protected as turf parks or active/high intensity parks (with tennis courts, baseball and soccer fields, etc. This preservation is separate from the ongoing formal and informal conservation efforts by agencies, CTCs, and non-profits—many of which are protecting lands for entirely different reasons.

As indicated on page 13 of the RTP/SCS, infill developments promote active transportation and improve access to amenities such as parks and natural lands. While the document (page 2) indicates that residents utilize the natural lands and recreational areas as a respite from the busy life in the city, unfortunately unless new and additional parks are created for the new influx of people, the limited existing parks will suffer even more from overuse and abuse. Creating new parks lessens the impacts on existing parks and maintains the balance for recreational uses needed when housing is added. Another Land Use Policy of the Plan is to "ensure adequate access to open space and preservation of habitat" (page 69), but nowhere does it state how additional lands will be preserved to accommodate the anticipated growth without severely impacting the existing protected natural lands from recreational overuse.

The reality on the conservation-front is, that there are a lot of natural lands left to protect across the SCAG region. Furthermore, land conservation occurs for many reasons, such as: species protection, wildlife corridor enhancements, mitigation lands, NCCP/HCP lands, and even local and regional parks. Not all parkland is available for recreational use (hiking, biking, equestrian, etc.). Many lands have restrictions or managed access due to legal requirements (deed restrictions), mitigation and permit requirements, and/or conservation easements. Simply providing "more" access may have significant consequences for the land manager.

Land Conversion (RTP/SCS)

The 2012 RTP/SCS indicated 742 square miles (474,880 acres) of greenfield lands in the Baseline (business-as-usual scenario) would be converted into more urban uses, but with the 2012 Plan in place it would reduce the conversion to 334 square miles (213,760 acres). Four years later, with the 2016 Plan, the document indicates (Table 8.1 - pages 150 and 153) the 2040 Baseline (business-as-usual scenario) would result in the conversion of 154 square miles (95,860 acres) of greenfield lands into more urban uses. With the Plan in place, the document states (pages 9, 147, and 148) only 118 square miles (75,520 acres) would be converted to more urban uses. A 23.4% reduction, as proposed by the 2016 Plan, provides a solid start to improved sustainability [and conservation]. But, as page 20 indicates, current conservation efforts are underway and this reduced land conversion does NOT account for those efforts. We would anticipate the greenfield acreage converted to urban uses to be even lower.

We continue to urge SCAG to promote infill developments, and encourage local and regional land use authorities to halt building at the WUI. As the survey SCAG conducted indicates (page 64), the clear majority of respondents supported development in existing urban areas rather than into our natural and farmlands. On page 63, the document also accurately notes that varying combinations of land use and transportation strategies lead to different rates of land consumption, among other things. This is exactly the type of information our decision makers need to have when making important land use decisions relating to infill and greenfield development.

Climate Change (RTP/SCS)

The Plan also notes that climate change will have impacts to natural habitats and overall biodiversity (page 56). In addition to coastlines being vulnerable to sea level rise and destructive storm surges, many of the transportation infrastructure (roads, highways, and rail lines) that already exists is vulnerable as well. A study conducted by the Pacific Institute may be helpful for SCAG in understanding what a 1.4 meter (4.6 feet) sea level rise has the potential to impact. (See **Attachment 5 – Vulnerable Infrastructure**) For example, with a 1.4 meter sea level rise, Ventura County has 7.7% of its roadways impacted, Los Angeles County has 18%, and Orange County has 9%. Another example, with a 1.4 meter sea level rise, Ventura has 10 miles of rail lines impacted, Los Angeles County has 14 miles, and Orange has 6.6 miles impacted. As noted in the Plan, we agree that your response to climate change impacts requires cooperation, creative thinking, and better use of limited resources (page 56). On page 13, the Plan discusses making communities more resilient to the impacts of climate change, but we also see a connection to ensuring our wildlands are more resilient to the effects as well. Guaranteeing our wildlife and plant species have the ability to reach other elevations through permanent connections between protected lands is essential to ensuring this region's biodiversity is retained and functional in the future.

The Process of Land Conservation (RTP/SCS)

Preserving natural lands comes in many forms. While, we support the general idea that as new growth is concentrated in existing urban areas (page 16) mainly concentrated at the HQTAs (per Huasha Lui at the Elected Official Briefing in OC on January 20, 2016), the pressures to develop the fringe lands are decreased. The reality remains that some mechanism (local land use plan, policy, ordinance, etc.) and entity (local, regional, state or federal or even non-profit) needs to spearhead the conservation effort. Just because you say growth will be focused in the urban areas, doesn't automatically protect the fringe areas. It likely alleviates some pressure on the fringe areas, but this may only be temporary. Often times there is significant coordination, funding and support that must be organized before natural lands are protected. For example, within the Land Use Policies (page 108) the document notes that the 2016 Plan itself leads to, among other things, "the preservation of natural lands," however the Plan fails to state exactly how that will occur. The Plan lacks a mechanism for actually protecting resource rich lands. This should be corrected and suggestions are in the revised Natural and Farmland policy language included in the Coalition letter submitted January 29, 2016. References to this concern occur on the following pages as well: 14, 16, 78, 108, and 159.

Existing Support for Land Conservation (RTP/SCS)

Ninety percent of the survey respondents supported protecting natural habitats (page 64). This is important information for our decision makers to have—it should be highlighted and enacted. The Plan has advanced well since 2012 and as the document states (page 111) "Building on this effort has the potential to create a regional conservation program that stakeholders such as CTCs, cities, agencies, and non-profits can align with and support." We agree. Let's work on the mechanism and funding by which land can be protected in the SCAG region and the environmental community and resources agencies will engage and support this effort.

Focused New Growth Around Transit (RTP/SCS)

The Plan indicates on page 70 that there are numerous benefits to focusing new growth around HQTAs. A clear benefit to focusing development at HQTAs is also a reduction in greenfield development. We believe this should be included in your list of benefits.

Maps (RTP/SCS)

Urban vs. Agriculture

Exhibit 2.1 (page 23) has a colorful map indicating the per acre habitat value of lands across the SCAG region. While this designation likely came from the CHAP mentioned earlier, we should note that there is a huge difference between the concrete "urban" landscape and the undeveloped "agricultural" landscape. Separating the Urban from the Agricultural layers in the map would provide a better delineation of the types of resources in the program—after all these policies address the Natural Lands *and Farmlands*.

Furthermore, the California Department of Conservation has mapped the “prime agricultural lands” for the state and every county in the SCAG region is included in this mapping. Prime agricultural lands are defined by two important criteria. First, the land use: “has been used for irrigated agricultural production at some time during the four years prior to the Important Farmland Map date. Irrigated land use is determined by FMMP (Farmland Mapping and Monitoring Program) staff by analyzing current aerial photos, local comment letters, and related GIS data, supplemented with field verification.” Second, the soil type: “The soil must meet the physical and chemical criteria for Prime Farmland or Farmland of Statewide Importance as determined by the USDA [United States Department of Agriculture] Natural Resources Conservation Service (NRCS).” Furthermore, the designation of “prime” refers to the agricultural use. (Source: California Department of Conservation, Prime Farmlands as Mapped by the FMMP http://www.conservation.ca.gov/dlrp/fmmp/overview/Pages/prime_farmland_fmmp.aspx)

Why isn't the SCAG Natural Resource Inventory Database used as the base layer for this map?

Wildlife Corridors (RTP/SCS)

Many efforts are underway across the SCAG region to connect the landscapes to one another. For example, efforts are underway to create a mountain lion corridor at Liberty Canyon to connect the Santa Monica Mountains in Los Angeles County to other preserved open space areas. In Riverside County, efforts are underway to connect lands in the San Jacinto Range with the San Geronio Range within the San Bernardino National Forest. Without connections for our large predators the entire ecosystem is impacted. The RTP/SCS has an opportunity to support documented wildlife corridors that are impacted by infrastructure projects. The research conducted by SC Wildlands and its South Coast Missing linkages project should be at the forefront of this effort. (See **Attachment 6** – South Coast Missing Linkages Study)

Glossary (RTP/SCS)

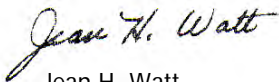
Greenfields are defined within the Plan's glossary. Please define “agricultural lands.” (page 178).

SCAG's Role in Mitigation Measure for Local Projects (RTP/SCS)

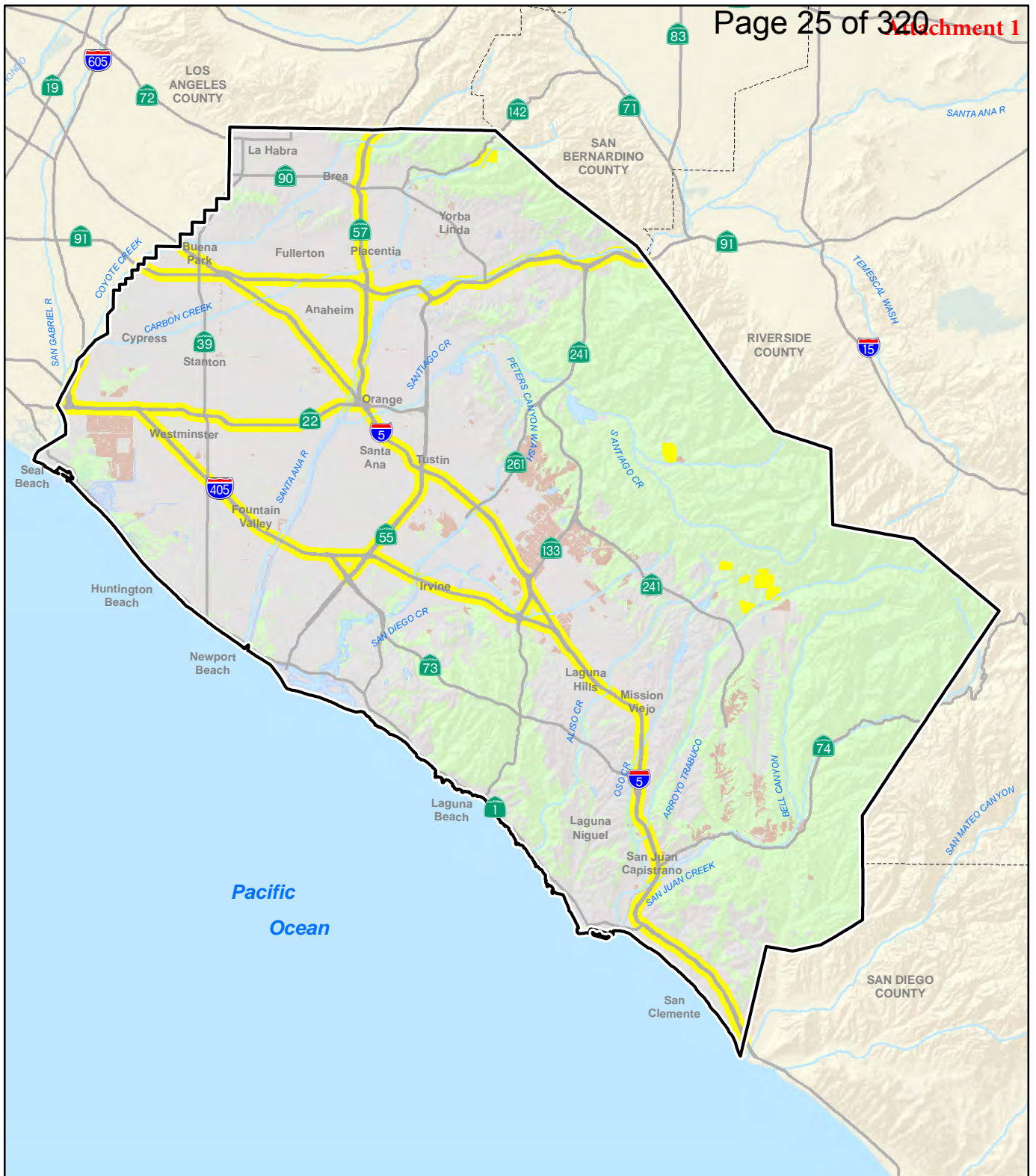
The RTP/SCS promotes building on the 2012 Plan with the aim to serve as a resource for lead agencies (page 109). This is a commendable goal. That said, SCAG could offer assistance through the use of the CHAP and Natural Resource Inventory Database layers by providing the data to those agencies or even suggesting potential mitigation sites with high per acre habitat value.

Thank you for the opportunity to provide substantive comments on the SCAG 2016 RTP/SCS and PEIR. We look forward to working closely with you in the future.






Sincerely,



Jean H. Watt
President



Legend

-  Plan Area
-  Permit Area
-  Natural Habitats
-  Agriculture
-  Developed

Note: Preserves that have been acquired to date are shown on this figure as part of the Permit Area. As additional Preserve(s) are acquired and included in the Plan, the Permit Area will expand, by definition, to include the additional Preserve(s).



Miles

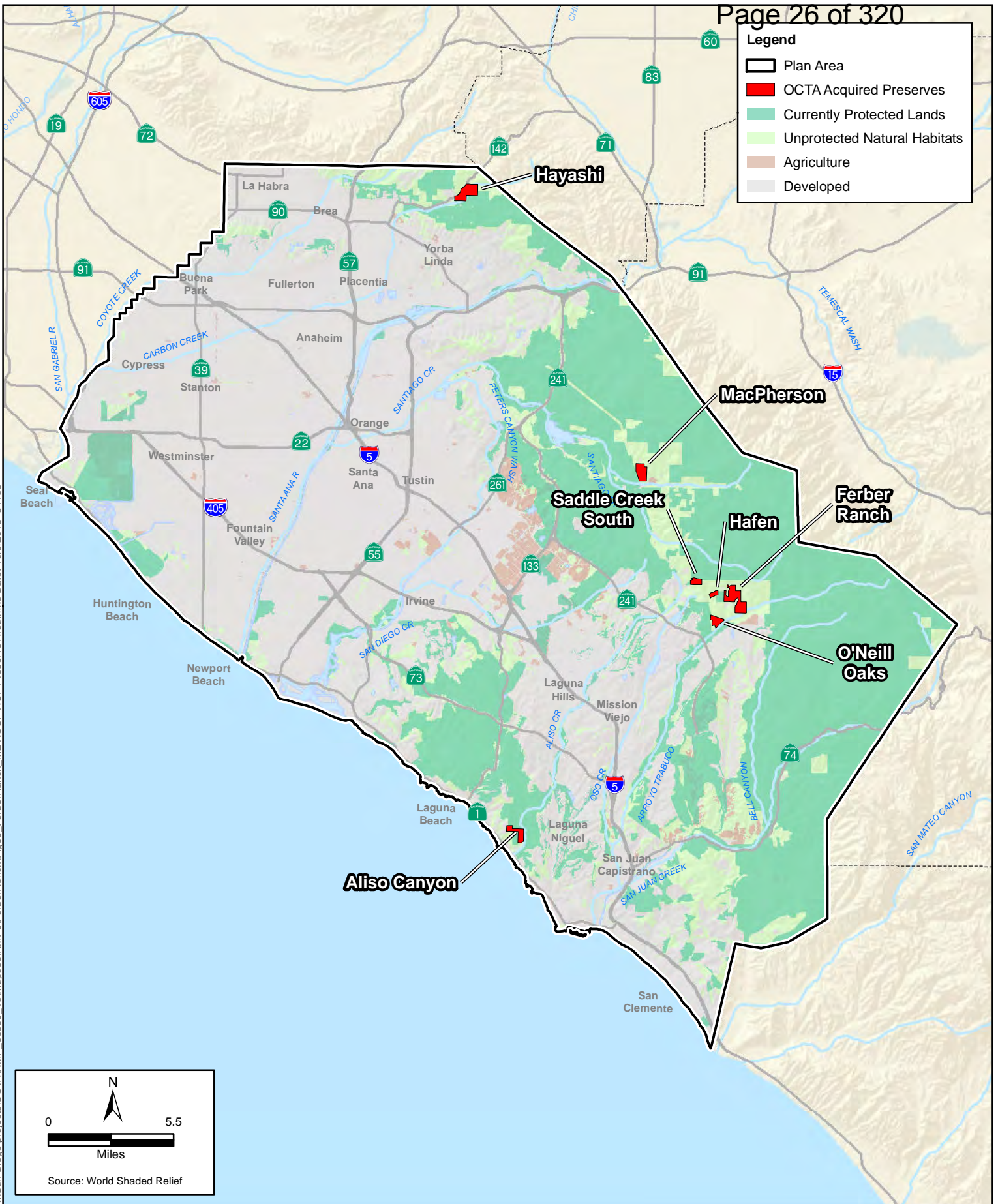
0 6

Vegetation Source: TAIC/ICF 2013



Plan and Permit Area

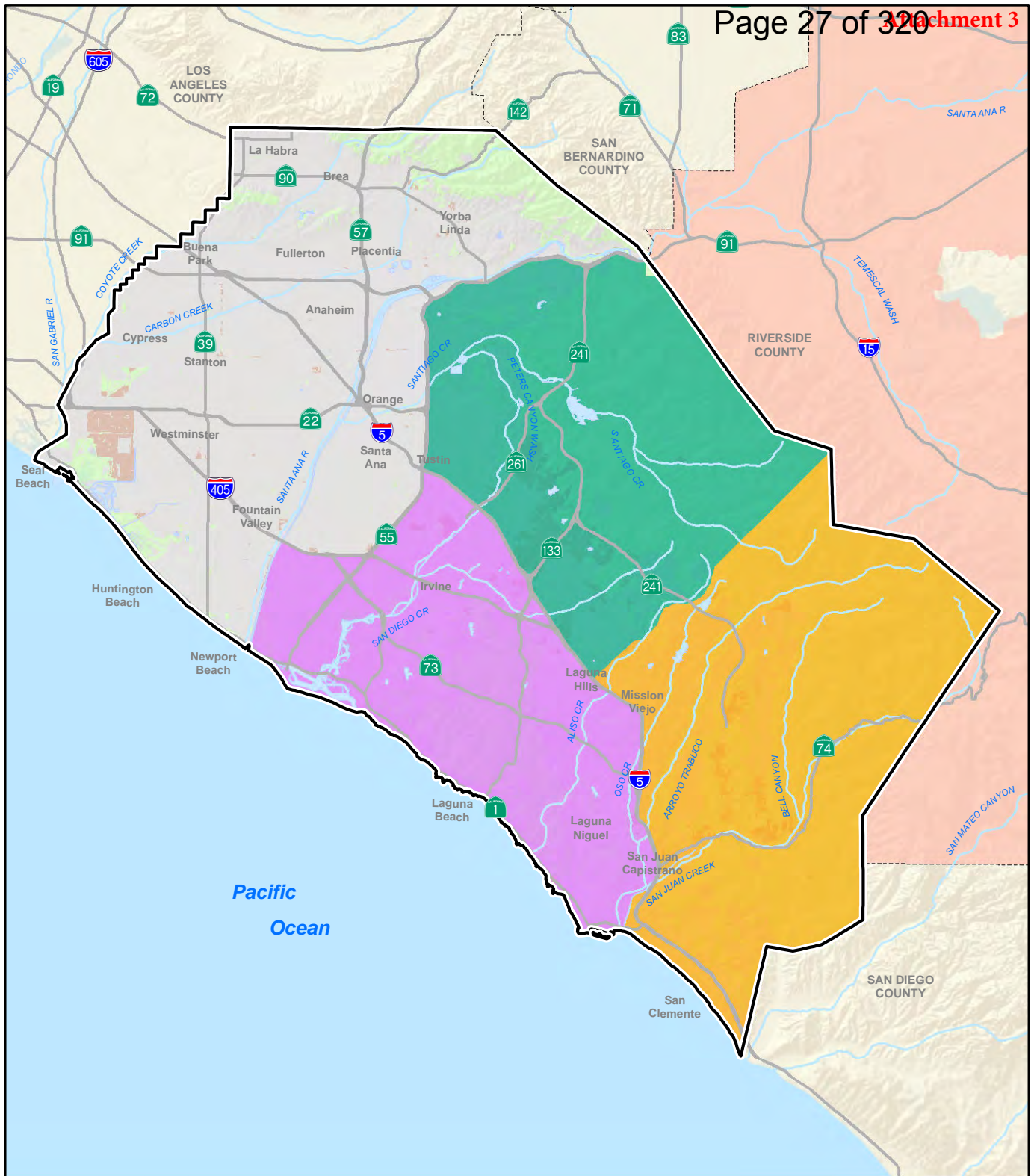
Figure 1-2



K:\San_Diego\projects\OCTA\RMP_00399_15\mapdoc\RMP\FerberRanch\FerberRanch.Fig03_FerberRanch_M2 NCCP HCP Preserve Area.mxd Date: 10/5/2015 3:41:53

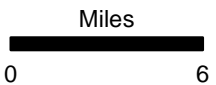


Figure 3
M2 NCCP/HCP Preserve Area
Ferber Ranch Resource Management Plan



Legend

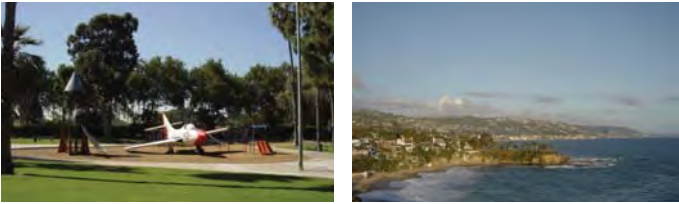
- Plan Area
- Orange County Central-Coastal NCCP/HCP-Central Subregion
- Orange County Central-Coastal NCCP/HCP-Coastal Subregion
- Orange County Southern Subregion HCP
- Western Riverside MSHCP
- Natural Habitats
- Agriculture
- Developed



Regional Conservation Planning Efforts

Figure 1-3

Orange County Park Scores



Place to Play and Rejuvenate

Imagine living in a community where the design and layout allowed you to quickly access protected natural lands, tot lots, and recreational trails. Parks play an important role in our life. Not only do parklands allow residents places to enjoy nature, they also boost the economy, increase property values, and reduce the cost for public services.

“City parks and open space improve our physical and psychological health, strengthen our communities, and make our cities and neighborhoods more attractive places to live and work,” according to The Trust for Public Land’s Benefits of Parks. It further explains “U.S. voters have repeatedly shown their willingness to raise their own taxes to pay for new or improved parks.”

Benefits of Parks

Parks have many benefits, including:

- Increasing the value of neighboring residential property
- Providing exceptional opportunities for children to learn, experience, and understand nature
- Improving our environment—including filtering pollutants from our air, soil, and water
- Creating community resources and activity hubs, like urban gardens and outdoor gyms
- Encouraging residents to exercise more and live healthier lifestyles

Sources: Benefits of Parks, The Trust for Public Land
Nature Deficit Disorder, Richard Louv



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

www.FHBP.org

ORANGE COUNTY’S TOP 3 BEST REGIONAL PARK SCORES

1. Laguna Beach (79.2 acres/1000 residents)
2. Irvine (56.2)
3. Rancho Santa Margarita (43.9)



Orange County Park Scores

For our purposes Friends of Harbors, Beaches, and Parks looked at the Park Score for each city in Orange County. Three analyses were conducted. The first analysis included city-owned parkland only. The second final analysis included city- and county-owned parkland. The final analysis included all publicly owned protected lands and beaches, even those with restricted access, as well as lands protected by conservation non-profits. Only 13 cities met or exceeded the 3+ acres in the city-only analysis, while 24 met or exceeded it in the other two analyses.



Measuring Park Scores

Park Scores measure how many acres of protected parkland there are per 1,000 residents. The 1975 Quimby Act established a statewide requirement that developers set aside land, donate conservation easements, or pay fees for park improvements (called park in lieu fees). Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities. Many jurisdictions have enacted local ordinances that require the maximum number of park acres per person allowed by the Quimby Act or 5 acres per 1,000 residents.

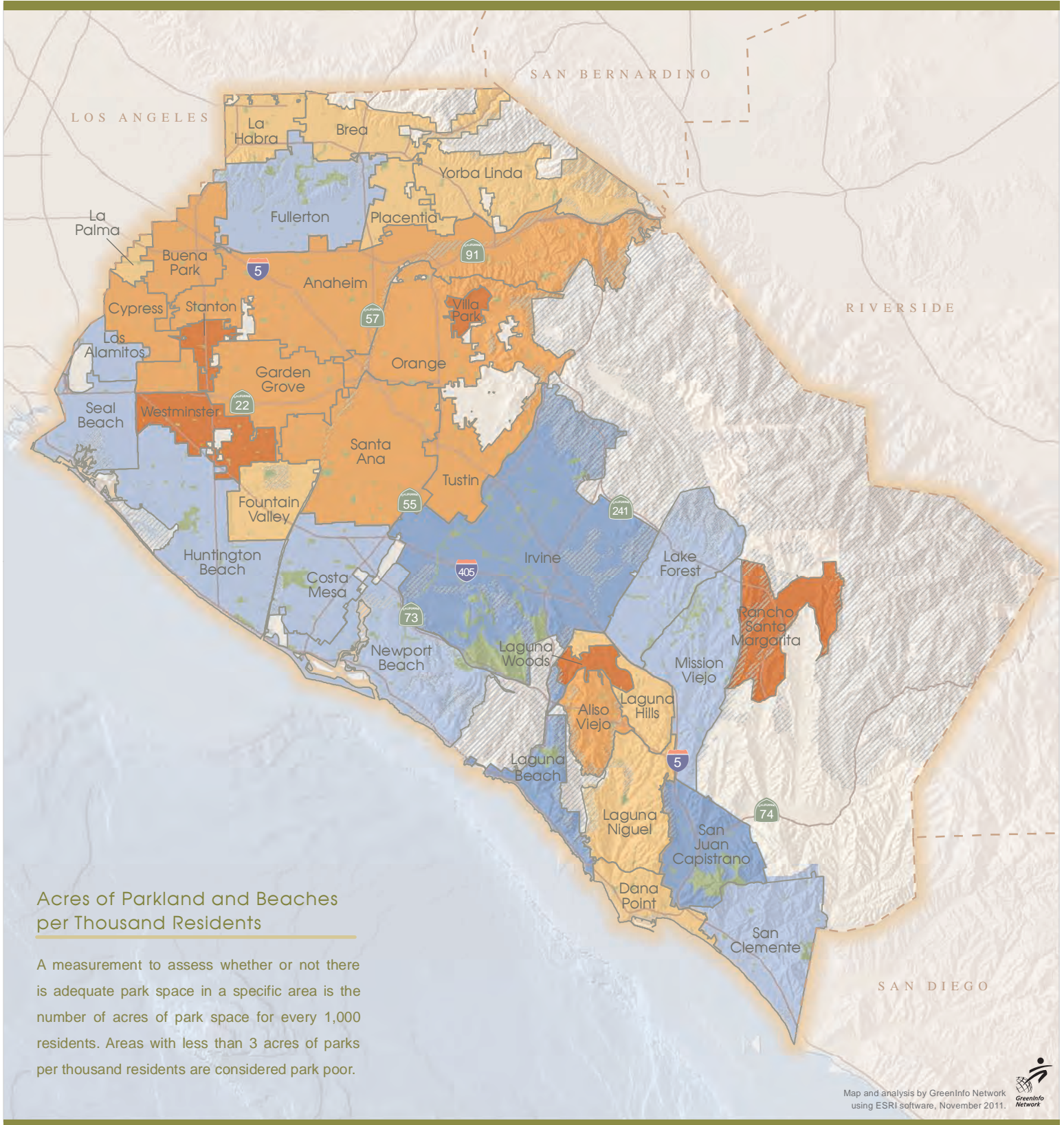
The scores for this analysis were calculated using the 2010 Census data and the California Protected Areas Database. See the additional pages in this flyer for a map and tables which illustrate our results.





Park Score by City

Includes City Ownership



Acres of Parkland and Beaches per Thousand Residents

A measurement to assess whether or not there is adequate park space in a specific area is the number of acres of park space for every 1,000 residents. Areas with less than 3 acres of parks per thousand residents are considered park poor.

Acres of Parkland and Beaches per Thousand Residents



Acres of parkland and beaches per thousand residents includes land with public access or restricted public access. Parkland and beach ownership includes city agencies only.
 Data Sources: Demographics - 2010 census, Park/Green Space - CPAD v1.6, calands.org.

Other Features



Map and analysis by GreenInfo Network using ESRI software, November 2011.



ORANGE COUNTY – PARK SCORE BY CITY			
<i>Includes City Park Ownerships</i>			
Name	Total Population	Acres of City Parkland	Acres of City Parks per Thousand Residents
Aliso Viejo	47,823	94	1.95
Anaheim	336,265	507	1.50
Brea	39,282	117	2.98
Buena Park	80,530	82	1.02
Costa Mesa	109,960	671	6.10
Cypress	47,802	88	1.83
Dana Point	33,351	97	2.89
Fountain Valley	55,313	160	2.89
Fullerton	135,161	877	6.49
Garden Grove	170,883	172	1.00
Huntington Beach	189,992	727	3.83
Irvine	212,375	4,003	18.85
La Habra	60,239	127	2.11
La Palma	15,568	36	2.35
Laguna Beach	22,723	353	15.52
Laguna Hills	30,344	71	2.34
Laguna Niguel	62,979	160	2.54
Laguna Woods	16,192	3	0.21
Lake Forest	77,264	281	3.64
Los Alamitos	11,449	37	3.17
Mission Viejo	93,305	672	7.20
Newport Beach	85,186	499	5.86
Orange	136,416	243	1.78
Placentia	50,533	108	2.15
Rancho Santa Margarita	47,853	0	0.00
San Clemente	63,522	341	5.37
San Juan Capistrano	34,593	1,138	32.90
Santa Ana	324,528	356	1.10
Seal Beach	24,168	120	4.98
Stanton	38,186	24	0.62
Tustin	75,540	102	1.35
Villa Park	5,812	0	0.00
Westminster	89,701	85	0.95
Yorba Linda	64,234	176	2.74

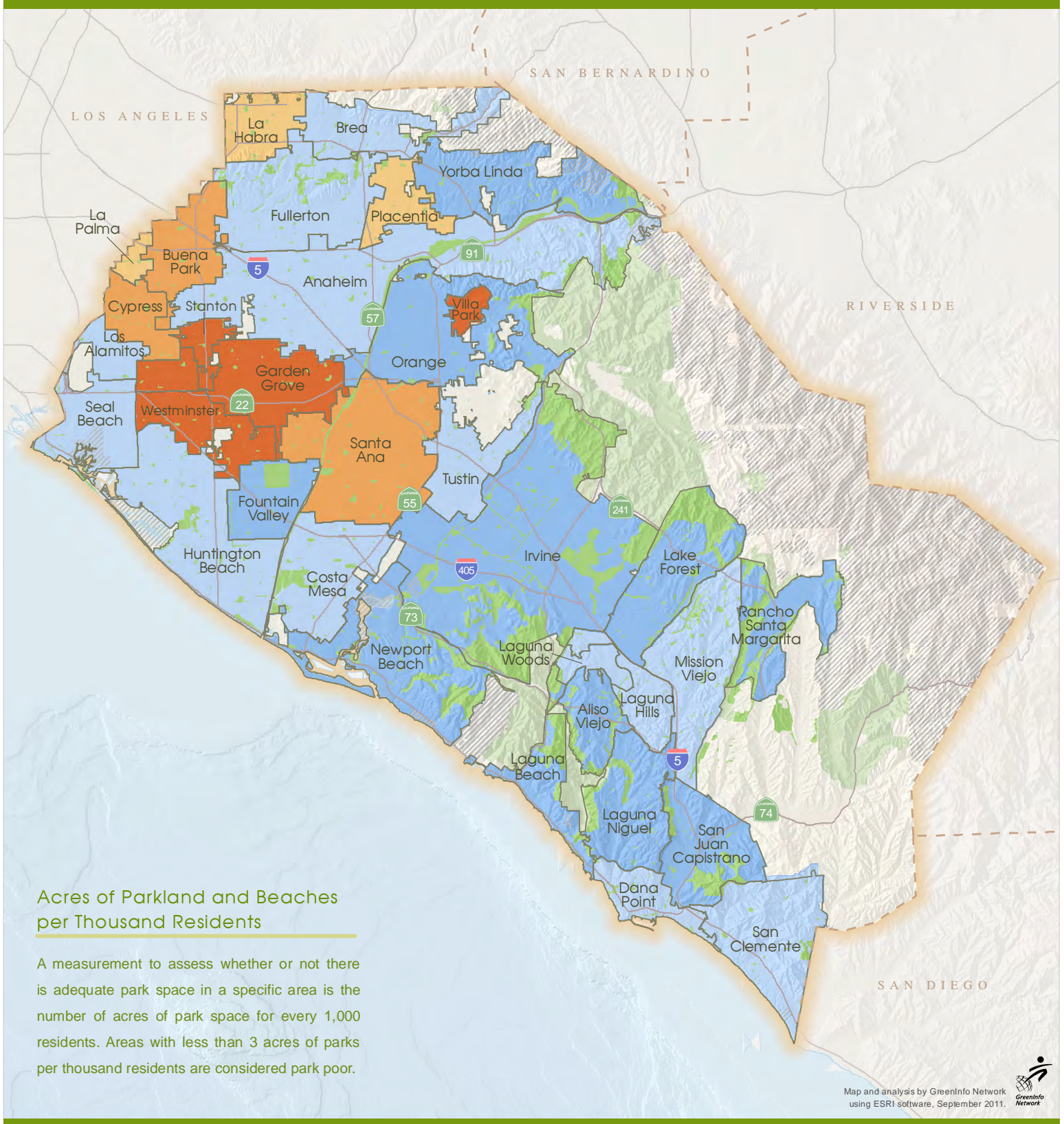
Parks and open space data was calculated from GreenInfo Network's California Protected Areas Database (CPAD) version 1.6, January 2011 www.calands.org. Acres of parkland and beaches per thousand residents includes land with public access or restricted public access. Parkland and beach ownership includes city agencies only.

Population Counts were calculated from 2010 Census Short Form Data, <http://factfinder2.census.gov>.



Park Score by City

Includes City and County Park Ownerships



Acres of Parkland and Beaches per Thousand Residents

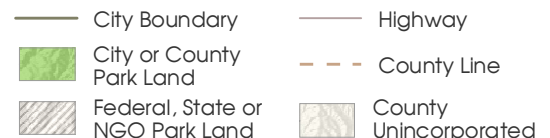
A measurement to assess whether or not there is adequate park space in a specific area is the number of acres of park space for every 1,000 residents. Areas with less than 3 acres of parks per thousand residents are considered park poor.

Acres of Parkland and Beaches per Thousand Residents



Acres of parkland and beaches per thousand residents includes land with public access or restricted public access. Parkland and beach ownership includes city and county agencies only. Data Sources: Demographics - 2010 census, Park/Green Space - CPAD v1.6, calands.org.

Other Features



Map and analysis by GreenInfo Network using ESRI software, September 2011.



ORANGE COUNTY – PARK SCORE BY CITY			
<i>Includes City and County Park Ownerships</i>			
Name	Total Population	Acres of City or County Parkland	Acres of City or County Parks per Thousand Residents
Aliso Viejo	47,823	930	19.4
Anaheim	336,265	2,761	8.2
Brea	39,282	231	5.9
Buena Park	80,530	129	1.6
Costa Mesa	109,960	963	8.8
Cypress	47,802	88	1.8
Dana Point	33,351	227	6.8
Fountain Valley	55,313	686	12.4
Fullerton	135,161	1,110	8.2
Garden Grove	170,883	172	1.0
Huntington Beach	189,992	881	4.6
Irvine	212,375	11,928	56.2
La Habra	60,239	127	2.1
La Palma	15,568	36	2.3
Laguna Beach	22,723	1,801	79.2
Laguna Hills	30,344	111	3.7
Laguna Niguel	62,979	1,033	16.4
Laguna Woods	16,192	106	6.5
Lake Forest	77,264	3,066	39.7
Los Alamitos	11,449	37	3.2
Mission Viejo	93,305	823	8.8
Newport Beach	85,186	2,258	26.5
Orange	136,416	1,443	10.6
Placentia	50,533	111	2.2
Rancho Santa Margarita	47,853	2,102	43.9
San Clemente	63,522	343	5.4
San Juan Capistrano	34,593	1,412	40.8
Santa Ana	324,528	603	1.9
Seal Beach	24,168	142	5.9
Stanton	38,186	24	0.6
Tustin	75,540	259	3.4
Villa Park	5,812	0	0.0
Westminster	89,701	85	1.0
Yorba Linda	64,234	918	14.3

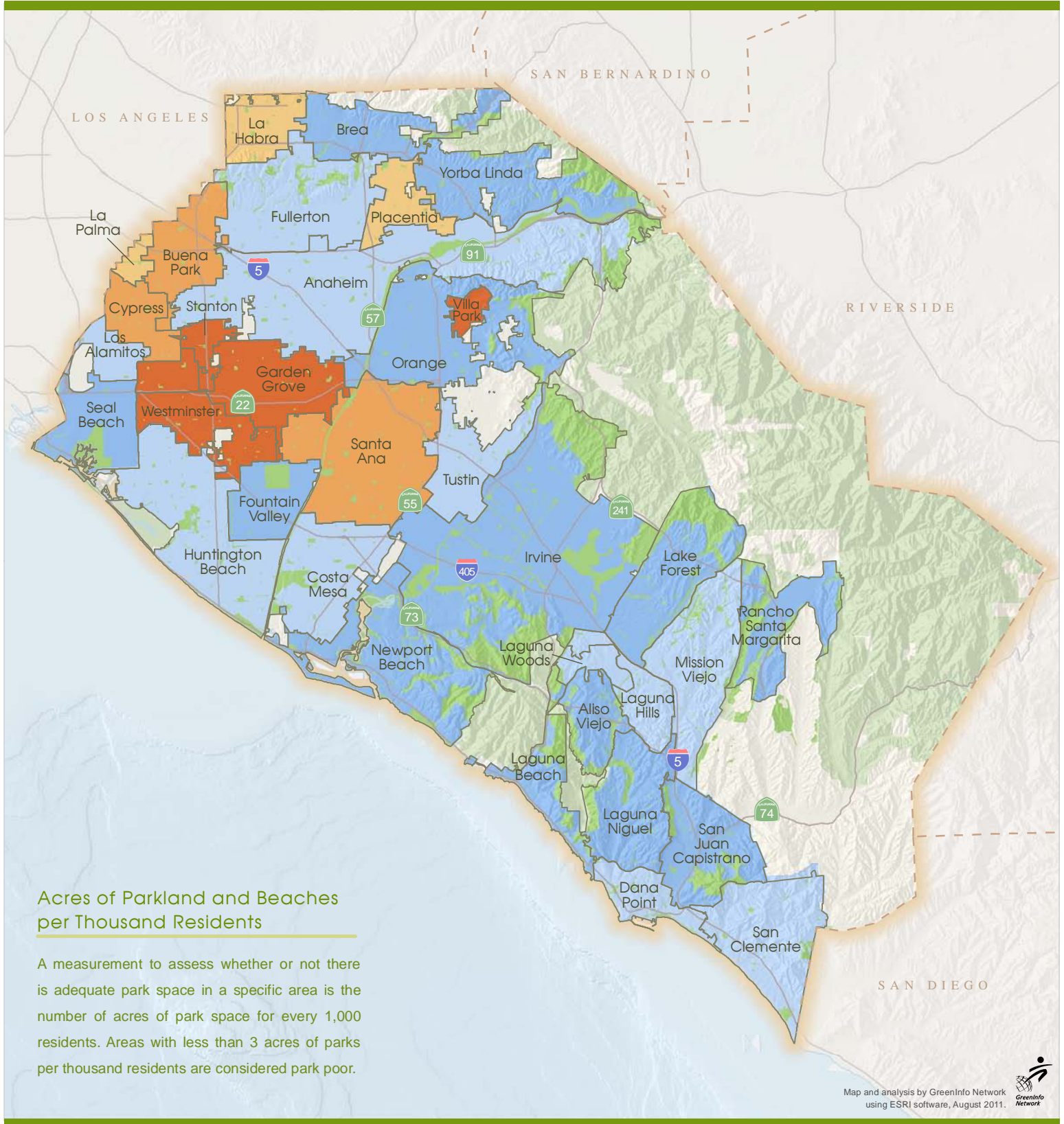
Parks and open space data was calculated from GreenInfo Network's California Protected Areas Database (CPAD) version 1.6, January 2011 www.calands.org. Acres of parkland and beaches per thousand residents includes land with public access or restricted public access. Parkland and beach ownership includes city and county agencies only.

Population Counts were calculated from 2010 Census Short Form Data, <http://factfinder2.census.gov>.



Park Score by City

Includes All Park Ownerships



Acres of Parkland and Beaches per Thousand Residents

A measurement to assess whether or not there is adequate park space in a specific area is the number of acres of park space for every 1,000 residents. Areas with less than 3 acres of parks per thousand residents are considered park poor.

Map and analysis by GreenInfo Network using ESRI software, August 2011.



Acres of Parkland and Beaches per Thousand Residents

- Less than 1 acre
- 1 - 2 acres
- 2 - 3 acres
- 3 - 10 acres
- More than 10 acres

Acres of parkland and beaches per thousand residents includes land with public access or restricted public access. Parkland and beach ownership includes the following agencies: non-governmental organizations, city, county, state and federal governments.
Data Sources: Demographics - 2010 census, Park/Green Space - CPAD v1.6, calands.org.

Other Features

- City Boundary
- Park Land
- County Line
- County Unincorporated
- Highway

ORANGE COUNTY – PARK SCORE BY CITY			
<i>Includes All Park Ownerships</i>			
Name	Total Population	Acres Parkland	Acres of Parks per Thousand Residents
Aliso Viejo	47,823	930	19.4
Anaheim	336,265	3,340	9.9
Brea	39,282	665	16.9
Buena Park	80,530	129	1.6
Costa Mesa	109,960	963	8.8
Cypress	47,802	88	1.8
Dana Point	33,351	302	9.1
Fountain Valley	55,313	686	12.4
Fullerton	135,161	1,115	8.2
Garden Grove	170,883	172	1.0
Huntington Beach	189,992	1,208	6.4
Irvine	212,375	12,127	57.1
La Habra	60,239	127	2.1
La Palma	15,568	36	2.3
Laguna Beach	22,723	1,950	85.8
Laguna Hills	30,344	111	3.7
Laguna Niguel	62,979	1,033	16.4
Laguna Woods	16,192	106	6.5
Lake Forest	77,264	3,066	39.7
Los Alamitos	11,449	37	3.2
Mission Viejo	93,305	823	8.8
Newport Beach	85,186	3,464	40.7
Orange	136,416	1,443	10.6
Placentia	50,533	111	2.2
Rancho Santa Margarita	47,853	2,131	44.5
San Clemente	63,522	463	7.3
San Juan Capistrano	34,593	1,412	40.8
Santa Ana	324,528	603	1.9
Seal Beach	24,168	1,078	44.6
Stanton	38,186	24	0.6
Tustin	75,540	259	3.4
Villa Park	5,812	0	0.0
Westminster	89,701	85	1.0
Yorba Linda	64,234	2,343	36.5

Parks and open space data was calculated from GreenInfo Network's California Protected Areas Database (CPAD) version 1.6, January 2011 www.calands.org. Acres of parkland and beaches per thousand residents includes land with public access or restricted public access. Parkland and beach ownership includes the following agencies: non-governmental organizations, city, county, state and federal governments.

Population Counts were calculated from 2010 Census Short Form Data, <http://factfinder2.census.gov>.

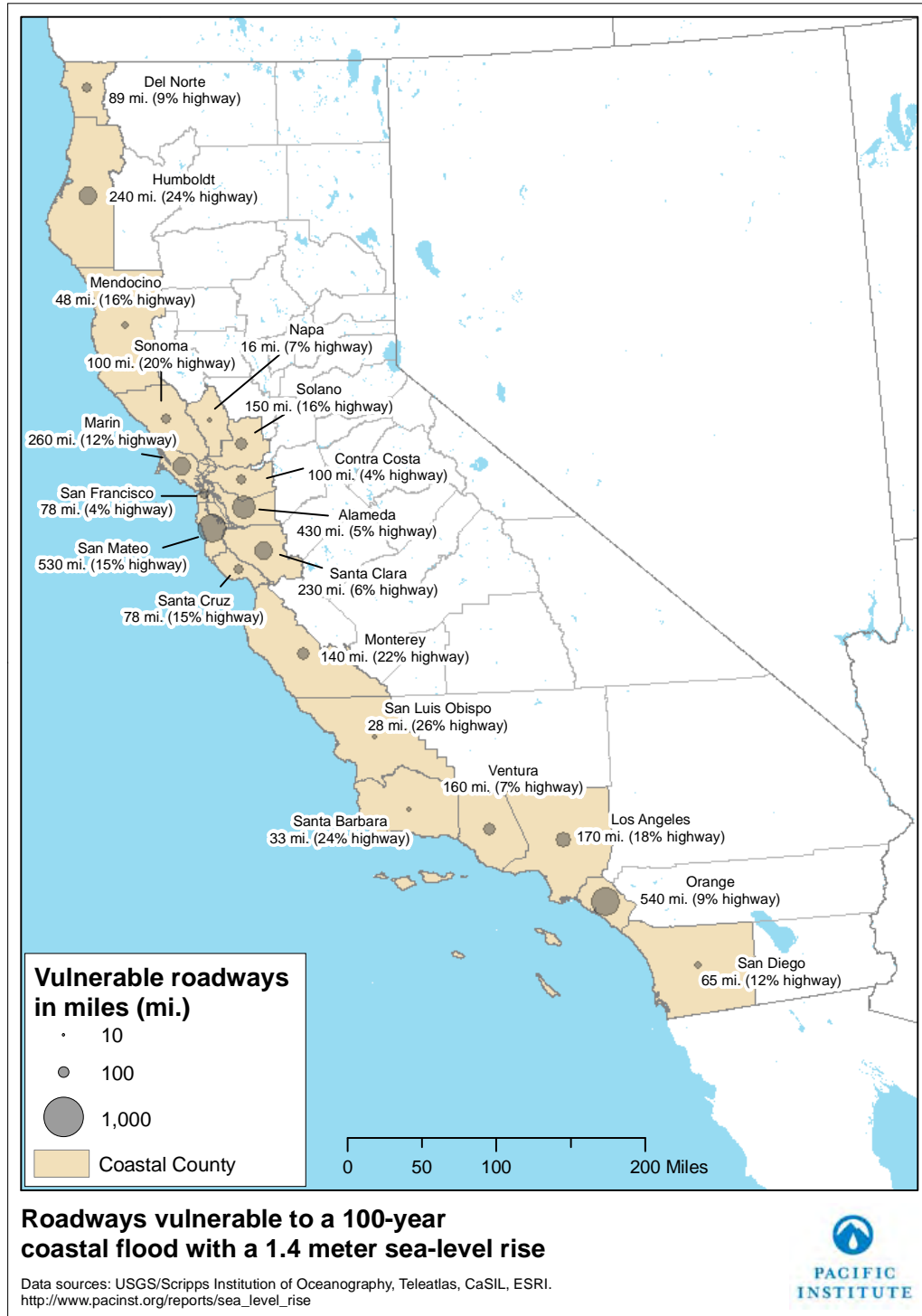


Figure 19. Roadways vulnerable to a 100-year coastal flood with a 1.4 m sea-level rise

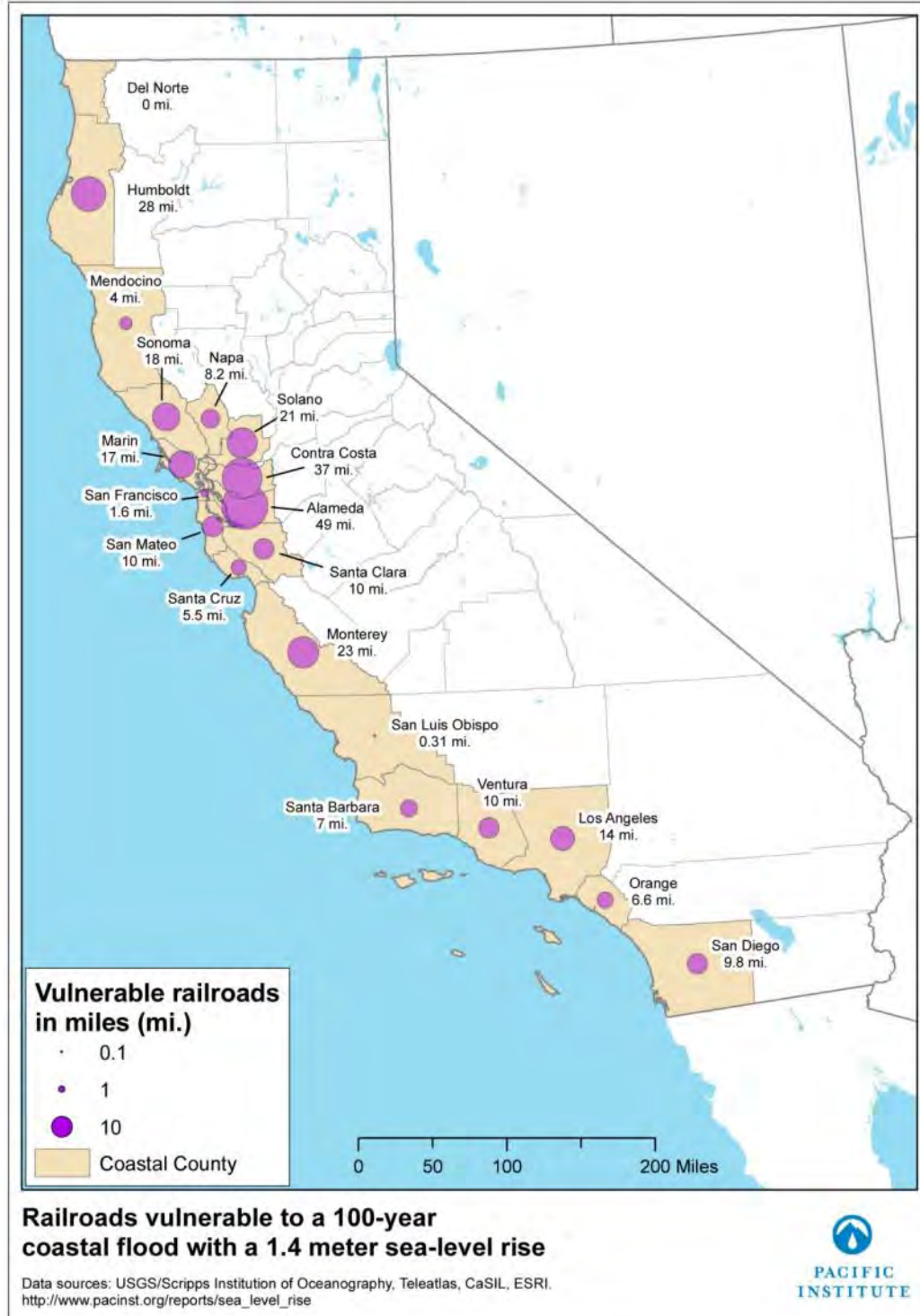


Figure 20. Railroads vulnerable to a 100-year coastal flood with a 1.4 m sea-level rise

South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion





SOUTH COAST WILDLANDS

Produced by South Coast Wildlands: Our Mission is to protect and restore systems of connected wildlands that support native wildlife and the ecosystems upon which they rely.

Project Partners: We would like to recognize our partners on the South Coast Missing Linkages Project, including The Wildlands Conservancy, The Resources Agency, U.S. Forest Service, California State Parks, California State Parks Foundation, National Park Service, San Diego State University Field Stations Program, Environment Now, The Nature Conservancy, Conservation Biology Institute, Santa Monica Mountains Conservancy, Wetlands Recovery Project, Mountain Lion Foundation, Rivers and Mountains Conservancy, California Wilderness Coalition, Wildlands Project, Zoological Society of San Diego Center for Reproduction of Endangered Species, Pronatura, Conabio, and Universidad Autonoma de Baja California. We are committed to collaboration to secure a wildlands network for the South Coast Ecoregion and beyond and look forward to adding additional agencies and organizations to our list of partners.



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Executive Summary: A Network of Wildlands

Only a century ago, southern California was one vast wildland supporting a dazzling array of habitats and a veritable treasure trove of life. Creatures great and small, mobile and stationary – many found no where else on earth - thrived in these habitats. Grizzly bears dominated the landscape and mountain lions roamed from the mountains to the sea.

Much of this vast wildland has been lost to housing developments, freeways, and strip malls, with drastic impacts on the abundant plant and animal communities that flourished here. Yet, much of the unique vegetation and wildlife that dominated this pre-development landscape can still be found, and what remains can be maintained, despite the changes we've made and continue making to the landscape.

Habitat loss and fragmentation are the leading threats to biodiversity worldwide, and nowhere is the risk more severe than in southern California. Countering these threats requires protecting connections between our existing open space areas to form a regional wildland network. Such an interconnected set of reserves would allow natural ecological processes—such as migration and range shifts with climate change—to continue operating as they have for millennia.

The South Coast Missing Linkages project has developed a comprehensive plan for such a regional network that would maintain and restore critical habitat linkages between existing reserves. These linkages form the backbone of a conservation strategy for southern California where the whole would be greater than the sum of the parts. This strategy represents the best hope for maintaining what remains of southern California's wildlife legacy, while ensuring quality of life for our citizens via clean air, clean water, and recreational opportunities.

South Coast Missing Linkages is a highly collaborative inter-agency effort to identify and conserve the highest-priority linkages in the South Coast Ecoregion. Partners include South Coast Wildlands, National Park Service, U.S. Forest Service, California State Parks, The Wildlands Conservancy, The Resources Agency, California State Parks Foundation, The Nature Conservancy, Santa Monica Mountains Conservancy, Resources Legacy Foundation, Conservation Biology Institute, San Diego State University Field Stations Program, Environment Now, Mountain Lion Foundation, and the Zoological Society of San Diego's Conservation and Research for Endangered Species, among others.

Cross-border alliances have also been formed with Pronatura, Universidad Autonoma de Baja California, Terra Peninsular, and Conabio, in recognition of our shared vision for ecological connectivity across the border into Baja.



The South Coast Ecoregion encompasses roughly 8% of California and extends 190 miles into Baja.

Nature Needs Room to Roam

Movement is essential to wildlife survival, whether it be the day-to-day movements of individuals seeking food, shelter, or mates, dispersal of offspring to find new homes, or seasonal migration to find favorable conditions. Movement is essential for gene flow, for recolonizing unoccupied habitat after a local population goes extinct, and for species to shift their geographic range in response to global climate change. Disruption of these natural movement patterns by roads, development, or other impediments can alter these essential ecosystem functions and lead to losses of species and critical environmental services.

The tension between habitat fragmentation and conservation is particularly acute in southern California, one of 25 hotspots of biological diversity on Earth, and one of our nation's largest urban areas. It is also one of the most threatened areas, with over 400 species of plants and animals considered endangered, threatened or sensitive by government agencies and conservation groups. Existing reserves conserve many of these species, but wide-ranging species like mountain lions, badgers, and bighorn sheep may be lost from even the largest areas if highways and urbanization isolate each major wildland.

Despite a half-century of rapid habitat conversion, the South Coast Ecoregion retains valuable wildlands, and opportunities remain to conserve and restore a functional wildland network. The region's archipelago of conserved wildlands is fundamentally one interconnected system, and the goal of South Coast Missing Linkages is to keep it so. It is our hope that the South Coast Missing Linkages plan will serve as a catalyst for directing funds and attention toward the protection of ecological connectivity for the South Coast Ecoregion and beyond.



Gerald and Buff Corsi
© CA Academy of Sciences



Gerald and Buff Corsi
© CA Academy of Sciences



© 2003 Christopher Christie

"Without connectivity, landscapes may be reduced to pathetic remnants that sustain few species and provide little ecological value."

E.O. Wilson

Impediments to Wildlife Movement

Impediments to wildlife movement include roads, railroads, dams, canals, urban development, and agriculture. Loss of connectivity is by no means inevitable, and development does not have to result in a proliferation of barriers to wildlife movement.

In our Ecoregion, roads and urbanization are the major obstacles to wildlife movement. Road effects extend far beyond the road itself and include road kill, disruption of animal movements, spread of exotic species, and increases in pollution, noise, light and fire in wildlife habitats. Roads can fragment large habitat areas into smaller patches that support smaller populations, which are consequently more prone to local extinction. Many of these effects can be mitigated and recommendations to do just that are an important component of our plan for restoring ecological connectivity to the South Coast Ecoregion.



Urban developments, unlike roads, create movement barriers that cannot be readily removed, restored, or mitigated. The impacts of urbanization include removal of native vegetation, spread of non-native vegetation, dogs and cats killing and harassing wildlife, artificial night lighting impeding night-time movement, pesticides, rodenticides, noise, disruption of fire regimes, pollution, conflicts with wild animals that eat domestic plants and animals, and altered patterns of water in streams and ponds.

Conservation Planning Approach

South Coast Missing Linkages incorporates advanced conservation planning techniques and the expertise of preeminent scientists. Our approach has been highly collaborative and interdisciplinary with participation by experts in biology, conservation design, and implementation in a reiterative process. This approach has yielded a strong biological foundation and a quantifiable, repeatable conservation design methodology (Appendix A, Conservation Planning Approach) that can be used as the basis for conservation action.

South Coast Missing Linkages developed the linkage designs based on inputs from a series of workshops at which 270 participants from 126 agencies, academic institutions, land managers, planners, conservation organizations, and community groups identified 109 focal species, including 26 plants, 25 insects, 4 fish, 5 amphibians, 12 reptiles, 20 birds and 17 mammals. These focal species cover a broad range of habitat and movement requirements such that planning adequate linkages for their needs is expected to cover connectivity needs for the ecosystems they represent. The linkage designs are based on state-of-the-art GIS analyses informed by experts on each focal species, and contain multiple strands to serve the needs of various species.

To identify potential routes between existing protected areas we conducted landscape permeability analyses for selected focal species for which appropriate data were available. Permeability analyses model the relative cost for a species to move between protected core habitat or population areas. We defined a least-cost corridor—or best potential route—for each species, and then combined these into a Least Cost Union. We then analyzed the size and configuration of suitable habitat patches within this Least Cost Union for all focal species to verify

that the final Linkage Design would suit the live-in or move-through habitat needs of all. Where the Least Cost Union omitted areas essential to the needs of a particular species, we expanded the Linkage Design to accommodate that species' particular requirements, and ensure that no species was left behind. We also visited priority areas in the field to identify and evaluate barriers to wildlife movement. We also suggest restoration strategies to mitigate those barriers, with special emphasis on opportunities to reduce the adverse effects of transportation barriers.

The resultant linkage designs are broad to 1) buffer against edge effects; 2) provide live-in habitat for species needing multiple generations to achieve gene flow through the linkage; 3) ensure availability of key resources; 4) allow natural processes to operate, and 5) allow species and natural communities to respond to climatic changes. A crucial element of each linkage design is a set of recommendations to mitigate barriers, restore habitats, and manage the linkage.

A Scientifically Sound Plan for Conservation Action

The South Coast Missing Linkages conservation plan addresses the challenges posed to our natural environment by the ever-increasing human footprint by seeking to influence regional development and land-management patterns in a manner that best preserves landscape level processes while accommodating economic development needs. We hope this linkage conservation plan will be used to protect an interconnected system of natural space where our native biodiversity can thrive at minimal cost to other human endeavors. For example, the plan can be used as a resource for regional land managers to guide how they can best help sustain biodiversity and ecosystem processes by implementing the linkage designs. Relevant aspects of the plan can be folded into management plans of agencies and organizations administering conservation lands in the region.

Transportation agencies can use the plan to design new projects and find opportunities to upgrade existing structures. Regulatory agencies can use this information to help inform decisions regarding impacts on streams and other habitats.

This report can also help motivate and inform construction of wildlife crossings, watershed planning, habitat restoration, conservation easements, zoning, and land acquisition. Implementing this plan will likely take decades, and will require collaboration among county planners, land and resource management agencies, transportation agencies, conservancies, and private landowners.

Public education and outreach are vital to the success of this effort – both to change land use activities that threaten wildlife



movement and to generate appreciation for the importance of the linkages and the wildland network they will sustain. The biological information, maps, figures, tables, and photographs in this plan are ready materials for interpretive programs. Public education can encourage residents at the urban-wildland interface to become active stewards of the land and generate a sense of place and ownership for local habitats and processes. Such voluntary cooperation is essential to preserving linkage function.

South Coast Wildland Network

South Coast Missing Linkages has prioritized and designed landscape linkages that are widely considered the backbone of a conservation strategy for southern California. The linkages designed by South Coast Missing Linkages stitch together over 18 million acres of our existing conservation investments (national forests, state and national parks, etc.) to form the South Coast Wildland Network (Appendix B, Existing Conservation Investments). The network encompasses 19,435,105 acres (94% is already protected), maintaining connected wildlife populations from the southern Sierra Nevada to Baja California, and from the beaches of Camp Pendleton eastward to the deserts of Anza-Borrego Desert State Park. These critically important linkages must be secured if we are to maintain the region's tremendous biodiversity.

The ecological, educational, recreational, and spiritual values of protected wildlands in the South Coast Ecoregion are immense. These conserved lands also represent an investment of tens of billions of dollars. We need to ensure the ecological health of this investment by securing these linkages.

The linkages identified by South Coast Missing Linkages are key to the ultimate protection and restoration of a wildlands network where our native biodiversity can thrive. The unbroken chain of mountains and foothills created by the South Coast Wildland Network will allow wide-ranging species like the mountain lion to roam from the Sierra Nevada to the Sierra Juarez in Baja California Norte. The South Coast Wildland Network will also provide unparalleled recreational, educational, and spiritual opportunities for more than 17 million people who make southern California their home, while promoting the long-term health of the state's land, water and air.

The following section provides an overview of the critical linkages: where they lie on the landscape, what they connect and the species that use them. The descriptions also provide some recommendations for improving wildlife



movement in each linkage. For a complete description of what is required to conserve and improve functional habitat connectivity in each linkage, please see the full linkage reports available at www.scwildlands.org.



**South Coast Missing Linkages:
A Wildland Network for the
South Coast Ecoregion**

- Linkage Design
- Conservation Lands
- Department of Defense Lands
- South Coast Ecoregion
- Highway
- Major River or Stream
- County Boundary

1:1,350,000

0 10 20 40 60 80 Kilometers

0 10 20 40 60 80 Miles

Las Californias Binational Conservation Initiative

Tehachapi Connection

This linkage has statewide importance as the sole wildland connection between the Sierra Nevada-Cascade system that stretches for over 2000 miles from Kern County into British Columbia, and the 800 mile long upland system comprised of the Sierra Madre (the coast ranges from San Francisco to Los Angeles), Transverse (Santa Monica, San Gabriel, San Bernardino, and San Jacintos Mountains), and Peninsular Ranges (Santa Ana, Palomar, and Laguna Mountains of San Diego County, and the Sierra Juarez of Baja). This linkage is also situated at the juncture of several ecoregions, including the Sierra Nevada, South Coast, Central Valley, and the Mojave Desert. The Tehachapis have been described as a “biogeographic crossroads” and a “crucible of evolution”, and are home to a stunning variety of plant and animal life (White et al. 2003). As might be expected in this remarkable landscape, the Linkage Design encompasses a diversity of natural communities, including over 30 vegetation types. About 15% (102,355 out of 663,257 total acres) of the Linkage Design currently enjoys some level of conservation protection, mostly in land administered by the Bureau of Land Management.



Looking down Bear Trap Canyon in the Tehachapi Mountains toward the Sierra Madre Ranges, Los Padres National Forest (Photo Andrew Harvey, VisualJourneys.net).

The Linkage Design has four main strands, which tend to follow elevational contours that connect along areas of similar ecological conditions. One strand includes a swath of grassland and foothill habitats along the southern rim of the San Joaquin Valley to serve the suite of grassland-dependent species clinging to existence there, such as the endangered San Joaquin kit fox and blunt-nosed leopard lizard. A second strand connects a series of higher elevation forest and shrubland habitats serving species, such as puma, western gray squirrel, and mule deer. A third strand follows the desert-side slopes of the Tehachapis, connecting habitats for species, such as

the Tehachapi pocket mouse, that are restricted to the unique conditions of this biogeographic contact zone. These three major strands, or linkages, are clearly separated in the northeast where each connects into the Sierra Nevada, but they tend to fuse in the more geographically constrained southwestern portion of the study area, in the western Tehachapis. Some cross connections were included between these strands to serve the movement needs of species, such as the western pond turtle, that require aquatic and riparian habitats running perpendicular to the main contour-following linkages. The fourth strand follows alluvial habitats along the Kern River across the San Joaquin Valley to connect alluvial grasslands and rare alkali habitats required by valley-floor species, such as the endangered Tipton kangaroo rat.

Interstate 5 and State Route 58 are the primary impediments to movement, with I-5 being the most substantial barrier. It bisects the southern part of the linkage and currently lacks adequate crossing structures. Given the continental importance of this linkage, we have identified four locations on I-5 and three locations on SR-58 at which first-class crossing structures should be located. At each of these locations, we recommend either a vegetated landbridge, or a bridged undercrossing large enough to allow natural vegetation to grow throughout the structure.

The top priority for a crossing structure on I-5 is where Grapevine Creek crosses I-5 just south of Ft. Tejon State Park and Tejon Ranch Headquarters. The least cost corridors for puma, mule deer, and western gray squirrel cross the freeway here, and appropriate habitats occur for numerous other species. Grapevine Creek now crosses I-5 in a small box culvert, which should be replaced with a large bridged undercrossing. To maximize the utility of Grapevine Creek as a movement area, we recommend removal of several buildings of the Tejon Ranch Headquarters (two administrative buildings, about a dozen homes, and an old school), and the associated mile of Lebec Road. The area vacated by these buildings should be restored to native vegetation.

Another priority area for improved crossing structures along I-5 is a 3-mile stretch south of the village of Gorman and north of the SR138 interchange. The least cost path of the Tehachapi pocket mouse crosses I-5 here, and suitable habitat occurs for several other focal species. The vegetation on the steep slopes appears to have been overgrazed and now lacks woody cover except in drainage bottoms; restoration or cessation of grazing domestic livestock would be needed. Four box culverts about 5 feet tall and wide are spaced one-half to 1 mile apart, and suggest locations for bridged undercrossings. Each culvert opens directly into Hungry Valley State Park on the west, and into Gorman Valley on the east. Alternatively, a vegetated land bridge may also be feasible in this area.



Culvert on Interstate-5 for Gorman Creek with Hungry Valley State Park in the foreground. Note steep degraded slopes on far side of I-5.

SR-58 is a 4-lane road with heavy traffic volumes. A concrete center divider runs almost continuously from the western foothills to the Tehachapi Creek Bridge at Keene, and again for another mile near Tehachapi. This barrier is about 5 ft tall from its west end to Bealville Road; elsewhere it is about 2.5 ft tall. The major feeder road to SR-58 in the western part of the linkage area (Bear Mountain Road SR-223) is a quiet country lane that is not a major impediment today. However, if lanes are added to SR-223, wildlife passage should be accommodated. Further east, SR-202 runs eastward from the city of Tehachapi into the agricultural but increasingly urban Cummings Valley and nearby residential developments of Stallion Springs and Bear Valley.



We recommend first-class crossing structures (canyon-spanning bridges, or vegetated overcrossings) in three areas along SR-58. The first area is in the grasslands near the San Joaquin Valley floor, between the 900-ft and 1400-ft elevation contours. The least cost corridors for blunt-nosed leopard lizard, San Joaquin kit fox, and badger all lie in this 2.5-mile wide stretch of SR-58. The best location for an underpass is at the 1020-ft elevation contour, where the freeway now sits on a 40-ft fill slope that spans a small canyon. Replacing this fill slope with a bridge 40 ft above the canyon bottom and about 500 ft long would provide an excellent crossing opportunity. At the 1280-ft contour, there is a similar fill slope that provides another location for a bridge of similar dimensions. The lower elevation area was modeled as the best habitat for focal species, but habitat quality is high at both sites. There are no dwellings or significant infrastructure (besides the highway) in the area.

The second area we propose an improved crossing structure is in the oak woodlands between the Hart Flat Road interchange with SR-58 and the village of Keene. The least cost corridors for mule deer and western gray squirrel cross SR-58 here and the entire area is excellent mountain lion habitat. The best location for an underpass is at the 2440-ft contour, where the highway now sits on a 20-ft fill slope that should be replaced with a bridge. Alternatively, it may be possible to construct a vegetated overcrossing here.

We also recommend maintaining the rural character of the landscape at the bridge over Tehachapi Creek. Although this bridge is an excellent crossing, it is not sufficient as the sole structure in the oak woodland belt for several reasons. First, it's on the periphery of the linkage. Second, the crossing structure contains a railroad and a 2-lane paved road. Finally, the wildland approaches to the underpass are steep slopes on both sides of the freeway. To the extent that animals tend to follow streams, an animal that descended the steep slope to reach the underpass may follow Tehachapi Creek east or west (village of Keene in both directions) rather than ascend the steep slope on the other side.

The third area we recommend a crossing structure is in the transition between Mojave Desert, grassland, and woodland west of Tehachapi, where two bridges now span Sand Creek. The least cost corridors of Tehachapi pocket mouse, mule deer, and mountain lion all cross SR-58 here. Excellent bridges already exist. We recommend enhancement of riparian vegetation underneath the bridges and approaching them.



Fill slope along SR-58 that should be replaced with a bridge.



Oak woodlands between Hart Flat Rd interchange with SR58 and Keene.



SR-58 bridge over Tehachapi Creek. The paved road connects the east and west portions of Keene.



The north side of SR-58 at Sand Creek.

Santa Monica-Sierra Madre Connection

This linkage is one of the few coastal to inland connections remaining in the South Coast Ecoegion. It stretches from the rugged Santa Monica Mountains at the coast to the jagged peaks of the Santa Susana Mountains and the Sierra Madre Ranges of Los Padres National Forest. The Linkage Design includes substantial public ownership that protects natural habitats from development, with 34% (43,249 of 125,613 acres) of the linkage currently enjoying some level of conservation protection. The linkage is comprised of a rich mosaic of oak woodland, savanna, chaparral, coastal sage scrub, grasslands, and riparian forests and woodlands, and has several major strands to accommodate diverse species and ecosystem functions.



Looking toward the coast over the gently sloping Simi Hills and the rugged Santa Monica Mountains. Photo Credit: Andrew M. Harvey, VisualJourneys.net

For most species, U.S. Route 101 and State Routes (SR) 23, 118, and 126 are the most obvious barriers between core reserves in the Santa Monica and Sierra Madre mountains, while Interstate 5 (I-5) and SR-14 impede movement between the Santa Susana and San Gabriel Mountains. The 101 Freeway is the most substantial impediment to movement. Several existing structures facilitate various levels of animal movement across these freeways.

Liberty Canyon was delineated by the landscape permeability analysis for mule deer, but also provides connectivity for species such as mountain lion and badger. Much research has been done to document the importance of this connection to wildlife (Soulé 1989, Kohn et al. 1999, Edelman 1991, Sauvajot et al. 2000, Allen 2001, Riley et al. 2003, Ng et al. 2004, Riley et al.

2006a). The existing bridge is regularly utilized by deer, coyotes, and raccoons (Ng et al. 2004). The National Park Service is working with Caltrans to provide a wildlife-specific crossing structure at this location, either a bridged underpass or an overpass, to prevent co-location of vehicle traffic and animal movement options (the current situation). Habitat restoration is also recommended, as well as fencing to direct animals towards the structure.

A variety of wildlife has been documented using the bridge at Alamos Canyon, including mountain lion, bobcat, coyote mule deer, striped skunk, raccoon, small mammals and birds (Ng 2000, Psomas 2002, LSA 2004). This bridge should be maintained, and if the existing road is not needed for vehicular access for maintenance purposes, we suggest removal of the pavement and habitat restoration. We advise conservation of contiguous natural habitats between Happy Camp Canyon Park and protected areas in the Simi Hills and Tierra Rejada Valley.

Rocky Peak is in the eastern strand of the linkage and was delineated by the least cost corridor analyses for mountain lion, badger, and mule deer, but also provides habitat for virtually every other focal species modeled. Several protected areas occur here, including Rocky Peak, Santa Susana State Historic, and Corriganville parks. This roadway overpass (roughly 60 feet wide and 130 feet long) connects Santa Susana State Historic Park south of SR-118, with Rocky Peak Park to the north. Mule deer, coyote, bobcat, raccoon, and skunk have been recorded utilizing this structure. The existing bridge could be converted to a vegetated land bridge, with native shrubs and trees tall enough to block lighting and reduce noise from traffic. One lane could be decomposed granite for emergency vehicle access.

Caltrans is working with the National Park Service to monitor wildlife movement at several culverts under SR-23. Proposed improvements include clearing tunnels and culverts and installing wildlife-proof fencing with escape gates to direct animals off the road and through underpasses. The pipe culvert to the right is located north of the Tierra Rejada Valley. Ng et al. (2004) recorded bobcat, coyote, and raccoon using this structure. We encourage protection of remaining natural habitats and conservation measures to maintain the rural character of the Tierra Rejada Valley.



Looking toward the Simi Hills through the Liberty Canyon underpass.



Looking toward the Santa Susanas through the bridge at Alamos Canyon.



Looking south at the Rocky Peak overpass.



Pipe culvert north of Tierra Rejada; typical of most structures on SR-23.



Sierra Madre-Castaic Connection

This linkage serves to connect the Los Padres and Angeles national forests. The Linkage Design encompasses 398,944 acres, of which 75% is already protected. It covers very diverse ecological settings and encompasses several major vegetation types. It has several main strands, reflecting variation in the habitat needs of different sets of target species. The northern strand is dominated by pinyon-juniper woodland, sagebrush, and desert scrub habitats and serves linkage needs of badger, puma, and mule deer. The central strands connect at generally higher elevations, including a series of hardwood, conifer, chaparral, and riparian habitats. They serve the needs of numerous focal species, including puma, mule deer, Pacific kangaroo rat, California spotted owl, acorn woodpecker, mountain kingsnake, pond turtle, two-striped garter snake, Monterey salamander, and bear sphinx moth. The southernmost strand of the Linkage Design follows the southern foothills and is dominated by coastal oak woodland, coastal sage scrub, valley foothill riparian, and grassland habitats. It provides the only fairly contiguous belt of coastal habitats in the Linkage Design, and provides connectivity for mule deer; Pacific kangaroo rat, acorn woodpecker and Monterey salamander, as well as many other species.



View from the Ridge Route of the Castaic Ranges in spring.

Interstate 5 and State Highway 33 are major transportation routes and are the greatest barriers to wildlife movement. By far the largest of these impediments is I-5, which bisects the linkage for a distance of 27 miles, and currently lacks adequate crossing structures. We call attention to five particular areas (Gorman Creek, Coyote Canyon, Cherry Canyon, Forest Road 6N43, and Big Oak Flat/Canton Canyon) where large crossing structures are needed on Interstate 5. These five areas are important because they provide opportunities for movement of animals via riparian and upland habitats and correspond to least-cost corridors for focal species.

Just south of the SR 138 interchange, Gorman Creek flows through a large bridged undercrossing with concrete flooring. It is then diverted to a concrete channel and funneled toward Pyramid Lake. The channel is fenced with chain link and barbed wire. We recommend removing the concrete flooring of the structure, the entire length of the concrete channel, and the fencing; restoring riparian habitat through the structure; and, if necessary, tapping the water of Gorman Creek farther south. Coordination with the California Department of Water Resources and other agencies will be essential to restore Gorman Creek.



Gorman Creek undercrossing just south of I-5/SR-138 interchange.

Cherry Canyon provides suitable habitat for puma, mule deer, Pacific kangaroo rat, and California spotted owl. At present Cherry Canyon leads to a steep fill slope at I-5. There are many deer trails on this slope, and a major deer trail up Cherry Canyon to the toe of the fill slope. Clearly deer are currently crossing at grade. Topography would allow a wildlife overpass on either the west or the east ridge of Cherry Canyon. Since this is one of the largest canyons crossing I-5, and it offers a direct link to Piru Creek below Pyramid dam, we suggest either a wildlife overpass (where existing cut banks occur) or a bridge be installed across the main wash that follows the contours that existed before the fill slope was created.



Potential site for vegetated landbridge on I-5 on the east ridge of Cherry Canyon.

The bridged underpass for Templin Highway at Canton Canyon is the only large underpass south of Pyramid Lake and currently provides one of the safest wildlife crossings. It is also used by (a) about 20 residences in the area, (b) a few recreationists, and (d) workers at the Castaic power plant. We recommend working with landowners to minimize land uses that compromise linkage function. We suggest reducing the pavement in the underpass from 4 to 2 lanes, restoring and redirecting Canton wash from the concrete culvert, and making the bridge wide enough to accommodate the wash. This would provide ample room to enhance wildlife movement and provide vehicular access.

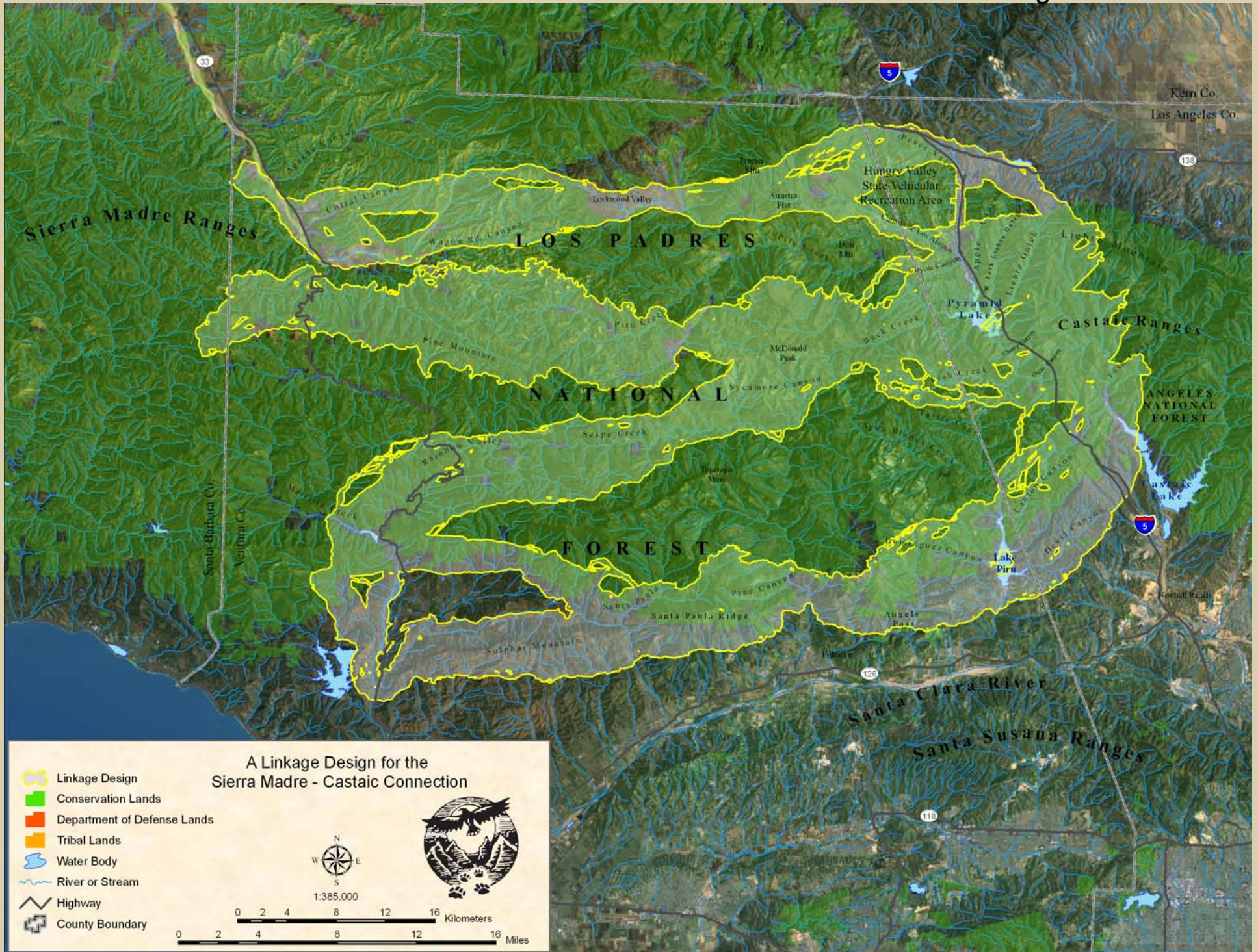


Canton Canyon with Templin Highway underpass at the center of the photo.

The Linkage Design crosses SR 33 in four areas. The best existing structure south of Ojai, which should be maintained is where San Antonio Creek passes under the 33 to join the Ventura River. From the north end of Meiners Oaks and Ojai to the confluence of Apache Canyon with the Cuyama River, we suggest constructing at least one expansive bridge every mile and crossing structures for reptiles, amphibians, and small mammals every 450-900 feet.



San Antonio Creek passing under the 33 to join the Ventura River.



San Gabriel-Castaic Connection

The majority of both the San Gabriel and Castaic ranges are included in the National Forest system, together forming the Angeles National Forest. The linkage encompasses a unique transition zone between coastal and desert landscapes, featuring coastal sage and chaparral on the west, and desert scrub, juniper and Joshua tree woodlands to the east. The Santa Clara River, one of the last free-flowing rivers in southern California and an integral part of the linkage, provides breeding sites and traveling routes for a variety of wildlife, and supports other critical natural processes such as natural flood control, recharge of groundwater basins, and nutrient cycling. Approximately 12% (2,772 out of 23,947 total acres) of the Linkage Design currently benefits from some level of conservation protection, mostly in Bureau of Land Management parcels and Vasquez Rocks County Park.



Looking toward the San Gabriel Mountains from Vasquez Rocks County Park. Photo credit Andrew M. Harvey, VisualJourneys.net.

The Linkage Design has three strands. The northwest strand is dominated by coastal sage scrub and chaparral and encompasses all or portions of Bee, Spring, Tapie, Tick, and Mint Canyons. It serves most of the focal species, including puma, mule deer, Pacific kangaroo rat, and California thrasher. The eastern strand connects a series of desert scrub and juniper woodland habitats, thereby linking habitat for species such as badger, burrowing owl, and bear sphinx moth that prefer the open habitats that are prevalent in desert plant communities. The third distinct strand of the Linkage Design follows the Santa Clara River and Soledad Canyon and provides large stepping-stones of habitat for semi-aquatic species, such as the western pond turtle, two-striped garter snake, and mountain kingsnake; it also serves a suite of aquatic and riparian-dependent

species (e.g., Unarmored three-spine stickleback, Santa Ana sucker, arroyo chub, California red-legged frog, arroyo toad), not specifically addressed by our analyses.

State Route 14 and Sierra Highway are major transportation routes and pose the greatest barriers to wildlife movement. By far the largest of these impediments is SR-14, which bisects the southern part of the linkage for a distance of eight miles. We have identified four locations at which crossing structures should be located (1) near the confluence of Spring Canyon, Bee Canyon and the Santa Clara River; (2) Agua Dulce Canyon; and (3 & 4) both places where Escondido Creek crosses the freeway.

The least cost corridors for puma, badger, mule deer, and Pacific kangaroo rat cross the freeway near the confluence of Spring Canyon, Bee Canyon, and the Santa Clara River. The existing bridge for Spring Canyon Road is inadequate to accommodate wildlife movement due to the steep fill slope for Soledad Canyon Road, lack of natural vegetation, asphalt in the two-lane underpass, and the mining operation in the Santa Clara River make it unlikely that this structure and the surrounding habitat can be restored to provide meaningful connectivity in the foreseeable future. We recommend a new bridge about 1200 feet east of the existing structure, and redirecting the main channel of Spring Canyon so that it would join Bee Canyon just south of SR-14, near the Santa Clara River. The new bridge would replace a section of fill slope along the low ridge between lower Spring and Bee Canyons. This design would provide a long and essentially undisturbed canyon (Spring Canyon) that would funnel animals toward a SR-14 underpass from the north. The south side of the freeway is close to both riparian and upland habitats, and away from the gravel mine.



Removing the fill slope under SR-14 would route Spring Canyon to Bee Canyon and the Santa Clara River.



Agua Dulce Canyon vehicle underpass, with drainage culvert for stream visible to the left of the underpass.

At present Agua Dulce Creek passes under SR-14 via an oversized concrete pipe culvert, with concrete flooring, poor visibility to the other side, and no vegetation in the structure, reducing the likelihood for plant and animal movement. South of SR-14, the riparian vegetation is well developed with cottonwoods, sycamores, and willows, and no significant riparian or upland impediments between SR-14 and Soledad Canyon (and the Angeles NF boundary) about two miles to the south. Immediately north of the freeway, the riparian vegetation is much reduced, and the town of Agua Dulce lies about one mile north, impeding meaningful riparian connectivity at this time. To maximize the utility of Agua Dulce Creek as a movement area, we recommend removing the fill slope under SR-14 and upgrading the existing vehicle underpass to a bridged undercrossing that spans the canyon. Improving this structure could help animals get to Vasquez Rocks or funnel them toward the middle strand of the Linkage Design to Spring, Tapie, and Tick Canyons.



San Gabriel-San Bernardino Connection

This linkage provides connectivity between two expansive areas of the Angeles and San Bernardino National Forests. Approximately 66% (77,941 out of 129,901) of the Linkage Design currently enjoys some level of conservation protection, mostly in National Forest land, whose management policies do not allow conversion to urban or agricultural use. The San Andreas Rift Zone runs through the linkage, producing steep rugged topography and a variety of microhabitats that support a rich diversity of natural communities, from coastal sage scrub and alluvial fan habitats in the southern foothills, chaparral, mixed conifer and oak woodlands in the central part of the linkage, transitioning to pinyon-juniper woodlands and desert scrub in the north. This linkage provides live-in and move-through habitat for rare wildlife such as bighorn sheep, San Bernardino kangaroo rat, and the metalmark butterfly.



Snow capped peaks in the San Gabriel-San Bernardino Connection.

At first glance, the linkage between the San Bernardino and San Gabriel Mountain Ranges seems simply to be a matter of getting plants and animals across Interstate 15. Indeed, for most species, the freeway is the most obvious barrier between core population centers, and National Forest land abuts both sides of the freeway for several miles. However, a Linkage Design that simply maintained and improved permeability along I-15's frontage with Forest Service land would fail to provide connectivity for lowland species along the southern foothills, and could result in Baldy Mesa becoming an island or peninsula of habitat, hemmed in by urban and agricultural land on the north, increasingly dense ranchette development on the south and west, and I-15 on the south and east. Therefore, the Linkage Design has three roughly parallel routes to accommodate diverse species and ecosystem functions.

The northern strand offers a high desert connection dominated by chaparral with scattered patches of desert scrub, juniper and Joshua tree woodlands, grassland, and riparian habitats, serving species such as the badger, rock wren, horned lizard, and metalmark butterfly. It extends

from the Upper North Fork of Lytle Creek, across Stockton Flat, down into Lone Pine Canyon, across Cajon Pass to Horsethief Canyon, up into Summit Valley and then on to the West Fork of the Mojave River. The central strand links a series of higher elevation forest and shrubland habitats serving numerous species, including puma, mule deer, spotted owl, mountain quail, and wrentit. This strand also offers the best potential connection for bighorn sheep, pygmy nuthatch, treefrog, whipsnake, and speckled dace. It encompasses the majority of land between Upper Lytle Creek Ridge, lower Lone Pine Canyon, Crowder and Cleghorn Canyons in the north and Cucamonga and Arrowhead Peaks in the south. The southern strand encompasses coastal and alluvial fan scrub habitats from San Antonio, Cucamonga, Deer, Day, Etiwanda, Morse, and San Sevaine creeks, to Lytle Creek and Cajon Wash, serving the movement needs of the endangered San Bernardino kangaroo rat and slender-horned spineflower, as well as the Pacific kangaroo rat, tarantula hawk, giant flower-loving fly, and California sagebrush.

Interstate 15 and State Route 138 are the major transportation routes and pose the most substantial barriers to wildlife movement. Interstate 15 is by far the most severe impediment, bisecting the linkage for a distance of roughly 17 miles, with 46 million vehicles a year traveling through the pass (USDA Forest Service 2004). Currently, State Route 138 (Rim of the World) is a two-lane road that receives light tourist traffic, though substantial increases in traffic and upgrading of the highway are planned. The US Forest Service is working with the Department of Transportation and Biological Resources division of US Geological Survey to design adequate linkages that will include one or more bridges and other large crossing structures to accommodate wildlife movement. Historic Route 66 and several major rail lines run alongside the freeway in many areas, adding to the barrier effect.

There are currently three bridges along I-15 that accommodate animal movement. All three occur within a one and a half mile long section of the highway south of the Cajon interchange. By far the best of these is the bridge at Cleghorn Canyon. The Least Cost Corridors for puma, mule deer, and bighorn sheep cross I-15 at Cleghorn Canyon, and there is a perennial spring in the upper canyon that draws animals into the drainage. Until new or upgraded crossing structures are available, it is critical that this structure be maintained and that the private and public lands near it are protected from urban development.

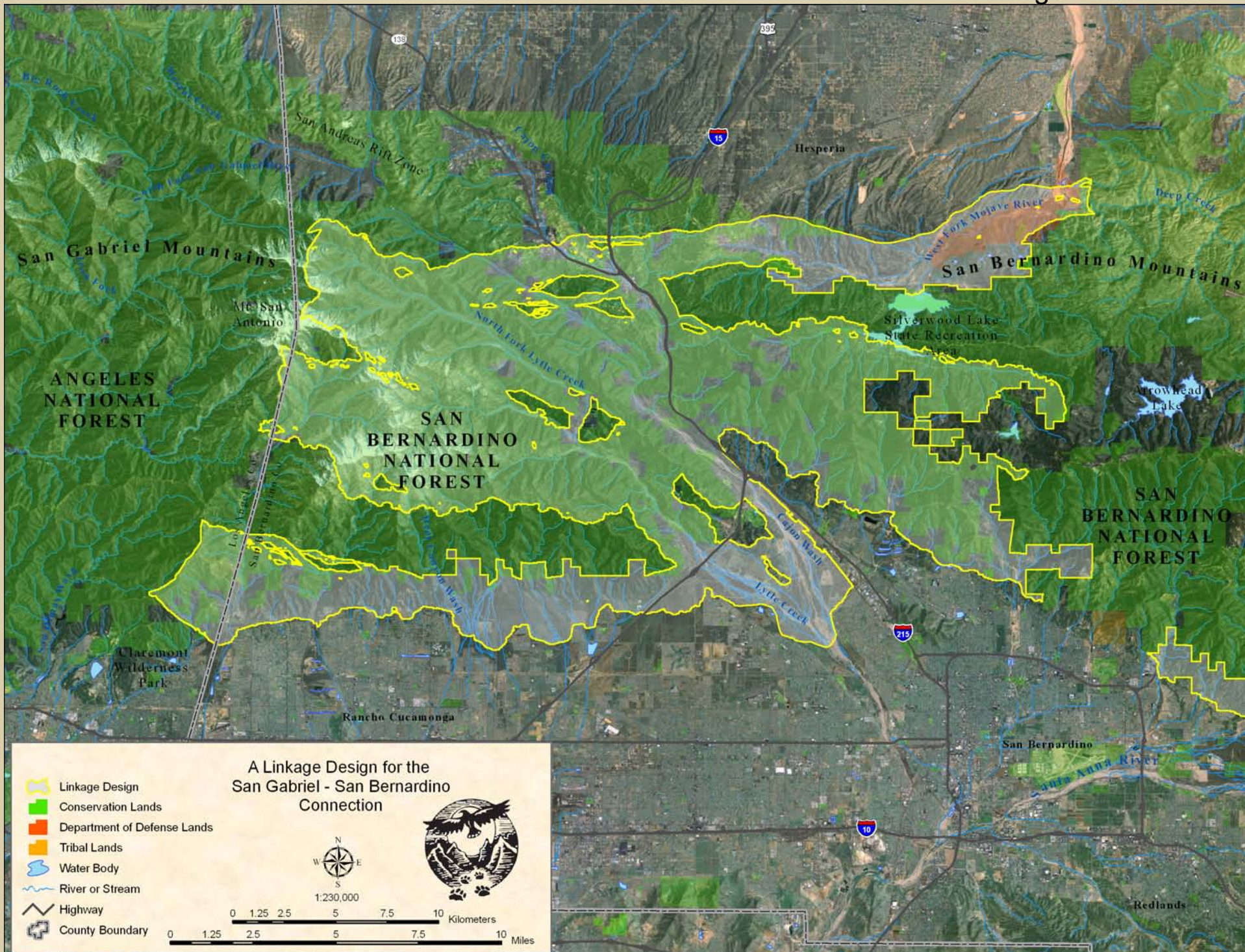
The other two bridged crossings lie to the north of Cleghorn Canyon and south of the site of old Cajon. Compared to the bridge at Cleghorn Canyon, these bridges have shorter spans, less clearance above the wash, and the canyons drain much smaller watersheds (100 to 300 acres, compared to about 1500 acres for Cleghorn). They may be expected to serve focal species, such as the Pacific kangaroo rat, San Diego horned lizard, and Chaparral whipsnake.



View down Cleghorn Canyon under I-15.



Bridges on I-15 north of Cleghorn Canyon; the top is 0.7 miles north of Cleghorn; the bottom is 400 yards south of the Cajon interchange.



San Bernardino-Granite Connection

This linkage connects the San Bernardino National Forest with extensive natural lands in the Granite, Ord, and Rodman Mountains. The Linkage Design encompasses 11,322 acres, of which approximately 38% (4,272 acres) currently enjoys some level of conservation protection, mostly Bureau of Land Management lands in the eastern strand of the linkage. This linkage is also within the California Desert Conservation Area and is addressed by the West Mojave Plan (BLM 2003, 2005). The linkage comprises two main strands, which accommodate overlapping but somewhat different suites of species.

The western strand was delineated by the permeability analyses for bighorn sheep, badger, and Pacific kangaroo rat and includes both riparian and upland habitats. It would also serve the movement needs of such diverse species as antelope ground squirrel, desert woodrat, and speckled rattlesnake. It extends from the San Bernardino Mountains, encompassing both Grapevine and Lovelace canyons, through Fifteenmile Valley and across State Highway 18, to enter the Granite Mountains at Fifteenmile Point. There is little surface water in the linkage, but Grapevine Canyon flows out of the San Bernardino Mountains through a dense riparian forest dominated by cottonwood (*Populus fremontii*) and various willow species (*Salix* spp.) before emptying into a broad bajada in Fifteenmile Valley. In addition to facilitating movements for several focal species, this strand supports habitat for several listed and sensitive species, including the Mojave ground squirrel (CDFG 2005).



The eastern strand of the Linkage Design encompasses rocky terrain and is dominated by creosote bush with scattered Joshua trees.

The eastern strand of the Linkage Design encompasses more rocky terrain. It was also delineated by the permeability analysis for bighorn sheep but should also serve badger, antelope ground squirrel, Pacific kangaroo rat, Merriam's kangaroo rat, and rock wren. This strand extends from Black Hawk Mountain near Cushenberry Canyon in the San Bernardino Mountains, through Fry Valley to the Fry and Rodman Mountains, crossing State Highway 247 between Lucerne and

Johnson Valleys. It encompasses Joshua tree woodland and pinyon-juniper woodland in the foothills of the San Bernardino Mountains, desert scrub through the valley and Fry Mountains, and sagebrush habitats in the Rodman Mountains. The eastern strand of the linkage includes substantial public ownerships that protect natural habitats from development.

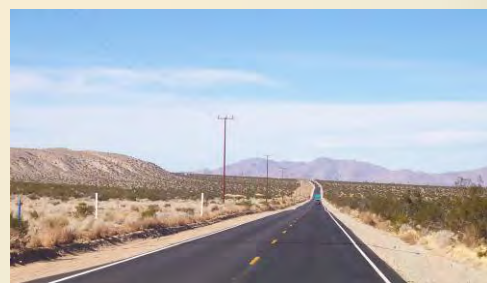
State Highway 18 (Happy Trails Highway) and Highway 247 (Old Woman Spring Road) are the only major transportation routes crossing the linkage and the only paved roads. State Highway 18 bisects the western strand of the linkage and State Highway 247 crosses the eastern strand; both are currently at grade for their entire length. Opportunities for using natural topographic features to enhance habitat connectivity in the linkage are limited and no crossing structures currently exist. The speed limit is 55 mph along both stretches of highway in the linkage, but many vehicles far exceed this limit. Although flat desert highways seem to be destined for high speeds, we suggest reducing the speed limit on both highways to 45 mph through each strand of the linkage. We also recommend installing wildlife crossing signs to alert drivers they are entering a wildlife movement corridor. Laser and infrared activated warning signs with flashing lights may be an option to alert drivers to slow down for wildlife (Reed 1981, Messmer et al. 2000, Gordon 2001, Robinson et al. 2002, Huijser and McGowen 2003). These two actions alone could significantly reduce wildlife mortality in the linkage area but other measures can be taken to improve wildlife movement when the next highway improvement projects are undertaken. Future transportation projects will likely widen both of these two-lane highways to at least four lanes. These transportation improvement projects represent timely opportunities to improve habitat connectivity. We suggest a roadkill study as part of the upgrade projects, with design of crossing structures contingent on results.

In the western strand, we recommend burying or elevating a stretch of State Highway 18 at least 650 feet long to provide an at-grade wildlife crossing that conforms to the natural topography of the site. To either side of this structure, we suggest installing several pipe culverts (one foot diameter), spaced fairly frequently to provide passage for small mammals and reptiles.

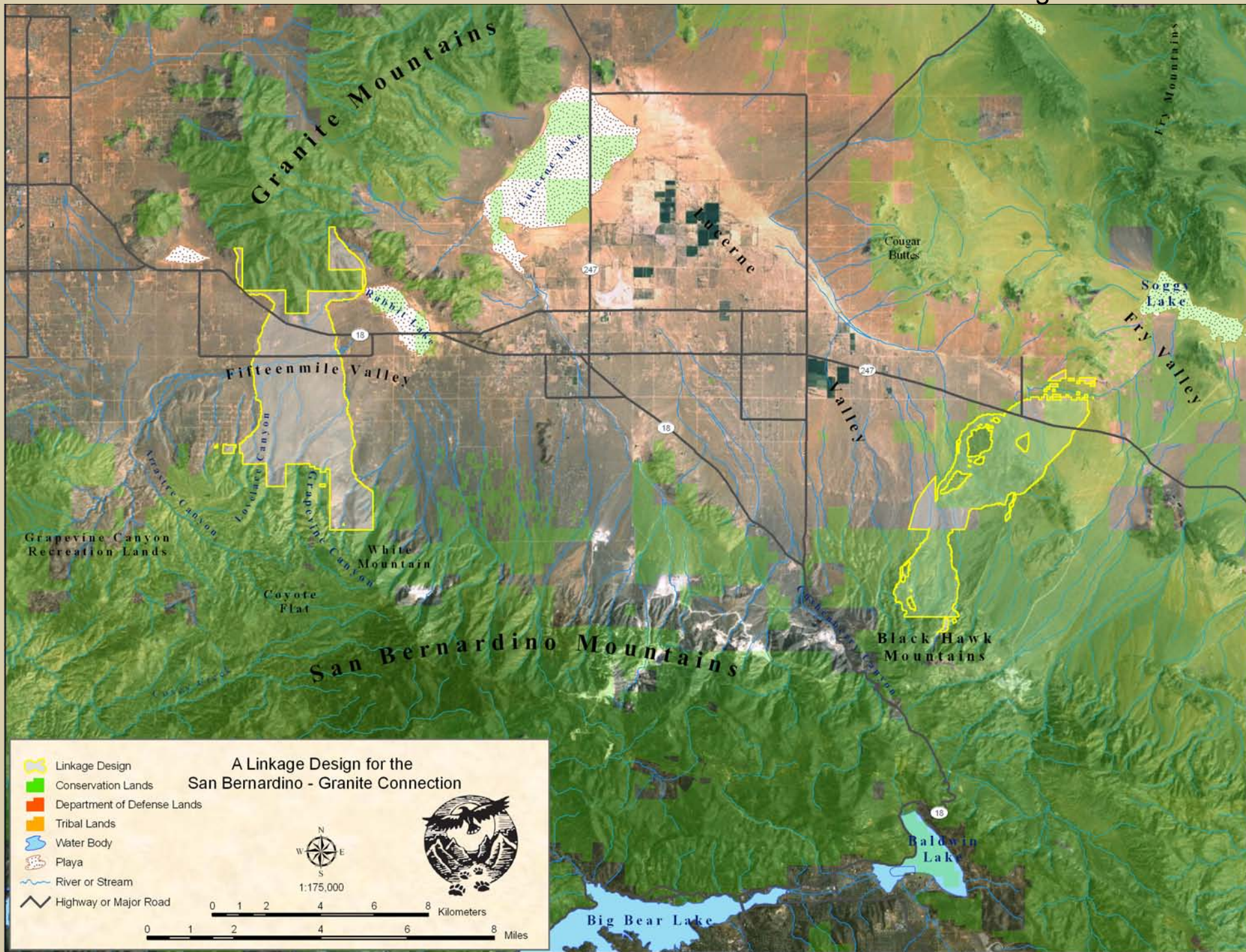
If wildlife movement studies for road improvement projects confirm bighorn sheep movement through the eastern strand of the linkage, we recommend installing a vegetated overpass over State Highway 247. Although the topography in this area isn't ideal to accommodate a ridge-to-ridge overpass, there is a ridge south of the highway that could be extended out and over the roadway, creating an overpass for wildlife and a tunnel for vehicular traffic. The structure should be at least 650 to 985 feet wide and should be strong enough to allow placement of large boulders along each side of the overpass to minimize noise from the highway, with a soil depth sufficient to maintain desert vegetation. The overpass should be vegetated using plants propagated from cuttings and seed collected from the surrounding vegetation communities.



Western strand: State Highway 18 looking south toward Grapevine and Lovelace canyons in the San Bernardino Mountains from Fifteenmile Point in the Granite Mountains.



Eastern strand: the ridge south of the highway could be extended out and over the roadway providing an overpass for wildlife and a tunnel for vehicular traffic.



San Bernardino-Little San Bernardino Connection

This linkage connects San Bernardino National Forest with Joshua Tree National Park. It also connects the South Coast Ecoregion to the Mojave and Sonoran Deserts and encompasses a unique variety of both coastal and desert habitats. The Linkage Design encompasses 60,805 acres, of which approximately 62% (37,650 acres) currently receives some level of conservation protection. The majority of land in the Linkage Design within Riverside County will be included in the Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP).



The Big Morongo Canyon Preserve in the linkage is known internationally for its bird diversity. In this landscape of predominantly dry vegetation, the desert oases provide essential resources that attract a diversity of wildlife such as mountain lion, bighorn sheep as well as rare aquatic species.

The Linkage Design has five major swaths or strands. The most northerly strand is a high desert connection dominated by juniper and Joshua tree woodlands. It extends from Antelope Creek and meanders in and out of Pipes Canyon, takes in a wide swath of habitat between Morongo and Yucca Valleys, and enters Joshua Tree National Park near Burnt Mountain. The next strand extends from Onyx Spring in the San Bernardino Mountains, and follows Little Morongo Canyon; it is especially important for species requiring a contiguous riparian connection. The next strand follows Big Morongo Canyon, which flows out of the San Bernardino Mountains through riparian forests dominated by white alders and cottonwoods before emptying into a broad bajada in the Morongo Basin, which then feeds the oasis in Big Morongo Canyon Preserve. The widest strand extends from Dry Morongo Canyon to Mission Creek and encompasses the steepest terrain along State Route 62. Dry Morongo Creek flows southward out of the San Bernardino Mountains, passes under State Route 62, and then meanders along the highway to empty into Mission Creek. The most southerly strand encompasses much of the Mission Creek watershed, as well as the southern segments of Little Morongo, Big Morongo, and Dry Morongo washes, where they empty into Mission Creek.

State Route 62 is the most substantial impediment to movement within the Linkage Design. Several structures along State Route 62 accommodate various levels of animal movement.

Mission Creek is an excellent lowland linkage that provides live-in and move-through habitat for several species. Desert scrub occurs in the uplands, and desert willows line Mission Creek. There are two well-designed bridges where the creek flows under the highway and animals that follow washes could then enter Big Morongo, Midway, or White House Canyons in the Little San Bernardino Mountains. Big Morongo appears to be the best route; we recorded numerous species using it, including mountain lion, bobcat, and gray fox. Off-road vehicle signs were visible beneath both bridges and efforts should be made to discourage these activities.

The least cost corridor for bighorn sheep crossed State Route 62 in very rugged topography. We recommend a ridge to ridge vegetated overpass. To the extent possible, the overpass should follow the contours that existed prior to the highway being constructed. The structure should be at least 650 to 985 feet wide and strong enough to allow placement of large boulders along each side to minimize noise from the highway. The overpass should be vegetated using plants propagated from cuttings and seed from the area.

A well-designed bridge that allows wildlife movement is found where Dry Morongo Wash flows under State Route 62. There are springs in the upper canyon that draw animals into the drainage. The area is also popular with off-road vehicle enthusiasts. These activities impact soils and vegetation and will inhibit species from using this crossing. We recommend preventing off-road vehicles from entering the canyon and enforcing closures. This structure should be maintained and lands near it protected.

Big Morongo Wash passes under State Route 62 via a box culvert. We recommend a bridge here that is tall enough and sufficiently wide to provide views to the other side, with natural flooring. We recommend measures to confine light and noise pollution to home sites, and advise conservation of land in the broad bajada of the wash, and parcels that straddle the highway to enhance the integrity of the linkage.



One of two bridges for Mission Creek; this is the southernmost bridge.



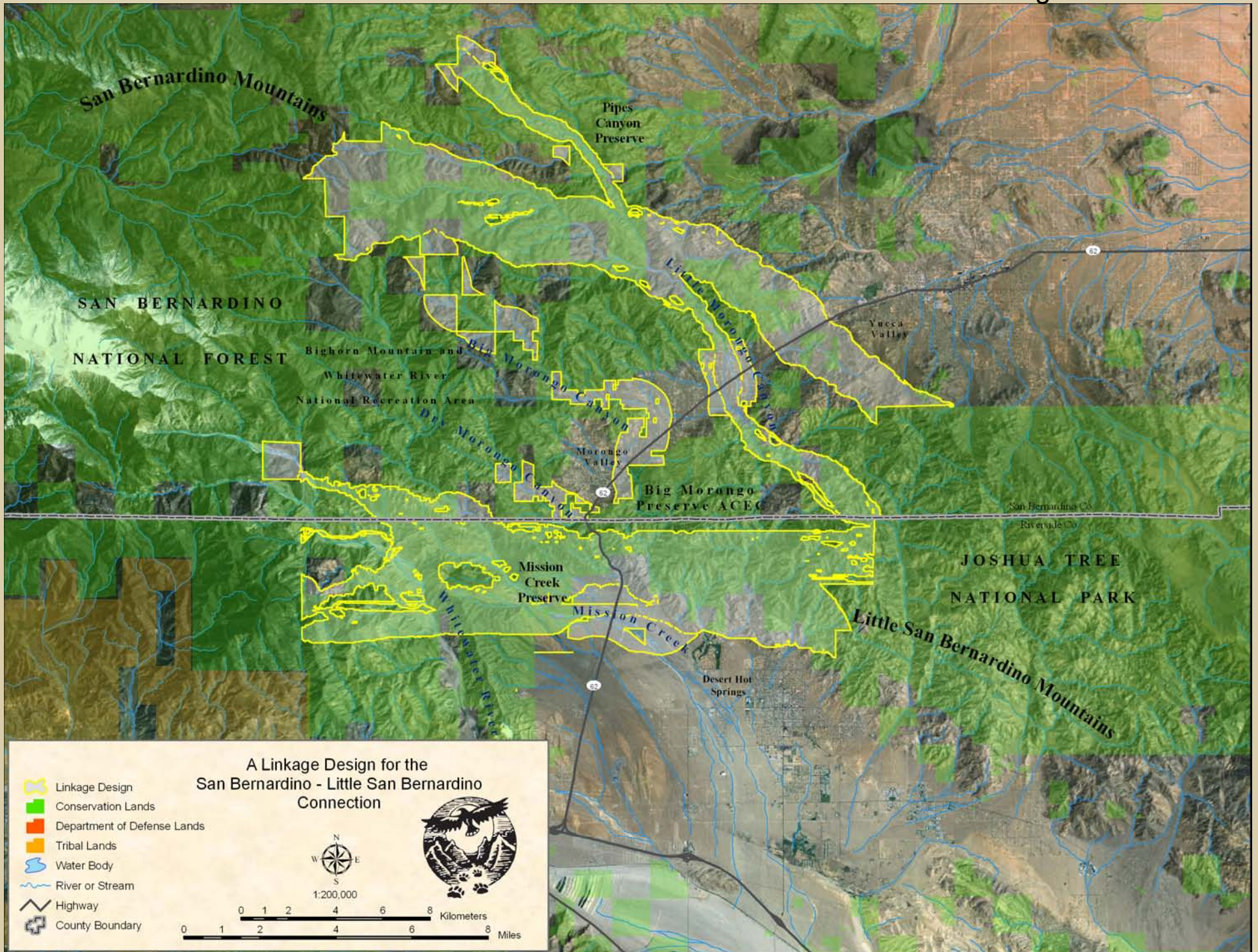
We recommend a vegetated wildlife overpass be built in this area to accommodate bighorn sheep movement.



Looking down Dry Morongo Canyon from BLM parcel west of the highway.



The culvert for Big Morongo Wash flowing under State Route 62.



San Bernardino-San Jacinto Connection

This linkage provides a connection between the San Bernardino and San Jacinto mountains, which together form the San Bernardino National Forest. The San Bernardino Mountains are part of the Transverse Ranges and feature the highest peak in southern California, Mount San Gorgonio, while the San Jacinto Mountains are the highest and northernmost of the Peninsular Ranges. Both coastal and desert habitats occur in the lowlands between these mountain masses, with the San Gorgonio River marking the transition between coastal habitats in the west and desert habitats in the east. The Linkage Design encompasses a total of 74,414 acres, of which approximately 29% (21,223 acres) is currently protected. The majority of unprotected land in the linkage could be conserved through the Western Riverside MSHCP and the Coachella Valley MSHCP (County of Riverside 2002, CVAG 2004).



Looking across the broad bajada of the San Gorgonio River toward the San Jacinto Mountains.

The Linkage Design has five routes to accommodate diverse species and ecosystem functions. The western strand links the San Bernardino Mountains with the Badlands and extends from Noble Creek in the San Bernardino Mountains, taking in the wide swath of natural habitats remaining between the communities of Calimesa and Cherry Valley, and entering San Timoteo Canyon in the Badlands. The next strand encompasses the San Gorgonio River, which forms a substantial alluvial fan through the pass to its confluence with the Whitewater River. This strand is intended to serve badger, large-eared woodrat, Merriam's kangaroo rat, and coast horned lizard. The San Gorgonio River is especially important for a number of rare endemic species associated with alluvial fans (County of Riverside 2002, CVAG 2004). The strand in the foothills of the San Jacinto Mountains near the confluence of Smith Creek and the San Gorgonio River accommodates several focal species including mountain lion, chaparral whipsnake, and slender-horned spinyflower. The Stubbe Canyon Wash strand was delineated by the landscape

permeability analysis for mountain lion but is also expected to serve species such as badger and little pocket mouse. The easternmost strand follows the Whitewater River, which empties into a broad bajada in the San Gorgonio Pass at the base of the San Jacinto Mountains. This strand was delineated by the landscape permeability analysis for puma but also serves focal species such as California treefrog, and white alder.

Interstate 10, Highway 111 and Highway 79 are the major transportation routes posing the most substantial barriers to movement. Interstate 10 bisects the linkage for roughly 11 miles. Several existing structures accommodate various levels of animal movement.

There is a series of crossing structures where the San Gorgonio River flows under Interstate 10, and for the service road between the freeway and the railroad tracks. Animals that follow washes can then enter several canyons in the San Jacinto Mountains. Just downstream, however, a low concrete dike runs almost the full width of the river, deflecting flow to the south bank to protect a mining operation that occupies the river bottom. Mining operations in the river decrease its value as a travel corridor, closing and restoring these areas would benefit this connection.



Bridge spanning the San Gorgonio River.

There is a series of under-crossings to accommodate Stubbe Wash, which crosses the freeway and service road in two places, roughly 90 feet apart. There is some native vegetation at the approach of these structures, but virtually no vegetative cover through the entire length of the structures. We suggest planting native shrubbery in between each bridge. We also recommend maintaining the rural character of the landscape by confining light and noise pollution to existing home sites in the vicinity.



Looking toward the San Jacintos at the westernmost bridges over Stubbe Canyon.

There is also a series of bridges for the Whitewater River, and one for the service road. The Whitewater River had the highest frequency of bobcat use; coyote, rabbit, and roadrunners were also documented here (Myers et al. 1996). Public agencies bulldoze a stretch of the river to increase percolation for groundwater recharge; we recommend habitat restoration here. There are windmills in the river south of the freeway that are enclosed by chain-link fence, which should be removed to allow animals to roam the floodplain and access side canyons more easily.



Looking toward the San Jacintos through the bridge over the Whitewater River.



Palomar-San Jacinto/Santa Rosa Connection

This linkage facilitates wildlife movement between Cleveland and San Bernardino National Forests and Anza Borrego Desert State Park, and overlaps portions of the Cahuilla and Santa Rosa Reservations. The Linkage Design encompasses 204,766 acres, of which approximately 57% (116,396 acres) currently enjoys some level of conservation protection, mostly in land administered by Bureau of Land Management, Forest Service, California State Parks, The Nature Conservancy, and the counties. Portions of the Cahuilla and Santa Rosa reservations also occur and are almost entirely covered by high-quality natural habitats. Coordination with Tribal Councils will be critical for securing this regionally important landscape linkage.



One of many magnificent vistas of the rocky terrain in Anza Borrego Desert State Park.

The Linkage Design has three major strands. The most northerly strand extends from the Palomar Ranges of Cleveland National Forest, encompassing the coastal sage scrub and chaparral habitats surrounding Vail Lake and on Billy Goat, Cahuilla and Little Cahuilla mountains, the riparian habitats along Temecula Creek, Wilson Creek, Bautista Canyon, Lion Canyon, and Cottonwood Creek, and the oak woodland and hardwood conifer habitats in the foothills of the San Jacinto Mountains. This strand was delineated by the landscape permeability analysis for mule deer and mountain lion but also provides the largest core areas of suitable habitat for quino checkerspot butterfly. The central strand follows a series of valleys, from Aguanga Valley near the junction of highways 371 and 79, through the Cahuilla and Anza valleys and up into Garner Valley in the San Jacinto Mountains. This strand was delineated by the landscape permeability analysis for badger, a species that prefers grassland habitats in flat or gently sloping terrain, but it is also intended to serve the Aguanga kangaroo rat, loggerhead shrike, rock wren, and coast horned lizard. The southern strand extends from the Palomar Ranges, and encompasses habitats around Oak Grove, on Beauty Mountain, Tule Peak, and Iron Spring Mountain, and in Copper Canyon, Previt Canyon and the Chihuahua Valley, to Table Mountain in the Santa Rosa Mountains. This strand was defined by the landscape permeability

analysis for mountain lion but it provides live-in and move-through habitat for a number of native species.

State Route 79, and Highways 74, and 371 are the primary impediments to movement. The 79 is a two-lane heavily traveled highway that is at-grade for much of its length, except where it crosses major drainages. Highway 371 runs east-west through the central strand of the linkage, from its juncture with Highway 79 in the Aguanga Valley, to its juncture with Highway 74 near Garner Valley. This busy two-lane road is mostly at grade, with very few existing crossing structures. Highway 74 runs through Garner Valley for roughly 11 miles in the linkage. Several structures exist that facilitate various levels of wildlife movement.

There is a sizeable culvert on Highway 79 for Tule Creek with suitable habitat in the vicinity for mountain lion, badger, large-eared woodrat, western toad, coast horned lizard, and pale swallowtail. Tule Creek supports a well-developed cottonwood willow riparian forest; however tamarisk (*Tamarix ramosissima*), has invaded this system. We recommend habitat restoration to eradicate or control this and other non-native species. If transportation projects are undertaken, the culvert should be replaced with a bridge at least 24 feet wide and as close to 12 feet high as topography will allow.



Looking up Tule Creek at the concrete box culvert under Highway 79.

Chihuahua Creek flows under Highway 79 through an expansive well-designed bridge that facilitates wildlife movement in the southern strand of the linkage. Coast live oak riparian forest lines Chihuahua Creek, with grassland, sagebrush and redshank chaparral in the uplands. The bridge is roughly 30 feet high and 138 feet wide. When transportation projects occur, the dimensions of the structure should remain the same. Lands along the creek effectively link the Palomar and Santa Rosa Mountains, with only a few parcels remaining to secure this fully functional connection.

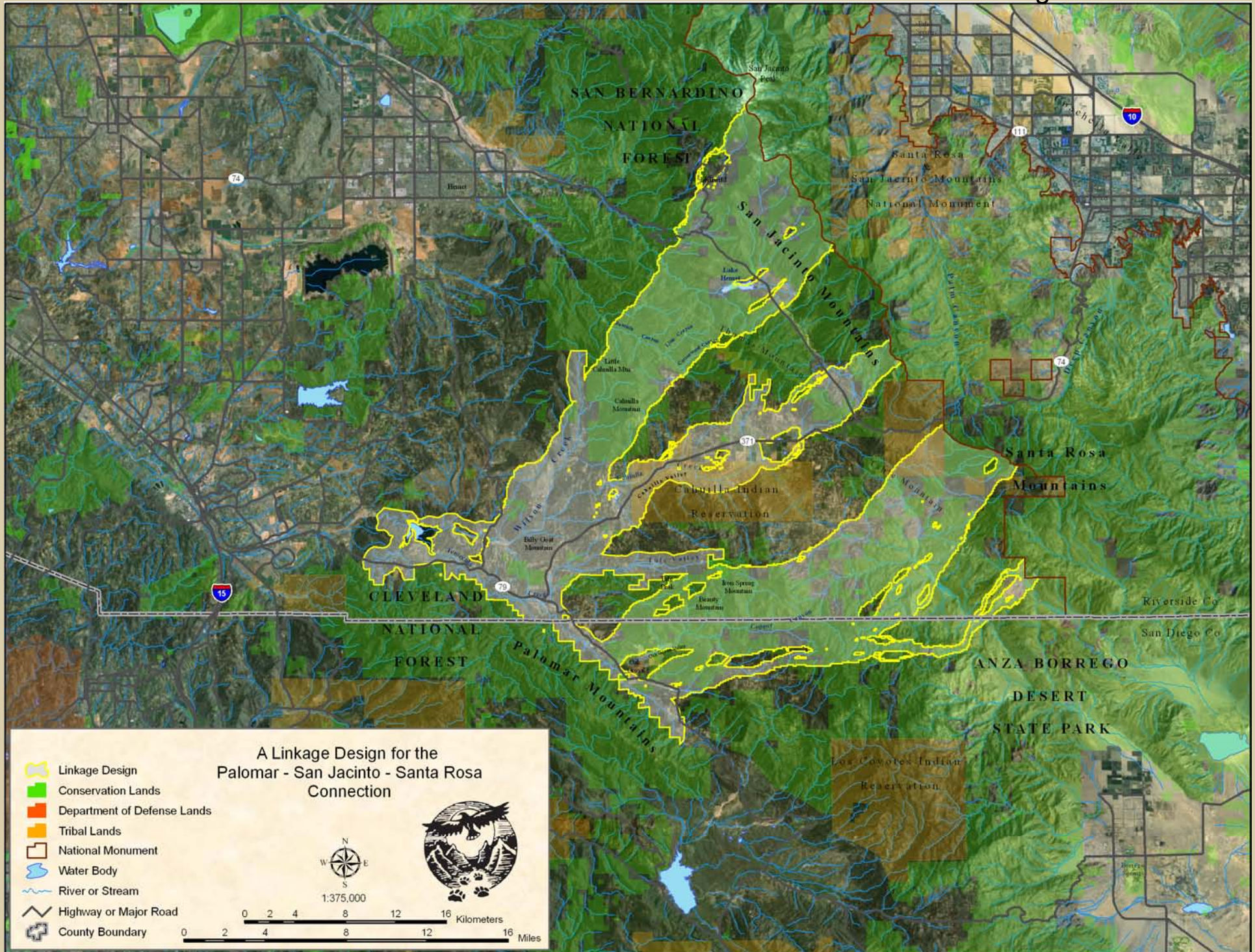


Looking down Chihuahua Creek toward the Palomar Ranges.

Highway 74 runs through Garner Valley for roughly 11 miles in the linkage. Several structures were incorporated into the original road design. There are three box culverts measuring four feet high and wide, and 23 feet long. There are also two box culverts in this stretch of highway but each has a significant drop off at the eastern entrance, which should be fixed to provide passage. There are two bridges (6' high, 43' wide) spaced about 600 feet apart that span Antsell Rock Creek and Servo Creek. Another bridge (10' high, 12' wide) spans Hurkey Creek. These creeks feed expansive wetland habitats that provide habitat for a number of aquatic and semi aquatic species.



Example of a concrete box culvert on Highway 74 in Garner Valley.



Santa Ana-Palomar Connection

This linkage joins the Santa Ana Mountains and its coastal lowlands to the Palomar Mountains and inland ranges of San Diego County, serving to connect extensive natural areas of Cleveland National Forest (CNF) and Camp Pendleton, the largest contiguous block of coastal habitat remaining in the ecoregion. The Linkage Design is a band of habitat roughly 21 miles in width and 75 miles long that extends eastward from the CNF Trabuco Ranger District, and Camp Pendleton to the western and northern boundaries of the CNF Palomar Ranger District. The Santa Margarita River, the longest intact stream corridor in southern California, winds through the linkage; it crosses I-15 and continues up Temecula Creek and across Vail Lake until it reaches the CNF Palomar Ranger District via the Arroyo Secco, Kolb, and Temecula creek drainages. This connection serves aquatic species (arroyo and southern steelhead trout), but also benefits semi-aquatic and terrestrial species that move along canyon bottoms (e.g., western pond turtle, pale swallowtail, or mountain lions). Approximately 1/3 of the 67,888 acres in the Linkage Design are protected from conversion to urban or agricultural use.



Looking west across Interstate 15, toward the Santa Ana Mountains from Sage Scrub Ridge in the Palomar Mountains.

Interstate 15 is the only major freeway in the Linkage Design, and currently lacks crossing structures adequate to accommodate species moving through upland and aquatic habitats. Other paved roads in the Linkage Design are two lanes in width (including Old Highway 394 and the Pala Temecula Road) and show lower levels of use than I-15 or State Route 79. Fisher and Crooks (2001) showed that roads in the linkage area vary substantially in their danger to wildlife depending upon level of use. Larger mammals and low flying birds and insects often are able to

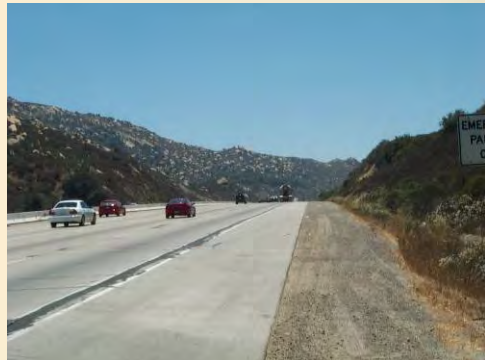
successfully cross roads of this type, but small mammal and reptile mortalities are fairly high (Fisher and Crooks 2001).

The bridge spanning Temecula Creek would permit use by both upland and riparian focal species, but the adjacent Red Hawk Golf Course and commercial and residential developments block movements to and from the bridge on the eastern side. Further upstream there are significant gaps in natural habitats creating a dead-end for species moving eastward along Temecula Creek. We recommend restoring riparian vegetation from the Temecula Creek crossing to natural habitats in the Palomar Mountains and restoring a chaparral connection near the bridge on the east side of I-15 that extends to the ridgeline above the golf course, and removing existing fences and any other barriers. There are also three corrugated metal pipes about three feet in diameter and roughly 144 feet in length but curvature in the pipes prevents visibility to the other side. We recommend these pipes be replaced with expansive underpasses with earthen substrate flooring that are large enough to provide visibility to the other side. Appropriate fencing should be used to guide animals to these passageways. Due to the significance of I-15 as a barrier and the compromised function of the Temecula Creek bridge, a top priority for restoring linkage function is to install a habitat overpass just north of the Border Patrol checkpoint. Beier and Barrett (1993) identified this site as the “most critical link”. During their study, three lions were killed but a juvenile successfully crossed at this location. They also concluded that this connection must be secured for immigration of lions from the Palomar Range to prevent the extinction of the population in the Santa Ana Mountains.

State Highway 79 is a two-lane high-speed road with heavy levels of traffic that crosses key riparian drainages in the eastern portion of the linkage. It crosses Kolb Creek, Arroyo Secco, and Temecula creek drainages above Vail Lake near the Palomar Ranger District. These bridges vary in height from 6 to 30 feet, and all have well-developed riparian and upland vegetation in the vicinity, and provide good visibility to the other side. These bridges provide passageways across the 79 for various species, but use of all of the bridges could be enhanced by installing fencing to guide animals towards the structures.



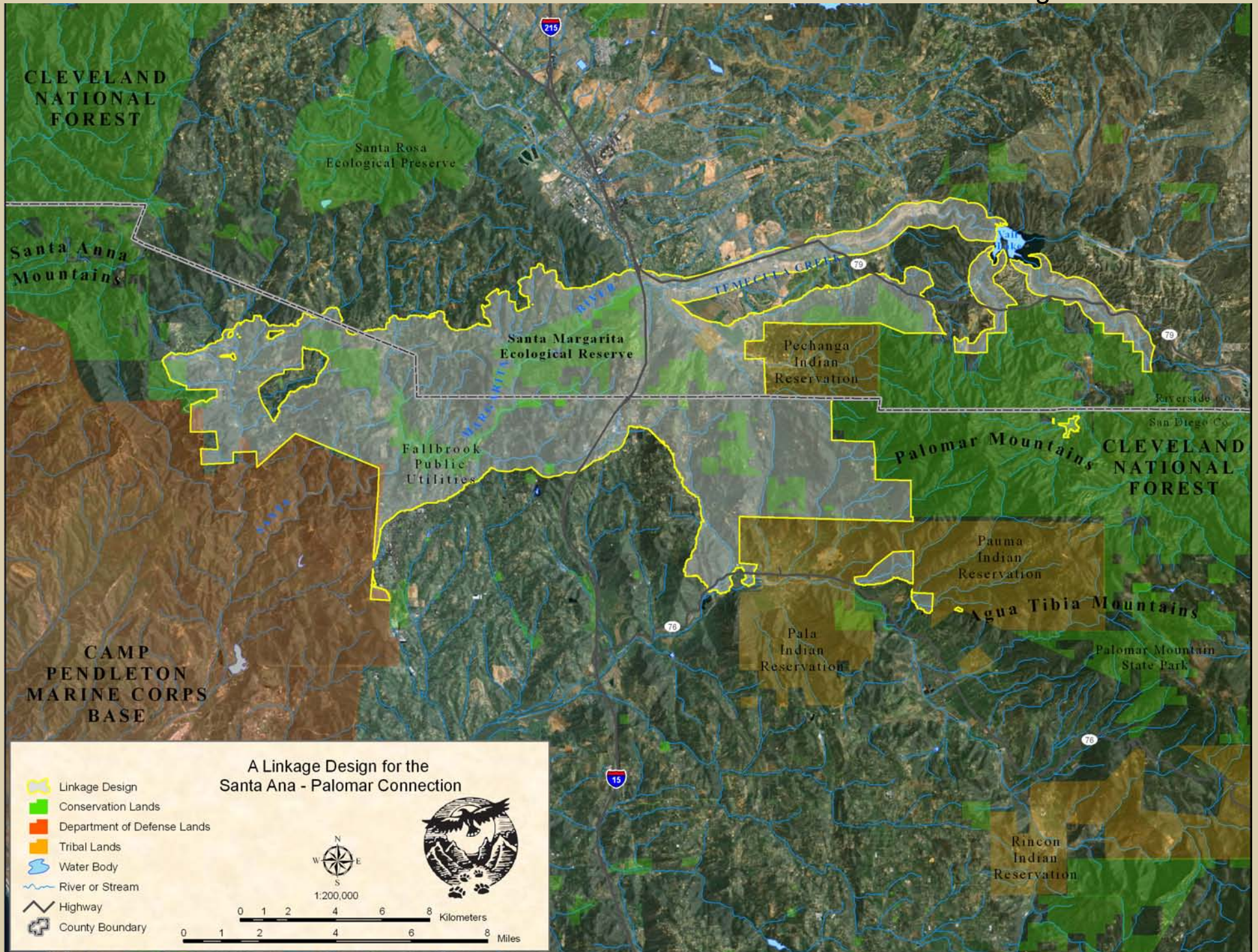
Temecula Creek passing through two extended bridges on Interstate 15.



Potential site for vegetated land bridge on Interstate 15; near call box 15-16.



Kolb Creek bridge on the SR-79.



Peninsular-Borrogo Connection

This linkage connects the coastal habitats of Cleveland National Forest and Cuyamaca Rancho State Park in the Peninsular Ranges with the desert communities of Anza Borrego Desert State Park. The Linkage Design encompasses 127,788 acres, of which approximately 36% (45,521 acres) currently enjoys some level of conservation protection, mostly in land administered by US Forest Service, California State Parks, Bureau of Land Management, Department of Fish and Game, County of San Diego, and The Nature Conservancy. Portions of the Santa Ysabel and Mesa Grande reservations also occur in the linkage.

The Linkage Design has three major strands. The most northerly strand extends from the Palomar and Aguanga mountains of Cleveland National Forest, encompasses habitats surrounding Lake Henshaw in the Warner Basin, the riparian habitats along the San Luis Rey River, San Ysidro, Buena Vista, and Matagual Creeks and the mixed chaparral and oak woodland habitats in the San Felipe Hills near Pinyon Ridge in Anza-Borrogo Desert State Park. This strand was delineated by the landscape permeability analysis for badger but also provides the largest core areas of suitable habitat for grasshopper sparrow and black-tailed jackrabbit.



Looking southeast down Banner Canyon with Granite Mountain in Anza Borrego Desert State Park in the distance.

The central strand extends from Black Mountain in Cleveland National Forest and encompasses riparian and upland habitats along Bloomdale, Witch, and Santa Ysabel creeks, Santa Ysabel Valley, the southern extent of the Volcan Mountains, Banner Canyon, and San Felipe Creek, and enters Anza-Borrogo Desert State Park between Pinyon Ridge and Grapevine Mountain. This strand was delineated by the landscape permeability analysis for mountain lion but is also intended to serve other species such as mule deer, badger, and granite night lizard. Santa Ysabel Creek is especially important for species requiring a contiguous riparian connection.

The southern strand extends from Sutherland Lake and follows the belt of oak savanna, and grassland habitats in the Ballena Valley and the riparian habitats of Witch Creek to the upper San Diego River Gorge, and then up Sentenac Creek to habitats around Lake Cuyamaca in Cuyamaca Rancho State Park and the desert riparian habitats of Vallecito Wash in Anza-Borrego Desert State Park. This strand was defined by the landscape permeability analysis for mule deer.

State Routes 78 and 79 are the major transportation routes and pose the most substantial barriers to movement. SR-79 bisects the linkage for a distance of roughly 27 miles, while SR-78 passes through the central and southern strands of the linkage.

A well-designed bridge conveys flows of Canada Verde Creek under SR-79 near Warner Springs. Coast live oak riparian forest lines the creek with grasslands south of the SR-79 and redshank chaparral the dominant community north of the highway. This bridge is well-suited as a wildlife crossing, as the stream draws animals to the canyon. The Pacific Crest Trail also utilizes this structure, as it passes through the northern strand of the linkage, between Anza-Borrego Desert State Park and Forest Service lands north of SR-79.



Bridge for Canada Verde Creek and the PCT under SR-79.

The least cost corridor for mountain lion crossed SR-79 using Santa Ysabel Creek and researchers have documented lions using the creek as a travel route (Sweaner et al. 2003). There is a well-designed bridge that has natural flooring, provides good visibility, and measures about 30 feet high, 40 feet wide, and 22 feet long. Species that utilize riparian, grassland, or oak savanna habitats (e.g., badger, mule deer, black-tailed jackrabbit, and grasshopper sparrow) will benefit from this connection. Santa Ysabel Creek provides the most direct riparian connection between targeted areas, and most of the canyon is already protected.



Bridge for Santa Ysabel Creek on SR-79.

The bridge for San Felipe Creek is roughly 30 feet high, 325 feet wide and 30 feet long. San Felipe Creek is designated as a National Natural Landmark, one of the last natural perennial desert streams that supports an incredible diversity of species. Many focal species have been detected, including mountain lion, badger, mule deer, black-tailed jackrabbit, granite night lizard, golden eagle, and black brant. Most of the habitat in the San Felipe Hills and Valley is already conserved. S2 runs along San Felipe Creek at the base of the San Felipe Hills, connecting SR-78 and Sr-79. S22 passes through the northern strand of the linkage, and stretches from the community of Borrego Springs, to the base of the San Felipe Hills. Both of these scenic highways are currently one lane in each direction and almost entirely at grade. Any road improvements should incorporate regularly spaced culverts to increase movement opportunities for smaller species and reduce roadkill.



San Felipe Creek flows beneath SR-78 through a bridge that provides passage to numerous species.



Missing Linkages along the U.S.-México Border

Linkages along the U.S.-México border in San Diego and Imperial counties are being implemented as part of the *Las Californias Binational Conservation Initiative* (LCBCI; www.consbio.org/cbi/projects), led by The Nature Conservancy, Conservation Biology Institute, Pronatura, and Terra Peninsular, with assistance from the Resources Legacy Fund Foundation, Back Country Land Trust, The Conservation Fund, California State Parks, Bureau of Land Management, and others. As a result of the LCBCI, priority properties have been identified and approximately 3,500 acres have been conserved to date (representing an investment of over \$8 million in private, state, and federal funds), and LCBCI priorities have been included in several agency planning documents. The California Biodiversity Council (CBC) has embraced LCBCI and established a border work group, comprised of agencies and NGOs from both sides of the border, which is collaborating on implementation. We are also working with the San Diego Natural History Museum, U.S. and Mexican agencies, and academic institutions on a binational expedition to increase our understanding of resources in the study area on both sides of the border.

Otay Mountain—Cerro San Ysidro linkage

Otay Mountain in California and Cerro San Ysidro in Baja California represent *sky islands* of endemic plant species and represent the last cross-border coastal sage scrub linkage. This linkage continues along Cottonwood Creek to the Laguna Mountains in the Cleveland National Forest. Completion of this linkage will contribute to the recovery of 22 federally and state listed species and secure protection of some of the most rare and floristically diverse vegetation communities on the planet.

La Posta linkage

This linkage serves to connect the Campo Valley in San Diego County with the El Hongo Valley in Baja California. It occurs in an ecological transition area between the coast and the desert, and between mountain and inland valley biomes. Completing this linkage, by conserving a series of small core areas, will decrease fragmentation, maintain a sanctuary of wilderness values at the edge of an urban metropolis, and ensure conservation across a range of elevational gradients that will enhance the resilience of existing protected lands to global climate change.

Parque-to-Park linkage

This linkage provides a connection between Anza-Borrego Desert State Park in San Diego and Imperial counties, and Parque Constitución de 1857 in Baja California. This is a truly continental-scale linkage along the transboundary region of the Peninsular Ranges, thus ensuring cross-border connectivity through the eastern edge of the South Coast Ecoregion and the Sonoran Desert. Completing this linkage ultimately will allow the endangered Peninsular Bighorn Sheep to repopulate the Sierra Juárez in northern Baja California and encourage binational collaboration in managing bighorn sheep populations on both sides of the border.

Following are a few of the primary implementation objectives:

- Work toward creation of a binational park that links Parque Constitución de 1857 in the Sierra Juárez in Baja California with public wilderness areas in San Diego County.
- Work toward creation of a cross-border linkage between Tijuana and Tecate / San Diego and Campo.
- Conserve the Cottonwood Creek corridor between Cerro San Ysidro, Otay Mountain, and the Laguna Mountains.
- Provide technical support to Mexican partners in conserving large, intact natural areas and working landscapes within Baja California.

Recommendations to Improve Connectivity

Recommendations to Reduce the Effects of Roads: Although road-widening projects and new roads generally increase vehicle traffic, they need not result in more wildlife/vehicle collisions, or a decrease in animal movements. Transportation projects present the greatest opportunity to provide crossing structures to accommodate wildlife movement. Because most of California's roads were not originally designed to accommodate wildlife movement, road improvement projects can dramatically restore permeability. Conversely, we can expect slower progress making canals and railroads more wildlife-friendly because these structures are not as regularly upgraded. Nonetheless, most structures are eventually upgraded, creating opportunities to facilitate connectivity, thus it is critical that planners and engineers be aware of the need for connectivity.

Wildlife crossing structures that have been used in North America and Europe to facilitate movement through landscapes fragmented by roads include wildlife overpasses, bridges, culverts, and pipes. While many of these structures were not originally constructed with ecological connectivity in mind, many species benefit from them (Clevenger et al. 2001; Forman et al. 2003). No single crossing structure will allow all species to cross a road. For example rodents prefer to use pipes and small culverts, while bighorn prefer vegetated overpasses or open terrain below high bridges. A concrete box culvert may be readily accepted by a mountain lion or bear, but not by a deer or bighorn sheep. Small mammals, such as deer mice and voles, prefer small culverts (McDonald & St Clair 2004).



Elk using wildlife overpass, Banff National Park, Canada

Although some documents refer to such structures as “corridors” or even “linkages,” we use these terms in their original sense to describe the entire area required to link the landscape and facilitate movement between large wildland blocks. Crossing structures represent only small portions, or choke points, within an overall habitat linkage or movement corridor. Properly designed crossing structures are a means of making barriers more permeable to wildlife movement. However, investing in specific crossing structures may be meaningless if essential lands in the linkage are left unprotected. Thus it is essential to keep the larger landscape context in mind when discussing existing or proposed structures to cross movement barriers. This broader context also allows awareness of a wider variety of restoration options for maintaining functional linkages.

Based on the small but increasing number of scientific studies on wildlife use of highway structures, we offer these general standards and guidelines for *all* existing and future crossing structures intended to facilitate wildlife passage across highways, railroads, and canals.

- **Multiple crossing structures should be constructed to provide connectivity for all species likely to use a given area** (Little 2003). For deer or other ungulates, an open

structure such as a bridge is crucial. For medium-sized mammals, black bear, and mountain lions, large box culverts with natural earthen substrate flooring are optimal (Evink 2002). For small mammals, pipe culverts from 0.3m – 1 m in diameter are preferable (Clevenger et al. 2001; McDonald & St Clair 2004).

- **At least one crossing structure should be located within an individual's home range.** Because most reptiles, small mammals, and amphibians have small home ranges, metal or cement box culverts should be installed at intervals of 150-300 m (Clevenger et al. 2001). For ungulates (deer, bighorn) and large carnivores, larger crossing structures such as bridges, viaducts, or overpasses should be located no more than 1.5 km (0.94 miles) apart (Mata et al. 2005; Clevenger and Wierzchowski 2006).
- **Suitable habitat for species should occur on both sides of the structure** (Ruediger 2001; Barnum 2003; Cain et al. 2003; Ng et al. 2004). "Crossing structures will only be as effective as the land and resource management strategies around them" (Clevenger et al. 2005).
- **Whenever possible, suitable habitat should occur *within* the crossing structure.** This can best be achieved by having a bridge high enough to allow enough light for vegetation to grow under the bridge, and by making sure that the bridge spans upland habitat that is not regularly scoured by floods. Where this is not possible, rows of stumps or strands under large span bridges can provide cover for smaller animals such as reptiles, amphibians, rodents, and invertebrates; regular visits are needed to replace artificial cover removed by flood. Within culverts, earthen floors are preferred by mammals and reptiles.
- **Structures should be monitored for, and cleared of, obstructions that impede movement.** Many box culverts have large accumulations of branches, Russian thistle, sand, or garbage that impede animal movement, while bridged undercrossings rarely have these problems.
- **Fencing should direct animals towards crossing structures** (Yanes et al. 1995). In Florida, construction of a wall to guide animals into a culvert system resulted in 93.5% reduction in roadkill, and also increased the total number of species using the culvert from 28 to 42 (Dodd et al. 2004). One-way ramps on roadside fencing can allow an animal to escape if it is trapped on a road (Forman et al. 2003).
- **Raised sections of road discourage animals from crossing roads, and should be used when possible to encourage animals to use crossing structures.** Clevenger et al. (2003) found that vertebrates were 93% less susceptible to road-kills on sections of road raised on embankments, compared to road segments at the natural grade of the surrounding terrain.
- **Manage human activity near each crossing structure.** Clevenger & Waltho (2000) suggest that human use of crossing structures should be restricted and foot trails relocated away from structures intended for wildlife movement. However, a large crossing structure (viaduct or long, high bridge) should be able to accommodate both recreational and wildlife use. At a minimum, nighttime human use of crossing structures should be restricted.
- **Design culverts specifically to provide for animal movement.** Most culverts are designed to carry water under a road and minimize erosion hazard to the road. Culvert designs adequate for transporting water often have pour-offs at the downstream ends that

prevent wildlife usage. At least one culvert every 150-300m of road should have openings flush with the surrounding terrain, and with native land cover up to both culvert openings, as noted above.

Recommendations to Reduce the Effects of Rail Lines: We recommend a policy of using any railroad realignment as an opportunity not simply to mitigate loss of wildland connectivity, but to improve it. Ameliorating the adverse affects of railroads is similar to that for roads, providing viaducts, bridged underpasses, and tunnels (Reed and Schwarzmeier 1978, Borowske and Heitlinger 1981, Forman 1995).

- We recommend that crossing structures should be sited at least every 1.5 to 2 km.
- We suggest structures for rail lines be aligned with crossing structures on freeways.
- We encourage crossing structures associated with rail lines be integrated with sound walls to reduce noise.
- Structures should be integrated with fences where beneficial to guide animals toward crossing structures. Fencing can be permeable to humans and larger animals, and would not be needed where steep cut and fill slopes already divert animals toward structures.

Recommendations to Reduce the Effects of Streams Barriers: Since 80% of terrestrial vertebrate species depend on riparian systems (Kreuper 1992), it is critical to maintain these communities. Measures to minimize development impacts on aquatic habitats typically focus on establishing riparian buffer zones (Barton et al. 1985, Allan 1995, Willson and Dorcas 2003). Buffers must contain enough upland habitat to maintain water-quality and habitat characteristics essential to the survival of many aquatic and semiaquatic organisms (Brosofske et al.1997, Willson and Dorcas 2003). To enhance species use of riparian habitats, we recommend:

- Restore riparian vegetation in all drainages and upland vegetation within 0.6 miles of streams and rivers to encourage plant and animal movement and increase water quality.
- Investigate historic flow regimes and develop surface and groundwater management programs to restore and recover properly functioning aquatic/riparian conditions.
- Remove exotic plants (e.g., tamarisk) and animals (e.g., bullfrogs, African clawed frogs) from washes, streams and rivers. Work with relevant agencies and organizations to survey for invasive species and develop a comprehensive removal strategy.
- Enforce regulations protecting streams and stream vegetation from illegal diversion, alteration, manure dumping, and vegetation removal.
- Enforce regulations restricting farming, gravel mining, suction dredging, and building in streams and floodplains.
- Work with the Resource Conservation Districts to help establish use of Best Management Practices for rural communities in the linkage designs and surrounding communities.
- Support efficient water use and education programs that promote water conservation.
- Discourage development in flood prone areas and prevent the construction of concrete-banked streams and other channelization projects.

- Support the protection of riparian and adjacent upland habitats on private lands. Pursue cooperative programs to improve conditions in riparian and upland habitats.

Recommendations to Reduce the Effects of Mining: Mining operations can be modified with actions that reduce the affects of these industrial activities. Preventing any further mining operations in key areas of a Linkage Design through administrative withdrawals will have the greatest effect on preserving linkage function. Existing mining operations can be targeted for regulatory actions that reduce the effects of these industrial activities. These include, limiting noise from blasting, minimizing night lighting, reducing traffic in sensitive areas or constriction points, monitoring water quality and quantity, minimizing the use of harmful chemicals, and increasing enforcement of existing regulations. The California Surface Mining and Reclamation Act (1975) require that land used in mining operations be restored once operations have ceased.

Recommendations to Reduce the Effects of Urban Barriers: Urban developments, unlike roads, create movement barriers that cannot be readily removed, restored, or mitigated. Preventing urban developments in key areas through acquisition or conservation easements is therefore the strongest option. Mitigation for existing urban developments focuses on designing and managing buffers to reduce penetration of undesirable effects into natural areas (Marzluff and Ewing 2001). Management in buffers can include fencing in pets, reducing human traffic in sensitive areas or constriction points, limiting noise and lighting, reducing traffic speeds, minimizing use of irrigation, maximizing outdoor water use efficiency measures, encouraging the planting of locally native vegetation, minimizing the use of pesticides, poisons and other harmful chemicals, and increasing enforcement of existing regulations.

Recommendations to Reduce the Effect of Agricultural Barriers: Agricultural practices remove native vegetation, require significant water resources, and increase nutrient runoff into streams, and support invasions by exotic species. Waters draining from these developments show elevated levels of nutrients and particles. Many drainages that were once ephemeral become perennial (Fisher and Crooks 2001) and are capable of supporting exotic species such as exotic fish, bullfrogs and giant reed. As with urban developments, acquisition or conservation easements with willing landowners will have the greatest effect on preserving linkage function from agricultural impacts. For existing developments, a variety of Best Management Practices can reduce nutrient runoff and erosion. These include the timing and types of nutrient use, use of native vegetation to absorb surface and subsurface runoff, dirt road design, and soil management. In addition, the pattern of agricultural developments can have a significant affect on species movements. We provide the following initial recommendations to prevent or mitigate the effects of agriculture in the linkage design areas:

- Discourage further agricultural development by purchasing lands with natural vegetation, or developing easements with willing landowners.
- Restore agricultural lands in areas of a linkage where natural habitats have been severely constricted. Where possible, restore a one kilometer wide isthmus of habitat through adjacent agricultural developments.
- Work with The Regional Water Quality Control Board's Total Maximum Daily Load plans to evaluate the cause the water quality deterioration and enact an implementation plan to return water quality to targeted water quality values.
- Encourage research on agriculture that specifically identifies solutions to elevated nutrient runoff, erosion, and effects of perennializing streams.

Recommendations to Reduce the Effects of Recreation: If recreational activities are effectively planned, developed, managed, and monitored, most negative impacts can be avoided or minimized by limiting types of use, directing recreational activities away from particular locations, sometimes only for particular seasons, and with reasonable precautions. We provide the following recommendations:

- Monitor recreational use to provide a baseline for decisions regarding levels, types, and timing of recreational use.
- Collect data on special status species, species movements, and vegetation disturbance in areas of high recreational activity.
- Develop and conduct multi-lingual outreach programs to recreational users on how to lessen impacts in sensitive areas.
- Close, obliterate, and restore any unauthorized off-road vehicle routes.
- Enforce leash laws so that dogs are under restraint at all times.

Translating Plans into Action

Although South Coast Missing Linkages rigorous, detailed designs are central to the approach, the project will not be complete with the publication of the linkage designs. The success of South Coast Missing Linkage will be measured by our effectiveness at *translating our vision of a connected landscape into land-saving actions*. With the completion of the planning and design phase comes the need to disseminate and institutionalize the results and build and support Linkage Implementation Coalitions to undertake the on-the-ground work to conserve our South Coast linkages.

Institutionalization of Linkage Designs

Partners in the South Coast Missing Linkages initiative are designing a strategic outreach plan that will a) focus broad incorporation of the Linkage Designs into relevant governing instruments (e.g. general plans, HCPs, local ordinances, CEQA); b) establish a public expectation of linkage protection; c) organize new constituencies and empower old partners; and d) utilize the unique abilities of each constituency to institutionalize support for these linkages. We are also working with our partners to develop and implement communication strategies to broaden the dissemination of the designs and inform the public and decision makers as to the importance of protecting these linkages.

The South Coast Missing Linkages initiative has already strongly influenced a number of important local, regional, and statewide conservation planning efforts. One direct result of our broad collaboration is the integration of the South Coast Missing Linkages into policy decisions to improve and enforce protection of these regionally important habitat linkages. For example, the four southern California Forests (Los Padres, Angeles, San Bernardino, and Cleveland) recently finalized their Resource Management Plans and identified connecting the four forests to the existing network of protected lands as one of the key strategies for protecting biodiversity in the forests. South Coast Missing Linkages was also recently acknowledged as a vital strategy for improving the status of wildlife in the state by the California Department of Fish and Game in a report prepared for the National State Wildlife Grant Program. *California Wildlife: Conservation Challenges* includes the following as one of its Recommended Region-Specific Conservation Actions:

“To address regional habitat fragmentation, federal, state, and local agencies, along with nongovernmental conservation organizations, should support the protection of the priority wildland linkages identified by the South Coast Missing Linkages project.”

South Coast Wildlands is representing South Coast Missing Linkages in the Western Governors Wildlife Corridors Initiative (<http://www.westgov.org/wga/initiatives/corridors/index.htm>). The governors of the 19 Western States passed a unanimous resolution in 2007 that all future highways, canals, energy developments, and new land-use plans should be consistent with conservation of important wildlife corridors. Although this will be a broad-brush approach, it can profoundly impact the face of the conserved landscape of the Western United States.

Building Implementation Coalitions

The importance of investing in building and maintaining relationships cannot be over-emphasized. Development of technical plans to overcome barriers to animal movement must be matched by efforts to build and maintain linkages among all the players. Partners across the region have already heeded the call to action! The following describes a few of the implementation activities underway to translate our plans into land-saving actions:

In the Santa Ana-Palomar Mountains Linkage, we have been working with the South Coast Conservation Forum, a consortium of county, state, and federal agencies, universities, and non profits formed to advise the Department of Defense on reducing urban encroachment and conflicts with military training maneuvers on Camp Pendleton. South Coast Missing Linkages information provided to the Forum ensured that this linkage was recognized as important to mitigating long-term impacts to sensitive species. The Linkage Design has been used to target Defense Authorization Act funds that will protect thousands of acres within the linkage. In addition, this linkage overlaps planning boundaries for two Multiple Species Conservation Plans, the Western Riverside Multiple Species Habitat Conservation Plan and the Northern San Diego Multiple Species Conservation Plan. Roughly 70% of the linkage in Riverside County and 92% in San Diego County are targeted for conservation by these NCCPs. A Conceptual Area Protection Plan (CAPP) has also been completed which will target state land acquisition funds.

To conserve the linkage between the San Gabriel Mountains and the Castaic Ranges of the Angeles National Forest, we are partnering with Upper Santa Clara Biodiversity Working Group, whose members include Forest Service, Bureau of Land Management, Fish and Wildlife Service, Department of Fish & Game, City of Santa Clarita, Santa Monica Mountains Conservancy (SMMC), Rivers and Mountains Conservancy, Wetlands Recovery Project, and The Nature Conservancy (TNC). The Linkage Design helped the agencies focus on the western part of the linkage; the most important area for promoting wildlife movement. The City of Santa Clarita is focusing its capital improvement project mitigation acquisitions in the Linkage Design even though this area is outside their city limits. The Forest Service is working with National Park Service to reroute the Pacific Crest Trail, now threatened by encroaching development, into our linkage design. A CAPP has also been completed, which will target state land acquisition funds. The Nature Conservancy, Rivers and Mountains Conservancy, & Santa Monica Mountains Conservancy are working with the Land Agent at Wildlife Conservation Board to acquire land in the linkage.

To maintain connectivity between the Santa Monica Mountains and Sierra Madre Ranges, we are working with the National Park Service, Caltrans, SMMC, TNC, Trust for Public Land, and Los Angeles and Ventura Counties. Caltrans used the Linkage Design to identify mitigation opportunities along State Route 118, and has initiated a working group for this transportation improvement project. It is our hope that this working group will evolve into an implementation coalition that covers the entire linkage area.

Exporting the South Coast Missing Linkages Model

The success with which South Coast Missing Linkages has been met propels us to work with our partners beyond the South Coast Ecoregion to identify and design landscape linkages across the state, the west, and the nation. To our great excitement, the state of Arizona has completely adopted the South Coast Missing Linkages methodology for designing landscape linkages, and Colorado has partially adopted it.

The Vision

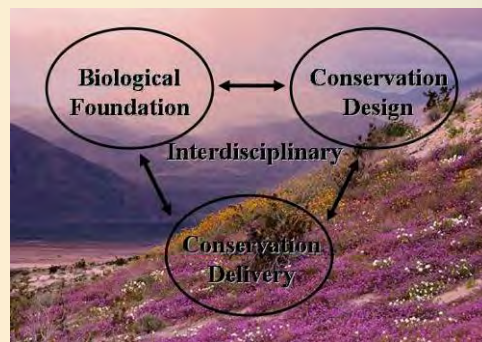
The ecological, educational, recreational, and spiritual values of protected wildlands in the South Coast Ecoregion are immense. These conserved lands also represent an investment of tens of billions of dollars. We need to ensure the ecological health of this investment by securing these linkages. These Linkage Designs represent opportunities to protect truly functional landscape-level connections among these wildlands. If implemented, our plan would not only permit movement of individuals and genes, but should also conserve large-scale ecosystem processes that are essential to the integrity of existing conservation investments throughout the region.

Appendix A Conservation Planning Approach

The goal of linkage conservation planning is to identify specific lands that must be conserved to maintain or restore functional connections for all species or ecological processes of interest, generally between two or more protected core habitat areas. Our approach can be generally summarized as follows:

- 1) *Focal Species Selection*: select focal species from diverse taxonomic groups to represent a diversity of habitat requirements and movement needs.
- 2) *Landscape Permeability Analysis*: conduct landscape permeability analyses to identify a zone of habitat that addresses the needs of multiple species potentially traveling through, or residing in the linkage.
- 3) *Patch Size & Configuration Analysis*: use patch size and configuration analyses to identify the priority areas needed to maintain linkage function.
- 4) *Field Investigations*: conduct fieldwork to ground-truth results of analyses, identify barriers, and document conservation management needs.
- 5) *Linkage Design*: compile results of analyses and fieldwork into a detailed comprehensive report with recommended conservation and restoration opportunities.

Our approach has been highly collaborative and interdisciplinary (Beier et al. 2006). We followed Baxter (2001) in recognizing that successful conservation planning is based on the participation of experts in biology, conservation design, and implementation in a reiterative process. To engage regional biologists and planners early in the process, we held a series of habitat connectivity workshops in 2002. The workshops engaged over 270 participants representing over 126 different agencies, academic institutions, conservation organizations, and community groups. Our partners come from wide and varied backgrounds and include scientific and academic institutions, federal land management agencies, state agencies, local electeds, and conservation non-government organizations.

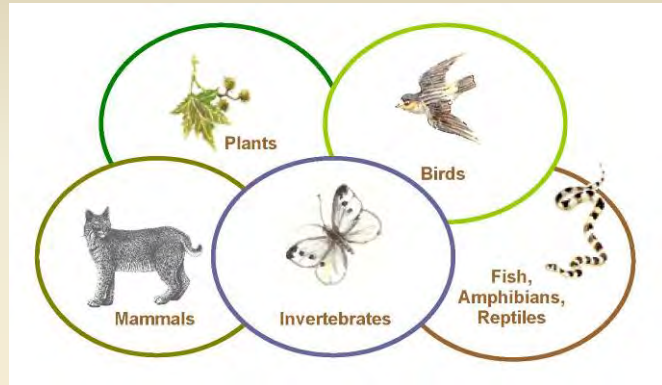


Successful conservation planning requires an interdisciplinary and reiterative approach among biologists, planners, and activists (Baxter 2001).

Focal Species Selection

Although our ultimate goal is to conserve ecosystem function, we designed linkages to serve the needs of particular species. We selected species that covered a wide array of habitat and movement needs in the region, so that planning adequate linkages for these species is expected to cover connectivity needs for the *ecosystems* they represent. We identified species from several taxonomic groups (plants, birds, mammals, invertebrates, fish, amphibians, and reptiles) with 109 focal species selected from across the priority linkages. Our suite of focal species included a few “orthogonal” species, i.e., species that occur within the linkage but not necessarily in the core areas. Planning for such species can help ensure that linkages maintain ecological integrity and are not sterile gauntlets through which other species must pass. Thus, although most of our focal species were “species that need the linkage” (to pass between core areas), the orthogonal taxa represented “species that the linkage needs” (to ensure its integrity).

A taxonomically diverse group of focal species was selected to represent species that are sensitive to habitat loss and fragmentation and to represent the diversity of ecological interactions that can be sustained by successful linkage design. The focal species approach (Beier and Loe 1992) recognizes that species move through and utilize habitat in a wide variety of ways. Focal species were selected because their life history characteristics render them either particularly sensitive to habitat fragmentation or otherwise meaningful to linkage design.

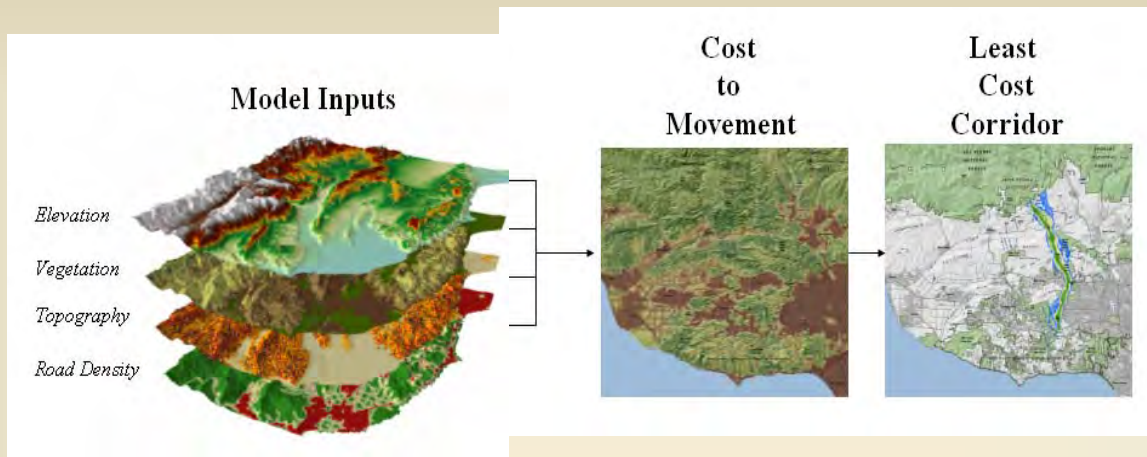


Landscape Permeability Analysis

Landscape permeability analysis is a GIS technique that models the relative cost for a species to move between core areas based on how each species is affected by habitat characteristics, such as slope, elevation, vegetation composition, and road density. This analysis identifies a least-cost corridor, or the best potential route for each species between protected core areas (Walker and Craighead 1997, Craighead et al. 2001, Singleton et al. 2002). The purpose of the analysis was to identify land areas, which would best accommodate all focal species living in or moving through the linkage (Beier et al. 2006). Species used in landscape permeability analysis must be carefully chosen, and were included in this analysis only if:

- We know enough about the movement of the species to reasonably estimate the cost-weighted distance using the data layers available to our analysis.
- The data layers in the analysis reflect the species' ability to move.
- The species occurs in both cores (or historically did so and could be restored) and can potentially move between cores, at least over multiple generations.
- The time scale of gene flow between core areas is shorter than, or not much longer than, the time scale at which currently mapped vegetation is likely to change due to disturbance events and environmental variation (e.g. climatic changes).

The relative cost of travel was assigned for each species based upon its ease of movement through a suite of landscape characteristics (vegetation type, road density, and topographic features). The following spatial data layers were assembled at 30-m resolution: vegetation, roads, elevation, and topographic features. We derived four topographic classes from elevation and slope models: canyon bottoms, ridgelines, flats, or slopes. Road density was measured as kilometers of paved road per square kilometer. Within each data layer, we ranked all categories between 1 (preferred) and 10 (avoided) based on focal species preferences as determined from available literature and expert opinion regarding how movement is facilitated or hindered by natural and urban landscape characteristics. Each input category was ranked and weighted, such that: $(\text{Vegetation} * w\%) + (\text{Road Density} * x\%) + (\text{Topography} * y\%) + (\text{Elevation} * z\%) = \text{Cost to Movement}$, where $w + x + y + z = 100\%$.



Permeability Model Inputs: elevation, vegetation, topography, and road density. Landscape permeability analysis models the relative cost for a species to move between core areas based on how each species is affected by various habitat characteristics.

Weighting allowed the model to capture variation in the influence of each input (vegetation, road density, topography, elevation) on focal species movements. A unique cost surface was thus developed for each species. A corridor function was then performed in GIS to generate a data layer showing the relative degree of permeability between core areas.

For each focal species, the most permeable area of the study window was designated as the least-cost corridor. The least-cost corridor output for all focal species was then combined to generate a Least Cost Union. The biological significance of this Union can best be described as the zone within which all modeled species would encounter the least energy expenditure (i.e., preferred travel route) and the most favorable habitat as they move between targeted protected areas. The output does not identify barriers (which were later identified through fieldwork), mortality risks, dispersal limitations or other biologically significant processes that could prevent a species from successfully reaching a core area. Rather, it identifies the best zone available for focal species movement based on the data layers used in the analyses.

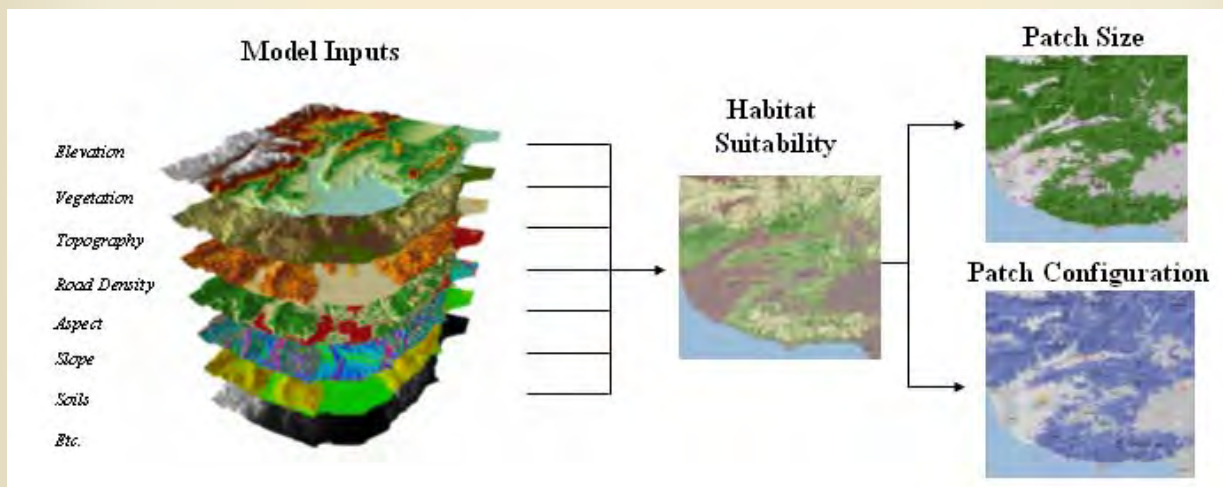
Patch Size & Configuration Analysis

Although the Least-Cost Union identifies the best zone available for movement based on the data layers used in the analyses, it does not address whether suitable habitat in the Union occurs in large enough patches to support viable populations and whether these patches are close enough together to allow for inter-patch dispersal. We therefore conducted patch size and configuration analyses for all focal species (Table 1) and adjusted the boundaries of the Least Cost Union where necessary to enhance the likelihood of movement. Patch size and configuration analyses are particularly important for species that require multiple generations to traverse the linkage. Many species exhibit metapopulation dynamics, whereby the long-term persistence of a local population requires connection to other populations (Hanski and Gilpin 1991). For relatively sedentary species like desert woodrat and terrestrial insects, gene flow will occur over decades through a metapopulation. Thus, the linkage must be able to accommodate metapopulation dynamics to support ecological and evolutionary processes in the long term.

A habitat suitability model formed the basis of the patch size and configuration analyses. Habitat suitability models were developed for each focal species using the literature and expert opinion. Spatial data layers used in the analysis varied by species and included: vegetation, elevation, topographic features, slope, aspect, hydrography, and soils. Using scoring and weighting

schemes similar to those described in the previous section, we generated a spectrum of suitability scores that were divided into five classes using natural breaks: low, low to medium, medium, medium to high, or high. Suitable habitat was identified as all land that scored medium, medium to high, or high.

To identify areas of suitable habitat that were large enough to provide a significant resource for individuals in the linkage, we conducted a patch size analysis. The size of all suitable habitat patches in the planning area were identified and marked as potential cores, patches, or less than a patch. *Potential core areas* were defined as the amount of contiguous suitable habitat necessary to sustain at least 50 individuals. A *patch* was defined as the area of contiguous suitable habitat needed to support at least one male and one female, but less than the potential core area. Potential cores are probably capable of supporting the species for several generations (although with erosion of genetic material if isolated). Patches can support at least one breeding pair of animals (perhaps more if home ranges overlap greatly) and are probably useful to the species if the patch can be linked via dispersal to other patches and core areas.



Model Inputs to Patch Size and Configuration Analyses vary by species. Patch size delineates cores, patches, and stepping-stones of potential habitat. Patch configuration evaluates whether suitable habitat patches and cores are within each species dispersal distance.

To determine whether the distribution of suitable habitat in the linkage supports meta-population processes and allows species to disperse among patches and core areas, we conducted a configuration analysis to identify which patches and core areas were functionally isolated by distances too great for the focal species to traverse. Because the majority of methods used to document dispersal distance underestimate the true value (LaHaye et al. 2001), we assumed each species could disperse twice as far as the longest documented dispersal distance. This assumption is conservative in the sense that it retains habitat patches as potentially important to dispersal for a species even if it may appear to be isolated based on known dispersal distances. Groupings of core areas and patches that were greater than the adopted dispersal distance from other suitable habitat were identified using a unique color.

For each species we compared the configuration and extent of potential cores and patches, relative to the species dispersal ability, to evaluate whether the Least Cost Union was likely to serve the species. If necessary, we added additional habitat to help ensure that the linkage provides sufficient live-in or “move-through” habitat for the species’ needs.

Minimum Linkage Width

While the size and distance among habitats (addressed by patch size and configuration analyses) must be adequate to support species movement, the shape of those habitats also plays a key role. In particular, constriction points—areas where habitats have been narrowed by surrounding development—can prevent organisms from moving through the Least Cost Union. To ensure that functional processes are protected, we imposed a minimum width of 2 km (1.2 mi) for all portions of the final Linkage Design.

For a variety of species, including those we did not formally model, a wide linkage helps ensure availability of appropriate habitat, host plants (e.g., for butterflies), pollinators, and areas with low predation risk. In addition, fires and floods are part of the natural disturbance regime and a wide linkage allows for a semblance of these natural disturbances to operate with minimal constraints from adjacent urban areas. A wide linkage should also enhance the ability of the biota to respond to climate change, and buffer against edge effects.

Field Investigations

We conducted field surveys to ground-truth habitat conditions, document existing barriers and potential passageways, and determine restoration opportunities. Because paved roads present the most formidable barriers, surveyors drove or walked each accessible section of road that transected a linkage. We identified areas where structures could be improved or installed, and opportunities to restore vegetation to improve road crossings and minimize roadkills.

Restoration and Conservation Opportunities and Recommendations

Each Linkage Design provides implementation opportunities for agencies, organizations, and individuals interested in participating in conservation activities in the linkage. Biological and land use summaries include descriptions and maps of vegetation, land cover, land use, roads, road crossings, railroads, and restoration opportunities. Each design also identifies existing planning efforts addressing the conservation and use of natural resources in the planning area. Finally, each provides a flyover animation using aerial imagery, satellite imagery, and digital elevations models, which provide a visualization of the linkage from a landscape perspective.

Appendix B South Coast Wildland Network, Existing Conservation Investments			
Linkage	Conservation Investments the Linkage Serves	Regional Significance	Major Conservation Investors
Tehachapi Connection	Links 4,100,994 acres of existing conservation investments. In the Sierra Nevada this includes Sequoia National Forest, 7 other Forests (Sierra, Inyo, Stanislaus, Eldorado, Tahoe, Plumas, Lassen), 3 National Parks (Sequoia-Kings Canyon, Yosemite, and Lassen), and Red Rock Canyon State Park. In the Sierra Madre, this includes Los Padres National Forest, Carrizo Plain National Monument, Bitter Creek National Wildlife Refuge, Hungry Valley State Vehicular Recreation Area, Wind Wolves Preserve, and others.	The only upland connection between the 2000 mile long Sierra-Cascade mountain system and the 800 mile long complex of the Coastal, Transverse, and Peninsular ranges of the S Coast region.	US Forest Service, Bureau of Land Management, US Fish & Wildlife Service, National Park Service, California State Parks, California Department of Fish and Game, The Wildlands Conservancy, The Nature Conservancy, among others.
Santa Monica-Sierra Madre Connection	Links 1,914,175 acres of existing conservation investments. In the Sierra Madre, this includes Los Padres National Forest, Carrizo Plain National Monument, Bitter Creek National Wildlife Refuge, Hungry Valley State Vehicular Recreation Area, and Wind Wolves Preserve. In the Santa Monica Mountains, this includes Santa Monica Mountains National Recreation Area, Point Mugu State Park, Malibu Creek State Park, Topanga State Park, and others.	The Sierra Madre – Sierra Madre Connection is one of the last remaining coastal to inland connections in the South Coast Ecoegion.	US Forest Service, National Park Service, California State Parks, Santa Monica Mtns Conservancy, Mountain Resources Conservation Authority, Conejo Open Space and Conservation Authority, Rancho Simi Dept of Parks and Rec, LA County Dept of Parks and Rec, The Nature Conservancy, among others.
Sierra Madre – Castaic Connection	Links 1,665,624 acres of existing conservation investments. In the Sierra Madre, this includes Los Padres National Forest, Carrizo Plain National Monument, Bitter Creek National Wildlife Refuge, Hungry Valley State Vehicular Recreation Area, and Wind Wolves Preserve. In the Castaic Ranges, this includes Angeles National Forest, Castaic Lake State Recreation Area, and others.	This linkage covers diverse ecological settings and encompasses several major vegetation types, including desert, forest, and coastal vegetation communities.	US Forest Service, US Fish & Wildlife Service, California State Parks, The Wildlands Conservancy, Ventura County Dept. of Parks & Recreation, and The Nature Conservancy, among others
San Gabriel-Castaic Connection	Links 661,023 acres of existing conservation investments. In the San Gabriel Mountains and Castaic Ranges, this includes Angeles National Forest, and Castaic Lake State Recreation Area, and others.	This linkage encompasses a unique transition zone between coastal and desert communities. The Santa Clara River, one of the last free-flowing rivers in southern California, is an integral part of the linkage.	US Forest Service, Bureau of Land Management, Santa Monica Mountains Conservancy, The Nature Conservancy, Rivers and Mountains Conservancy, Los Angeles County, City of Santa Clarita, among others.

San Gabriel – San Bernardino Connection	Links 948,451 acres of existing conservation investments. In the San Gabriel Mountains, this includes the Angeles National Forest. In the San Bernardino Mountains, this includes San Bernardino National Forest, Silverwood Lake State Recreation Area, Mission Creek Preserve, Pipes Canyon Preserve, Oak Glen Preserve and others.	The San Andreas Rift Zone runs through the linkage, producing steep rugged topography and a variety of microhabitats that support a rich diversity of natural communities.	US Forest Service, California State Parks, Bureau of Land Management, California Department of Fish and Game, The Wildlands Conservancy, among others.
San Bernardino – Granite Connection	Links 3,272,463 acres of existing conservation investments. In the San Bernardino Mountains, this includes San Bernardino National Forest, Silverwood Lake State Recreation Area, Mission Creek Preserve, Pipes Canyon Preserve, Oak Glen Preserve and others. In the Granite, Ord, and Rodman Mountains this includes land administered by the Bureau of Land Management, and others.	Ecoregional connection linking the South Coast Ecoregion to the Mojave Ecoregion.	US Forest Service, Bureau of Land Management, California State Parks, California Department of Fish and Game, The Wildlands Conservancy, among others.
San Bernardino – Little San Bernardino	Links 3,236,289 acres of existing conservation investments. In the San Bernardino Mountains, this includes San Bernardino National Forest, Silverwood Lake State Recreation Area, Mission Creek Preserve, Pipes Canyon Preserve, Oak Glen Preserve and others. In the Little San Bernardino Mountains, this includes Joshua Tree National Park, and Big Morongo Canyon Preserve, and others.	Connects the South Coast Ecoregion to the Mojave and Sonoran Desert ecoregions, encompasses a unique variety of both coastal and desert habitats.	San Bernardino National Forest, Bureau of Land Management, The Wildlands Conservancy, Coachella Valley and Mountains Conservancy, among others.
San Bernardino – San Jacinto	Links 656,423 acres of existing conservation investments. In the San Bernardino Mountains, this includes San Bernardino National Forest, Silverwood Lake State Recreation Area, Mission Creek Preserve, Pipes Canyon Preserve, Oak Glen Preserve and others. In the San Jacinto Mountains, this includes San Bernardino National Forest, Mount San Jacinto State Park, and others.	San Bernardino Mountains are part of the Transverse Ranges and feature the highest peak in southern California, Mount San Gorgonio, while the San Jacinto Mountains are the highest and northernmost of the Peninsular Ranges.	US Forest Service, Bureau of Land Management, California State Parks, The Wildlands Conservancy, Coachella Valley Mountains Conservancy, Friends of the Desert Mountains, among others.
Palomar – San Jacinto – Santa Rosa Connection	Links 826,678.4 acres of existing conservation investments. In the San Jacinto Mountains, this includes San Bernardino National Forest, Mount San Jacinto State Park, and others. In the Palomar Mountains, this includes Cleveland National Forest and Palomar Mountain State Park, and others. In the Santa Rosa Mountains, this includes Anza Borrego Desert State Park, Santa Rosa and San Jacinto Mountains National Monument, and others.	Elements of both coastal and desert habitats occur side by side in many areas of this linkage, serving wildlife such as mountain lion, mule deer, Aguanga kangaroo rat, western toad, and the endangered quino checkerspot butterfly.	US Forest Service, Bureau of Land Management, California State Parks, County of San Diego, The Nature Conservancy, among others.

Santa Ana – Palomar Connection	Links 199,904 acres of existing conservation investments. In the Santa Ana Mountains, this includes Cleveland National Forest, Santa Margarita Ecological Reserve, Santa Rosa Ecological Plateau, Camp Pendleton, and others. In the Palomar Mountains, this includes Cleveland National Forest and Palomar Mountain State Park, and others.	The Santa Margarita River, the longest intact stream corridor in southern California, winds through the linkage.	US Forest Service, Bureau of Land Management, California State Parks, County of San Diego, San Diego State University Field Stations Program, The Nature Conservancy, among others.
Peninsular – Borrego Connection	Links 845,224 acres of existing conservation investments. In the Peninsular Ranges, this includes Cleveland National Forest, Cuyamaca Rancho State Park, and others. In the Santa Rosa Mountains, this includes Anza Borrego Desert State Park, Santa Rosa and San Jacinto Mountains National Monument, and others.	The linkage contains a number of rare and sensitive natural communities, including coastal sage scrub, grassland, meadow, palm oasis, coast live oak forest, and Engelmann oak woodland	US Forest Service, Bureau of Land Management, California State Parks, Anza Borrego Foundation and Institute, The Nature Conservancy, among others.
Otay Mountain–Cerro San Ysidro linkage	In the United States this includes, Otay Mountain Wilderness Area, administered by the BLM, Laguna Mountains of Cleveland National Forest, and others. In Baja California this includes Cerro San Ysidro.	Otay Mountain in southern California and Cerra San Ysidro in Baja represent sky islands of endemic plant species, and the last cross-border coastal sage scrub linkage.	US Forest Service, Bureau of Land Management, California State Parks, The Nature Conservancy, Conabio, Pronatura, and Universidad Autonoma de Baja California, among others.
La Posta linkage	This linkages serves to connect the Campo Valley in the United States with the El Hongo Valley in Baja California.	Occurs in an ecological transition zone between the coast and the desert and between mountain and inland valley biomes.	US Forest Service, Bureau of Land Management, California State Parks, The Nature Conservancy, Conabio, Pronatura, and Universidad Autonoma de Baja California, among others.
Parque-to-Park linkage	In the United States, this includes Anza Borrego Desert State Park, Santa Rosa and San Jacinto Mountains National Monument, and others. In the Sierra Juarez Mountains in Baja California, this includes Parque Constitucion de 1857.	Completing this connection will allow the endangered Peninsular bighorn sheep to repopulate the Sierra Juarez in northern Baja.	US Forest Service, Bureau of Land Management, California State Parks, The Nature Conservancy, Conabio, Pronatura, and Universidad Autonoma de Baja California, among others.

Appendix C Literature Cited

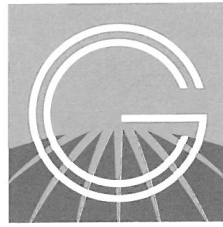
- Allan, J.D. 1995. Stream ecology: structure and function of running waters, Chapman and Hall, New York.
- Allen, J.C. 2001. Summary of Ecological Findings for Malibu. California Coastal Commission.
- Barnum, S.A. 2003. Identifying the best locations along highways to provide safe crossing opportunities for wildlife: a handbook for highway planners and designers. Colorado Department of Transportation.
- Barton, D.R., W.D. Taylor, and R.M. Biette. 1985. Dimensions of riparian buffer strips required to maintain trout habitat in southern Ontario (Canada) streams. *North American Journal of Fisheries Management* 5:364-378.
- Baxter, C. 2001. An integrated approach to bird conservation in the Mississippi Alluvial Valley. Keynote Address. Riparian Habitat and Floodplains Conference March 12-14, 2001, Sacramento, California.
- Beier, P., K. L. Penrod, C. Luke, W. D. Spencer, and C. Cabañero. 2006. South Coast Missing Linkages: Restoring connectivity to wildlands in the largest metropolitan area in the United States. Chapter In K R. Crooks and MA Sanjayan, editors, *Connectivity conservation: maintaining connections for nature*. Cambridge University Press.
- Beier, P. and R. Barrett. 1993. The cougar in the Santa Ana Mountain Range, California. Final Report for Orange County Cooperative Mountain Lion Study.
- Beier, P., and S. Loe. 1992. A checklist for evaluating impacts to wildlife movement corridors. *Wildlife Society Bulletin* 20:434-440.
- Borowske, J.R. and M.E. Heitlinger. 1981. Survey of native prairie on railroad rights-of-way in Minnesota. *Transportation Research Records (Washington)* 822:22-6.
- Brosofske, K.D., J. Chen, R.J. Naiman, and J.R. Franklin. 1997. Harvesting effects on microclimatic gradients from small streams to uplands in western Washington. *Ecological Applications* 7:1188-1200.
- Bureau of Land Management. 2005. Environmental Impact Report and Statement for the West Mojave Plan and California Desert Conservation Area Plan Amendment.
- Bureau of Land Management. 2003. Draft Environmental Impact Report and Statement for the West Mojave Plan and California Desert Conservation Area Plan Amendment.
- Cain, A.T., V.R. Tuovila, D.G. Hewitt, and M.E. Tewes. 2003. Effects of a highway and mitigation projects on bobcats in Southern Texas. *Biological Conservation* 114: 189-197.
- California Department of Fish and Game. 2005. Rare Find California Natural Diversity Database.
- Clevenger, A.P., and J. Wierzchowski. 2006. Maintaining and restoring connectivity in landscapes fragmented by roads. Chapter in K. R. Crooks and M. A. Sanjayan, editors. *Connectivity conservation: maintaining connections for nature*. Oxford University Press.
- Clevenger, A.P., and N. Waltho. 2005. Performance indices to identify attributes of highway crossing structures facilitating movement of large mammals. *Biological Conservation* 121: 453-464.
- Clevenger, A.P., B. Chruszcz, and K.E. Gunson. 2003. Spatial patterns and factors influencing small vertebrate fauna road-kill aggregations. *Biological Conservation* 109: 15-26.
- Clevenger, A.P., B. Chruszcz, and K. Gunson. 2001. Drainage culverts as habitat linkages and factors affecting passage by mammals. *Journal of Applied Ecology* 38: 1340-1349.
- Clevenger, A.P., and N. Waltho. 2000. Factors influencing the effectiveness of wildlife

- underpasses in Banff National Park, Alberta, Canada. *Conservation Biology* 14: 47-56.
- Coachella Valley Association of Governments(CVAG). 2004. Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan Public Review Draft October 15, 20004. Volume 1 The Plan. Prepared for Coachella Valley Association of Governments, prepared by Coachella Valley Mountains Conservancy.
- County of Riverside. 2002. Western Riverside County Multiple Species Habitat Conservation Plan Draft EIR/EIS. Riverside County Integrated Project.
- Craighead, A.C., E. Roberts, and F. L. Craighead. 2001. Bozeman Pass Wildlife Linkage and Highway Safety Study. Prepared for American Wildlands, <http://www.wildlands.org/research.html>.
- Dodd, C.K, W.J. Barichivich, and L.L. Smith. 2004. Effectiveness of a barrier wall and culverts in reducing wildlife mortality on a heavily traveled highway in Florida. *Biological Conservation* 118: 619-631.
- Edelman, P. 1991. Critical Wildlife Corridor/Habitat Linkage Areas between the Santa Susana Mountains, the Simi Hills and the Santa Monica Mountains. Prepared for The Nature Conservancy.
- Evink, G.L. 2002. Interaction between roadways and wildlife ecology. National Academy Press, Washington, D.C.
- Fisher, R., and K. Crooks. 2001. Baseline biodiversity survey for the Tenaja Corridor and southern Santa Ana Mountains. U.S. Geological Survey Biological Resources Division and Department of Biology, San Diego State University, San Diego, California.
- Forman, R.T.T., D. Sperling, J.A. Bissonette, A.P. Clevenger, C.D. Cutshall, V.H. Dale, L. Fahrig, R. France, C.R. Goldman, K. Heanue, J.A. Jones, F.J. Swanson, T. Turrentine, and T.C. Winter. 2003. *Road Ecology: Science and Solutions*. Island Press, Washington, D.C.
- Forman, R.T.T. 1995. *Land Mosaics: The Ecology of Landscapes and Regions*. Cambridge University Press, Cambridge, England.
- Gordon, K.M. et al. 2001. Motorist response to deer-sensing system in western Wyoming. In: The proceeding of the international conference of wildlife ecology and transportation. Keystone, Colorado.
- Hanski, I., and M. Gilpin. 1991. *Metapopulation Dynamics*. Academic Press, London.
- Huijser, M. P. and P. T. McGowen. 2003. Overview of animal detection and animal warning systems in North America and Europe. Pp. 368-382, in: *The International Conference on Ecology and Transportation (ICOET)*; August 24-29, 2003; Lake Placid, NY.
- Kohn, M.H., E.C. York, D.A. Kamradt, G. Haught, R.M. Sauvajot, and R.K. Wayne. 1999. Estimating population size by genotyping faeces. *Proc. Royal Soc. (Series B)* 266: 657-663.
- Kreuper, D.J. 1992. Effects of land use on western riparian ecosystems. In: D.M. Finch and P.W. Stangel, eds. *Status and Management of Migratory Birds*. U.S.D.A. Forest Service General Technical Report RM-229.
- LaHaye, W.S., R.J. Gutierrez, and J.R. Dunk. 2001. Natal dispersal of the spotted owl in southern California: dispersal profile of an insular population. *Condor* 103:691-700.
- Little, S.J. 2003. The influence of predator-prey relationships on wildlife passage evaluation. *ICOET 2003*.
- LSA Associates, Inc. 2004. *Final Wildlife Corridor Assessment Ventura State Route 118*. Prepared for CalTrans District 7 Division of Environmental Planning. Prepared by LSA Associates, Inc.
- Marzluff, J.M., and K. Ewing. 2001. Restoration of fragmented landscapes for the conservation of birds: a general framework and specific recommendations for urbanizing landscapes. *Restoration Ecology*. 9:280-292.

- Mata, C., I. Hervas, J. Herranz, F. Suarez, and J.E. Malo. 2005. Complementary use by vertebrates of crossing structures along a fences Spanish motorway. *Biological Conservation* 124: 397-405.
- McDonald, W. and C.C. St Clair. 2004. Elements that promote highway crossing structure use by small mammals in Banff National Park. *Journal of Applied Ecology* 41:82-93.
- Messmer, T.A., C.W. Hedricks, and P.W. Klimack. 2000. Modifying human behavior to reduce wildlife-vehicle collisions using temporary signing. In: *Wildlife and highways: seeking solutions to an ecological and socio-economic dilemma*. September 12-16: Nashville, TN.
- Myers, S.J., S. Ogg, and L.F. LaPré. 1996. Potential wildlife corridors in the San Gorgonio Pass: Initial Report. Prepared for The Wildlands Conservancy; prepared by Tierra Madre Consultants, Inc.
- Ng, S.J., J.W. Dole, R.M. Sauvajot, S.P.D. Riley, and T.J. Valone. 2004. Use of highway undercrossings by wildlife in southern California. *Biological Conservation* 115, pp. 499-507.
- Ng, S.J. 2000. Wildlife use of underpasses and culverts crossing beneath highways in southern California. MS Thesis, California State University Northridge, Northridge, CA. 58pp.
- Psomas. 2002. Regional wildlife corridors, wildlife utilization, and open space in the Simi Valley region, Ventura and Los Angeles Counties, California, revised draft, June 17. Prepared for Unocal Land and Development Company by Psomas Natural Resources Group. Costa Mesa, California. June 17.
- Reed, D.M. and J.A. Schwarzmeier. 1978. The prairie corridor concept: possibilities for planning large scale preservation and restoration. In Lewin and Landers (eds) *Proceedings of the Fifth Midwest Prairie Conference*, pp. 158-65. Iowa State University, Ames, Iowa, USA.
- Reed, D.F. 1981. Effectiveness of highway lighting in reducing deer-vehicle accidents. *Journal of Wildlife Management*. 45:1981.
- Riley, S.P.D., J.P. Pollinger, R.M. Sauvajot, E.C. York, C. Bromley, T.K. Fuller, and R.K. Wayne. 2006a. A southern California freeway is a physical and social barrier to gene flow in carnivores. *Molecular Ecology* 15: 1733-1741.
- Riley, S.P.D., R.M. Sauvajot, T.K. Fuller, E.C. York, D.A. Kamradt, C. Bromley, and R.K. Wayne. 2003. Effects of urbanization and habitat fragmentation on Bobcats and coyotes in southern California. *Conservation Biology* 17:566-576.
- Robinson, M., P. McGowen, A. Habets, and C. Strong. 2002. Safety Applications of ITS in Rural Areas. Section 7.1.1. Science Applications International Corporation, McLean, VA, USA.
- Ruediger, B. 2001. High, wide, and handsome: designing more effective wildlife and fish crossings for roads and highways. ICOET 2001.
- Sauvajot, R.M., E.C. York, T.K. Fuller, H.S. Kim, D.A. Kamradt, and R.K. Wayne. 2000. Distribution and status of carnivores in the Santa Monica Mountains, California: preliminary results from radio telemetry and remote survey cameras. In: Keeley, J.E., M.B. Baer-Keeley, and C.J. Fotheringham (Eds.), *Second interface between Ecology and Land Development in California*. US Geological Survey, Sacramento, CA. pp. 113-123.
- Singleton, P.H., W.L. Gaines, and J.F. Lehmkuhl. 2002. Landscape Permeability for Large Carnivores in Washington: A Geographic Information System weighted-distance and least-cost corridor assessment. USDA Forest Service, Pacific Northwest Research Station, Research Paper PNW-RP-549.
- Soulé, M.E. 1989. USDI-National Park Service Proposed Land Exchange: Wildlife Corridors. Unofficially released report prepared for the Santa Monica Mountains National Recreation Area.

- Sweaner, L., Logan, K., Bauer, J., and W. Boyce. 2003. Southern California Puma Project June 2003 Progress Report for Interagency Agreement No. C0043040 (California State Parks and the University of California, Davis)
- USDA Forest Service. 2004. Draft Environmental Impact Statement for Revised Land Management Plans: Angeles National Forest, Cleveland National Forest, Los Padres National Forest, and San Bernardino National Forest. Pacific Southwest Region, R5-MB-045, May 2004.
- Walker, R. and L. Craighead. 1997. Analyzing Wildlife Movement Corridors in Montana Using GIS. ESRI User Conference Proceedings.
- White, M.D., J.A. Stallcup, W.D. Spencer, J.R. Strittholt, and G.E. Heilman. 2003. Conservation significance of Tejon Ranch: a biogeographic crossroads. Unpublished report prepared by the Conservation Biology Institute for Environment Now. August. <http://www.consbio.org/cbi/pubs/index.htm>
- Wilson, J.D. and M.E. Dorcas. 2003. Effects of habitat disturbance on stream salamanders: Implications for buffer zones and watershed management. *Conservation Biology* 17: 763-771.
- Yanes, M., J.M. Velasco, and F. Suárez. 1995. Permeability of roads and railways to vertebrates: the importance of culverts. *Biological Conservation* 71: 217-222.

Preferred Citation: South Coast Wildlands. 2008. South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion. Produced in cooperation with partners in the South Coast Missing Linkages Initiative. Available online at <http://www.scwildlands.org>.



GATEWAY CITIES
COUNCIL OF GOVERNMENTS

February 3, 2016

Artesia

Avalon

Bell

Bellflower

Bell Gardens

Cerritos

Commerce

Compton

Cudahy

Downey

Hawaiian Gardens

Huntington Park

Industry

La Habra Heights

La Mirada

Lakewood

Long Beach

Lynwood

Maywood

Montebello

Norwalk

Paramount

Pico Rivera

Santa Fe Springs

Signal Hill

South Gate

Vernon

Whittier

County of Los Angeles

Port of Long Beach

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

Dear Mr. Ikhata:

**Gateway Cities COG Staff Comments on the 2016-2040 Draft Regional
Transportation Plan and Sustainable Communities Strategy (RTP/SCS)**

Thank you for the opportunity to review and comment on the Draft 2016-2040 RTP/SCS. SCAG is to be commended for developing a plan with broad support during a time of rapid evolution in regional planning goals and practices. The 2016 Draft RTP/SCS includes a wide variety of strategies to move the region towards sustainability, enhance livability and prosperity, all while meeting federal and statewide air quality and greenhouse gas (GHG) emission reduction targets.

Please know that we are most appreciative of your personal visit to the Gateway Cities COG Board meeting of November 2015. We also appreciate the briefing provided on January 13, 2016 for our COG elected officials.

We have the following three comments on the Draft RTP/SCS:

1) Technical Foundation for Local Land Use Analysis and Plan Investments

Your staff has met many times with our staff and with the Planning Directors of our member jurisdictions to discuss the methodology of plan development. We understand that, of necessity, SCAG must make certain assumptions about where growth will occur within our jurisdictions, even though these assumptions might differ from the jurisdictions' own plans, and that our jurisdictions will not be bound by SCAG's assumptions.

In order to meet regional goals, the Draft RTP/SCS recommends and assumes many different approaches to "sustainable" planning to reduce GHG – including strategies such as complete streets, "complete

Mr. Hasan Ikhata, Executive Director
February 3, 2016
Page 2

communities,” sustainable zoning codes, and neighborhood mobility areas, among others.

Our concern is whether these strategies rest on a solid technical and analytical foundation. For example, the plan in some places refers to “urban/compact/suburban” development, but to the best of our understanding, these three categories do not directly correspond to the multiple place types in the Scenario Planning Model. It thus appears that different land use categories are used to underpin different analyses in the plan, rather than all categories being consistent.

This analytical foundation is important because of the RTP/SCS’s growing emphasis on active transportation, especially bike investments, infrastructure, and programs. It is difficult to be confident that these investments are appropriate if they are not well supported by analysis showing they can make a real difference in reaching air quality or GHG goals. As a region, we shouldn’t invest in a mode unless it can pull its weight in terms of plan performance, or be appropriately funded in concert with other strategies.

2) Inclusion of Gateway Cities Future Transit Corridors in High-Quality Transit Areas

Exhibit 5.1 presents the high-quality transit areas (HQTA) projected for 2040. It appears that several of the planned light-rail corridors for the Gateway Cities are not shown as HQTA on this map, which is surprising. We believe the exhibit should be amended to include the corridors for the following projects:

- West Santa Ana Branch (Eco Rapid Transit Project)
- Green Line Eastern Extension (Norwalk)
- Gold Line Eastside Extension, Phase II – Washington Blvd. Alignment.

3) Inclusion of SR 60/I-605 Interchange Direct HOV Connectors

As you know, the Gateway Cities COG has worked closely with our member jurisdictions to develop an extensive, long-range Strategic Transportation Plan. In addition, we have worked with LA County MTA to express our priorities for major projects to be included in a potential sales tax ballot measure later this year. Due to the format in which the 2016-2040 RTP/SCS project lists are presented, it is difficult to be sure whether all of our projects are appropriately included in the regional plan. Based on our review, it appears that the SR 60/I-605 HOV direct connector project is

Mr. Hasan Ikhata, Executive Director
February 3, 2016
Page 3

listed only in the Strategic Plan, which indicates that it does not have any funding source identified. This project is among the Gateway Cities COG's priorities for the potential 2016 MTA ballot measure and thus should be included in the financially constrained plan.

Thank you very much for considering our comments on the Draft 2016-2040 RTP/SCS. I look forward to our continued partnership in planning.

Sincerely,

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

Richard Powers
Executive Director

Highgrove has an ideal location for a Metrolink Station Jan. 27, 2016

We have written support from residents, business owners, civic organizations, and Senators from both Riverside and San Bernardino Counties who have supported a Metrolink station at Highgrove for the last 14 years. This includes written support from the cities of Grand Terrace, Loma Linda and Colton all of which are in San Bernardino County.

Highgrove is in the un-incorporated part of Riverside County near the county line and is 7 rail miles south of the San Bernardino Metrolink station and 3.5 rail miles north of the Riverside Metrolink station. The land needed for a Metrolink station is 17.22 acres of vacant land that is owned by and under the jurisdiction of the Riverside County Transportation Commission that could easily be used for a parking lot for commuters who want to travel between San Bernardino and Riverside Counties or to Oceanside where there are connections to San Diego and Los Angeles.

The 17.22 acres are already owned by the Riverside County Transportation Commission and is a pie shaped piece of vacant property that RCTC bought for a curved track to connect the new Perris Valley Line track to the BNSF main line track that is the Inland Empire/Orange County Line. The Inland Empire/Orange County Line has daily 7 day a week Metrolink trains that pass right next to the west side of RCTC's property at Highgrove that go between the two counties but RCTC has opposed this station location for the last 14 years. RCTC has constructed a curved track through this property but they only need the width of the track to connect the Perris Valley Line to the Inland Empire/Orange County Line. The remainder of this vacant property is the location needed for a Metrolink parking lot and RCTC already has \$5,347,500.00 invested in this property they do not need for the Perris Valley Line connection, but they refuse to build a parking lot on their excess property. This parking lot/station is the most efficient use of transportation funds because the IE/OC Metrolink timetable is already in place, the existing Metrolink trains go in both directions between the 2 counties every day including week-ends that is right next to RCTC's property, and **all that is needed is a parking lot and station platform**. There is a paved entry road for parking on the inside of the curved track at the base of the new Iowa Ave. overpass and Villa St. is a paved road for access for parking on the outside of the curved track. Within a **2 mile radius** of the Highgrove location there are over 33,000 residents and that does not include the 1,409 new homes that are being built **1 mile** east of the Highgrove station location. New residents are now living in phase 1 with phase two being sold in the new Spring Mountain Ranch development.

It is important to understand that a parking lot/station at Highgrove will not interfere with the Perris Valley Line because the connecting curved track is already in place. The Marlborough Ave. station on the Perris Valley Line is almost completed but RCTC also owns 17.22 acres only one mile away for the curved track at Highgrove. Also very important is that commuters from the new Marlborough Ave. Metrolink station on the Perris Valley Line will not be able to get to San Bernardino because the Perris Valley Metrolink trains will only go to Perris or Riverside.

But the **west side** of RCTC's property at Highgrove is where the daily Metrolink trains operate between Riverside and San Bernardino Counties. Our Congressman and 3 of his staff visited this location and Congressman Takano feels that even though RCTC owns 2 properties only one mile apart, both Metrolink stations are needed because they have different destinations.

Please visit our website: www.highgrovehappenings and review the **map; concept map** of the Highgrove location where all of the area between Villa St. and the Drainage Channel is vacant land except for the curved red line which is the track that connects the two railroads (the parking lines do not exist but have been added as a concept), **Supporting Docs; 8 years of comments; Station costs; uneconomic remnant** (that shows RCTC is only charging 38% of the cost they paid for the Highgrove property to the Perris Valley Line (which is \$3,277,500.00 instead of \$8,625,000.00) meaning they have \$5,347,500 invested in excess vacant land at Highgrove, and; **RCTC's inappropriate actions to prevent a Highgrove Metrolink Station 2004 to 2010**. This project meets the requirements of the RTP/SCS because it will address the "transportation and land use challenges of the region" on both sides of the Riverside San Bernardino County line that is already connected to the Metrolink commuter rail system and is only ½ mile from the Center St. exit of the I-215 freeway.

R. A. "Barney" Barnett, Chmn. Highgrove Municipal Advisory Council



1405 N IMPERIAL AVE SUITE 1
EL CENTRO, CA 92243-2875
PHONE: (760) 592-4494
FAX: (760) 592-4497

January 29, 2016

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

SUBJECT: Draft 2016 Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Aguirre:

Thank you for the opportunity to review the Draft 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We have no specific comments at this time. We believe that the Southern California Association of Governments staff has done a great job to incorporate our Imperial County planned projects, land use and sustainable community strategies. The Draft 2016 RTP/SCS meets all of our state and federal mandates for metropolitan planning and achieving greenhouse gas emission reduction goals.

If you have any questions regarding this matter, please contact Virginia Mendoza at (760) 592-4494.

Sincerely,

A handwritten signature in blue ink that reads 'Mark Baza'.

MARK BAZA
Executive Director

MB/vm



INLAND EMPIRE BIKING ALLIANCE

Draft 2016 RTP/SCS Comments

Attn: Courtney Aguirre

Southern California Association of Governments

818 W. 7th Street, 12th Floor

Los Angeles, CA 90017

Inland Empire Biking Alliance

PO Box 9266

Redlands, CA 92375

Dear SCAG,

We are writing on behalf of the Inland Empire Biking Alliance. Our organization is a registered 501(c)(3) nonprofit dedicated to addressing the needs and concerns of bicyclists in the Inland Empire. Our mission is to ensure that everyone has a safe, convenient place to ride, no matter what or why they're riding. Our growing group of members come from all rides of life and are equally as passionate as we are about seeing bicycling in the most dangerous area of the state be improved.

Our letter is in response to the Draft 2016 Regional Transportation Plan/Sustainable Communities Strategy document that has been released and available for review. We have reviewed the document and have developed comments in response to what is and is not proposed. There are several highlights to be noted, including the regional network of non-motorized paths. However, we are also disappointed by quite a lot of the proposals and are especially flummoxed to see that more is not being done to encourage the use of bicycles for commuters. As cities and regions around the world continue to provide ever-increasing amenities for bicyclists and are seeing success in achieving reductions in congestion and improved air quality due to increased use of bicycles, it is inconceivable as to why a much stronger promotion of bicycling as a solution to the region's problems is not being pursued in 2016. Such an oversight is inexcusable and represents a failure of vision and leadership at several levels.

We are grouping our comments below in relation to several of the Appendices of the 2016 RTP/SCS.

Active Transportation

The Active Transportation (AT) Appendix provides a little depth to what is otherwise a topic that receives far too little attention in the 2016 RTP/SCS. However, while the Appendix paints a picture of a blossoming and encouraging environment for active transportation and bicycling in the SCAG region, it is short on the details pertaining to planning and funding, especially for the Inland Empire. Turning to the Project List Appendix also is exceedingly light on specifics, especially of the greenway network laid out in Exhibit 12 Regional Bikeway Network of the AT Appendix. While a few trails are identified, they are



absolutely dwarfed by plans to increase automobile capacity and the actual word “greenway” appears only twice in the entire Project List Appendix; Figure 1. Additionally, it’s uncertain how many of the few trails identified will provide linkages that aren’t primarily recreational in focus.

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County	System	FTIP ID	Route #	Description	Project Cost (\$1,000's)
LOS ANGELES	LOCAL HIGHWAY	LA003092	0	VALLEYVIEW AVE GRADE SEPARATION (NSF) DUALWAY SOUTH OF STAGE RD. CONSTRUCT A GRADE SEPARATION FOR VALLEYVIEW AVE FROM EXISTING (NSF) TRACKS BY CONSTRUCTING A HWY UNDERPASS (PNO 317) (0/22).	\$75,177
LOS ANGELES	LOCAL HIGHWAY	LA003095	0	CONSTRUCT EASTERN MICHIGAN AVE NEIGHBORHOOD GREENWAY IN VICINITY OF EDSON LANGUAGE ACADEMY. CROSSWALK STOPPING AT CRITICAL INTERSECTIONS, CURB EXTENSIONS AND DUAL CURB RAMP, AND WAITING AND SHARED LANE MARKINGS. EDUCATE STUDENTS AND PARENTS. CREATE DROP-OFF AND PICK-UP PLAN.	\$48
LOS ANGELES	LOCAL HIGHWAY	LA003142	0	4TH ST (NSF) PROJECT WILL WIDEN THE EAST SIDEWALK OF 4TH ST. UP TO 8 FT BETWEEN BROADWAY AND COLORADO (0.5 MILES). THE PROJECT WILL ALSO ADD CLASS B BIKE LANES ON 4TH ST., BETWEEN BROADWAY AND OLYMPIC DR., INCLUDING BIKE SHARROW STRIPING ON THE 4TH ST. BRIDGE OVER THE 140 FREEWAY (0.4 MILES).	\$750
LOS ANGELES	LOCAL HIGHWAY	LA990352	0	PHILADELPHIA STREET STABILIZATION CALIFORNIA IN-LINE ADJACENT (TEAZER #453)... TOLL CREDITS OF \$897 WILL BE USED TO MATCH FY15 FEDERAL FUNDS FOR THE CON PHASE.	\$7,776
LOS ANGELES	LOCAL HIGHWAY	LAF532	0	SCHOOL BASED BICYCLE TRAINING, SANTA MONICA. PROVIDE TRAINING FOR STUDENTS AT 2 MIDDLE SCHOOLS ON HOW TO SAFELY RIDE BICYCLE ON CITY STREETS TO ACCESS SCHOOL.	\$130
LOS ANGELES	LOCAL HIGHWAY	LAF528	0	CITY OF SANTA MONICA ITS IMPROVEMENTS. SANTA MONICA REAL TIME EACH PARKING SIGNS. THIS PROJECT WILL MAKE INFORMATION REGARDING BEACH PARKING AVAILABLE TO MOTORISTS DESTINED FOR SANTA MONICA BEACH PARKING LOTS. TOLL CREDIT BEING USED IN FY14 FOR \$57 IN CONS...	\$1,619
LOS ANGELES	LOCAL HIGHWAY	LAF3506	0	BIKE NETWORK LINKAGES TO EXPOSITION LIGHT RAIL PROJECT. BIKE NETWORK ENHANCEMENTS TO SUPPORT EXPOSITION LINE. INCREASED SAFETY AND CONFORMANCE WITH SIGNAL DETECTION HIGH VISIBLE LANE MARKINGS AND NEW BIKE RACKS. THE PROJECT AREA IS LOCATED THROUGHOUT THE CITY OF SANTA MONICA AND NO MORE THAN TWO MILES FROM THE PROPOSED EXPOSITION LIGHT RAIL LINE STATIONS.	\$3,429
LOS ANGELES	LOCAL HIGHWAY	LAF3703	0	A NO NET NEW TRIPS. BIKESHARE TO LOC. DEVELOP A TDM TOOLKIT WITH ONLINE MULTI-MODAL MOBILITY INFORMATION, BIKE ACCOMMODATIONS, 300 WALKING ROLLING CARS, 75 BIKE LOCKERS & INCENTIVE PROGRAMS FOR EMPLOYERS, SCHOOLS & NEIGHBORHOODS WITHIN THE CITY OF SANTA MONICA IN DEMAND MANAGEMENT AREAS AS DEFINED IN THE LAND USE AND CIRCULATION ELEMENT (LUCE) ADOPTED JULY 2010.	\$840
LOS ANGELES	LOCAL HIGHWAY	LAF524	0	IMPLEMENTATION OF A SANTA MONICA BIKE SHARE PROGRAM INCLUDING THE PURCHASE AND INSTALLATION OF 250 BIKES AND 25 DOCKING STATIONS TO BE LOCATED AT ACTIVITY NODES AND TRANSIT STATIONS INCLUDING EXPO LIGHT STATIONS. TWO VEHICLES WILL BE ACQUIRED AND OUTFITTED TO TRANSPORT AND REDISTRIBUTE BICYCLES BETWEEN STATIONS AS NEEDED. THE BIKE SHARE DOCKING STATIONS WILL BE COLLOCATED WHERE APPROPRIATE AND INCLUDE A TECHNOLOGY PLATFORM FOR SYSTEM OPERATION THROUGH THE WEB AND SMART PHONE APPLICATIONS.	\$2,403
LOS ANGELES	LOCAL HIGHWAY	LAF582	0	EXPO LIGHT COLORADO AVENUE TRANSIT VILLAGE ENHANCEMENTS. THIS PROJECT IS LOCATED IN SANTA MONICA ALONG COLORADO HWY BETWEEN 4TH ST AND 19TH ST. IT WILL INSTALL PARTIAL PARKWAYS ON THE NORTH SIDE TO MATCH THE SOUTH SIDE, SIK ARTISTIC DESIGN FENCES AT T-JUNCTIONS, AND A TRACKWAY VISIBILITY TREATMENT ALONG THE CORRIDOR. FUNDS ARE REQUESTED FOR CONSTRUCTION AND INSTALLATION COSTS. THE ORIGINAL SCOPE OF THE PROJECT WAS REDUCED BY ELIMINATING 50% OF PARKWAYS.	\$1236
LOS ANGELES	LOCAL HIGHWAY	LAF7320	0	SANTA MONICA - SANTA MONICA SIGNAL SYNC IMPROVEMENTS. (B) ENHANCES EXISTING TRAFFIC MANAGEMENT SYSTEM WITH INSTALLATION OF UP TO SIXTY (60) VIDEO DETECTION CAMERAS (2-4 CAMERAS AT INTERSECTION AT WHENY LINE (20) CRITICAL INTERSECTIONS ALONG WITH SIGNAL CONTROLLED CLEAN IN SANTA MONICA, MAIN ST, OCEAN PARK BL, MONTANA AV, AND 19TH ST. (C) THE PROJECT WILL ALSO INCLUDE STRIPING AND STOPPING TO MINIMIZE TURN MOVEMENT CONFLICTS BETWEEN MIXED FLOW AND BICYCLE LANES.	\$676
LOS ANGELES	LOCAL HIGHWAY	LAF7704	0	MULTI-MODAL WAYFINDING CONGESTION REDUCTION STATION ACCESS. IMPROVES VEHICLE, PEDESTRIAN, AND BICYCLE CIRCULATION BY PROVIDING WAYFINDING SIGNS, TRANSIT MAPS, AND OTHER ELECTRONIC PARKING GUIDANCE SIGNS. IT WILL SERVE THE SURROUNDING AREA OF THE METRO EX LINE STATIONS, DOWNTOWN, AND CIVIC CENTER.	
LOS ANGELES	LOCAL HIGHWAY	LA003095	0	CHERRY AVE. WIDENING PROJECT. GET 19TH ST AND PACIFIC COAST HIGHWAY BY WIDENING THE ARTERIAL FROM ONE TO TWO LANES IN EACH DIRECTION (PNO 303). SAFETY LU #2002	
LOS ANGELES	LOCAL HIGHWAY	LAF1018	0	FIRESTONE BLVD IS EXISTING 2 LANES IN EACH DIRECTION, AFTER THE PROJECT WILL BE 3 LANES IN EACH DIRECTION. THE LENGTH OF THE PROJECT IS .75 MILES. PRIMARY IT WILL WIDEN FIRESTONE BLVD AND ATLANTIC AVENUE AND REALIGN THEIR INTERSECTION. IT WILL ALSO ADD 300 NORTH BOUND THROUGH LANE ON ATLANTIC AVENUE FROM FIRESTONE BLVD TO APPROXIMATELY 200' NORTH OF SALT LAKE AVENUE. LOCAL STREET AND COMPLETE ADJACENT IMPROVEMENTS AT RAILROAD CROSSINGS AT FIRESTONE BLVD AND ATLANTIC AVENUE.	
LOS ANGELES	LOCAL HIGHWAY	LAF304	0	FIRESTONE BLVD CAPACITY IMPROVEMENTS. INCREASE THE NUMBER OF LANES FROM 4 TO 6 ON FIRESTONE BLVD WITHIN THE ROW, RAISED ISLANDS, SIDEWALKS, BUS STOP SHELTERS & PULLOUTS, GAS STREET LIGHTING, & UTILITY RELOCATION.	

31 LA003095 0 CONSTRUCT EASTERN MICHIGAN AVE NEIGHBORHOOD GREENWAY IN VICINITY OF...

97 LOCAL HIGHWAY VEN140805 0 IN SIMI VALLEY, ARROYO SIMI GREENWAY BIKE TRAIL PHASE...

Previous
Next
Results
Close

Figure 1. Results of a search for the word “greenway” in the Project List Appendix to the SCAG Draft 2016 RTP/SCS.

Other issues with the AT Appendix appear early on. Per CA Streets & Highways Code §890.3, bicyclists traveling for transportation purposes beyond just work are still considered commuters. Yet, the document attempts to split commuters into two separate groups of people going to work and people biking for other transportation-related reasons when the reality is that no division is needed. All bicyclists traveling for transportation, whether heading to work or going to a store/school/etc. on a “utilitarian” trip all have the same goal and desire from the system: to be able to travel to their destination in as direct a journey as possible with as few stops as possible. Trying to dissect commuters into two separate subgroups and is unnecessary and does a disservice to all.

All wasn’t doom and gloom. We were inspired by the Level of Traffic Stress ranking and models presented in Table 1 of the AT Appendix. It serves as great model to adopt and to strive toward. SCAG policies need to be updated to include LTS2 bikeways as the default. Additionally, SCAG and the member jurisdictions must set a goal of ensuring that all residents live a maximum of a mile from a LTS2 bikeway within five years, a half mile within 10 years, and a quarter mile by the horizon year. This standard needs to also extend to new developments to ensure that they either fall within the limits or build the facility as part of construction. These facilities must also connect the communities to others surrounding and to



INLAND EMPIRE BIKING ALLIANCE

the greater region as a whole. Cul-de-sac developments should be exploited to provide connectivity for non-motorized users by way of an off-street network that provides greater freedom of movement than driving on the road would.

We also have several other comments, grouped together below based on the page where they are found.

Page 5:

- more encouragement of bike boulevard treatments
- Illustration of Class IV bikeways is inaccurate, would be more appropriate for use for Class IIs

Page 6:

- Roundabouts as an effective intersection and should be encouraged as default at all intersections, especially as part of new construction
- Remove/disallow free right turn lanes
- Complete Streets strategies need to go a step further beyond just "allowing" or "enabling" access by removing car-centric designs driven by LOS and establishing metrics such as people per hour to determine success

Page 7-8: Land use

- Cul-de-sac can be open and include connections for non-motorized users
- Disincentives driving

Safety (page 8-9)

- Increase in injuries should be addressed, but in itself is not as problematic if participation is increasing faster
- Addressing hotspots or common factors should be focus
- Lack of lighting identified, is a real issue in Inland Empire, yet no concrete steps identified for addressing that problem

Existing bikeways (page 15-19)

- Inland Empire needs to focus on more 8-80 facilities
- Greater use of Class IV facilities
- Class III bikeways on arterials cannot be considered anywhere near adequate, should barely be considered bikeways
- Much more attention needs to be paid toward improving connections among IE cities and especially between the two counties
- Bike parking is extremely lacking, more bike corrals need to be encouraged, especially in new construction

Congestion Management

The bicycle can be one of the most effective methods of dealing with congestion in the majority of the SCAG region. With a capacity that is several multiples of the hourly capacity of a vehicular lane, encouraging biking provides what is probably the best return on investment for increasing capacity. While regional work commutes may stretch longer than many people are willing to ride, bicycles should still be integral to strategies to reduce motor vehicle travel. Shorter trips to stores, appointments, and especially of parents taking children to school can be greatly reduced, freeing up roadway capacity for



INLAND EMPIRE BIKING ALLIANCE

people driving for longer distances that are infeasible to bike. Additionally, improving connections to transit, including parking at transit, is integral to providing options for those who are traveling longer distances.

Unfortunately, there is much work to be done to bring the Congestion Management Appendix up to snuff in regards to using bikes to their fullest potential. However, the good news is that a few small changes would greatly address that issue. We are identifying them below. Their inclusion in the final document will go far toward ensuring that this oversight does not continue.

- MULTI-MODAL PERFORMANCE is identified as being measured, but no mention is made about it being tracked over time and is mum in regards to active transportation. It needs to be changed to explicitly identify that it will be tracked over time and that active transportation will be part of it.
- Change the word “and” in TRANSPORTATION DEMAND MANAGEMENT (TDM) to “by”.
- Add a metric that measures Active Transportation to the Mobility and Accessibility portion of the 2016 RTP/SCS Performance Measures identified in Table 1.

Highways & Arterials

Perhaps the most perverse of all the Appendices is the one dedicated to Highways and Arterials. Despite all the proposals and platitudes to change included throughout the RTP/SCS and this very Appendix, a closer read through it and the Project List reveal the truth: it’s almost all just doublespeak for widening roads and continuing the failed strategy of attempting to build out of congestion with wider roads. This is especially true in regards to the Inland Empire, as the vast majority of the projects identified and expenditures planned for Riverside and San Bernardino counties all start with “widen”, despite the Inland region already failing to even maintain a good state of repair on what exists. That must be improved before expansion occurs.

While there is potential for the widenings to serve all users, it requires that strong complete streets policies that truly serve, not just accommodate, all modes be in place. Such policies would focus on making sure that moving people, not cars, is the primary concern. We have several

Guiding Principles

- System monitoring needs to include measurements of active transportation
- Mention at least one active transportation-oriented TSM
- All capacity increases MUST include increase in transit and active transportation as well and cannot be dependent on only occurring "where feasible". If transit and active transportation are “not feasible”, there's really no reason for an expansion.
- ALL streets are for ALL users, complete streets CANNOT rely only on being done "where feasible and practical". They MUST be included as the guiding principle for ALL projects with robust opt-out clauses based on the design life of the facility in question.

Corridor Mobility and Sustainability Improvement Plans

- "optimize corridor performance" needs to ensure that corridors are optimized for ALL modes



INLAND EMPIRE BIKING ALLIANCE

- CSMPs must have a complete streets approach with strong exception clauses to ensure that easy outs can't occur

Additional System Management Initiatives needs to include greater focus on transit signal priority
Arterials should carry less of overall traffic, more of transit/active traffic

Performance Results

- Crucial error, they must NOT be solely based on vehicle-hours of delay
- Performance results MUST include the currently glaringly absent measurement of delay incurred by users traveling by active transportation and transit in the analysis

Mobility Innovations

We agree with the reasoning that went behind the name of this Appendix. Bicycles are by no means a new invention, but they continue to hold an extremely large potential in helping SCAG and its member jurisdictions address the mobility challenges and opportunities that face the region. We would encourage that more experimentation be included, especially of parking opportunities with transit. There should be a much greater focus on increasing access to transit all over the region as well to ensure that it is easily accessible by all.

Performance Measures

The Performance Measure Appendix is another window into the lip service being given to alternative solutions by the RTP/SCS. Too many of the metrics proposed are car-centric and are just a continuation of flawed policies of the last half-century. Despite the passage of SB 743 in 2013 and continual work by the State on an alternative to LOS, it is apparent that trying to make sure that there's space for everyone to drive at 65 MPH and be at the front of every queue has played a large role in guiding the parts of the Plan, especially in the Inland Empire. With continued admission on all fronts and levels of government that building bigger roads only results in more people KSI, it is inexcusable to see the magnitude to which LOS-based "capacity" is being promoted by a Plan that aims to be sustainable.

Introduction

- Maximize mobility for people and goods
- Maximize productivity of transportation system <-- arterials is not the way
- Make the existing environment also provide better bike/ped
- Mobility and Accessibility metric needs to address delay incurred by transit and active transportation users

2016 RTP/SCS Outcomes & Performance Measures

- Reliability needs to include a metric to measure variability of travel time for transit and active transportation
- Mobility MUST include a measurement of Person Delay for transit

Performance Measure for On-Going Regional Monitoring

- Vehicle delay and non-recurrent delay cannot be the only measures used to determine performance
- Delay for travelers going by active means or transit MUST also be included



INLAND EMPIRE BIKING ALLIANCE

- Inexcusable that Plan will only improve biking mode share by 0.2% over 25 years
- Needs to include a metric measuring how many residents live within 1/2 mile of a maximum LTS2 bikeway
- Exhibit 4 is laughably unrealistic without significant investments in alternative transportation far beyond what is outlined by the Plan

In conclusion, we are not confident that the current Draft SCAG 2016 RTP/SCS will be beneficial for many bicyclists of the Inland Empire. Many currently quiet roads are slated to be ballooned to outrageous proportions, degrading the LTS of the riding conditions and leaving bicyclists without reasonable alternatives. Though the Plan includes many comments and possibilities for what could occur in the future, the Inland Empire is left and decidedly stuck in the height of car-centric planning and design. This needs to be corrected and addressed by both SCAG and the member jurisdictions. As the Inland Empire continues to grow, it cannot continue to be paved over in a bid to keep cars moving. Other measures need to be explored to their fullest extent, including bicycles. With much developable opportunity still existing, the opportunity exists to provide ideal provisions from inception. We hope to see those used to their fullest extent to provide a model environment for the region, nation, and even the international community. But it requires a vision of improvement. We hope that vision can become a reality.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Friis".

Mark Friis, Executive Director



Marven E. Norman, Policy Director



Barry A. Rondinella
A.A.E./C.A.E.
Airport Director

January 29, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Dear Ms. Aguirre:

John Wayne Airport/Orange County (JWA) appreciates the opportunity to review and comment on the Southern California Association of Governments (SCAG) Draft 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). During the Draft 2016 RTP/SCS preparation process, SCAG requested, and JWA submitted, specific aviation-related data for use in preparing the document. The data that JWA submitted to SCAG included, but was not limited to: JWA's legal agreement parameters, including operational and capacity limits; current passenger, aircraft and cargo statistics; recent aviation forecast information (including airfield, terminal and gate capacity forecasts), an updated Airport Layout Plan; and JWA's most recent Economic Impact Study.

In reviewing the Draft 2016 RTP/SCS, it appears that most of the information accurately reflects the JWA data and information provided to SCAG. However, we request correction to two items as follows:

1. In the Draft 2016 RTP/SCS Aviation and Ground Access Appendix, page 21, it is stated that John Wayne Airport has thirteen bridged gates that accommodate aircraft design group (ADG) IV aircraft, specifically the Boeing 757 aircraft. Although that is correct from a gate design standpoint, it is critical to note that currently only six of JWA's twenty bridged gates are actually used to accommodate a 757-200 aircraft. This is the result of a gradual phasing out of the aircraft by the airlines, the age of the aircraft, and the lack of future production. Therefore, it is likely that even fewer than six JWA gates will be used for this ADG IV aircraft in the future. Because of the document's assumptions related to existing and future JWA gate accommodations for the 757-200 aircraft, the JWA terminal capacity appears to be overestimated. Specifically, page 21 states that based upon the estimated maximum number of operations per gate, average seat capacity and load factors, the existing JWA terminal would have a capacity of 16 million annual passengers (MAP). However, based upon analysis done in JWA's 2014 *Capacity Analysis Technical Report* (AECOM 2014), which was provided to SCAG, terminal gate capacity would be exceeded at approximately 12.3 MAP.

We therefore request that the JWA terminal capacity be reevaluated and corrected based upon the JWA 2014 *Capacity Analysis Technical Report*.

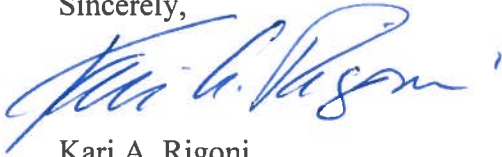
3160 Airway Avenue
Costa Mesa, CA
92626-4608
(949) 252-5171
(949) 252-5178 FAX
www.ocair.com



2. On page 34 of the Draft 2016 RTP/SCS Aviation and Ground Access Appendix, the text states, "John Wayne Airport is located in the City of Santa Ana, in Orange County, near the cities of..." Please correct this to read, "John Wayne Airport is located in unincorporated Orange County, near the cities of..."

Thank you for the opportunity to comment on the Draft 2016 SCAG Regional Transportation Plan/Sustainable Communities Strategy. Please contact me with any questions you might have. I can be reached at (949) 252-5284 or krigoni@ocair.com.

Sincerely,



Kari A. Rigoni
Planning Manager

cc: Barry Rondinella
L. G. Serafini

2016 RTP/SCS

From: robert dale <[REDACTED]>
Sent: Friday, January 22, 2016 2:41 PM
To: 2016 RTP/SCS; 2016 PEIR; Angela Lindstrom; Shawn Nelson; Bill Ballinger; Barbara Ballinger; Carl Nelson; Carlos Jaramillo; Chamber; Chris Johansen; Chuck Buck; Cliff Kaiser; Dave Larson; David Whiting; Debbie Presley; Douglas Cox; Dr. David Nilson; Jeff Dickman; Teri Daxon; davidd@lahabracity.com; Jack Miller; Kitty Ernie Zoeter; ecarpenter@octa.net; Fullerton Observer; Shirley Gregg; Jim Gomez; sue gaede; heather mcRea; Chris Johansen; James Odling; Jean Watt; Sadro, Jim; Angela Lindstrom; Jim Brewer; Lahabrajournal News; Lou Salazar; Lynton Hurdle; Amir Mozayeny; Mike Foley; Schlotterbeck, Melanie; Nord, Gregory; Lahabrajournal News; Nelson Wong; Nicole Panza; Debbie Presley; Claire Schlotterbeck; Theresa Sears; sfailla@lahabraca.gov; Thy Vo; TheTracks@cityofbrea.net; Alan Thompson; tory@trwengineering.com
Subject: Public comments, SCAG 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS)

1/22/16

To: Southern California Association of Governments (SCAG)
 Re: Public comments, 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR).

Dear SCAG

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and **Sustainable Community Strategy (SCS)** and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, "La Habra 2025" is now a part of this growing coalition in 2016.

La Habra 2025 works in Orange County and has since 2000. Our mission is to encourage citizen participation & visionary planning of the La Habra area. We have had important successes since our inception including planting 1000 trees to help replace 4000 missing municipal trees.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We've reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG's mission with the Natural and Farmland policies.

Population Growth Impacts to Existing and Future Parklands

The Plan outlines that the region anticipates an additional 3.8 million people by 2040 providing increased pressure on our existing parkland. Studies document that many communities in the Southern California region already do not have enough parkland as outlined by the **Quimby Act (3 acres per 1,000 residents)**. **The City of La Habra is 100 acres short of meeting its, "2.5 acres of parkland per 1000 people", General Plan requirement. Now is the time to acquire more regional open-space.**

In the future, these regional parks will become even more valuable.

Throughout the document, the Plan promotes providing more access to these existing parks as infill projects are built, but nowhere does it state how additional parks will be created. The mechanism is missing. More importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity recreation oriented activities, like soccer and baseball fields, and are turfed. The types of land acquired as mitigation or through local conservation efforts typically are focused on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing "more" access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. The document needs to address the impacts to local parks with increased access from expanding populations. The document also needs to address how additional lands will be protected, i.e., what mechanism will be used?

SCAG's Support of Regional Wildlife Corridors

The current federal transportation bill, FAST Act, supports understanding transportation impacts on natural resources. The previous bill, MAP-21, supported restoring and maintaining environmental functions (i.e., wildlife corridors) affected by the infrastructure projects in the RTP. SCAG has even supported efforts in Los Angeles County to create a wildlife corridor over the 101 Freeway. Many efforts are underway across the region to connect landscapes to one another. This is very important to the region and its biodiversity. Wildlife corridors allow species to migrate and forage and expand genetic diversity. These corridors also allow ecosystems to maintain ecological functions, act as sources for repopulation after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by infrastructure projects.

Regional Bike Trails

Now is the time for a "Regional Bike Trail System Implementation Plan".

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to RobertDalePlanning@Yahoo.com

Sincerely,
Robert Dale

La Habra 2025





Tax ID #33-0441816 501(c)(3) Non-profit status determined by IRS letter of 6/14/91

KEEP IT WILD!

Advisory Council

Howard Adler
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Hugh A. Sanders
Laura Tarbox

Executive Director

Hallie Jones

February 1, 2016

To whom it may concern,

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Laguna Canyon Foundation is now a part of this growing coalition in 2016.

Laguna Canyon Foundation was founded in 1990 with the mission of acquiring and preserving open space. We work in the 22,000 acre South Coast Wilderness, which includes Orange County Parks, State Parks, and City land. Our mission now focuses on education, outreach, habitat restoration, stewardship and land acquisition.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We've reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG's mission with the Natural and Farmland policies.

Congratulations

We are pleased to see an Appendix devoted directly to natural and farmlands protection in the 2016 Plan. We are glad that the Plan contains specific strategies addressing natural land and farmlands issues. This is certainly a step in the right direction. The culmination of the work from the last RTP/SCS is clearly visible in this Draft Plan. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful and science-based role in mitigating impacts to our natural environment from transportation, infrastructure and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

LAGUNA CANYON FOUNDATION

PO Box 4895 Laguna Beach CA 92652 Tel 949.497.8324 Fax 949.376.5590

lagunacf2@lagunacanyon.org

www.lagunacanyon.org

**Identify a Conservation Mechanism for the Natural and Farmlands Preservation**

Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it likely relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.

SCAG's Support of Regional Wildlife Corridors

The current federal transportation bill, FAST Act, supports understanding transportation impacts on natural resources. The previous bill, MAP-21, supported restoring and maintaining environmental functions (i.e., wildlife corridors) affected by the infrastructure projects in the RTP. SCAG has even supported efforts in Los Angeles County to create a wildlife corridor over the 101 Freeway. Many efforts are underway across the region to connect landscapes to one another. This is very important to the region and its biodiversity. Wildlife corridors allow species to migrate and forage and expand genetic diversity. These corridors also allow ecosystems to maintain ecological functions, act as sources for repopulation after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by infrastructure projects.

Conclusion

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Should you need to contact me, I can be reached at Hallie@lagunacanyon.org. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to the above email address.

Sincerely,

A handwritten signature in black ink that reads "Hallie Jones". The signature is written in a cursive, flowing style.

Hallie Jones
Executive Director



Laguna Greenbelt, Inc.

a non-profit corporation

February 1, 2016

To: Southern California Association of Governments

Re: 2016 RTPSCS

By email to: 2016PEIR@scag.ca.gov and RTPSCS@scag.ca.gov

Laguna Greenbelt, Inc., was formed in 1968 as a non-profit community organization to preserve land in the coastal canyons near Laguna Beach for public enjoyment and natural habitat protection. The experience of open space, wilderness areas, and wildlife viewing are important to the long-term health and wellbeing of residents of southern California. We were successful to the tune of 22,000 acres of parks and preserves, but they are an island in an urban sea.

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). We are part of the regional coalition organized by Friends of Harbors, Beaches and Parks (FHBP) to advocate for the inclusion of natural lands mitigation within the 2016 plan.

We are now working on a 6-mile wildlife corridor between the coastal open space and the Cleveland National Forest in the Santa Ana Mountains, because 22,000 acres aren't enough to maintain the top predators in the local ecosystem, or prevent inbreeding in our wildlife. We are isolated by urban development from other large blocks of open space with wildlife populations. All of our wildlife is at risk from past habitat fragmentation, and genetic studies affirm our isolation from nearby San Diego and Orange County populations of wildlife.

It's time for SCAG to **implement** a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that should be replicated in Southern California.

If there are any questions, please contact us at lagunagreenbelt@gmail.com, or by phone.

Sincerely,

Elisabeth M. Brown, Ph.D

President

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LATHAM & WATKINS LLP

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VIA SCAG ONLINE FORM AND MESSENGER

February 1, 2016

Southern California Association of Governments
 Attn: Courtney Aguirre
 818 West 7th Street, 12th Floor
 Los Angeles, CA 90017

Re: Draft 2016 RTP/SCS

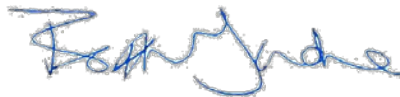
Dear Ms. Aguirre:

We write to provide comments on SCAG's Draft 2016 RTP/SCS. We commend SCAG for its visionary leadership in developing a regional transportation plan and sustainable communities strategy, in particular the theme of "integrating strategies for land use and transportation" and focusing new housing and employment around transit.

Given the importance of the RTP/SCS for future planning, the designations as to the Chavez Ravine property located immediately north of downtown Los Angeles should be clarified. We understand that the Draft 2016 RTP/SCS designates much of the Chavez Ravine property as Urban land use, with portions Compact land use, and much of the property as a 2040 Plan High Quality Transit Area. Recognizing that this is an integrated site, SCAG should designate the entirety of the Chavez Ravine property as Urban land use and High Quality Transit Area. Such designations can encourage opportunities for meaningful transit to the area and Elysian Park, as well as support reinvestment in adjacent neighborhoods that have been designated as SB 535 Disadvantaged Communities.

We appreciate your consideration.

Very truly yours,



Beth Gordie
 of LATHAM & WATKINS LLP

cc: Howard Sunkin, Ek & Sunkin
 David Granis, pointC
 Cindy Starrett, Latham & Watkins



LAFCO

Local Agency Formation Commission for San Bernardino County

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Executive Officer

SAMUEL MARTINEZ
Assistant Executive Officer

MICHAEL TUERPE
Project Manager

REBECCA LOWERY
Clerk to the Commission

LEGAL COUNSEL

CLARK H. ALSOP

Sent via mail and email at 2016PEIR@scag.ca.gov and

February 1, 2016

Draft 2016 RTP/SCS Comments

Attn: Ms. Courtney Aguirre

Southern California Association of Governments

818 West 7th Street, 12th Floor

Los Angeles, CA 90017

Draft 2016 RTP/SCS Draft PEIR Comments

Attn: Ms. Lijin Sun

Southern California Association of Governments

818 W. 7th Street, 12th Floor

Los Angeles, CA 90017

SUBJECT: Draft 2016 RTP/SCS & Draft PEIR Comments

Dear Ms. Aguirre/Ms. Sun:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) Draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) and the associated Draft Program Environmental Impact Report (Draft PEIR). The Draft 2016 RTP/SCS and Draft PEIR is a monumental effort critical to ensuring availability of federal funding to local agencies for a broad range of infrastructure projects throughout the SCAG region.

Local Agency Formation Commissions ("LAFCOs") were established by the State Legislature in 1963 and are governed by the Cortese-Knox-Hertzberg local Government Reorganization Act of 2000 ("CKH" Government Code Section 56000 et seq.). Under the Act, LAFCOs are required to establish spheres of influence for each city and each special within the county and enact policies designed to promote the logical and orderly development of areas within the sphere. A sphere of influence is means "a plan for the probably physical boundaries and service area of a local agency, as determined by the commission (Government Code Section 56076).

In determining spheres of influence, LAFCOs carry out the purposes and responsibilities defined by the State Legislature for planning and shaping the logical and orderly development and coordination of local governmental agencies to ultimately provide for the present and future needs of the county and its communities. It is for this reason that SCAG must consider the spheres of influence that have been adopted

by LAFCOs for the region when developing the RTP/SCS (Government Code Section 65080(b)(2)(G)). There are six LAFCOs within the SCAG region: Los Angeles LAFCO, Orange LAFCO, Riverside LAFCO, San Bernardino LAFCO, Imperial LAFCO, and Ventura LAFCO. The spheres of influence that have been adopted by these LAFCOs should have been considered when developing the RTP/SCS. However, neither the 2016 RTP/SCS nor the Draft PEIR takes into consideration the spheres of influence for any of the cities and/or special districts within the entire region.

Each of these LAFCOs is also required to conduct reviews of municipal services provided in the county in order to prepare and update the spheres of influence for the cities and special districts within their respective county. SCAG uses information produced by LAFCOs in the development of growth forecasts of population, household and employment for the 2016 RTP/SCS.

The comments below are offered to improve the accuracy of the Draft 2016 RTP/SCS and the Draft PEIR to adequately reference LAFCO and spheres of influence, as they are defined in state law.

1. Correct Description of LAFCO's Governing Statute

Section 3.11 includes discussion of land use and planning activities. On page 3.11-6 of the current Draft EIR, there is a reference to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2005 (Government Code 56133).

Please correct this cross reference as follows: Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000 et seq.).

2. Include Discussions of Spheres of Influence

Section 3.11 provides a historical overview of the predecessor laws that governed LAFCOs prior to 1986. While the historical context is interesting, it does not provide relevant information connecting the role of LAFCOs and SCAG. As noted above, SCAG is required to consider the spheres of influence determined by LAFCO for each of the cities and special districts in their county in the preparation of the RTP/SCS.

We recommend the description be modified to include a definition of a sphere of influence and discussion of how they were used by SCAG in the preparation of the RTP/SCS.

3. Annexation Alternative in PEIR

The PEIR includes the discussion of several alternatives as required by Statute and the CEQA Guidelines. However, there is no discussion of the impact that annexation of unincorporated areas within city spheres of influence would have on

the future implementation of the 2016-2040 RTP/SCS. In the development of the demographic projections, SCAG relied on the land use data provided by the local jurisdictions, the cities and counties in the SCAG region. While many cities have adopted land use designations for the unincorporated areas within their respective spheres of influence, the practice is not consistent throughout the SCAG region. Additionally, the land use designations adopted by the cities do not always coincide with the land use designation and associated densities that have been adopted by the counties for the unincorporated areas.

We recommend that SCAG include an annexation alternative that considers the potential impact that annexations of unincorporated territory would have on the implementation of the 2016-2040 RTP/SCS.

Thank you for this opportunity to comment on the Draft 2016-2040 RTP/SCS and Draft PEIR. If you have any questions concerning the information outlined above, please do not hesitate to contact Samuel Martinez, Assistant Executive Officer, at (909) 388-0480. Please maintain LAFCO on your distribution list to receive further information related to this process.

Sincerely,



KATHLEEN ROLLINGS-McDONALD
Executive Officer

cc: Carolyn Emery, Executive Officer, Orange LAFCO



LOS ANGELES AREA
CHAMBER OF COMMERCE

January 29, 2016

Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Subject: 2016 Draft Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Aguirre:

On behalf of the Los Angeles Area Chamber of Commerce, representing over 1,600 member organizations, we would like to submit a few comments in response to the Southern California Association of Governments (SCAG) regarding the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); the document seeks to address mobility and housing needs while promoting economic growth, well-being and livable communities for all Southern Californians.

The RTP/SCS document does a good job of developing long-range regional plans and strategies that provide practical movement of people and goods, while enhancing economic growth, facilitating international trade and improving the environment and quality of life. The Chamber is pleased the RTP/SCS used a transparent, inclusive decision making approach that engaged all stakeholders impacted by the RTP/SCS.

SCAG's emphasis on transportation- transit and highways, active transportation, goods movement, housing and land use, energy and environment- in addition to workforce development, education, innovation and technology address the most significant needs of the region.

With the goods movement sector contributing to nearly one-third of the regional economy, efficient transportation of goods through transit corridors and arterials is especially significant in the RTP/SCS to maintain competitive, thriving economy. We'd like to highlight that with decreasing gas tax revenue for transportation projects, it is crucial that funding for transportation projects and revenue for all goals outlined in the RTP/SCS be attainable and innovative sources to fund projects, while addressing diverse funding streams. Closing the funding gap is paramount to achieving the goals of this plan.

The Chamber applauds SCAG's efforts in composing a substantive, comprehensive document. We look forward to working with you on implementing the Regional Transportation Plan/Sustainable Communities Strategy.

Sincerely,

A handwritten signature in cursive script that reads "Gary Toebben".

Gary Toebben
President & CEO



February 1, 2016

Ms. Cheryl Viegas-Walker
Southern California Association of Governments
818 W 7th St #1200
Los Angeles, CA 90017

Re: Draft of SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy

On behalf of the Los Angeles County Business Federation (BizFed), representing more than 152 business organizations with more than 272,000 businesses across our region, we want to commend the Southern California Association of Governments (SCAG) on a comprehensive and detailed document. BizFed and its members are pleased to see the attention paid to the process and vision of the region's most influential plan that affects sectors in transportation, land use and development, energy and environment, and technology and innovation and workforce development and education.

We want to call special attention to SCAG's RTP/SCS vision as it relates to goods movement/freight/logistics. These sectors represent one-third of the state's economic growth, and addressing the goods movement corridor bottlenecks are key to enabling this growth to continue. Paralleled investments in transit and development will be the catalysts in reducing overall emissions and spurring economic growth throughout the region. Targeting the growth in the region's housing, transportation, and business sectors to be most beneficial to ensure a stable and thriving economy is the top priority. Then the attention paid to the "haves and have nots" in our region was excellent in showing a desire to formulate a regional plan that provides a positive economic impact for *everyone*. Additionally, we are pleased to see the inclusion of technology neutral solutions in the plan. And finally, the extended time period that SCAG provided for stakeholder feedback was a valuable adjustment that ensured the effective input from stakeholders from around the region.

While this is a strong document and we feel it addresses many important factors we want to highlight the need to seek innovative and flexible funding options to bring the RTP/SCS to fruition. This is paramount in achieving the public and business community's participation. BizFed is pleased with the effort put forth by SCAG in developing this plan and support its overall vision, especially when a diverse set of funding resources are identified and pursued.

We have great confidence in the draft plan set forth by SCAG to provide a foundation of investment to improve the future of SCAG's six county region. Once again BizFed wants to commend your work and effort in developing the comprehensive Regional Transportation Plan and Sustainable Communities Strategy to address the myriad needs for a region as diverse as Southern California. BizFed and our members look forward to continued collaboration on not only the 2016 RTP/SCS, but on implementing the projects it contains so that together we can build a resilient economy to serve our great region.

Sincerely,



Gilbert Ivey,
BizFed Chair
Metropolitan Water District
of Southern California
Cc: Hon. Michele Martinez
Hon. Margaret Finlay
Hon. Carl Morehouse
Board of Directors



David Fleming,
BizFed Founding Chair
Latham & Watkins, LLP



Tracy Rafter,
BizFed CEO
Impower, Inc.



CYNTHIA A. HARDING, M.P.H.
Interim Director

JEFFREY D. GUNZENHAUSER, M.D., M.P.H.
Interim Health Officer

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

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February 1, 2016

Cheryl Viegas-Walker, President
Regional Council
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Dear President Viegas-Walker:

The Los Angeles County Department of Public Health (DPH) commends the Southern California Association of Governments (SCAG) and the Regional Council for your efforts in developing the 2016-2040 Draft Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS).

We are pleased to see the inclusion of the Public Health Appendix, which describes the impact of different land use and transportation scenarios on public health outcomes such as physical activity, chronic disease, and air quality. Furthermore, the inclusion of performance measures helps demonstrate the health impacts of the RTP/SCS and measure progress as projects are implemented. While we are pleased with many aspects of the RTP/SCS, we offer the following comments to ensure the plan maximizes the potential health benefits of this \$555.6 billion investment into our region.

The RTP/SCS has the potential to improve health outcomes in our region by planning for transportation investments that will improve access to jobs, schools, parks, natural environments, nutritious foods, and health care. However, these same transportation investments may also create unintended negative health impacts by decreasing housing affordability and increasing displacement of minority and low-income residents.

Households that pay more than 30% of their income on housing are considered to have a high housing burden. According to the American Community Survey, 52.1% of households in Los Angeles County have a high housing burden.¹ This is a significant public health concern, as

President Viegas-Walker

February 1, 2016

Page 2

housing affordability, stability, and quality are essential for human health and well-being.² Unaffordable housing reduces the income available for other subsistence needs such as nutritious foods, health care expenses, and transportation. Families that cannot afford their housing may have to move frequently, which can lead to psychological stress and depression, especially in children. The experiences of eviction and foreclosure can negatively impact mental health. Lacking a stable place to live may increase anxiety and depression. Homelessness may cause physical and mental distress and can lead to acute and chronic health problems. For all of these reasons, protecting the current supply of affordable housing and creating new affordable housing around transit is essential both for public health and for the health of the transit system, whose core ridership is most often low income residents.

In the Environmental Justice Appendix, SCAG identifies gentrification as an issue in transit oriented communities (TOCs) and states that this could cause the displacement of minority and low-income households. We applaud SCAG for identifying a gentrification and displacement performance measure in the RTP/SCS and for stating that the agency will continue to monitor growth in TOCs. However, we recommend that SCAG track the number of very low, low, and moderate income housing units available and constructed as a way of gauging progress toward implementation of the 2013-2021 Regional Housing Needs Assessment.

We also encourage SCAG, as our regional planning agency, to play a leadership role in working with local jurisdictions on land use and affordable housing strategies that prevent and reduce gentrification and displacement of minority and low income residents. We encourage SCAG and the Regional Council to identify ways to do this within the RTP/SCS or in the work plan to be created upon its adoption. Technical assistance programs, tools, and policies must be identified to assist member jurisdictions in maximizing the benefits of transit investments for housing and decrease the potential for displacement of minority and low-income populations.

SCAG is well positioned to encourage jurisdictions to develop local affordable housing policies near transit. For example, the County of Los Angeles is currently developing a comprehensive plan to combat homelessness that includes consideration of land use strategies that could be adopted by local jurisdictions throughout the SCAG region.

These policies include options such as:

- An affordable housing benefit fee program, also known as a linkage fee, which would charge a fee on all new development to support the production of affordable housing.
- An incentive zoning and “value capture” strategy based on the concept that infrastructure and planning actions such as zone changes can increase land values which can be redirected toward the public good, such as affordable housing.
- A density bonus ordinance that can incentivize the development of affordable housing in exchange for greater density.³

President Viegas-Walker
February 1, 2016
Page 3

SCAG could play a key regional leadership role in encouraging member jurisdictions to develop policies such as these in communities where transit investments have or will be made. SCAG could also play a role at the State level with respect to housing policies near transit.

Finally, we recommend that SCAG convene a task force specifically to assist local jurisdictions with best practice tools to address the complex issues of gentrification and displacement around transit. The task force should include affordable housing experts, transit agencies, city officials, public health practitioners, and others.

Overall, we are pleased with the direction of the RTP/SCS and offer these comments to maximize our region's investments and further improve the health and vitality of our region. We provide these recommendations because housing unaffordability, instability, and quality have significant public health impacts that disproportionately impact minority and low-income people. We look forward to continuing to work with you as you finalize and begin implementation of the 2016-2040 RTP/SCS.

Sincerely,



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

PS:ap

-
- ¹ Office of Health Assessment and Epidemiology, Los Angeles County Department of Public Health. Analyses of 2008-2012 American Community Survey 5-Year Estimates, U.S. Census Bureau.
 - ² Housing and Health in Los Angeles County. Social Determinants of Health, Issue no. 2. Los Angeles: Los Angeles County Department of Public Health; February 2015.
 - ³ County of Los Angeles Homeless Initiative; Draft Recommended Strategies to Combat Homelessness; January 2015.



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

Page 135 of 320

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metro.net

January 28, 2016

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

Dear Mr. Ikhata:

Thank you for the opportunity to review the draft 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We have been pleased to have participated in SCAG's Transportation Working Group and other forums over the last several years as SCAG has worked to address many of the challenging issues facing the Southern California region.

We commend SCAG for a draft 2016 RTP/SCS that is well written and includes all of the projects identified in Metro's adopted 2009 Long Range Transportation Plan. We also acknowledge the visionary aspects of the RTP/SCS in supporting sustainability, active transportation and in seeking new revenue sources. We are pleased that SCAG has determined that the RTP/SCS meets state goals for greenhouse gas reductions as set forth in SB 375 and federal air quality conformity requirements of the federal Clean Air Act.

We would also like to compliment SCAG on the immense stakeholder outreach process that was undertaken to develop the RTP/SCS in conjunction with the Sustainable Communities Strategy (SCS), in order to develop this draft RTP/SCS.

Attached for your information, are various technical comments on the draft RTP/SCS and several of its appendices. Again, SCAG has made an exceptional document from a challenging set of requirements, and we commend you.

Sincerely,

Brad McAllester
Executive Officer
Long Range Planning & Coordination

Attachment

Technical Comments on Draft 2016 RTP/SCS

Active Transportation Appendix

Pg. 4, column 2, bullet 2 –

Reads: “Utilitarian walkers requiring easy, attractive and safe access to retail, dining and other attractions.” Suggested edits: Utilitarian walkers requiring safe access to vital services including medical, grocery, public transit, child care, retail, and other key destinations.

Pg. 4, column 2, bullet 3

Reads: “Recreation and fitness pedestrians requiring good quality infrastructure for fast walking/jogging.” Suggested edits: Recreation and fitness pedestrians requiring safe and unobstructed quality infrastructure for unimpeded walking/jogging.

Pg 15

Discussion of LA County does not recognize adopted and current efforts by Metro, e.g.: Complete Streets Policy, First/Last Mile Strategic Plan, Bike Share, LA River Bike Path Gap Closure, etc. and forthcoming Metro Active Transportation Strategic Plan. Also several cities in the San Gabriel Valley have adopted a regional bike plan. The RTP should be updated to reflect current activities for LA County.

Pg 15

Bike lockers and secure bike rooms (self-serve and attended) currently exist for long term.

Need to better define/describe what bike parking stations are as some provide additional attended services to support bike commuters such as at El Monte, Long Beach and Santa Monica. Pasadena does not have a bike station. Also Burbank, Covina and Claremont have self-serve bike stations.

Should note to mention that bicycle lockers also have issues with maintenance and the required space and footprint they take up.

Document should also recognize education on how to properly lock a bicycle. Often time people use cable locks for locking their bike that are easily defeated. Important for people to be responsible for their own property through preventable measures.

Pg. 18

Statement “Bicycle-racks are often located within an office building’s parking garage (providing increased security over bicycle racks on public sidewalks)...” This is not necessarily true as bike racks at the street level have more “eyes” on them. Whereas, bike racks in hidden places such as parking garages can be very susceptible to theft.

Pg. 19

Include 2014 existing LA County bikeway conditions not 2012:

Facility Type as of 2014
Class 1 305.29
Class 2 835.5
Class 3 522.26
Cycle Track 4.2

Pg. 18

The 2012 National Household Travel Surveys indicated that bike trips for SCAG region were calculated at 1.9%. In the 2016 draft it indicates that the bike mode share for the CA household survey is 1.12%. This is a significant reduction; please verify that the figures are accurate.

Pg. 20

Same for Pedestrian mode share 2012 NHTS CA SCAG region indicated 19.24% and now for draft 2016 it is 16.8%. Please verify accuracy of figures and/or provide discussion on reduction/change.

Pg. 25

“...has developed a ~~bicycle-to-transit access plan~~ Bicycle Transportation Strategic Plan (2006)...”

Pg. 28

Verify that preliminary cost estimates are carefully identified. For example, \$194 million identified for 755 miles of “Greenways” comes out to \$256,954/mile. This is a very low estimate for Class 1 and Class 4 bikeway construction costs. Bike path projects estimated for FHWA by the UNC Highway Safety Research Center in 2013 were between \$500K to \$4.2 mil/mile (pg. 12).

Pg. 28

Total estimate for active transportation needs seem low. Provide details on the underlying assumptions.

Suggest providing clear performance metrics and benchmarks to evaluate how the region is doing to meet the goals laid out in the 2016 Active Transportation Plan.

Pg. 55 (4th paragraph)

A “plan” for bike share is cited with no reference. These appear to be general statistics for bike share programs worldwide rather than assumptions made for a specific plan and should be reflected as such. Reflect information on Metro’s Countywide Bike Share Program.

Pg. 61

Regional bikeways should include those recommended by Metro’s ATSP.

Aviation and Airport Ground Access Appendix

Pg. 20, paragraph 6, last line--states that the scenarios and sensitivity tests yielded a range of airfield capacities from 82.9 to 96.6 MAP, but does not state the year(s). Please specify the year(s) for the MAP projections.

Goods Movement Appendix

Pg. 5 (Exhibit 3), the I-210 east of Glendora is not included in the Final Primary Freight Network, yet SCAG's many analyses include this stretch along I-210 to I-15 and indicate serious congestion. SCAG should address this inconsistency.

Pg. 13, under "... Drivers", the Air Quality subject should be expanded to a discussion of CO2 emissions concerns and reference SB2, etc., as developed on Page 40.

Pg. 44, there is no mention of Cap and Trade Program's Greenhouse Gas Reduction Fund as a funding source for the development of vehicle prototypes and infrastructure demonstrations. This should be highlighted as an opportunity for zero-emission technology research and development.

Highways & Arterials Appendix

Pg. 6 - Additional System Initiatives - Recommend adding Caltrans ATM Study on I-105 and the RIITS and IEN Data Exchange efforts.

Overall - Comment - Recommend discussing Freight Signal Priority.

Mobility and Innovations Appendix

Page 7 - First/Last Mile Strategies - Recommend discussing Ride Sourcing as a potential strategy.

Page 7 - Automated/Connected Vehicles - Recommend discussing potential impact of AV/CV on age profile of licensed drivers.

Page 9 - ITS-Roadways - Recommend adding discussion on ATM (Active Traffic Management) strategies.

Natural/Farm Lands Appendix

There is currently policy language supporting urban greening as a component of a larger natural lands strategy. We support this as consistent with Metro's Urban Greening Plan and Toolkit,

but would further request that SCAG include in “Strategies, Next Steps and Recommendations” a commitment to further integrate greening strategies into regional planning efforts.

Passenger Rail Appendix

Pg. 2, First paragraph under Metrolink--The South Perris connection will be in operation in 2016.

Pg. 2, Second paragraph under Metrolink--Metro owns 40% of the Ventura County Line within L.A. County. “Much of the track is owned by the the Member Agencies of Metrolink and/or the freight railroads.” Suggest referring to the CTCs that are Member Agencies of Metrolink as being a Member Agency.

Pg. 2, Third Paragraph--Perris Valley will begin operations in 2016. PTC will begin operations in 2016.

Pg. 4, Second paragraph--Metrolink will be operating the efficient locomotives in 2017.

Pg. 4, First paragraph under Metrolink’s history--The Ventura line started in 2002.

Pg. 4, Second paragraph under high speed rail--It has been almost 20 years for the development of HSR.

Pg. 7, In the MOU paragraph--The language should state “\$1B from Proposition 1A and other funds” That is the language in the MOU.

Pg. 9 and throughout the document--Should state that the projects are for operational efficiency. Although ultimate capacity is a benefit, operational efficiency is the key.

Under the Master Plan--SCRIP preceded the Master Plan. The Master Plan accommodates SCRIP.

Pg. 11, Under the Freight paragraph include language about the agencies owning the right of way that the freights operate on as tenant railroads.

Pg. 13, Add two projects--Bob Hope Airport/Hollywood Way Station; and Bob Hope Airport Station Pedestrian Bridge

Pg. 18, The Perris Valley Line will open for revenue service in 2016.

Pg. 24, The pedestrian bridge at the Bob Hope Airport Station is not Phase 2 of RITC. Add language about the new Bob Hope Airport/Hollywood Way Station.

Pg. 26, The Metro Orange Line is connected to SCRRA in Chatsworth.

Pg. 9, Los Angeles Union Station Master Plan, 1st bullet, add “expanded multi-modal” between “new” and “passenger concourse” and replace “the current tunnel” with “currently called the “tunnel”” (“a new expanded multimodal passenger concourse (the current tunnel currently called the “tunnel”) that would be widened)”

Pg. 9, 5th bullet add “accommodating” before “future tracks”—it should read “accommodating future tracks and platforms for the CA HSR project”;

Pg. 9, 7th bullet delete “new and” and replace with “3.25 million square feet of” It should read, “3.25 million square feet of improved retail and transit-oriented development (TOD) uses.”

Pg. 9, ADD 8th bullet: “improved pedestrian and bike network”

Pg. 12: insert “SCRIP run through tracks and to incorporate the” before larger passenger concourse and replace “has been approved” with “was developed”. It should read: “An additional component of the work is to study the effects of raising the entire platform areas in order to accommodate the SCRIP run-through tracks and to incorporate the larger passenger concourse that was developed-as part of the Union Station Master Plan...”

Project List Appendix

Pg. 140, RTP ID #1TR1012, California High-Speed Rail Phase I – Env/PE, should have the Lead Agency as “California High Speed Rail Authority”. It is currently blank. The completion date is listed as 2011, and SCAG may want to update this.

Pg. 147, RTP ID # 1122005, SR-138 Loop Road – this project is not in the Metro 2009 LRTP, and the Lead Agency is listed as “TBD”. This should be clarified that the project is not a Metro-funded project.

Pg. 148, RTP ID #1C0401, “I-710” project, Lead Agency should read “Los Angeles County MTA”, as this is a project from Metro’s 2009 LRTP. Lead Agency is currently blank.

Pg. 148, RTP ID # 1M1002, “I-710 Early Action Projects”, Lead Agency should be “Los Angeles County MTA”, as this is a project from Metro’s 2009 LRTP. “Lead Agency” is currently blank. The completion year should be “2022” and it is currently “2025”.

Pg. 150, RTP ID # 1120005, Metro Green Line Extension—this is a project assumed to be funded with innovative financing, and not a constrained project in Metro’s 2009 LRTP.

Pg. 150, RTP Project # 1TR1011, West Santa Ana Branch ROW Corridor -- this is a project assumed to be funded with innovative financing, and not a constrained project in Metro's 2009 LRTP.

Pg. 154., RTP #10M08D01, this is TIP #LA0G159, and is nearly complete. This should be moved into the TIP section.

Pg. 157, RTP #UT101, Metro Purple Line Westside Subway Extension Section 3 – Century City to Westwood/VA Hospital—the completion year should be 2035 (12/31/2015), and the Project Cost is \$2,157,100 (YOE). Also, this listing is duplicative of a listing on page 158. Please correct and list only once.

Pg. 157, RTP ID # 1TR0101 (TIP # LA0G1162), Airport Metro Connector, the completion date is 07/01/2023.

Pg. 158, RTP ID #1TR1003 (EIR is TIP # LA0G642) – This appears to be a duplicate of the incorrect entry listed above on page 157. There needs to be only one “Metro Purple Line Subway Extension Section 3”, completion date of 12/31/2035 with a project cost of \$2,157,100. Please delete one of the duplicates.

Pg. 158, RTP ID #1TR1017 – please delete this project.

Pg., 158, RTP ID #1TR1020 – Please delete this project.

SCS Background Data Appendix

General – The SCS Technical Appendix provides a clear and sound description of how the 2016 RTP/SCS complies with SB 375, both from a content and process standpoint. We are confident that the Plan as presented will be approved by ARB.

Metro explicitly partners with SCAG on SCS development and implementation through the SCAG/Metro Joint Resolution and Work Program, most recently adopted by the Metro Board of Directors on May 28, 2015. The Plan and Appendix could be strengthened through further discussion of Joint Work Programs, including acknowledging completed efforts and identifying future initiatives that will advance the goals of the Plan. For example, the scenario planning exercise described in the appendix prompts preliminary steps in addressing sea level rise and other climate vulnerabilities as well as habitat protection needs. Through the plan, SCAG should describe and commit future planning activities in these areas or others.

Similarly, the Metro Board has adopted various sustainability policies acknowledging climate adaptation needs, and would suggest that sea level rise and climate vulnerabilities be explicitly included as priorities in the adopted plan, as opposed to a factor in a scenario exercise that does not influence policy and future activities.

Also, of note, the updated SCAG/Metro Joint Work Program commits a coordinated effort on deploying future planning funding, particularly from SCAG's Sustainability Planning Grant program. We would request that the Plan clearly acknowledge this commitment and further commit that future planning funding will be allocated in consultation with Metro such that priority activities are given consideration, and that local planning projects are structured appropriately for near term funding opportunities such as the Cap-and-Trade Affordable Housing and Sustainable Communities Program, the California Active Transportation Program, and the Metro Call For Projects.

Among other items, Metro collaborates with SCAG on the development and implementation of the First/Last Mile Strategic Plan. As such, we appreciate the emphasis on first/last mile implementation (transit/active transportation integration) with the Draft RTP/SCS and the SCS Technical Appendix. The appendix could do more to acknowledge and be consistent with Metro's recent work on this subject. In particular the estimated region-wide funding need for first/last mile, as reflected in the Active Transportation Appendix is substantially lower than our own estimates for Los Angeles County alone prepared for the current Active Transportation Strategic Plan effort. We encourage SCAG to coordinate with us on this aspect of the Plan.

We appreciate the inclusion emerging transportation technologies within the scenario planning exercises, as this is consistent with Metro's policies and work products including the Countywide Sustainability Planning Policy, First/Last Mile Strategic Plan and emerging pilot projects. As a technical matter, we are unclear on why the use of ride share and ride hailing services would be reflected in a direct reduction in VMT. It would seem more supportable through data as well as more consistent with policy goals to reflect these travel choices through an assumed reduction in vehicle ownership.

Transportation Finance Appendix

Pg. 10, near bottom of page (concept also applies to page 26): New Starts: "As with the FHWA sources, fuel consumption declines by 0.9 percent (in real terms) annually." We would like to suggest it state that, "As with the FHWA sources, fuel consumption declines by 0.9 percent (in real terms) annually making it increasingly difficult for Congress to back fill with general funds."

Pg. 23, top of page: ...State Transit Assistance (STA) are included under this source (meaning Local Agency Funds for LA County). STA should be included under State sources on page 24.

General Comment Concerning Above Appendix Comments

If any comment above pertains to any section of the main documents of the Draft 2016 RTP/SCS, SCAG may also want to apply the changes beyond the appendices and into the body of the main document.



Los Angeles
World Airports

Attachment B

January 15, 2016

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

LAX
LA/Ontario
Van Nuys
City of Los Angeles

Dear Mr. Ikhata:

Eric Garcetti
Mayor
Board of Airport
Commissioners

The Los Angeles World Airports (LAWA) is pleased to have worked with the Southern California Association of Governments (SCAG) and SCAG's Aviation Technical Advisory Committee on the update of the 2016 Regional Transportation Plan (RTP). LAWA is especially appreciative of SCAG's inclusion and modeling of the Los Angeles International Airport (LAX) Landside Access Modernization Program (LAMP) in the draft 2016 RTP.

Sean O. Burton
President

Valeria C. Volasco
Vice President

Jeffery J. Dean
Gabriel L. Eshaghian
Beatrice L. Hsu
Nolan V. Rollins
Dr. Cynthia A. Telles

As you know, LAMP proposes to transform LAX into a world-class airport by improving the travel experience for passengers, relieving traffic congestion, and improving air quality within the Central Terminal Area (CTA) and on the surrounding street network. The LAX Automated People Mover (APM) would connect passengers to off-airport intermodal facilities, a Consolidated Rental Car Facility, and the Metro regional rail system, providing alternative travel modes to and from LAX.

Deborah Flint
Executive Director

In an effort to further partner with SCAG's Aviation Technical Advisory Committee, LAWA recommends SCAG convene a working group of the region's airports, transportation agencies, SCAG members, and other key stakeholders to help identify strategies and policies aimed at distributing commercial traffic and goods movement across the region. LAWA looks forward to actively participating on such a SCAG Committee.

Should you need additional information or have any questions, please contact Lisa Trifiletti of my staff at LTrifiletti@lawa.org or (424) 646-5186.

Sincerely,


Deborah Flint
Executive Director

cc: Cynthia Guidry
Lisa Trifiletti





Los Cerritos Wetlands Land Trust
for Long Beach and Seal Beach

PO Box 30165
Long Beach, CA 90853

714-357-8576
www.lcwlandtrust.org

February 1, 2016

Hasan Ikhata
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017
RE: Comments on the 2016 Draft RTP/SCS and PEIR

Dear Mr. Ikhata

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, The Los Cerritos Wetlands Land Trust, is now a part of this growing coalition in 2016.

The Los Cerritos Wetlands Land Trust works in Orange and Los Angeles Counties and has for 15 years. Our mission is the protection and preservation of Los Cerritos Wetlands. We have had important successes since our inception including moving almost half of Los Cerritos Wetlands into the public trust.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe

can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We've reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG's mission with the Natural and Farmland policies.

We are pleased to see an Appendix devoted directly to natural and farmlands protection in the 2016 Plan. We are glad that the Plan contains specific strategies addressing natural land and farmlands issues. This is certainly a step in the right direction. The culmination of the work from the last RTP/SCS is clearly visible in this Draft Plan. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful and science-based role in mitigating impacts to our natural environment from transportation, infrastructure and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

Sincerely,

Elizabeth Lambe
Executive Director
Los Cerritos Wetlands Land Trust



Foothill Gold Line

Metro Gold Line Foothill Extension Construction Authority

406 East Huntington Drive, Suite 202
Monrovia, CA 91016-3640

p 626.471.9050 f 626.471.9049
www.foothillgoldline.org

Board Members:

January 28, 2016

BLCA-3RD-1666

Doug Tessitor
Chair
Appointee,
City of Pasadena

Sam Pedroza
Vice Chair
Mayor Pro Tem,
City of Claremont
Appointee, SGVCOG

Marisol Rodriguez
Member
Alternate Appointee,
City of Los Angeles

Paul S. Leon
Member
Mayor,
City of Ontario
Appointee, City of South
Pasadena

John Fasana
Member
Council Member,
City of Duarte
Appointee, LACMTA

Gene Masuda
Member, Non-Voting
Vice Mayor
City of Pasadena
Appointee, City of
Pasadena

Carrie Bowen
Member, Non-Voting
District 7 Director,
Caltrans
Gubernatorial
Appointee

Daniel M. Evans
Member, Non-Voting
Appointee, City of
South Pasadena

Alan D. Wapner
Member, Non-Voting
Council Member,
City of Ontario
Appointee, SANBAG

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

SUBJECT: Southern California Association of Governments
2016 Draft Regional Transportation Plan/Sustainable Communities Strategy

We are pleased that the Southern California Association of Governments (SCAG) is including the Foothill Gold Line from Glendora to Montclair in the Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) under the financially constrained plan. However, the RTP/SCS forecasts completion of the project in 2040, almost two decades beyond the current planned schedule while also understating the project costs.

The Foothill Gold Line is a critically needed link that will connect a dozen universities, the LA County Fairplex, and LA County with San Bernardino and Riverside Counties at the Montclair TransCenter. The Foothill Gold Line will alleviate traffic on one of the most heavily congested corridors which is expected to assume the majority of the subregion's population and employment growth in the coming decades. The Glendora to Montclair segment is estimated to achieve 18,300 daily boardings by reducing Vehicle Miles Traveled (VMT) by 111,000 and reduce emission burden levels resulting in beneficial effect on CO, TOG, Nox, PM10 and PM 2.5 levels.

The current forecast in the Draft RTP/SCS of completing the Foothill Gold Line in 2040 is too late and should be amended to complete this vitally needed project as soon as possible. No other rail project in Los Angeles County is as ready as this one. The project will be ready in 2017 to break ground and SCAG should find ways to include innovative sources to fully fund the \$1,216 M project sooner as they are doing with other unfunded rail projects in Los Angeles.

Sincerely,

Douglas F. Tessitor
Chairman

Executive Officer:

Habib F. Balian
Chief Executive Officer



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

February 1, 2016

Courtney Aguirre and Lijin Sun
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

Via email (2016PEIR@scag.ca.gov) and USPS

**RE: Southern California Association of Governments Draft 2016
Regional Transportation Plan and Sustainable Communities
Strategy; and Draft Program Environmental Impact Report
(SCH#2015031035) – National Trust for Historic Preservation
Comments**

Dear Ms. Aguirre and Ms. Sun,

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) Draft 2016 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS); and Draft Program Environmental Impact Report (PEIR) (SCH#2015031035).

We commend SCAG for its focus on constructive, sustainable, regional transportation improvements, and for not explicitly including the State Route 710 Tunnel Alternative (SR-710 Tunnel) in the list of constrained projects. However, some ambiguity about the status of the SR-710 Tunnel project remains as a result of references to the SR-710 North project in the Draft PEIR. We urge SCAG to clarify references to the SR-710 North project in the Final 2016 RTP/SCS and PEIR, and confirm that the SR-710 Tunnel Alternative is not included in the RTP list of constrained projects.

Interests of the National Trust

The National Trust for Historic Preservation is a private, nonprofit organization chartered by Congress in 1949 to facilitate public participation in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. 54 U.S.C. §§ 320101, 312102. With the strong support of its members across the nation, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government.

The National Trust has decades of experience working for better transportation solutions in Southern California. Beginning in 1989, the Trust named South Pasadena, Pasadena and El Sereno to its annual list of *America's 11 Most Endangered Historic Places*, for five

consecutive years, shining a national spotlight on the devastating threat posed to historic communities within the corridor from the proposed 710 freeway extension. And in 1999, the National Trust was a co-plaintiff in the litigation that resulted in an injunction against the surface freeway proposed at the time, which would have demolished hundreds of historic homes and cultural sites. *City of South Pasadena, et al. v. Slater*, 56 F. Supp. 2d 1106 (C.D. Cal. 1999). In 2015, the National Trust became a member of Connected Cities and Communities (C3) coalition and named the “Historic Communities of the 710” as a National Treasure in light of the renewed threats to historic resources, neighborhoods, and communities from the tunnel projects proposed in the SR-710 Draft Environmental Impact Report (DEIR).

Since a Locally Preferred Alternative has not yet been identified by Caltrans for the SR-710 North Project, SCAG should remove all references or inferences that the project will be the SR-710 Tunnel Alternative. Specifically, RTP ID 1M0101 should be moved from the Constrained Plan to the Strategic Plan, and the language should be clarified to ensure the project description is alternative–neutral, for the following reasons:

I. An SR-710 Tunnel Alternative Is Inconsistent with the Majority of SCAG’s Regional Goals Expressed in the Draft 2016 RTP/SCS.

Inclusion of a freeway Tunnel Alternative in the Final RTP/SCS and PEIR would be in direct opposition to the many valid, forward-thinking, and sustainable initiatives established by the Draft 2016 RTP/SCS:

- Preserving the Transportation System We Already Have (Fixing it First)
- Expanding Our Regional Transit System to Give People More Alternatives to Driving Alone
- Expanding Passenger Rail
- Managing Demand on the Transportation System
- Promoting Walking, Biking and Other Forms of Active Transportation
- Focusing New Growth Around Transit

II. Including a Tunnel Alternative Would Be Inconsistent with Recent California State Legislation.

An SR -710 Tunnel Alternative is in opposition to the principles and goals of Assembly Bill 32 (AB 32) and Senate Bill 375 (SB 375) because the resulting project would induce demand, increase vehicle miles traveled (VMT), and increase greenhouse gas (GHG) emissions. As the Metropolitan Planning Organization for the region, SCAG should promote and implement policies that will improve regional air quality and support projects that will reduce regional VMT and GHG emissions.

III. References to "SR-710 North Extension (Alignment TBD)" should be revised.

We remain concerned with SCAG’s assertion in Appendix B of the draft PEIR that the alignment is “to be determined.” Comments within the draft RTP/SCS and PEIR suggests

that the project proposed by SCAG remains the SR-710 Tunnel and that it is not alternative-neutral. The PEIR should be revised accordingly to address the following:

- Appendix B, page 149 describes the project as "SR-710 North Extension (Alignment TBD)." A footnote indicates that the project will be selected after environmental review and then the RTP/SCS will be subsequently amended. However this description suggests that the tunnel project is the only extension contemplated, when in fact, the ongoing environmental review for the 710 project includes other alternatives that are not highway extensions (TDM/TSM, Bus Rapid Transit, and Light Rail Transit).
- Appendix B, page 37, notes that funding is being sought "to close the 710 freeway gap." Listing the project as a "freeway gap closure" implies that the project is a freeway tunnel rather than any of the other alternatives proposed in the SR-710 DEIR.
- The Appendix B designation of the project as a "State Highway," like the "Route #" of SR-710 (Appendix B, pp. 37, 149) suggests the project is the SR-710 Tunnel Alternative, which is the only state highway alternative identified in the Caltrans 710 North Study
- Figure 2.4.2-1 (Major Highway Projects) and Figure 2.4.2-5 (Major Toll Projects) in the draft PEIR describe the SR-710 North Project as a toll project. The only Caltrans 710 North Project alternative that calls for a toll road is the freeway Tunnel Alternative.
- The stated project cost of \$5.6 billion in Appendix B page 149 correlates with the project costs stated in the SR-710 DEIR, and therefore appears to identify the dual-bore Tunnel as the selected alternative.

IV. The SR-710 Tunnel Alternative Should Be Removed from the Constrained Projects List.

Inclusion of the SR-710 Tunnel Alternative fails to meet the federal requirement that any project listed as fiscally constrained must establish that funds for the project are "committed, available, or reasonably available." (23 C.F.R. §450.104.) The \$5.6 billion in projected project costs for the dual-bore SR-710 Tunnel Alternative are not at all "committed, available, or reasonably available."

Only \$740 million of Los Angeles County Measure R funds remain for construction of a San Gabriel Valley transportation project, and these funds are *not* specifically designated for the SR-710 Tunnel Alternative, but can be applied to other projects or programs. *City of South Pasadena v. Los Angeles County Metropolitan Transportation Authority* (Mar. 22, 2011) 2d Civil No. B22118, Cal. App. 2d Dist. (available at <http://www.leagle.com/decision/In%20CACO%2020110322011/CITY%20OF%20SOUTH%20PASADENA%20v.%20LOS%20ANGELES%20COUNTY%20METROPOLITAN%20TRANSPORTATION%20AUTHORITY>.) Even if the remaining \$740 million of Measure R

funding were assigned to a Tunnel Alternative, the additional \$4.8 billion has not yet been identified to fund the construction of the dual-bore alternative.

SCAG should remove the Tunnel Alternative from its constrained list in the Final RTP/SCS and PEIR, and invest the region's limited financial resources in transportation projects that are in alignment with the regional goals and priorities set forth in the RTP/SCS. The previous error of including the SR-710 Tunnel in the 2012 Constrained Plan should be corrected in the 2016 RTP/SCS by moving the project to the Strategic Plan to accurately reflect the lack of available funding.

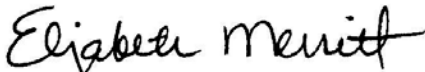
As a member of the Connected Cities and Communities (C3) coalition, the National Trust supports *Beyond the 710: Moving Forward - New Initiative for Mobility and Community* (http://www.beyondthe710.org/the_bt710_proposal) a proactive initiative developed in collaboration with the Natural Resources Defense Council, the 5 Cities Alliance, and other community stakeholders. The *Beyond the 710* initiative carefully considers the larger mobility and economic development needs of the San Gabriel Valley, promotes strategies and solutions similar to SCAG's 2016 Draft RTP/SCS Land Use Strategies, and could serve as the starting point for SCAG to outline an East Los Angeles/Pasadena or West San Gabriel Valley Mobility Plan.

Thank you for considering the comments of the National Trust for Historic Preservation. Please feel free to contact us if you have any questions.

Sincerely,



Brian R. Turner
Senior Field Officer and Attorney



Elizabeth S. Merritt
Deputy General Counsel

cc: Chris Wilson, Charlene Vaughn, and Reid Nelson, Advisory Council on Historic Preservation
Julianne Polanco and Natalie Lindquist, California State Historic Preservation Office
Cindy Heitzman, California Preservation Foundation
Linda Dishman and Adrian Scott Fine, Los Angeles Conservancy
Sue Mossman and Jesse Lattig, Pasadena Heritage
Damon Nagami, Natural Resources Defense Council
Sarah Gavitt, West Pasadena Residents Association
Marina Khubesrian and Ara Najarian, Beyond the 710

Claire Bogaard and Jan SooHoo, No 710 Action Committee
Antonio Rossmann, Esq., Counsel to City of South Pasadena
Margaret Lin, City of South Pasadena
Vince Bertoni, Planning & Community Development, City of Pasadena
Elena Phleger, Sequoyah School
Douglas Carstens, Chatten-Brown and Carstens on behalf of Westridge School

Individual Coalition Letter

February 1, 2016

Dear Southern California Association of Governments,

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Naturalist For You is now a part of this growing coalition in 2016.

Naturalist For You works in Orange, San Diego, Riverside, Los Angeles, San Bernardino and Ventura County, and has since 2006. Our mission is to connect everyone to local wilderness. We have had important successes since our inception including recruitment of community members as naturalists and the continuous environmental education of an estimated 20,000 members of the public through our nature walks, presentations, workshops and events.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We've reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG's mission with the Natural and Farmland policies.

Congratulations

We are pleased to see an Appendix devoted directly to natural and farmlands protection in the 2016 Plan. We are glad that the Plan contains specific strategies addressing natural land and farmlands issues. This is certainly a step in the right direction. The culmination of the work from the last RTP/SCS is clearly visible in this Draft Plan. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful and science-based role in mitigating impacts to our natural environment from transportation, infrastructure and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

Amendments to the Open Space Maps in the PEIR

Maps contained within the PEIR, RTP, SCS and Appendix should be internally consistent and they are not. For example, each map that shows "open space" or "protected lands" should be using the same base dataset but they do not. The 2012 Plan resulted in the creation of SCAG's very own geographic information systems (GIS) dataset: the Natural Resource Inventory. It is more accurate than what is in the document now and it has been vetted by numerous organizations. That's why it is surprising to see that so few of SCAG's own GIS layers were actually used in the documents' maps. We urge SCAG to honor its own work and that of its partner organizations by using this dataset as the basis for natural and farmland mapping. Let's move forward with the same baseline information.

Identify a Conservation Mechanism for the Natural and Farmlands Preservation

Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it likely relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy

and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.

Formal Versus Informal Conservation Plans—All Are Important

SCAG focused many sections of the document on formal conservation plans, in the form of Natural Community Conservation Plans and Habitat Conservation Plans (NCCP/HCP), as the conservation method most identified by the agency. It is important to note that NCCP/HCP programs are only one conservation mechanism and they have limitations. For example, they are voluntary, property owner driven and generally only apply to larger land ownerships. Efforts underway by local, regional, state and federal agencies outside of these formal plans should not be discounted and must be included. Furthermore, many conservation organizations help facilitate, coordinate and find funding for land conservation transactions. We believe the conservation approach promoted by SCAG should include all of the ways land is protected, including those less regulated methods of conservation outside of NCCP/HCP programs.

Population Growth Impacts to Existing and Future Parklands

The Plan outlines that the region anticipates an additional 3.8 million people by 2040 providing increased pressure on our existing parkland. Studies document that many communities in the Southern California region already do not have enough parkland as outlined by the Quimby Act (three acres per 1,000 residents). Throughout the document, the Plan promotes providing more access to these existing parks as infill projects are built, but nowhere does it state how additional parks will be created. The mechanism is missing. More importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity recreation oriented activities, like soccer and baseball fields, and are turfed. The types of land acquired as mitigation or through local conservation efforts typically are focused on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing "more" access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. The document needs to address the impacts to local parks with increased access from expanding populations. The document also needs to address how additional lands will be protected, i.e., what mechanism will be used?

SCAG's Support of Regional Wildlife Corridors

The current federal transportation bill, FAST Act, supports understanding transportation impacts on natural resources. The previous bill, MAP-21, supported restoring and maintaining environmental functions (i.e., wildlife corridors) affected by the infrastructure projects in the RTP. SCAG has even supported efforts in Los Angeles County to create a wildlife corridor over the 101 Freeway. Many efforts are underway across the region to connect landscapes to one another. This is very important to the region and its biodiversity. Wildlife corridors allow species to migrate and forage and expand genetic diversity. These corridors also allow ecosystems to maintain ecological functions, act as sources for repopulation after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by infrastructure projects.

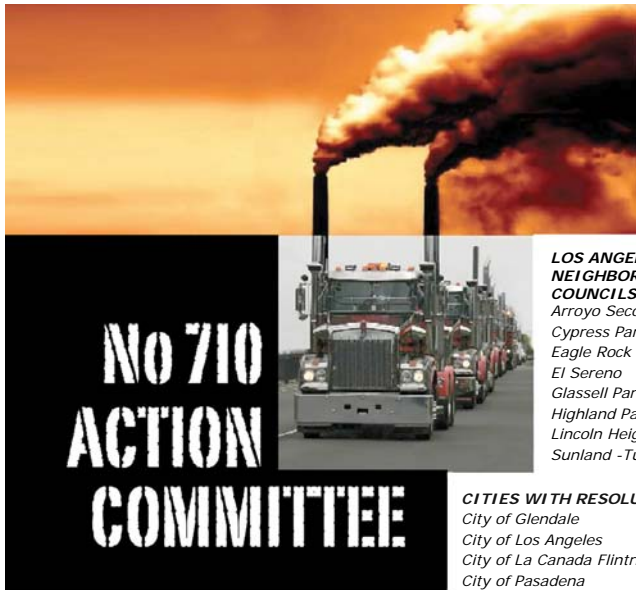
Conclusion

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Should you need to contact me, I can be reached at [REDACTED]. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to [REDACTED].

Sincerely,



Joel Robinson
 Director/Head Naturalist
 Naturalist For You
www.naturalist-for-you.org



OPPOSITION GROUPS (PARTIAL LIST)

Caltrans Tenants of the 710 Corridor
 Natural Resources Defense Council
 East Yard Communities for Environ. Justice
 Glassell Park Improvement Association
 Far North Glendale Homeowners Association
 San Rafael Neighborhoods Association
 West Pasadena Residents Association
 Highland Park Heritage Trust
 Glendale Homeowners Coordinating Council
 Crescenta Valley Town Council
 La Canada Unified School District
 LA RED, El Sereno

INJUNCTION PLAINTIFFS

City of South Pasadena
 Sierra Club
 National Trust for Historic Preservation
 California Preservation Foundation
 Los Angeles Conservancy
 Pasadena Heritage
 South Pasadena Preservation Foundation
 South Pasadena Unified School District

LOS ANGELES NEIGHBORHOOD COUNCILS

Arroyo Seco
 Cypress Park
 Eagle Rock
 El Sereno
 Glassell Park
 Highland Park
 Lincoln Heights
 Sunland - Tujunga

GREEN SCISSORS 2011 REPORT GROUPS

Friends of the Earth
 Taxpayers for Common Sense
 The Heartland Institute
 Public Citizen

CONTACT INFORMATION



www.no710.com

CITIES WITH RESOLUTIONS AGAINST THE SR-710 TUNNEL

City of Glendale City of Sierra Madre
 City of Los Angeles City of South Pasadena
 City of La Canada Flintridge
 City of Pasadena

February 1, 2016

Draft 2016 RTP/SCS Comments

Attn: Courtney Aguirre

Southern California Association of Governments

818 W. 7th Street, 12th Floor

Los Angeles, CA 90017

Dear Ms. Aguirre,

The stated cost of the \$5.6 billion for the SR 710 Tunnels at Appendix B, page 149 is a false cost estimate. This cost estimate is grossly underestimated by 1/2. I assume this number was adopted from Caltrans/Metro's DEIR for the 710 North which is drawn from Metro's LRTP. This number is for construction only and does not include the total cost of the project besides being purposely low to deceive the public, decision makers in an attempt to attract and gain support from tunnel contractors.

One needs only to look no further for an accurate cost estimate than SCAG's final compilation of all matrices used during the 2008 RTP workshops between September and October of 2007 (attached) for a more realistic estimate. The SCAG staff got it right in 2007. Additionally, SCAG could have looked at the bid costs for Seattle's tunnel project which is the most comparable project in the US at this time. That estimate, based on Seattle's numbers, would be close to SCAG's \$11.8 billion.

There has been a long history of attempts to estimate the tunnel costs dating back to 1992 with a \$4 billion cost estimate. From that time to date, the cost estimates for the SR 710 Freeway Toll Tunnels have been so wildly variable as to be invalid (see attached).

SCAG is the region's MPO. One would hope you would act responsibly and try to build confidence with your constituents and not try to fool the public by using a number in 2016 this is 1/2 the number you used eight years before.

Thank you for your attention.

Joanne Nuckols



RTP WORKSHOP: WRAP-UP

#	2004 RTP	FUNDING SOURCE	DESCRIPTION	EST. POTENTIAL REVENUES	ENERGY IMPACTS	PROS	CONS	PROJECTS IMPACTED	RECOMMENDATION
1	No	Congestion Pricing Strategy (e.g., regional VMT fee, regional HOT lane network, open-road tolling)	A region-wide pricing strategy used to address congestion and emissions starting in 2015	\$25 billion to \$50 billion assuming a half-cent to a one-cent VMT charge (2015-2035); for a driver who drives 10,000 miles/year, this would cost about \$50 to \$100 per year.	This policy reduces total vehicles on the road and subsequently reduces fuel consumption and greenhouse emission while simultaneous raising money for the area. The reduction in congestion can account for a 28% reduction in crashes (found in London Studies).	<ul style="list-style-type: none"> - Funding stays in the Region - With current advances in technology, could be relatively easy to implement - Can serve as an effective demand management tool and help with air quality conformity - Revenue collection is directly tied to use of the system 	<ul style="list-style-type: none"> - Politically challenging - Currently there is no legislative authority - There is no regional entity to administer/implement such a comprehensive program - Further study is needed 	- If Strategy 2 is not recommended for the financially constrained RTP, this Strategy 1 may serve as an alternative funding source for those projects listed under Strategy 2	<p>Include in the Strategic Plan and continue further study.</p> <p>Requisite Milestone:</p> <ul style="list-style-type: none"> - Perform further study of congestion pricing as a future financing option although the Federal Government will most likely not accept it as an option at this point.
2	Yes	State and Federal Gas Excise Tax Increase	Additional ten cent per gallon gasoline tax imposed by the State and a ten cent per gallon gasoline tax imposed by the Federal government starting in 2011	\$16.9 billion (2012-2035)	A study at UC Davis reports that the short run elasticity of gas has dropped to -0.034 to -0.077 and is more inelastic. This implies that with a ten percent increase in the gas price, there is a less than one percent change in gas consumption. (Source: UC Davis. Evidence of a Shift in the Short-Run Price Elasticity of Gasoline Demand. http://repositories.cdlib.org/uc/ei/csem/CSEMWP-159)	<ul style="list-style-type: none"> - Historical precedence - Relatively easy to implement - Revenue distribution mechanism already in place - Revenue collection is closely tied to use of the system 	<ul style="list-style-type: none"> - Politically challenging - Requires periodic adjustments to keep up with inflation and fuel efficiency - Further increase in the use of alternative fuel vehicles hampers revenue potential - Concerns about not adequately receiving the region's fair share of revenues 	- Additional Operations and Maintenance for Highway system - Potentially all the major highway corridors requiring additional public funding: High Desert Corridor; CETAP Riv-Orange; 710 Tunnel; 710 South; I-5 HOV & Truck Climbing Lanes	<p>Include in the Constrained Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - Conduct outreach with state and federal elected representatives - Initiate public education program - Draft legislation - Need Congressional or State Legislature approval
3	No	Index State and Federal Gas Tax	Index to inflation (3.8 percent annually)	\$20 billion (2012-2035)	See option #2	<ul style="list-style-type: none"> - Keeps pace with inflation - Relatively easy to implement - Revenue distribution mechanism already in place - Revenue collection is closely tied to use of the system 	<ul style="list-style-type: none"> - Politically challenging because periodic increases are not necessarily subject to further public discourse - Further increase in the use of alternative fuel vehicles hampers revenue potential - Concerns about not adequately receiving the region's fair share of revenues 	- Additional Operations and Maintenance for Highway system - Potentially all the major highway corridors requiring additional public funding: High Desert Corridor; CETAP Riv-Orange; 710 Tunnel; 710 South; I-5 HOV & Truck Climbing Lanes	<p>Include in the Strategic Plan and continue further study.</p>
4	Yes	Highway Tolls	Tolls assumed for the 710 Tunnel, 710 South (truck lanes), CETAP Riv-Orange, High Desert Corridor	Only applicable to specific projects; revenue potential varies (e.g., for the 710 Truck lane prior studies have indicated that toll revenues could cover about 1/3rd of capital costs)	With a shift of about half the amount of travel from congested to uncongested times and places, fuel reductions could reach 10 percent. (Based on SCAG Energy Consultant Work)	<ul style="list-style-type: none"> - Generates additional source of revenue for transportation projects - With current advances in technology, could be relatively easy to implement - Can serve as an effective demand management tool and help with air quality conformity - Revenue collection is directly tied to use of the system - AB1467 authorizes the region to implement tolls/user-fees for goods movement projects 	<ul style="list-style-type: none"> - Politically challenging (perceptions of equity, privacy, and opposition from trucking industry, etc.) - Currently there is no legislative authority for non-goods movement related facilities 	-High Desert Corridor; CETAP Riv-Orange; 710 Tunnel; 710 South (truck lane)	<p>Include in the Constrained Plan (specific project generated tolls).</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - Conduct outreach with state and federal elected representatives - Initiate public education program - Draft authorizing legislation for specific projects - Need legislative approval - Need traffic and revenue analyses - Comprehensive financial/business plan

RTP WORKSHOP: WRAP-UP

#	2004 RTP	FUNDING SOURCE	DESCRIPTION	EST. POTENTIAL REVENUES	ENERGY IMPACTS	PROS	CONS	PROJECTS IMPACTED	RECOMMENDATION
5	Yes	Container Fees	Charge imposed on containerized cargo moving through the Ports/Region	Example: A \$50/TEU charge would generate apprx. \$45.6 billion (2012-2035)	Unknown	<ul style="list-style-type: none"> - Generates income consistent with growth of port traffic - 70 percent of containers are destined for markets outside of southern California--facilitates equitable cost allocation - Container fees should be directly tied to capacity expansion projects to facilitate the movement of goods - AB1467 authorizes the region to implement tolls/user-fees for goods movement projects - The Ports of LA and LB are negotiating container fees with shippers - Historical precedence--Alameda Corridor Container Fees 	<ul style="list-style-type: none"> - Politically challenging (opposition from shippers/business community) - Potential diversion of container cargo to other ports (e.g., Panama Canal Expansion) for fees over \$200/container 	- 710 South (Truck lanes) and Rail Capacity, Grade Separations, and Clean Technology Package	<p>Include in the Constrained Plan (no more than \$200/container per SCAG's Port & Modal Elasticity Study).</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - (Route 1) Conduct outreach with state elected representatives to pursue legislative approval route - (Route 2) Can continue to work with the Ports to facilitate a negotiated fee structure for a system of regional goods movement projects - Need traffic and revenue analyses - Comprehensive financial/business plan
6	Yes	Local Option Sales Tax Extension for Imperial County	Half-cent sales tax on retail sales in Imperial County--dedicated to transportation purposes. Current sales tax expires in 2010.	\$816 million (2011-2035)	Unknown	<ul style="list-style-type: none"> - Historical precedence - Relatively easy to implement - Revenue distribution mechanism already in place - Dedicated to transportation - Stays in county of revenue generation 	<ul style="list-style-type: none"> - No direct relationship with use of transportation system - Tax is regressive - Needs 2/3rds voter approval - Politically challenging 	- Example of projects in Imperial potentially impacted: SR111 freeway and Jasper Rd expressway	<p>Include in the Constrained Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - Work with Imperial County - Initiate public education program/marketing - Local consensus - Surveys - Expenditure plan - Ballot measure by Imperial County
7	No	Local Option Sales Tax Imposition for Ventura County	Half-cent sales tax on retail sales in Ventura County.	\$6.2 billion (2011-2035)	Unknown	<ul style="list-style-type: none"> - Relatively easy to implement - Revenue distribution mechanism already in place - Dedicated to transportation - Stays in county of revenue generation 	<ul style="list-style-type: none"> - No direct relationship with use of transportation system - Tax is regressive - Needs 2/3rds voter approval - Politically challenging - Recent effort was not successful 	Additional efforts to widen the 101 may be impacted	<p>Include in the Strategic Plan and continue to work with Ventura County.</p>
8	No	Value Capture Strategies	Includes Mello Roos Community District Financing, Benefit Assessment Districts, Joint Development Funds from private sector, real estate sales of Caltrans owned property	Revenue potential can vary; can generate roughly 10% of total capital cost; real estate sales for Caltrans owned property estimated to generate apprx. \$400 million to partially offset public contribution needs for the 710 Tunnel	Unknown	<ul style="list-style-type: none"> - Valuable gap funding strategy - Captures the incremental value generated by transportation investments--can be consistent with the Region's transit oriented development goals - Capitalizes on already owned public right-of-way (real estate sales) 	<ul style="list-style-type: none"> - Revenue generating potential is not significant in comparison to cost of the Region's infrastructure needs - Local jurisdiction approval process can be challenging (property owner approval needed)--subject to Prop 218 (supermajority) 	- 710 Tunnel (real estate sales); also transit improvements (e.g., Gold Line Extension)	<p>Include in the Constrained Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - Need Caltrans' commitment to utilize proceeds from real estate sales for 710 Tunnel (\$400M) - Public outreach with local jurisdictions for Mello Roos and Assessment District financing
9	Yes	Private Equity Participation (PPP)	Public-Private Partnership arrangement whereby a private entity designs, finances, builds, operates and maintains a transportation facility under a lease arrangement for a fixed period of time; project(s) must generate sufficient revenues to be economically viable (user-fees, tolls, etc.). Public sector would forgo revenue from these user-fees in exchange for private development.	Not technically a revenue source; it's an innovative project delivery mechanism that can accelerate projects. Only applicable to specific projects with creditworthy revenue streams.	Unknown	<ul style="list-style-type: none"> - Can accelerate project implementation - Taps into private sector to fill funding gaps - The private sector can bring expertise and efficiencies - AB1467 authorizes the region to work with private entities for goods movement projects - Facilitates risk sharing amongst private and public stakeholders - There could be revenue sharing for any surplus cash-flows (negotiable with private entity) 	<ul style="list-style-type: none"> - The public sector still needs to make significant financial commitment with predevelopment costs - Lengthy environmental review processes, etc. increases risk for the private sector - PPP arrangements are still fairly new in this country--requires better understanding by public entities to ensure protection of public interest 	-High Desert Corridor; CETAP Riv-Orange; 710 Tunnel; 710 South (truck lanes)	<p>Include in the Constrained Plan for new projects, not selling of public assets.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - Need detailed traffic and revenue analyses for specified projects - Comprehensive financial/business plans - Draft authorizing legislation for specific projects (non-GM projects) - Need legislative approval - Establish JPA or regional entity as appropriate to facilitate negotiations with private entity

RTP WORKSHOP: WRAP-UP

#	MODE/PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
1	Freight Rail	Yes	Rail Expansion + Grade Separations	\$9 billion	\$800 million committed locally to grade separations	Energy demand may be reduced if Metrolink ridership is increased. Goods movement demand could be overstated given the energy supply uncertainty.	- Expansion is needed for efficiency, expected growth, and Metrolink - Projects are consistent with county commission submittals and the Multi-County Goods Movement Action Plan - Almost \$800 million have been committed locally to these projects - Improves public safety	- Inadequate funding commitment	<p>Include clean technology strategies as package with grade separations and rail expansion in the Constrained Plan.</p> <p>Requisite Milestones: Work to secure funding sources:</p> <ul style="list-style-type: none"> - state bond revenues - container fees - railroad fees - additional local commitment - federal funds for clean technology - private activity bonds
		No	Clean technology for existing and future services	\$2.8 billion	\$0 committed at this time for clean technology components (\$800 million committed locally to grade separations)	The energy impacts are dependent on how the energy is generated. California currently imports about 31 percent of its annual electricity supply from out-of-state generating units, and about 75 percent of this power (4,744 MW) comes from coal. The majority of in-state electricity generation (46%) comes from natural gas. (Source: California Energy Commission, Gross System Power 2006. Retrieved on October 22, 2007 from http://energy.ca.gov/electricity/gross_system_power.html)	- Helps meet air quality attainment goals - Improves public health	- Inadequate funding commitment - Technology/construction risks	
2	Truck Lanes	Yes	2 Lanes in Each Direction: I-710 between the San Pedro Ports and SR-60 (this portion also includes mixed-flow improvements); SR-60 between I-710 and I-15; I-15 from SR-60 to Barstow	\$44 billion	\$30 million committed for I-710 EIR/EIS (could be in jeopardy if we do not include in Constrained Plan) (\$20 million expended in previous planning studies)	The demand for additional vehicle capacity may be overstated given the energy supply and cost uncertainty.	- Accommodates and provides improved mobility to trucks (close to free flow) - Relieves congestion on general purpose lanes (equivalent to adding more than one free flow lane at less than 40% of the cost) - Expected emission reduction due to congestion relief - Improves public safety	- Inadequate funding commitment - Public opposition - Environmental challenges - Right-of-way challenges	<p>Include I-710 portion in the Constrained Plan. Include SR-60 and I-15 portions in the Strategic Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - local funding commitment (via LACMTA's planning documents or board resolutions) - comprehensive business plan with documentation on tolls and other funding sources
3	Alternative Technology Conveyance for Freight Only Component	No	Fully elevated system over public transportation corridors linking the San Pedro Ports with potential inland port facilities	\$18 billion	\$0 commitment at this time	As with option #1, the energy impacts are dependent on how the energy is generated. Of the electricity consumed in the SCAG region in 2006, approximately 15 percent was generated from eligible renewables. (Source: California Energy Commission, 2005 Gross System Electricity Production. Retrieved on February 7, 2007 from http://www.energy.ca.gov/electricity/gross_system_power.html)	- Advanced technology holds promise for high-capacity, fast, efficient, and environmentally friendly transport of goods - Improves public health	- Inadequate funding commitment - Location of inland port facilities need to be identified - Port infrastructure requirements/cost needed to keep up with HSRT system - Untested technologies - Little interest from shippers and ports - Operation & Maintenance data is sparse	<p>Include in the Constrained Plan (per discussion at Workshop on passenger HSRT).</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - local funding commitment - comprehensive business plan with documentation on user fees and other funding sources - institutional authority with implementation ability - supporting documentation of private sector interest
4	Inland Port	Yes (policy discussion)	Inland port facility located in Palmdale and San Bernardino County to facilitate the HSRT container movement system	TBD	\$0 commitment at this time	If this option encourages efficient land use patterns and reduces VMT, operational energy demand could be reduced. However, increasing the throughput at the port facilities may be unlikely given the energy supply uncertainties.	- Freight traffic congestion relief through a reduction in regional Vehicle Miles Traveled (VMT) - Reduction in net emissions, particularly diesel particulate matter - Encouragement of efficient patterns of land use and industrial development - Increase in the capacity/throughput of port facilities	- Inadequate funding commitment - Substantial ongoing operating subsidies - Locating feasible, available sites for a facility - Community concerns	<p>Include in the Constrained Plan (consistent with recommendation for Alternative Technology Conveyance for Freight Only Component).</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - private commitment - implementation of Alternative Technology Conveyance for Freight Only Component - availability of site locations

RTP WORKSHOP: WRAP-UP

#	MODE/PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
1	Operations and System Preservation	Yes - Partial	Routine maintenance and early infrastructure repairs. Operational improvements (small physical improvements and technology deployments).	\$66 billion (through 2035)	\$40 billion commitment (\$26 billion unfunded)	This option would generally result in lower energy usage. However, with the continuing escalation of global fuel prices, many transportation projects are beginning to experience unprecedented construction cost increases. (Source: FHWA, http://www.fhwa.dot.gov/programadmin/contracts/price.cfm)	<ul style="list-style-type: none"> - Maintains or increases mobility - Maintains or increases safety - Maintains or increases efficiency - Improves public safety - Early minor repairs prevent expensive major repairs in the future - Lower cost for maintenance - More cost-effective than capacity expansion projects 	<ul style="list-style-type: none"> - Inadequate funding commitment - Less money is available for expensive capacity expansion projects - Politically unpopular (low-profile) 	<p>Increase level of funding in the Core RTP by up to 40% (\$10 billion) above current commitments, recognizing capital investment tradeoffs.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - increase in state gas tax and potential bond funding
2	I-710 tunnel	Yes - not as tunnel & not tolled	Gap closure from I-10 to I-210	\$11.8 billion	Technical study completed	This option would result in energy usage from construction and operation. Passenger cars use 581 gallons of gasoline per year per car and light trucks use 813 gallons of gasoline per year per vehicle. (Source: U.S. EPA, Office of Transportation and Air Quality, Average Annual Emissions and Fuel Consumption for Passenger Cars and Light Trucks. April 2000, EPA420-F-00-013)	<ul style="list-style-type: none"> - Increases capacity (one of the best performing capacity projects) - Relieves congestion - Fills in critical gap in the regional network - Tunnel is more environmentally sensitive option - Addresses community concerns - Private investment community has expressed interest in this project (prime candidate for PPP financing) 	<ul style="list-style-type: none"> - Inadequate funding commitment - Expensive investment alternative - Longstanding community opposition - Geological/seismic risks - Safety risks 	<p>Include in the Constrained Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - local funding commitment (via MTA's planning documents or board resolutions) - financial/business plan with adequate analysis of tolls and other funding sources - supporting documentation of private sector interest
3	High Desert Corridor	No	New freeway/tollway connecting LA County and SB County	\$13.7 billion	Over \$70 million committed from SANBAG for portion east of US-395; \$0 commitment from Metro	Regulating volume speed could be maintained at a more consistent rate thereby potentially reducing fuel use. In addition, removing vehicles from regular lanes to underutilized HOV lanes can improve flow and fuel efficiency in regular lanes. However, this could facilitate automobile dependent development, increasing overall VMT and energy consumption. Furthermore, the travel demand could be overstated given the energy supply uncertainty.	<ul style="list-style-type: none"> - Increases capacity - Relieves congestion - Provides east-west connection between high-growth areas - Allows through-traffic, including goods movement, to bypass congested urban core 	<ul style="list-style-type: none"> - Inadequate funding commitment - Environmental concerns 	<p>Include in the Constrained Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - local funding commitment (via MTA's planning documents or board resolutions) - financial/business plan with adequate analysis of tolls and other funding sources
4	CETAP Riverside County-Orange County Corridor	Yes	A) New facility on or parallel to SR-91 alignment, plus B) New facility connecting Riverside County and Orange County	\$22.5 billion	Planning study completed \$15.8 million federal earmark obligated for technical feasibility work	As with #3, this option could facilitate automobile dependent development, increasing overall VMT and energy consumption. Furthermore, the travel demand may be overstated given the energy supply uncertainty.	<ul style="list-style-type: none"> - Relieves SR-91 congestion - Provides additional intercounty connection between Riverside County and Orange County 	<ul style="list-style-type: none"> - Inadequate funding commitment - Environmental concerns - Right-of-way issues - Requires further study & consensus building 	<p>Include in the Constrained Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - local funding commitment from RCTC for Corridor A
5	I-5 HOV and Truck Lanes	No	HOV and truck climbing lanes on I-5 in Santa Clarita	\$2 billion	\$10 million planning funds for Draft EIR/EIS (includes \$1.5 million SAFETEA-LU earmark)	To the extent the vehicles have higher occupancy and are less congested, HOV lanes carry more people per unit of fuel use. Goods movement demand could be overstated given the energy supply uncertainty.	<ul style="list-style-type: none"> - Increases capacity - Relieves I-5 congestion - Improves public safety - Expands HOV network - Facilitates movement of trucks on major truck corridor 	<ul style="list-style-type: none"> - Inadequate funding commitment - Potential environmental/right-of-way issues 	<p>Include in the Constrained Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - local funding commitment (via MTA's planning documents or board resolutions)
6	US-101 Corridor	Yes	2 HOT lanes in each direction from Ventura County Line to SR-134/SR-170	\$11.4 billion	Planning study completed	By regulating volume, speed is maintained at a more consistent rate thereby reducing fuel use. In addition, removing vehicles from regular lanes to underutilized HOV lanes can improve flow and fuel efficiency in regular lanes.	<ul style="list-style-type: none"> - Increases capacity - Relieves congestion, improves mobility - Addresses intercounty commute 	<ul style="list-style-type: none"> - Inadequate funding commitment - Right-of-way constraints - Major community opposition - Requires further study & consensus building 	<p>Include in the Strategic Plan and continue further study.</p>

RTP WORKSHOP: WRAP-UP

#	MODE/PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
A	Transit Reliability and Performance	No	Use technology to monitor, report and improve on-time performance through operational improvements, rapid bus technologies, and better scheduling of services.	Limited costs incorporated through O & M funds committed. Total Potential Cost Undetermined.	Some commitments in the existing O & M commitments, but not all resources identified.	This option would reduce fuel consumption. Increases in public transit ridership can proportionately reduce VMT, congestion, fuel consumption and improve air quality.	<ul style="list-style-type: none"> - Improves customer satisfaction - Improves reliability of trips (number one issue of concern to transit riders) - Increases efficiency - Improves system productivity - Reduces dependence on highway system - Supports TOD investments 	- Uncertain funding for O & M	<p>Develop a policy to encourage the use of new technologies to monitor, enhance, and report transit system reliability and performance.</p> <p>Seek funding in next OWP (FY08-09).</p>
B	Transit Service Levels	No	Increase transit service levels to accommodate regional growth in demand, and to foster increased use.	Total Potential Cost Undetermined	Some commitments in the existing O & M commitments, but not all resources identified.	This option would reduce fuel consumption. A recent study found that current public transit use reduces U.S. gasoline consumption by 1.4 billion gallons each year. (Source: Public Transportation and Petroleum Savings in the U.S.: Reducing Dependence on Oil," by ICF International, January 2007.)	<ul style="list-style-type: none"> - Can encourage increased use of transit - Greater use of transit for business, social, cultural, and tourism travel - Improves access by transit through reduced travel and wait times 	- Uncertain funding for O & M	<p>Regional and local operator transit service policies should be assessed to determine how to optimize service levels to achieve maximum potential use of our transit investments.</p> <p>Seek funding in next OWP (FY08-09).</p>
C	Fare policies, Fare media, Subsidies to Transit	No	Adjust transit fares to maximize transit usage, including fare free concepts. Utilize new automated fare media to allow for ease of transit use. Increase subsidy levels to maximize transit ridership.	Total Potential Cost Undetermined	Some commitments in the existing O & M commitments, but not all resources identified.	Increases in public transit ridership can proportionately reduce fuel consumption, VMT, congestion, and improve air quality.	<ul style="list-style-type: none"> - Greater use of transit - Can reduce long term costs for highway operations and infrastructure, reducing total costs to the region 	- Uncertain funding for O & M	<p>A fare policy should be analyzed to assess the proper level of fares and subsidies to maximize transit use in the Region.</p> <p>Seek funding in next OWP (FY08-09).</p>
D	Increase Transit Connectivity	No	Restructure transit services, as needed, to more effectively connect different urban centers and activities. Enhance connectivity and ease of transfer between transit modes.	Total Potential Cost Undetermined	Some commitments in the existing O & M commitments, but not all resources identified.	Fostering more residential and mixed use developments near transit hubs will increase public transit ridership and reduce VMT, emissions, and fuel consumption.	<ul style="list-style-type: none"> - Increases connections to urban centers and TOD (supports the Regional Growth Strategy) - Increases connections to activity centers, including retail, cultural, social, and recreational activities - Improved intermodal connections allows for greater use of different modes for different trip needs 	- Uncertain funding for O & M	<p>Regional and local operator transit service policies should be assessed to determine how to optimize connectivity to regional centers, and facilitate intermodal transit service to achieve maximum potential use of our transit investments.</p> <p>Seek funding in next OWP (FY08-09).</p>

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#	MODE/PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
1	Expo Phase II	Yes	Extension of Expo light rail from Culver City to Santa Monica	\$1.1 billion	\$256 million programmed	It is estimated that households in Transit-Oriented Developments drive 45 percent less than residents of automobile-dependent neighborhoods. (Source: Transit Oriented Development: Using Public Transit to Create More Accessible and Livable Neighborhoods" Victoria Transport Policy Institute, TDM Encyclopedia, May 2007. http://www.vtpi.org/tdm/tm45.htm)	- High performing corridor in past RTP's (highest transit demand) - Strong local commitments to TOD - Limited opportunities for expansion of highway/freeway capacity	- Uncertainty over route - Uncertainty over costs	Include in the Constrained Plan.
2	Crenshaw Corridor	Yes	Transit Corridor-Technology/Mode Undetermined	\$1 billion	\$18 million programmed	Potential indirect energy demand for air travel with expanded access to LAX.	- In past RTP's, serves high transit use area - Potential for a branch to Expo - Limited opportunities for expansion of highway/freeway capacity - Potential access to LAX area	- Uncertain funding commitments - Uncertainty over route - Uncertainty over costs - Uncertainty over mode choice - Limited ROW	Include in the Constrained Plan.
3	Regional Connector	Yes	LRT Connection between Gold Line and Expo/Long Beach Lines through LA CBD	\$2.5 billion	\$0 committed at this time	In general, greater connectivity would increase transit ridership, thereby reducing fuel consumption from personal vehicles.	Connection of all Light Rail into a continuous system would allow all systems to interconnect for continuous trips: - Reducing transfers - Increases ridership	- Uncertain funding commitments - Limited ROW - Potential for costly subway construction	Include in the Constrained Plan.
4	Orange Line BRT Extension	Yes	Orange Line BRT Extension from Canoga to Chatsworth	\$226 million	\$118 million programmed for Phase 1 through 4	As with #4, could increase ridership and decrease fuel demand from personal vehicles.	- Low cost BRT extension - Increased use of current Orange Line investment - Connecting services to Metrolink services at Chatsworth	- Serves an area with low current transit ridership.	Include in the Constrained Plan.
5	Green Line LRT Extension	Yes	LRT connection into LAX complex by extending the existing Green Line	\$402 million	\$0 committed at this time- Possible Airport related financing options	As with #2, potential indirect energy impact from expanded access to LAX.	- Improves system connectivity - Improves ground access to LAX - Improved effectiveness of existing Green Line performance	- Uncertain funding commitments - Undetermined access to LAX - Available track capacity Issues with freight railroads	Include in the Constrained Plan.
6	Gold Line Extension	Yes	Phase 1: Phased Extension SMV to Azusa II Phase 2: Azusa II to Montclair Phase 3: Montclair to Ontario Airport-newly proposed and still in feasibility study	Phase 1: \$511 million Phase 2: \$1.5 billion Phase 3: TBD	SCAG includes Phase I to Azusa II as a Baseline Project due to project readiness criteria; LACMTA is unsure on funding O & M, Phase I to Azusa II is not in the MTA proposed list of Baseline projects--SANBAG has committed funding for Phase II Azusa II to Montclair. \$36 million - Phase 1 programming	TODs can save an average of 512 gallons of fuel and \$1,400 in fuel expenses annually.	- Cities in corridor have strong commitments to TOD - Environmental completed pending ROD for Phase One to Azusa II - Relatively low cost per mile on existing ROW	- Inadequate funding commitment (LACMTA has thus far not committed to operation of Phase I to Azusa II; LACMTA funding has not been identified for the extension to Montclair)	Include Phases 1 & 2 in the Constrained Plan. Include Phase 3 in the Strategic Plan. Seek additional State and Federal funds.

RTP WORKSHOP: WRAP-UP

#	MODE/PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
7	Purple Line Extension	Yes (to Fair-fax)	Phase 1: Phased Extension Western to La Cienega Phase 2: La Cienega to Century City Phase 3: Century City to UCLA and beyond	Phase 1: \$3.3 billion Phase 2: TBD Phase 3: TBD	No commitments from LACMTA, at this time.	As with #6, would decrease fuel usage from personal automobiles.	- High performing corridor in past RTP's (highest transit demand) - Strong local commitments to TOD - Limited opportunities for expansion of highway/freeway capacity	- Very limited surface ROW (subway) - High construction costs (subway)	Include Phase 1 in the Constrained Plan. Include Phases 2 & 3 in the Strategic Plan. Seek additional State and Federal funds.
8	Metrolink Strategic Plan	No	Strategic investments in additional track capacity, signaling, station capacity, cars, locomotives, support facilities, and new service levels to maximize ridership potential	\$10 billion	No commitments from CTC at this time.	If support for TODs is strong, this option could reduce fuel consumption by reducing personal vehicle usage.	- Maximizes and leverages the current investment in the regional commuter rail system - Supports TOD commitments near stations - Reduces future highway operating and infrastructure demands	- Limited available funding for transit capital and operations	Include the Metrolink Strategic Plan in the RTP Strategic Plan. Pursue funding commitments to include these components in the core RTP.
9	Temecula Extension Metrolink	No	Extend Metrolink from South Perris to Temecula	\$642 million	RCTC commitment to this project by 2025	If ridership can be increased, this option could reduce energy impacts.	Extension of Perris Line: - Good Commuter Rail Performance - Local commitments to 2% strategy	- Serves an area with low current transit ridership.	Include in the Constrained Plan. Seek additional State and Federal funds.
10	San Jacinto Extension Metrolink	No	Extend Metrolink from South Perris to San Jacinto	\$227 million	RCTC commitment to this project by 2025	As with #9, if ridership can be increased, this option could reduce energy impacts.	Extension of Perris Line: - Uses existing ROW - Good Commuter Rail Performance - Local commitments to 2% strategy	- Serves an area with low current transit ridership.	Include in the Constrained Plan. Seek additional State and Federal funds.
11	LOSSAN Strategic Plan	No	Systemic Capacity and Service improvements on the LOSSAN Rail Intercity Rail Corridor	\$7-9 billion	Limited commitments.	Depending on support and energy generation, this option could reduce energy impacts.	- Expands Intercity and Commuter Capacity in the LOSSAN - Relieves congestion in the I-5 and 101 Corridors, improves utilization of existing investments - Potential for future inter-regional funding or Amtrak reauthorization	- Uncertain funding commitments	Include committed portions in the Constrained Plan. Include uncommitted portions in the Strategic Plan. Seek additional State and Federal funds.
12	Orangeline (Orangeline Development Authority)	Yes	108-mile grade-separated, elevated Maglev down the Pacific Electric ROW through central Orange County to L.A. Union Station out to Santa Clarita and Palmdale. The Orangeline Development Authority (OLDA) is a JPA made up of cities from L.A. and Orange Counties. The financial plan calls for private funding for most capital costs.	\$42.5 billion	-\$250,000 planning grant from the federal government -\$1 million in-kind commitment from private sector group led by Arcadis -Dues from 14 member cities of the JPA -No other financial commitment from the private sector at this time	As with #11, depending on support and energy generation, this option could reduce energy impacts.	-Environmentally friendly -Helps regional economy -Increases transit ridership -Relieves overcrowding at LAX and shifts air passengers to Ontario, Palmdale, San Bernardino and March airports -Improves public health -Will provide construction jobs -Provides intermodal connections with other systems (e.g., Metrolink, CHSRA)	-Inadequate funding commitment -Untested technologies -Operation & Maintenance data is sparse -Technology may not be compatible with CHSRA -Capital costs need more vetting -Corridor not well-suited for high-speed Maglev technology. There are 14 stops in a 33-mile segment in the P.E. ROW which greatly reduces the capability of high-speed Maglev -LACMTA and OCTA own the P.E. ROW and have not shown any indication of giving the ROW to the Orangeline Development Authority -Minimal support from Orange County cities and no commitment from OCTA	Include in the Strategic Plan. Conduct Alternatives Analysis as to appropriate mode and technology options.

RTP WORKSHOP: WRAP-UP

#	MODE/PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
1	Initial Operating Segment (IOS)	yes	Fully grade-separated, elevated High-Speed Regional Transport (HSRT) system that operates primarily within freeway corridors. The 63-mile adopted IOS is from West L.A./LAX to L.A. Union Station to West Covina to Ontario Airport.	\$19 billion for passenger service only (Assumes small amount of public ROW and small amount of land purchases in constrained areas. Land purchases for stations not included).	\$0 commitment at this time	The energy impacts would generally be lower due to an increased transit ridership.	-Environmentally friendly -Helps regional economy -Increases transit ridership -Relieves overcrowding at LAX and shifts air passengers to Ontario -Improves public health -Will provide construction jobs -Provides intermodal connections with other systems (e.g., Metrolink, CHSRA)	-Inadequate funding commitment -Untested technologies -Operation & Maintenance data is sparse -West L.A. station site not selected. Land availability is questionable. -Technology may not be compatible with CHSRA -Community issues with HSRT coming to LAX	Include in the Constrained Plan. Requisite Milestones: -Need to identify source of public subsidy for environmental work -Form JPA for the IOS -Form public-private partnership -Secure funding -Technology selection
2	IOS Extension from Ontario to San Bernardino	yes	18-mile extension connecting Ontario to San Bernardino.	\$3.5 billion (Assumes small amount of public ROW and small amount of land purchases in constrained areas. Land purchases for stations not included).	\$0 commitment at this time	As with option #1, the energy impacts would generally be lower due to an increased transit ridership.	-Environmentally friendly -Helps regional economy -Increases transit ridership -Relieves overcrowding at LAX and shifts air passengers to Ontario -Improves public health -Will provide construction jobs -Provides intermodal connections with other systems (e.g., Metrolink, CHSRA) -San Bernardino supportive of HSRT	-Inadequate funding commitment -Untested technologies -Operation & Maintenance data is sparse -West L.A. station site not selected. Land availability is questionable. -Technology may not be compatible with CHSRA -Community issues with HSRT coming to LAX	Include in the Constrained Plan. Requisite Milestones: -Need to identify source of public subsidy for environmental work -Form JPA for the IOS -Form public-private partnership -Secure funding -Conduct Preliminary Engineering (P.E.) for IOS extension to San Bernardino -Technology selection
3	Anaheim-Ontario	Represented on the Maglev map in the 2004 RTP for further study but not in the 2004 RTP Constrained Plan	The Anaheim to Ontario segment is 32-miles and takes approximately 18 minutes. This link would connect commuters from Riverside County to job centers in Orange County and shift air passengers from JWA to Ontario Airport.	\$6.7 billion (Assumes public ROW and no land purchases).	\$0 commitment at this time for the Anaheim to Ontario portion. \$45 million allotted for the Nevada segment (Las Vegas to Primm) under T3 federal legislation. Attempt by CNSSTC, OCTA and Anaheim to reconcile the federal funding to allow some of the \$45 million to be spent on planning and environmental work in the Anaheim to Ontario segment. OCTA is also in negotiations with CHSRA to fund a feasibility study in the Anaheim to Ontario corridor if funding is available.	As with option #1, the energy impacts would generally be lower due to an increased transit ridership.	-Environmentally friendly -Helps regional economy -Increases transit ridership -Relieves overcrowding at JWA and LAX and shifts air passengers to Ontario Airport -Clears out the heavily congested SR-91 or SR-57 corridor during peak commute times -Will provide construction jobs -Provides intermodal connections with other systems (e.g., Metrolink, CHSRA) -Will serve the planned Anaheim Regional Transportation Intermodal Center (ARTIC)	-Inadequate funding commitment -Relying on federal funding to cover capital costs is unlikely -Untested technologies -Technology may not be compatible with CHSRA -Capital costs need to be revisited and refined -Route to Inland Empire not yet selected -Significant environmental issues (i.e., the Prado Dam, species habitat) in the corridor	Include in the Constrained Plan. Requisite Milestones: -Need to identify source of public subsidy for environmental work -Secure funding -Form public-private partnerships -Feasibility and planning studies needed -Form partnerships with OCTA and/or CNSSTC -Select route to Inland Empire (SR-91 or SR-57) -Conduct a feasibility study that examines possible intermediate stops

#	MODE/PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
4	Spur from the IOS mainline to the San Pedro Bay Ports	no	The 18-mile freight-only spur connects the San Pedro Bay Ports to the IOS at Hobart Yard, which is a few miles east of Union Station. From Hobart Yard to San Bernardino, the IOS ROW will serve both passenger and freight traffic.	\$18 billion (Assumes small amount of public ROW and small amount of land purchases in constrained areas. Does not include: Land purchases for stations, port automation costs, purchase of land and construction costs at the San Pedro Ports and selected Inland Port facilities)	\$0 commitment at this time	As with option #1, the energy impacts would generally be lower due to an increased transit ridership. Additional impacts are dependent on energy generation. California imports about 31 percent of its annual electricity supply from out-of-state generating units, and about 75 percent of this power (4,744 MW) comes from coal. California imports about 31 percent of its annual electricity supply from out-of-state generating units, and about 75 percent of this power (4,744 MW) comes from coal. (Source: California Energy Commission, Gross System Power 2006. Retrieved on October 22, 2007 from http://energy.ca.gov/electricity/gross_system_power.html)	-Relieves port congestion -Environmentally friendly -Helps regional economy -Improves public health -Will provide construction jobs	-Inadequate funding commitment -Location of inland port facilities need to be identified -Port infrastructure requirements/costs need to keep up with HSRT system -Untested technologies -Little interest from shippers and ports -Operation & Maintenance data is sparse	Include in the Constrained Plan. Requisite Milestones: -Need to identify source of public subsidy for environmental work -Secure funding -Form public-private partnerships -More in-depth engineering and design work -Form partnerships with stakeholders
5	Long-term HSRT (post 2035) system	yes	The following routes will be further studied: LAX-South (Orange County down Interstate 405), LAX-Palmdale, Irvine to San Bernardino, San Bernardino to Victorville, Victorville to Palmdale, and March Airport to San Diego. Feasibility studies have been completed for the LAX-South and the LAX-Palmdale routes, but more in-depth analysis is needed.	TBD	\$0 commitment at this time	As with option #1, the energy impacts would generally be lower due to an increased transit ridership. Additional impacts are dependent on energy generation. One freight train can remove 120 Heavy Goods Vehicle journeys from our roads. Rail is significantly more energy efficient than other modes with the exception of shipping. Per ton carried, road transport will require between 4 to 7 times more energy than rail. With less trucks on the road there is less congestion and additional emissions from idle cars and idle trucks. (Source: Freight Transportation Summary http://ops.fhwa.dot.gov/freight/freight_analysis/state_info/california/ca2.pdf)	-Environmentally friendly -Helps regional economy -Increases transit ridership -Relieves overcrowding at LAX and shifts air passengers to Ontario, Palmdale, San Bernardino and March airports -Improves public health -Will provide construction jobs -Provides intermodal connections with other systems (e.g., Metrolink, CHSRA)	-Inadequate funding commitment -Untested technologies -Operation & Maintenance data is sparse -Technology may not be compatible with CHSRA -Capital costs unclear -Little or no study has been done on these corridors	Include in the Strategic Plan. Requisite Milestones: -Secure funding -Form public-private partnerships -Feasibility and planning studies needed -Form partnerships with stakeholders

RTP WORKSHOP: WRAP-UP

#	MODE/PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
6	Orangeline (Orangeline Development Authority)	yes	108-mile grade-separated, elevated Maglev down the Pacific Electric ROW through central Orange County to L.A. Union Station out to Santa Clarita and Palmdale. The Orangeline Development Authority (OLDA) is a JPA made up of cities from L.A. and Orange Counties. The financial plan calls for private funding for most capital costs.	\$42.5 billion	-\$250,000 planning grant from the federal government -\$1 million in-kind commitment from private sector group led by Arcadis -Dues from 14 member cities of the JPA -No other financial commitment from the private sector at this time	As with option #1, the energy impacts would generally be lower due to an increased transit ridership. Additional impacts are dependent on energy generation.	-Environmentally friendly -Helps regional economy -Increases transit ridership -Relieves overcrowding at LAX and shifts air passengers to Ontario, Palmdale, San Bernardino and March airports -Improves public health -Will provide construction jobs -Provides intermodal connections with other systems (e.g., Metrolink, CHSRA)	-Inadequate funding commitment -Untested technologies -Operation & Maintenance data is sparse -Technology may not be compatible with CHSRA -Capital costs need more vetting -Corridor not well-suited for high-speed Maglev technology. There are 14 stops in a 33-mile segment in the P.E. ROW which greatly reduces the capability of high-speed Maglev -LACMTA and OCTA own the P.E. ROW and have not shown any indication of giving the ROW to the Orangeline Development Authority -Minimal support from Orange County cities and no commitment from OCTA	Remove from HSRT matrix and include in Transit matrix.
7	Ontario Airport to California/ Nevada stateline Maglev (California-Nevada SuperSpeed Train Commission)	Represented on the Maglev map in the 2004 RTP for further study but not in the 2004 RTP Constrained Plan	As a portion of the 269-mile grade-separated Maglev system from Anaheim to Las Vegas, Nevada, the Ontario to California/Nevada stateline segment would link the outlying Inland Empire with the central part of the SCAG region. The finance plan is to garner federal funding for capital construction.	\$40.4 billion (194-mile segment)	\$45 million allotted for the Nevada segment under T3 legislation. Attempt by CNSSTC, OCTA and Anaheim to reconcile the federal funding to allow some of the \$45 million to be spent on planning and environmental work in the Anaheim to Ontario segment.	As with option #1, the energy impacts would generally be lower due to an increased transit ridership. Additional impacts are dependent on energy generation.	-Environmentally friendly -Helps regional economy -Increases transit ridership -Relieves overcrowding at JWA and LAX and shifts air passengers to Ontario Airport -Clears out the heavily congested SR-91 or SR-57 corridor during peak commute times -Will provide construction jobs -Provides intermodal connections with other systems (e.g., Metrolink, CHSRA)	-Inadequate funding commitment -Relying on federal funding to cover capital costs is unlikely -Untested technologies -Operation & Maintenance data is sparse -Technology may not be compatible with CHSRA -Capital costs are old and need to be updated -Route to Inland Empire not yet selected -Significant environmental issues (i.e., the Prado Dam, species habitat) in the corridor	Include in the Strategic Plan. Requisite Milestones: -Secure funding -Form public-private partnerships -Feasibility and planning studies needed -Form partnerships with OCTA and CNSSTC -Select route to Inland Empire (SR-91 or SR-57)
8	California High-Speed Train (serving the SCAG region) (California High-Speed Rail Authority)	No	700-mile steel wheel statewide high-speed rail network that will serve the Bay Area, Sacramento, the San Joaquin Valley, Los Angeles, Orange County, the Inland Empire and San Diego. The portion of the system in the SCAG region connects Palmdale to Union Station and Anaheim. There is also a link from Union Station east to Riverside and south headed to San Diego. The system would compete directly with air travel for the long-haul intrastate trips.	\$34 billion (210 miles serving the SCAG region)	\$20.7 million allocated from the California state legislature to continue funding the state agency. \$3.5 million in funding from OCTA to begin the EIR for the L.A. to O.C. segment in FY '07-'08. \$3.5 million more in funding from OCTA in FY '08-'09. Funding for capital construction for this project is proposed to be from state bonds. A \$9.95 billion bond is slated for the November 2008 ballot.	According to the Final EIR/EIS for the proposed California High-Speed, the system would potentially decrease intercity automobile VMT and reduce fuel use by the equivalent of 5.2 million barrels of oil per year.	-Steel wheels is proven technology with standardized O&M costs -Environmentally friendly (although maybe less so than Maglev) -Helps state economy -Increases transit ridership -Relieves overcrowding at major airports -Provides an option to flying for intrastate connections -Connects city centers in Northern and Southern California -Improves public health -Will provide construction jobs -Provides intermodal connections with other systems (e.g., Metrolink, SCAG's HSRT, Caltrain) -San Diego (SANDAG) includes CHSRA project in their RTP's fiscally constrained plan	-Inadequate funding commitment -Passage of bond(s) can be difficult -Using "old" technology -Technology not compatible with Maglev systems not be compatible with CHSRA -Political support at the state level not certain -Potential political opposition from the airlines	Include in the Constrained Plan, with the following conditions: -Southern California must be included in initial construction -A study looking at alternative technologies (Maglev and other systems) must be undertaken for the Southern California portion -A detailed constrained financial plan must be presented to ensure Southern California funding is spent on Southern California segments Requisite Milestones: -Secure funding via passage of state bond(s) -Complete EISs for various segments -SCAG should continue its' partnership with CHSRA

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#	MODE/ PROJECT	2004 RTP	STRATEGIES	COST	FINANCIAL COMMITMENTS	ENERGY IMPACTS	PROS	CONS	RECOMMENDATION
1	Aviation Task Force Preferred Scenario with Extended IOS and Anaheim to Ontario HSRT segment	No	Complete Extended IOS portion of adopted HSRT system with Anaheim to Ontario segment and implement market incentives for aviation decentralization	\$22.5 billion to implement Extended IOS portion of adopted HSRT system (passengers only). Local airport ground access projects \$5.2-12 billion	For on-airport projects, passenger facility charges, revenue bonds, airport revenues (landing fees, concessions, leases etc.) and FAA AIP grants (not included in the RTP). \$5.2 billion for non-HSRT off-airport ground access projects	Fewer jobs/housing benefits could result in higher energy use given that mixed land use (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation has been shown to save consumers up to 512 gallons of gasoline per year. (Source: Transportation Demand Management Encyclopedia. "Transit Oriented Development." Victoria Transport Policy Institute.)	Problems and uncertainties associated with implementing full HSRT avoided (the extended IOS has a better "business case" but still has funding uncertainties). New terminal development and ground access improvements needed at San Bernardino and Palmdale airports, but less extensive at Palmdale Airport than with full HSRT system.	At 164 MAP a loss of 8 MAP compared to 2035 regional aviation scenario with entire adopted HSRT system. Fewer economic and jobs/housing balance benefits particularly in North LA County.	<p>Include in the Constrained Plan.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - Same as for the HSRT IOS, but with emphasis on developing terminal-to-terminal airport linkages in in-depth engineering and design work for HSRT. - Complete HOV/Flyaway study and develop recommendations on utilizing existing and planned investments in HOV and rail facilities to decentralize aviation demand to suburban airports. - Continue to coordinate with the Southern California Regional Airport Authority (SCRAA) to implement the Regional Aviation Decentralization Strategy through ground access, legislative and marketing strategies.
2	Aviation Task Force Preferred Scenario with entire HSRT system, with Anaheim to Ontario segment	No	Complete entire adopted HSRT system with Anaheim to Ontario segment, that is necessary to reach 170 MAP and implement market incentives for aviation decentralization	Cost to be determined to implement entire adopted HSRT system with long-range connections to Victorville and San Bernardino (passengers only) local airport ground access projects \$5.2-12 billion	For on-airport projects, passenger facility charges, revenue bonds, airport revenues (landing fees, concessions, leases etc.) and FAA AIP grants (not included in the RTP). \$5.2 billion for non-HSRT off-airport ground access projects.	The higher passenger forecasts could be tempered by greater efficiencies in jobs/housing balance benefits. However, aviation passenger mobility efficiency is very dependent on the type of aircraft, the configuration, the load factor, and the distance flown. (Source: United Nations Environment Programme. Aviation and the Global Atmosphere. Retrieved October 22, 2007 from http://www.grida.no/climate/ipcc/aviation/index.htm .)	Achieves 172 MAP with associated economic and jobs/housing balance benefits to the Inland Empire and North LA County.	Extensive new passenger terminals and ground access improvements needed at Palmdale and San Bernardino International airports. Air quality impacts likely greater than other scenarios because of higher number of aircraft operations (but partly offset by fewer ground access emissions from HSRT).	<p>Include in the Strategic Plan, mid- and long-term.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - Same as for the entire HSRT long-term system, but with emphasis on developing terminal-to-terminal airport linkages in in-depth engineering and design work and feasibility and planning studies for HSRT. - Complete HOV/Flyaway study and develop recommendations on utilizing existing and planned investments in HOV and rail facilities to decentralize aviation demand to suburban airports. - Continue to coordinate with the Southern California Regional Airport Authority (SCRAA) to implement the Regional Aviation Decentralization Strategy through ground access, legislative and marketing strategies.
3	Aviation Task Force Preferred Scenario with no HSRT	Yes	No HSRT implementation but implement market incentives for aviation decentralization	NO HSRT costs. Other ground access costs in unconstrained Airport Ground Access Element total \$12 billion (\$5.2 billion constrained)	For on-airport projects, passenger facility charges, revenue bonds, airport revenues (landing fees, concessions, leases etc.) and FAA AIP grants (not included in the RTP). \$5.2 billion for non-HSRT off-airport ground access projects.	As in #1, fewer jobs/housing benefits could result in higher energy usage.	Problems and uncertainties associated with implementing HSRT avoided. New terminal development and ground access improvements needed at Palmdale and San Bernardino International airports much less extensive	At 155 million air passengers (MAP) in 2035, this scenario represents a loss of 17 MAP compared to 2035 regional aviation scenario with entire adopted HSRT system. Fewer economic and jobs/housing balance benefits to the Inland Empire and North LA County. Represents a loss of about \$11 billion and 78,600 jobs compared to the 2035 scenario with the entire adopted HSRT system.	<p>Do not include in the 2008 RTP.</p> <p>Requisite Milestones:</p> <ul style="list-style-type: none"> - Complete HOV/Flyaway study and develop recommendations on utilizing existing and planned investments in HOV and rail facilities to decentralize aviation demand to suburban airports. - Continue to coordinate with the Southern California Regional Airport Authority (SCRAA) to implement the Regional Aviation Decentralization Strategy through ground access, legislative and marketing strategies.

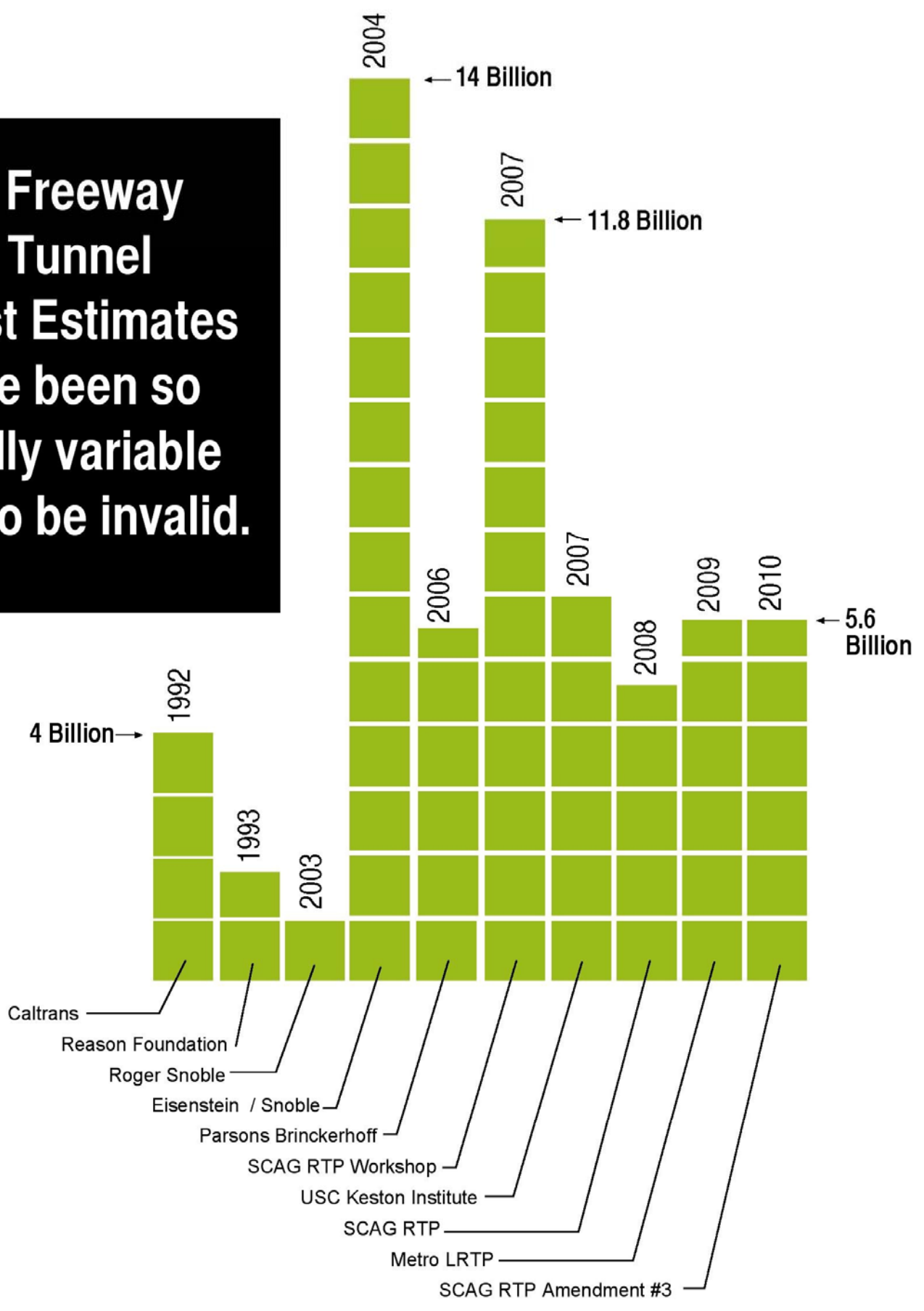
RTP WORKSHOP: WRAP-UP

#	2004 RTP	POLICY	DESCRIPTION	ENERGY IMPACTS	BENEFITS	COSTS	RECOMMENDATION
1	Yes	Identify regionally strategic areas for infill and investment*	Identify strategic opportunity areas for infill development of aging and underutilized areas and increased investment in order to accommodate future growth.	The energy consumption would generally be low and could be further reduced if green building practices, involving usage of renewable resources and reduced waste generation and water usage, are implemented. Such standards can reduce local environmental impacts, regional air pollutant emissions, and global greenhouse gas emissions.	<ul style="list-style-type: none"> - reduces regional VMT, VHT and congestion delay - efficient use of existing and planned infrastructure - revitalizes aging communities - increases local tax base - reduces sprawling development patterns 	<p>No direct costs in RTP</p> <p>SCAG should work to identify funding resources to assist local governments' voluntary implementation</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.
2	Yes	Structure the plan on a 3-tiered system of centers development*	Identify strategic centers based on a 3-tiered system of existing, planned, and potential, relative to transportation infrastructure.	The energy consumption would generally be low and could be further reduced if green building practices, involving usage of renewable resources and reduced waste generation and water usage, are implemented.	<ul style="list-style-type: none"> - reduces regional VMT, VHT and congestion delay - prioritizes investment based on infrastructure timing - supports long range conceptual planning in advance of financial commitments 	<p>No direct costs in RTP</p> <p>SCAG should work to identify funding resources to assist local governments' voluntary implementation</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.
3	No	Develop nodes on a corridor*	Intensify nodes along corridors with people-scaled, mixed use developments. Many existing corridors lack the residential and commercial concentration to adequately support non-auto transit uses, without which the existing transit system cannot fully realize its potential for accommodating additional trips and relieving the transportation system.	Creating walkable, transit oriented nodes would generally reduce energy use. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods. (Source: Transportation Demand Management Encyclopedia. "Transit Oriented Development." Victoria Transport Policy Institute.)	<ul style="list-style-type: none"> - reduces regional VMT, VHT and congestion delay - creates vibrant, walkable communities with localized access to amenities - supports region's existing & planned transit infrastructure 	<p>No direct costs in RTP</p> <p>SCAG should work to identify funding resources to assist local governments' voluntary implementation</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.
4	Yes	Develop "complete communities"*	Create mixed use districts or "complete communities" in strategic growth areas, through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other.	Creating walkable, complete communities would generally reduce energy use. It has the potential to reduce total VMT, ultimately reducing gas consumption.	<ul style="list-style-type: none"> - reduces regional VMT, VHT and congestion delay - ensures many daily needs can be met within a short distance of home - increases walk and bicycle trip opportunities - supports lower VMT through "trip chaining" 	<p>No direct costs in RTP</p> <p>SCAG should work to identify funding resources to assist local governments' voluntary implementation</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.
5	Yes	Plan for additional housing and jobs near transit*	Plan for additional housing and jobs within reach of the transit network. Pedestrian-friendly environments and more compact development patterns in close proximity to transit serve to support and improve transit use and ridership.	Fostering more residential and mixed use developments near transit hubs will increase public transit ridership and reduce VMT, emissions, and fuel consumption. Mixed-use development may also reduce congestion by fostering a jobs-housing balance.	<ul style="list-style-type: none"> - reduces VMT, VHT and congestion delay - reduces auto use and supports more multi modal travel behavior - reduces need for long commutes - increases viability of rail network for home to work trips 	<p>No direct costs in RTP</p> <p>SCAG should work to identify funding resources to assist local governments' voluntary implementation</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.

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#	2004 RTP	POLICY	DESCRIPTION	ENERGY IMPACTS	BENEFITS	COSTS	RECOMMENDATION
6	Yes	Plan for a changing demand in types of housing*	Plan for changing demographics and subsequent impacts on the region's economic future. Shifts in the labor force, as the large cohort of aging "baby boomers" retire over the next 15 years and are replaced by new immigrants and "echo boomers", will likely induce a demand shift in the housing market for additional development types such as multi-family and infill housing in central locations.	The energy impacts could be low if focused on multi-family housing. Residents of single family detached housing have been found to consume 22 percent more energy than those of multifamily housing and 9 percent more than those of single-family attached housing. (Source: Rong, Fang. (2006) Impact of Urban Sprawl on U.S. Residential Energy Use. University of Maryland. Retrieved from http://hdl.handle.net/1903/3848 on September 14, 2007.)	<ul style="list-style-type: none"> - reduces regional VMT, VHT and congestion delay - supports needs and lifestyles of growing segments of the population - increases affordable housing alternatives - supports changing market dynamics - limits greenfields development 	<p>No direct costs in RTP</p> <p>SCAG should work to identify funding resources to assist local governments' voluntary implementation</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.
7	Yes	Continue to protect stable existing single family areas*	Continue to protect stable existing single family neighborhoods as future growth and a more diverse housing stock are accommodated in infill locations near transit stations, in nodes along corridors and in existing centers.	The energy impacts would generally be higher. Single-family residents use more energy than their counterparts in multi-family housing.	<ul style="list-style-type: none"> - reduces regional VMT, VHT and congestion delay - maintains existing urban fabric in the majority of the region - reduces NIMBYism of intensification of appropriate areas 	<p>No direct costs in RTP</p> <p>SCAG should work to identify funding resources to assist local governments' voluntary implementation</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.
8	Yes	Ensure adequate access to open space and preservation of habitat	Ensure access to open space and habitat preservation despite competing quality of life demands driven by growth, housing and employment needs, and traditional development patterns.	This option would reduce autodependent development, thereby reducing VMT and the associated fuel use.	<ul style="list-style-type: none"> - reduces regional VMT, VHT and congestion delay - improves access to existing large-scale and neighborhood-scale open space - preserves the rapidly diminishing open space - limits leap frog development 	<p>No direct costs in RTP</p> <p>SCAG should work to identify funding resources to assist local governments' voluntary implementation</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.
9	Yes	Incorporate local input and feedback on future growth assumptions	Continue public outreach efforts as required by SAFTEA-LU and incorporate local input through the Integrated Growth Forecast. This innovative approach provides a more accurate forecast that integrates future land use and transportation planning through growth projections for population, employment, households and housing units. Public workshops, scenario planning, and stakeholder outreach improve the accuracy and feasibility of pursuing regional plans at the local level.	It is unclear what energy impacts would accrue from this option.	<ul style="list-style-type: none"> - increases consistency between local and regional forecasts - identifies areas where discrepancies may exist - improves discourse between government agencies, stakeholders and the public 	<p>No direct costs in RTP</p>	Include in the 2008 Draft Policy Growth Forecast Alternative.

**710 Freeway
Toll Tunnel
Cost Estimates
have been so
wildly variable
as to be invalid.**



All cost estimates stated by officials at public meetings or in writing.

Courtney Aguirre

From: Pete van Nuys <[REDACTED]>
Sent: Tuesday, December 1, 2015 10:16 AM
To: Alan Thompson
Subject: Re: Draft 2016-2040 RTP/SCS being released on Thursday

Alan, good morning.

I'm focused on the AT Appendix.

My first comment:

Page 3. I am very disappointed that you've chosen to use Geller's very divisive descriptions of Bicyclists by Comfort Level as a foundation for promoting bicycling. His "Strong and Fearless" label is resented by all the competent bicyclists I know-- it is deliberately dismissive of often the largest group of loyal bicyclists in a given market. It plays to the ignorance of the general public and marginalizes behaviors that are often safer, more tested and reliable than that of Californians at large.

Dividing the public into factions and playing one off against the other will NOT win the financial and political support we need in the long run. Promoting the very real benefits of bicycling for the individual will.

We must not stereotype bicyclists to make them understandable by the non-bicycling majority, PLEASE focus on Behaviors. Behaviors cross Geller's stereotypical "boxes," and are easily relatable for non- or occasional bicyclists.

I'll be happy to elaborate if you'd like.

Alan Thompson
Senior Planner - Active Transportation
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
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Pete van Nuys Exec. Dir. Orange County Bicycle Coalition ECI, LCI, CSI [REDACTED]



January 28, 2016

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

Re: Southern California Association of Governments (SCAG) draft 2016- 2040 Regional
Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS)

Dear Mr. Ikhata:

On behalf of Orange County Business Council (OCBC) I would like to formally submit comments on the Southern California Association of Governments (SCAG) draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) and the associated Program Environmental Impact Report (PEIR). The draft 2016 RTP/SCS and PEIR is critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development of the region's housing needs, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards. **For the business community the key word in achieving all of these objectives is balance.** To that end we offer the following technical and policy suggestions for consideration.

1. **The RTP/SCS should not mandate technologies or use transit agencies as technology incubators.** Instead, it should allow for any and all technologies (i.e. near-zero emission technologies) that can meet SCAG's performance goals (focus on performance metrics vs technology mandates). Near-zero emission technologies will help achieve regional air quality and climate goals, at a fraction of the cost and with more flexibility/choice for agencies.
2. **SCAG should take advantage of the best of what innovation can deliver, and shouldn't limit options, but instead welcome technology advancements that moves us towards our goals by:**
 - a) Maximizing opportunities to improve air quality and reduce GHG emissions through "near-zero" technologies.
 - b) Emphasis Life Cycle emission analysis as opposed to simply tail pipe emissions.
 - c) Supporting technology neutral policies.

3. **OCBC does not support the growth forecast utilized in the development of the Intensified Land Use Alternative (Alternative 3) in the draft PEIR.** The Intensified Land Use (ILU) Alternative does not reflect entitlements, development agreements, open space donations, projects recently completed and projects under construction (which are properly reflected in The Plan). OCBC requests that the growth forecast in the 2016 RTP/SCS and ALL alternatives be based on the technically corrected growth forecast submitted to SCAG by Orange County Council of Governments (OCCOG) in August 2015.
4. In order to clarify the intent that the mitigation measures are a menu of options for which feasibility has not been established for any given project, the “can and should” language should be changed in all mitigation measures identifying entities other than SCAG to read “should consider where applicable and feasible.”
5. OCBC concurs with the comments identified by OCTA in its letter of January 11, 2016. OCTA has identified policy and technical issues related to the draft 2016 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTC).
6. OCBC Concurs with comments in the OCCOG letter regarding Priority and Funding Preference for Transportation Projects. To address the significant impacts of increasing Vehicle Miles Traveled (VMT) and traffic congestion, the draft Program EIR for SCAG’s 2016 - 2040 RTP/SCS proposes project-level mitigation measures that include language allowing for:
 - a. Giving priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita [Mitigation Measure MM-TRA-1(b)]; and,
 - b. Giving funding preference to improvements in public transit over other new infrastructure for private automobile traffic [Mitigation Measure MM-TRA-2(b)].

Please delete these provisions in Mitigation Measure MM-TRA-1(b) and Mitigation Measure MM-TRA-2(b), unless the language in these provisions is modified to recognize that they would only be considered if they are found by the Lead Agency to be appropriate and consistent with local transportation priorities.

7. Recently the California Transportation Commission (CTC) moved to deprogram nearly \$1 Billion in transportation projects. How will the State’s continued funding shortfall factor into the assumptions in the 2016 RTP/SCS.

8. The PEIR and its appendices instruct local lead agencies to consider VMT in their project- and plan-level CEQA analyses, in lieu of a “level of service” (LOS) traffic analysis. This instruction is premature as the Governor’s Office of Planning and Research (OPR) is currently considering whether VMT analysis should be incorporated into CEQA analysis—a direction from the California Legislature. SCAG should defer to any eventual OPR decision.
9. OCBC applauds SCAG’s emphasis on managed lane strategies as not only a funding source, but as a means to enhance mobility.

OCBC applauds SCAG’s work on developing the draft 2016 RTP/SCS. The valuable work conducted by your professional staff under the leadership of the SCAG Board of Directors is critical to the prosperity of the Southern California region. We thank you for your dedication to this process and we appreciate your thoughtful consideration of the comments we have presented. Please do not hesitate to contact me at (949)794-7210 if your team has questions or needs clarification on any of the points we have addressed.

Sincerely,



Bryan M. Starr
Senior Vice President, Government Affairs

Cc: OCBC Infrastructure Committee
OCMoves Steering Committee



January 28, 2016

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

Subject: Orange County Council of Governments Comments for RTP/SCS and PEIR

Dear Mr. Ikhata:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS or "The Plan") and the associated Program Environmental Impact Report (PEIR). The draft 2016 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.

The OCCOG is comprised of 34 cities, the County of Orange, and six special districts. The OCCOG Technical Advisory Committee (OCCOG TAC), made up of member agency planning staff, created an ad hoc committee dedicated to the review of the draft 2016 RTP/SCS and PEIR. The ad hoc committee membership was extended to partner agencies within Orange County that serve as ex-officio members on the OCCOG Board. The ad hoc committee includes representation from the OCCOG, the County of Orange, the cities of Anaheim, Irvine, and Mission Viejo, the Orange County Health Care Agency, the Orange County Transportation Authority, the Transportation Corridor Agencies, the Association of California Cities Orange County, the League of California Cities Orange County Division, the Building Industry Association, and the Center for Demographic Research at California State University Fullerton. This committee met six times since December 3, 2015, and has collectively spent hundreds of hours reviewing the draft Plan and documents, and preparing comments which incorporated additional feedback provided by Orange County jurisdictions and agencies, such as the Orange County Business Council. The OCCOG TAC review and analysis was considered in late January by the OCCOG Board and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2016 RTP/SCS, PEIR, and all associated appendices. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2016 RTP/SCS, PEIR, and associated documents.



RTP/SCS

1. Growth Forecasts

Overall, the OCCOG supports the 2016-2040 RTP/SCS growth forecast and the adoption of the growth forecast at a geographic level no lower than the jurisdictional level. The OCCOG supports The Plan since the growth forecast accurately reflects Orange County's Projections dataset. The Plan growth forecast reflects entitlements, development agreements, and projects recently completed or under construction in Orange County. OCCOG appreciates the ongoing coordination between SCAG and the Center for Demographic Research (CDR) at California State University Fullerton on behalf of all Orange County jurisdictions. The Orange County Projections have been used by the Orange County Transportation Authority (OCTA) in the development of its Orange County Long-Range Transportation Plan demonstrating that Orange County has integrated transportation and land use planning for decades.

OCCOG representatives on the Regional Council and SCAG Policy Committees repeatedly requested that the growth forecasts in the 2016 RTP/SCS and all PEIR alternatives be based on the technically corrected growth forecast submitted to SCAG in August 2015 by the CDR on behalf of all Orange County jurisdictions. Because the draft PEIR's Intensified Land Use Alternative (Alternative 3) does not include the technically corrected growth forecast for Orange County, the OCCOG would not support consideration of this Alternative as the preferred alternative.

Growth Forecast Recommendations: OCCOG supports the adoption of the 2016 RTP/SCS growth forecast at the jurisdictional level. OCCOG does not support the use of Alternative 3 for any purposes.

2. Maintain Unbiased, Objective Tone

Language throughout the draft 2016 RTP/SCS and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues such as active transportation and public health. While these issues are important, it is recommended that the document utilize a more unbiased, objective tone. For example, OCCOG recommends the removal of "Our Vision" and "Our Overarching Strategy" from the Executive Summary of the document. These two sections are highly speculative and are not necessary to the document. "Our Vision" and "Our Overarching Strategy" go above and beyond the requirements of the RTP. Additional examples of overly emphatic language are outlined in Attachment 1.

General Comments

3. Concurrence with the Comments from the Orange County Transportation Authority

The OCCOG concurs with the comments identified by OCTA in its letter of January 11, 2016. OCTA has identified policy and technical issues related to the draft 2016 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTC). The OCTA comment letter is included for reference as Attachment 2.



4. “Can and Should”

As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rest with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies’ regulatory measures. OCCOG recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, OCCOG deems inappropriate any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language “can and should” for mitigation measures addressed to local agencies is overreaching.

“Can and Should” Recommendations: Change language in all project level mitigation measures to read “can and should consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.

5. 500 foot “buffer”

The Draft RTP assumes that almost no new growth will occur within 500 feet of a freeway or busy transportation corridor. The Draft RTP states that a “buffer” is consistent with the California Air Resources Board’s 2005 advisory guidance that housing be discouraged within 500 feet of high volume roadways such as freeways. It is important to note that CARB’s guidance is not a prohibition of development near high-volume roadways; nevertheless, SCAG’s “buffer” strategy eradicates growth in these areas that are otherwise rich in connections to jobs, retail and housing accessible by many transportation modes. Furthermore, the proposed “buffer” does not reflect the availability of mitigation measures to address near-roadway emissions that remain despite a dramatic reduction of diesel emissions in the last decade. At best, this strategy is a short-term response and problematic because it prevents the kind of density and proximity between land uses that actually reduce trips and associated VMT. As vehicle engines and fuels become cleaner, the “buffer” strategy will become obsolete yet will leave behind a legacy of inefficient land use patterns. Moreover, throughout the SCAG Region, the prevailing existing land use patterns include residential and sensitive receptor uses within 500 feet of a major transportation corridor. In many cases, these areas demonstrate compact development form and serve as affordable housing. Removing this substantial portion of developable land from availability for use is premature and counter to the overarching principles of SB375 to locate housing near job centers and previously urbanized areas.

There needs to be consistency throughout all the documents regarding the 500 foot “buffer.” To that end, OCCOG offers the following **recommendations and requests for additional clarification:**



- The word “buffer” should not be used.
- Use consistent radius/demarcation throughout the documents
- Clarify where distance is measured from (e.g. centerline, edge of roadway, edge of right of way)
- Clearly articulate the types of transportation corridors being identified (e.g. freeways, high quality transit corridors, high volume corridors, rail etc.)
- Emphasis should be on mitigation not prohibition of development.
 - Resolve the conflict with discouraging development within 500 feet of transportation corridors now and future reductions in emissions and fleet changes over time which will negate the need to utilize this mitigation measure, so that the mitigation approach allows for flexibility with the changing fleet mix in the future.

6. Cities vs. Jurisdiction

Throughout the 2016 RTP/SCS, PEIR, and associated appendices, there are references to “cities”. Since the SCAG region also includes counties, it is recommended that references to “city” or “cities” are changed to “jurisdiction” or “jurisdictions” where appropriate.

Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.

7. Remain Neutral on Technology

Throughout the documents, there are specific examples of technology identified. It is not SCAG’s purview to pick winner and losers in technology; the marketplace will determine dominant technologies. Therefore, it should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more flexible.

PEIR

8. PEIR Mitigation Measures

- a. Please state that in the event a state law referenced in the mitigation measure is updated or changed, the most current state law requirements prevails.
- b. For all “Project-level Mitigation Measures”, replace the word “require” with “encourage” or “it is recommended”. Examples include:
MM-AES-3(b), MM-Air-2(b), MM-Air-4(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), MM-BIO-5(b), MM-GHG-3(a)(11), MM-TRA-1(b), MM-TRA-2(b), MM-USS-6(b)

A redline version identifying the location of the exact language is provided in the matrix of comments in Attachment 1.



c. Priority and Funding Preference for Transportation Projects:

To address the significant impacts of increasing Vehicle Miles Traveled (VMT) and traffic congestion, the draft Program EIR for SCAG's 2016 - 2040 RTP/SCS proposes project-level mitigation measures that include language allowing for:

- (1) Giving priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita [Mitigation Measure MM-TRA-1(b)]; and,
- (2) Giving funding preference to improvements in public transit over other new infrastructure for private automobile traffic [Mitigation Measure MM-TRA-2(b)].

Please delete these provisions in Mitigation Measure MM-TRA-1(b) and Mitigation Measure MM-TRA-2(b), unless the language in these provisions is modified to recognize that they would only be considered if they are found by the Lead Agency to be appropriate and consistent with local transportation priorities.

The language in these provisions implies a specific emphasis towards policy consideration to the prioritization, selection and funding of transportation projects that, to our knowledge, has not been discussed nor endorsed by SCAG's Transportation Committee, or Regional Council, as a regional strategy for the implementation of the 2016 RTP/SCS.

Moreover, the language in these provisions fails to recognize that several counties in the SCAG region implement transportation projects and programs that are mandated through voter-approved sales tax measures (i.e., Renewed Measure M2 in Orange County), and that are identified through long-range transportation plans.

Finally, the language in these provisions could compromise the delivery of committed transportation projects, by creating opportunities for potential delay and legal challenge. To avoid these kinds of potential unintended consequences, **we request that SCAG either delete these provisions, or modify these provisions to make it abundantly clear that they are only for consideration when determined to be appropriate by the Lead Agency.**

9. Fees and Taxes

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval, and therefore it should not be assumed that they will be approved.

Fees and Taxes Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

10. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing regulation or processes



(e.g. CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact, and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

Examples of existing regulations included as mitigation measures are found within the Hydrology section of the draft PEIR. For example, Section 3.10.6, Mitigation Measures (page 3.10-56): Parts of this section list mitigation measures that are already being required by municipal storm water programs across the region. Instead of listing specific mitigation measures, the PEIR should make reference to these programs. In Orange County, for example, this program is detailed in the DAMP/Model WQMP. The Model WQMP describes the process that cities and County employ for requiring a WQMP, which is a plan for minimizing the adverse impacts of urbanization on site hydrology, runoff flow rates, and pollutant loads at the project level. A reference to the Model WQMP and equivalent documents in the region’s other counties, should replace the last ten bullet points of section MM-HYD-1(b).

Additionally, there are specific mitigation measures included in the Hydrology section that may be in conflict with Storm Water Permits issued by Regional Water Quality Control Boards. In the SCAG region, there are five water quality control boards each with its own Municipal NPDES Storm Water Permit. The regulations and requirements contained in these permits vary from each other. By listing specific measures in the PEIR that are not included in a project’s applicable Municipal NPDES Storm Water Permit, the PEIR creates conflicting compliance requirements. To eliminate potential conflict with existing regulations, the mitigation measures regarding specific BMPs should be removed and replaced with a single requirement that each project must comply with its applicable Municipal NPDES Storm Water Permit.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the 2016-2040 RTP/SCS documents. They represent incredibly complex technical work and have important and far-reaching policy impacts for our region. However, because of this importance and complexity, we would like to express concern about the timing of the release of the documents, and our desire that the preparation of future RTP/SCS documents in future RTP/SCS cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The current timeline of document



releases, public comment period, and time allowed for the response to comments results makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period through February 1, 2016, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS on April 7, 2016. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do not hesitate to contact me or Marnie Primmer, OCCOG's Interim Executive Director.

Sincerely,

A handwritten signature in blue ink that reads "Arthur C. Brown".

Art Brown
Chairman

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCTA Board of Directors
Orange County City Managers Association



Attachment 1: Detailed comments on RTP/SCS, PEIR, & related appendices

2016 RTP/SCS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	p.2	Delete Our Vision & Our Overarching Strategy strategies. These sections are highly speculative and not necessary for the rest of the document.
2	Clarification	p.3, column 2, bullet 5	<p>“Millions of people are in poor health... Millions of more people live with chronic diseases, such as asthma, every day.”</p> <p>Define ‘poor health’ Cite numbers or share of population for region instead of saying “millions”. Provide reference to what chronic diseases include.</p>
3	Clarification	P. 4, column 2, paragraph 2	“Among the milestones: a one-year demonstration of <u>the tolled Express Lanes in Los Angeles County along Interstate 10 and Interstate 110 was made permanent in 2014...</u> ”
4	Clarification	p. 7, column 2, paragraph 1	“In many instances, <u>the additional these</u> chargers <u>will create the opportunity to increase</u> may double the electric range of PHEVs, reducing vehicle miles traveled that produce tail-pipe emissions.”
5	Clarification	p. 13, column 2, paragraph 2	“Since 2009, every MPO <u>in California</u> has been required to develop a Sustainable Communities Strategy...Once implemented along with the rest of the Plan, it will improve the <u>overall</u> quality of life for all residents of the region.”
6	Clarification	p. 13, column 2, paragraph 3	“But these advances in mobility also have the potential to help Baby Boomers, <u>and the generations that follow them</u> , maintain their independence as they age.”
7	Clarification	p. 14, column 1, paragraph 2	“In Southern California, striving for sustainability <u>includes</u> will require achieving state-mandated targets for reducing greenhouse gas emissions from vehicles and federal air quality conformity requirements, and also adapting wisely to a changing environment and climate.”
8	Clarification	p. 14, column 2, paragraph 5	“It is particularly important that the Plan consider <u>and minimize</u> the <u>negative impacts</u> consequences of transportation projects, <u>especially</u> on low-income and minority communities <u>and minimize negative impacts.</u> ”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
9	Clarification	p. 16, column 2	<p>“2. Collaborating with Member Agencies, Jurisdictions and Stakeholders. Implementing the Plan will require SCAG to continue working closely with its <u>all jurisdictions member agencies...</u>”</p> <p>“The agency will also have to work with key stakeholders to ensure the Plan benefits the economy and <u>promotes ensures</u> social equity. To ensure that the region makes progress on its goals, SCAG will monitor its own progress toward achieving its targets and will share this information with <u>its relevant partners and the public.</u>”</p>
10	Clarification	p. 20, column 1, paragraph 3	<p>“However, of the remaining developable land, only a small portion of it can be developed <u>as transit-ready infill sustainably</u> – meaning it can be reached via planned transit service and that it can readily access existing infrastructure (water resources, sewer facilities, etc.). According to <u>SCAG land use data collected by SCAG</u>, only two percent of the total developable land in the region is located in High Quality Transit Areas (HQTAs). <u>A more compact land development strategy is needed, which will be discussed in Chapter 5.</u>”</p>
11	Clarification	p. 20, column 1, paragraph 4	<p>“<u>SCAG supports the fact that local jurisdictions conduct much of the planning for land use in our region. However, as</u> the agency prepared the 2016 RTP/SCS, it needed to organize the many different <u>land use</u> types and classifications <u>of land uses in...</u>”</p>
12	Clarification	p. 20, column 1, paragraph 5	<p>“To accurately represent land uses throughout the region, SCAG <u>aggregated reviewed</u> information from jurisdictions and simplified the types and classifications of land use <u>into a consolidated set of land use types</u>. The agency <u>then converted these consolidated land uses into identified</u> 35 “Place Types”... the Urban Footprint <u>Scenario Sustainability Planning Model (SPM), to demonstrate which guided and evaluated</u> urban development in the Plan in terms of form, scale and function in the built environment.”</p>
13	Clarification	p. 20, column 2, paragraph 2	<p>“SCAG then <u>classified sorted</u> the 35 Place Types into three Land Development Categories. The agency used these categories to: describe the general conditions that exist and/or are likely to exist within a specific area; <u>SCAG did not intend to have them represent detailed policies for land use, development or growth. Rather, they and</u> reflect the varied conditions of buildings and roadways, transportation options, and the mix of housing and employment throughout the region.”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
14	Clarification	p. 21, column 1, paragraph 3	<p>Conversely, s Some areas, especially near the edge of existing urbanized areas, do not have plans for conservation and may be slated for development are susceptible to development pressure. ... – meaning these are areas that are home to a high number of species and serve as highly functional habitats.”</p> <p>“Some key habitat types are underrepresented within the 35 percent of the region already under protection.” Clarify why does there need to be an equal share of types of protected land? If not, delete sentence.</p>
15	Clarification	p. 22, column 1, paragraph 1	<p>“However, although these housing units are planned and zoned for, historical data shows that less than ten percent of the needed affordable housing has been built. In contrast, housing construction measured by building permits issued meets nearly 90 percent of projected market rate housing needs.”</p> <p>What is the data source that reports on building finals by income category? What is the time frame for the “less than ten percent”? What is the time period for the data on the market rate housing?</p>
16	Clarification	p. 22, column 2, paragraph 1	“... of our region’s jurisdictions have <u>certified</u> adopted housing elements.”
17	Define	p. 22, column 2, paragraph 3	Define “high quality” housing
18	Define	p. 23, Figure	Define “demand response” in “Passenger Miles by Mode” figure
19	Clarification	p. 25, column 2, paragraph 2	“This network includes fixed-route local bus lines, community circulators, express and rapid buses, Bus Rapid Transit (BRT), demand response <u>paratransit</u> , ³ light rail transit, heavy rail transit (subway) and commuter rail. ⁴ ”
20	Clarification	p. 26, column 1, paragraph 2	“ <u>Transit users directly typically</u> pay <u>about</u> 25 percent of the operating and maintenance cost of their travel, with the remaining 75 percent paid for by state and local public subsidies. Most capital expenditures are also funded <u>through various taxes and</u> with public subsidies, including a larger share of federal grants.”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
21	Clarification	p. 28, column 1, paragraph 2	<p>“The regional bike network is expanding <u>evolving</u> but remains fragmented. Nearly 500 additional miles of bikeways were built since SCAG’s 2012 RTP/SCS, but only 3,919 miles of bikeways exist regionwide, of which 2,888 miles are bike paths/ lanes (see EXHIBIT 2.3). This is compared with more than 70,000 roadway lane miles. One way to quantify bikeway quality and density is to calculate a ratio of bike path to lane miles. SCAG’s ratio of bike path/lane miles ratio is 0.039. To put this in perspective, Portland, Oregon and San Francisco have bike path/lane ratios to lane miles at 0.054 and 0.078, which are 38 percent and 100 percent higher than the SCAG region, respectively. Our region’s lack of consistent infrastructure discourages all but the most fearless people to bike.”</p> <p>Comment: There is typically only one bike lane in each direction whereas there could be multiple traffic lanes in each direction. It is not appropriate to compare lane miles to bike lane miles. Comparison, if any, should be to centerline miles. Comparison of bike path/lane miles ratio for SCAG region to individual cities is not appropriate.</p>
22	Clarification	p. 28, column 1, paragraph 2	<p>“Most walk trips (83 percent) are less than one half mile; walkers are <u>less likely to travel</u> often discouraged from traveling farther. Routes to <u>bus</u> stops and stations are often...”</p>
23	Delete	p. 33, column 1, paragraph 2	<p>“A significant amount of travel in the region is still by people who choose to drive alone (42 percent of all trips and nearly 77 percent of work trips). So, the challenge of getting individuals to seek more environmentally friendly alternatives of travel remains.”</p>
24	Clarification	p. 54, column 2, paragraph 4	<p>“Certainly, <u>The overall quality of life is expected to</u> will increase for many people.”</p>
25	Clarification	p. 55, column 1, paragraph 3	<p>“Chronic diseases including heart disease, stroke, cancer, chronic lower respiratory disease and diabetes are responsible for 72 percent of all deaths in our region. Millions of more people live with chronic diseases every day.”</p> <p>Cite number and source or delete sentence.</p>
26	Clarification	p. 56, column 1, paragraph 1	<p>“<u>California is experiencing</u> ongoing drought conditions, water shortages due to less rainfall as well as declining snowpack in our mountains, and an agriculture industry in crisis have become hard realities in recent years.”</p>
27	Clarification	p. 61, column 1, paragraph 2	<p>Add statement that says “<u>These preliminary scenarios are not the ones modeled in the PEIR.</u>”</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
28	Clarification	p. 64, column 1, paragraph 1	Clarification should be made that attendance was self-selected as was the survey participation. Attendees were strongly encouraged by SCAG staff to fill out a survey. A more detailed description should be included that explains that these results are not scientific.
29	Clarification	p. 64, column 2, paragraph 2	<p>“...was also a principal concern, as was access to healthy food.”</p> <p>What percentage of respondents elevates an item to a ‘principle concern’?</p>
30	Clarification	p. 64, column 2, paragraph 4	<p>“Collectively, the survey responses offered an invaluable guide to help finalize the Plan’s investments, strategies and priorities. They reflect how regional stakeholders want us to address priority areas such as transit and roadway investments, system management, active transportation, land use and public health.”</p> <p>Did the survey responses change the Plan? Clarify if a higher priority in making changes was afforded to survey respondents’ feedback over jurisdictional and CTC input?</p>
31	Clarification	p. 65, column 1, paragraph 4	<p>“Jurisdictions were asked to provide input on the growth scenario, including information on specific planned development projects with entitlements, other planned projects, or recently completed developments.”</p> <p>Comment: During the local input process, SCAG requested feedback on the distribution of new households and employment. SCAG did not request information from jurisdictions on specific planned development projects with entitlements, other planned projects, and recently completed developments. During review of the draft policy growth forecast (PGF) in summer 2015, technical errors throughout the draft PGF were identified. These “technical errors” in the dataset were that entitlements, development agreements, and projects currently under construction or recently completed were not properly reflected. It was then that SCAG stated that jurisdictions could provide the information if jurisdictions wanted corrections made to the PGF.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
32	Clarification	p. 65, column 2, bottom note	<p>“*With the exception of the 6 percent of TAZs that have average density below the density range of local general plans.”</p> <p>Please clarify the footnote. Did SCAG lower the growth or is General Plan buildout expected after 2040?</p>
33	Clarification	p. 70, column 1, paragraph 1	<p>“In addition, local jurisdictions <u>are encouraged to</u> should pursue the production of permanent affordable housing through deed restrictions or development by non-profit developers, which will ensure that some units will remain affordable to lower-income households.”</p>
34	Clarification	p. 70, Table 5.1	Add note to table “Adopted in 2013”
35	Define	p. 73, column 2, paragraph 4	Define “riparian”
36	Clarification	p. 76, paragraph 1	How many of these trips are alone vs. with others? Are these linked trips/trip segments?
37	Clarification	p. 76, paragraph 3	The narrative implies that Neighborhood Mobility Areas (NMAs) are needed for Neighborhood Electric Vehicles (NEVs). If this is not true, reword section to allow for flexibility that one is not tied to another exclusively.
38	Clarification	p. 77	Figure needs title
39	Clarification	p. 79, Figure 5.2	Clarify if the preservation and operations expenditures apply to the SCAG region or California State.
40	Clarification	p. 83, column 2, paragraph 5	<p>“Bus lanes are even more effective at increasing speeds, however in our region there is a dearth of such lanes. Transit agencies should heavily lobby <u>SCAG encourages transit agencies and local jurisdictions in which they operate</u> to implement them, where appropriate <u>at least for peak period operation.</u>”</p>
41	Clarification	p. 88, column 1, paragraph 4	“The 2016 Active Transportation <u>portion of the 2016 Plan</u> updates the 2012 Active Transportation Plan...”
42	Clarification	p. 89, column 2, paragraph 2	“SCAG has identified <u>developed</u> 12 regionally significant bikeways that connect the region.”
43	Clarification	p. 92, column 1, paragraph 2	“The launch date coincided with the <u>end of daylight savings time</u> decline in daylight hours , a period when bicycle and pedestrian collisions peak during the year.”
44	Define	p. 93, column 1, paragraph 4	Define “no-maintenance exercise spots”
45	Clarification	p. 103, column 1, paragraph 3	<p>“...figure “2040 Airport Demand Forecasts” on the previous page...”</p> <p>Properly label figure and page reference.</p>



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
46	Clarification	p. 105, column 1, paragraph 1	<p>“In recent years, airport operators, CTCs and SCAG have all undertaken their own initiatives to improve ground access at the region’s aviation facilities.”</p> <p>Clarify what initiatives SCAG has undertaken.</p>
47	Clarification	p. 111, column 1, paragraph 2	<p>“Building on its strong commitment to the environment as demonstrated in the 2012 RTP/SCS, SCAG’s mitigation program is intended to function as a resource for lead agencies to consider in identifying mitigation measures to reduce impacts anticipated to result from future <u>transportation projects</u> as deemed applicable and feasible by such agencies.”</p>
48	Clarification	p.111-119 & PEIR	Update language on the mitigation measures to be consistent with any language changes to the PEIR document.

ACTIVE TRANSPORTATION APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	all	Needs to include statement saying that pedestrians and bikes are also responsible (e.g. distracted walking by cell phones; bikers with headphones) and isn’t always vehicles as cause Everyone needs to be educated and follow the rules and enforcement needs to happen for all modes
2	General Comment	all	Acknowledge the improvement over time of AT usage and the lowering of accident and death rates
3	Clarification	p. 5	<p>“Class I Bikeways ...A Class I Bikeway provides a completely separated <u>right-of-way</u> designated for the exclusive use of bicycles and/or pedestrians with cross flows by motorists minimized. Some of the region’s rivers include Class 1 Bikeways. Increasing the number of bikeways in <u>along rivers, utility corridors, and flood control channels</u> may provide additional opportunities for “interested but concerned” cyclists.”</p>
4	Clarification	p.6, column 1	<p>“INTERSECTION TREATMENTS ...In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections.” Define how far away from the intersection an accident may occur to be included in the count of pedestrian injuries at intersections</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p.6, column 1	<p>“COMPLETE STREETS</p> <p>In recognition of the need to accommodate various types and needs of roadway users, the State of California adopted the Complete Streets Act of 2008 (AB 1358) requiring cities and counties to incorporate the concept of Complete Streets to any general plan’s substantive update <u>to their General Plan’s circulation element.</u>”</p>
6	Clarification	p.8, column 1	<p>“COLLISIONS AND FATALITIES</p> <p>While the numbers of bicyclists and pedestrians are increasing, so are injuries and fatalities, although not as fast as the growth in active transportation. In California, 64,127 pedestrians were injured and 3,219 were killed between 2008 and 2012. In 2012 alone, 702 pedestrians were killed and <u>13,280 pedestrians were injured and 702 pedestrians were killed.</u>”</p>
7	Clarification	p. 17, Table 5	Create separate tables for columns 1 to 3 and columns 3 to 10.
8	Define	p. 24, column 1, paragraph 1	<p>“2012 RTP/SCS PROGRESS</p> <p>The 2016 Active Transportation <u>portion of the Plan</u> ... The Plan examined access to transit, noting that 95 percent of SCAG residents would be within walking (0.5 mile) or biking (2 mile) distance from a transit station.”</p> <p>Define what constitutes a ‘transit station’</p>
9	Clarification	P. 25, second column, top bullet (last under #4)	<p>“Success of this program depends on cities and counties conducting these counts and providing the data to SCAG.”</p> <p>Identify funding source and acknowledge that this is voluntary effort and may not be a priority, especially without funding</p>
10	Add bullet	P. 25, second column, Bullet 6	Add 4 th bullet under #6: “ <u>OCCOG is working on a comprehensive Complete Streets design manual for the entire county which will be completed in 2016.</u> ”
11	Correction	P.26, Table 9	Change language for Orange County: Not yet Planned. <u>In Process</u>
12	Clarification	p. 27, column 1, and any other references	Clarify that the ‘2016 Action Transportation Plan’ is not a standalone plan, but is a portion within the RTP.
13	Clarification	P.66-67, Tables 16 & 17	Add note to Table: “These draft scenarios are not the alternatives that were evaluated in the PEIR.”
14	Clarification	P. 71	Delete “Strategic Plan Beyond 2040” section. The inclusion of this section is not consistent with other appendices. It creates confusion as to what the RTP’s Strategic Plan is.



DEMOGRAPHICS/GROWTH FORECAST APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Label Y axis on all figures
2	Clarification	P. 2, column 1, paragraph 3	Add text: <u>“The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>

GOODS MOVEMENT

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 4, Exhibit 2	Exhibit is labeled warehouse & distribution centers but shows manufacturing firms total employment. Correct.

PERFORMANCE MEASURES APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	P.8-10, Table 4	Label all Performance Measures that were new in 2016 Plan
2	Clarification	P.11	Add definition of HQT A to map.
3	Clarification	p.20	LSPT was used for 2012 RTP. Add information on the SPM.
4	Clarification	p. 31, Table 12	Add model sources to bottom of table.

PUBLIC HEALTH APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Final document should contain hyperlinks to other documents.
2	General Comment	All	Spell out Acronyms in Tables/Figures Titles e.g. CHIS



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	p.1, column 1	“Public health is increasingly an area of emphasis for Metropolitan Planning Organizations (MPOs) and Departments of Transportation (DOTs) across the country, have an opportunity to impact due to the prevalence of chronic diseases such as obesity, hypertension, asthma and heart disease through transportation planning which promotes increased physical activity.”
4	Clarification	p.2, column 1	Introduction- first paragraph sentence beginning with “Public health outcomes are the product of Social Determinants of Health.....” consider adding “and other factors.
5	Clarification	p.1, column 2	“Climate Adaptation: Support efforts to prevent <u>mitigate</u> climate change and make the region more resilient to future changes with reductions in VMT and greenhouse gas emissions.”
6	Correction	p.2, Figure 1	Arrows should go both ways.
7	Clarification	p.3, column 1, paragraph 2	“Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors <u>and related conditions</u> can play a role in supporting healthy behaviors.”
8	Clarification	p.3, column 2, paragraph 3	“Access to healthy food environments such as grocery stores, farmers’ markets and community gardens decreases <u>can play an important role in</u> food insecurity and obesity.”
9	Define	p.7, column 1, first line	Define “weather insurance”
10	Clarification	p.7, column 2, paragraph 2	“... Providing access to <u>education and job training aligned with job opportunities in the region</u> jobs with a living wage is critical to ensuring communities become and stay healthy.”
11	Clarification	p.7, column 2, paragraph 3	“...Creating infrastructure <u>policies and community conditions</u> and facilities that encourage active transportation such as biking and walking provides opportunities for residents to increase their daily physical activity.”
12	Clarification	p.8, paragraph 3	Consider adding the recommendations for children which has a higher standard of one hour per day. This is valuable as jurisdictions look at health co-benefits of safe routes to school infrastructure changes and related programming.
13	Clarification	p.9, all figures	Recommend using the more current 2014 data. Also, it might be helpful to look at these metrics on a smaller level of geography and/or by poverty and/or by race/ethnicity. Especially since there are often funding set asides to reach disadvantaged communities, it might be interesting to see what each of these indicators looks like at a more refined level. The need is not equally distributed throughout any jurisdiction.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
14	Clarification	p.9	Add table with data for walking.
15	Clarification	p.10, column 2	Consider including funding as both a challenge and an opportunity.
16	Clarification	p.10, column 1, last sentence	“Much of our local arterial system is also in need of pavement improvements, as local roadways in the SCAG region average a score of 69 out of 100 in the Pavement Condition Index (PCI), where a score of 70 or less typically translates to conditions that are <u>inadequate more costly to repair.</u> ”
17	Clarification	p.10, column 2, paragraph 4	“With more than 18 million people, 191 cities, six counties and hundreds of local and regional agencies, Southern California is <u>one of the most complex regions on earth a diverse region.</u> Within the region, health outcomes vary widely based on <u>many things, such as geography, income and race.</u> ”
18	Clarification	p. 15, column 2, paragraph 3; & throughout all	“500 foot buffer”- be consistent with usage and description throughout all documents in whether this is adjacent to just freeways or freeways, rail, and high frequency transit corridors.
19	Clarification	p. 16, column 1, paragraph 1	“Region-wide, about ten percent of the land area within HQTAs is also within the 500 feet <u>foot buffer</u> of the freeway. To balance regional policy goals, the Plan accommodates the vast majority of growth within HQTAs <u>but beyond outside of the 500 feet buffer</u> of freeways...”
20	Clarification	p. 17, column 1	“Water Consumption” and “Land Consumption” Specify the time period for the change or difference in numbers. Compare this to 2040 Baseline.
21	Clarification	p. 19, column 2	“Public Health Work Program” Clarify if this work program was approved by the RC or SCAG staff is pursuing these tasks under direction of RC to incorporate more public health into RTP.
22	Clarification	p. 22-29	Are these all “best practices” or are they local examples of promising practices? Since some of these are in process, are the results are there to show that this particular practice has proven efficacy over another? These may have the potential to be best practices. If the project is based upon a best practice, it is recommended to link to the best practice so other jurisdictional leaders could consider for replication. If it is not already a proven practice, suggest calling it something different such as “local promising practices”. Add the Complete Streets Guidelines that are being developed in Orange County (which integrates in best practices.)



SCS BACKGROUND DOCUMENTATION APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	P.42-43	How do the SPM Place Types nest into the Land Development Categories?
2	General Comment	All maps	“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. <u>The advisory sub-jurisdictional data shall not be required</u> should not be used for purposes of qualifying for future grant funding or other incentives. The data is controlled to be within the density ranges of local general plans and/or input received from local jurisdictions. the purpose of or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA) streamlining, lead agencies have the sole discretion in determining a local project’s consistency with the 2016 RTP/SCS. ”
3	Clarification	p.6/43	Move the definitions of Urban, Compact Walkable, and Standard Suburban from page 43 to page 6 before the maps
4	Clarification	p. 41, column 1, paragraph 4	“Scenario modeling with UrbanFootprint brings meaningful, comprehensible, and timely results to those <u>local jurisdictions</u> wanting to understand how growth and development choices will impact their community, city, or region in the coming years and decades.”
5	Correction	p. 41, column 2, paragraph 2	“Since 2012... Developers of UrbanFootprint have also met with regional agencies, such as SCAG, Sacramento Area Council of Governments (SACOG), and San Diego Association of Governments (SANDAG); Orange County Council of Governments (OCCOG). ”
6	Clarification	p. 50, 51, 54, 56 maps	Clarify in map legends if growth refers to population, housing and/or employment.
7	Correction	p. 56 column 1, last paragraph	“ The scope of <u>These four scenarios were developed in early 2015 by SCAG and their consultant and shared, which were developed in consultation</u> with the CEHD Committee and the SCAG’s Technical Working Group (TWG); evolved throughout the first five months of 2015. ”
8	Clarification	p. 56 column 2, paragraph 2	“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing, <u>but sometimes modernization of utilities needs to be considered and completed to accommodate the additional usage.</u> ”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
9	Clarification	P. 58, column 2, paragraph 4	<p>“Saving water also saves on costs, and the RTP/SCS saves about \$1.2 billion over the span of the plan, and saves households in the SCAG region \$93 million on annual water bills.”</p> <p>Add “<u>Notwithstanding, infrastructure operations and maintenance costs require continued funding; further, these costs could offset ratepayer savings resulting from the implementation of RTP/SCS policies, conservation efforts, or installation and use of efficient appliances.</u>”</p>
10	Clarification	P. 83, column 2, paragraph 2	<p>“The SPM includes a suite of tools and analytical engines that help to quickly illustrate alternative plans and policies and to estimate their transportation, environmental, fiscal, <u>and public health and community regional impacts.</u>”</p>
11	Clarification	P. 83, column 2, last sentence	<p>“SPM will serve as a common platform for communications between SCAG and local jurisdictions in the process of local input and public outreach, providing local planners advanced analytical capabilities.”</p>

PEIR

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Any changes to mitigation measure language should be updated in both the Executive Summary and the chapters throughout the PEIR, as well as the RTP/SCS document.
2	General Comment	All	Cite original source data, not other documents, e.g. SCAG’s Local Profiles
3	Clarification	ES-14	“MM-AES-1(b): Consistent ... the Lead Agency can and should consider mitigation measures...”
4	Clarification	ES-14 & 15	<p>“MM-AES-3(b): Consistent ...the Lead Agency can and should consider mitigation measures...</p> <ul style="list-style-type: none"> •Require <u>Encourage</u> development of design guidelines... •Require <u>Encourage</u> that sites are kept in a... “”
5	Define	ES-16	Define ‘Natural Resource Inventory Database and Conservation Framework & Assessment’
6	Define	ES-16	Define ‘Conservation Plan’
7	Define	ES-16	Define ‘mitigation banks’
8	Clarification	ES-19	<p>MM-Air-2(b):</p> <ul style="list-style-type: none"> •Require <u>Encourage</u> contractors to assemble... •As appropriate require <u>encourage</u> that...”
9	Clarification	ES-19	<p>MM-Air-4(b):</p> <ul style="list-style-type: none"> •Require <u>Encourage</u> clean fuels, and reduce petroleum dependency.”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	ES-19	“MM-Air-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS <u>transportation</u> projects or development projects resulting from the land use patterns in the 2016 RTP/SCS would be located.”
11	Clarification	ES-20	MM-BIO 1(b): <ul style="list-style-type: none"> •Require <u>Encourage</u> project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.”
12	Clarification	ES-22	MM-BIO-2(b): <ul style="list-style-type: none"> “•Require <u>Encourage</u> project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.”
13	Clarification	ES-22	MM-BIO-3(b): <ul style="list-style-type: none"> “•Require <u>Encourage</u> project design to avoid federally protected wetlands consistent with the provisions of Section 404...” “•Require <u>Encourage</u> review of construction drawings by a certified wetland delineator...”
14	Clarification	ES-23	MM-BIO-4(b): <ul style="list-style-type: none"> “•Require <u>Encourage</u> review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDB...”



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	ES-24	<p>MM-BIO-5(b):</p> <p>“•Require <u>Ensure</u> that no change in existing ground level occur from the base of any protected tree at any time. Require It is recommended that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.”</p> <p>“•Require <u>Encourage</u> that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require It is recommended that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require It is recommended that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require It is recommended that no sign, other than a tag showing the botanical classification, be attached to any protected tree.”</p> <p>“... require <u>ensure</u> replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed.”</p>
16	Clarification	ES-31	<p>MM-GHG-3(a)(11):</p> <p>“•Require <u>Encourage</u> amenities for non-motorized transportation, such as secure and convenient bicycle parking.”</p>
17	Clarification	ES-40	<p>MM-LU-1(a)(3): “SCAG shall work with its member cities and counties to encourage <u>but not require</u> that transportation projects and growth are consistent with the RTP/SCS.”</p>
18	Clarification	ES-40	<p>MM-LU-1(a)(4): “SCAG shall coordinate with member cities and counties to encourage <u>but not require</u> that general plans consider and reflect as appropriate RTP/SCS policies and strategies. SCAG will work to encourage <u>but not require</u> consistency between general plans and RTP/SCS policies.”</p>
19	Clarification	ES-40	<p>MM-LU-1(a)(8): “SCAG shall continue to use its Intergovernmental Review Process to provide comments to lead agencies on regionally significant projects, that may be considered for determining consistency with the RTP/SCS.”</p>
20	Clarification	ES-52	<p>MM-TRA-1(b):</p> <p>“... bicyclist accommodations, and require <u>encourage</u> new development and redevelopment projects to include bicycle facilities...”</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
21	Clarification	ES-53	MM-TRA-1(b): “ •Require <u>Encourage</u> new office developments with more than 50 employees to offer a Parking “Cash-out” Program to discourage private vehicle use.”
22	Clarification	ES-53	MM-TRA--2(b) “•Where traffic signals or streetlights are installed, require <u>encourage</u> the use of Light Emitting...”
23	Clarification	ES-54	MM-TRA--2(b) “•Diode (LED) technology, <u>or similar technology.</u> ”
24	Clarification	ES-55	MM-TRA--2(b) “• Require <u>Encourage</u> the development of Transportation Management Associations for large employers and commercial/ industrial complexes;”
25	Clarification	ES-59	MM-USS-6(b): “• Require <u>Encourage</u> the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).”
26	Clarification	ES-59	MM-USS-6(b): “Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible.” Comment: Trash disposal should be addressed regionally while considering distance instead of being limited to within the SCAG region. It is possible that disposal could be done nearby while crossing regional boundaries.
27	Delete	P. 3.3-26 Regional Air Quality	It is not appropriate to use the American Lung Association grading system to rate the region’s the transportation plan. This section (paragraph and Table 3.3.2-1) should be deleted.
28	Clarification	P. 3.3-29 Sensitive Receptors & Table 3.3.2-3	“Sensitive Receptors by County” Clarify what the source data was and how the tally of sensitive receptors was made.
29	Clarification	Figure 3.3.2-3	Figure needs legend, labels, source of data and definition of sensitive receptors
30	Clarification	P. 3.10-5 Section 3.10.1, Regulatory Framework	The definition of a Municipal Separate Storm Sewer System (MS4) is incomplete and incorrectly cited.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
31	Clarification	p. 3.10-15 Section 3.10.1, Orange County General Plan	Specific mention of the Orange County Stormwater Program's Drainage Area Management Plan (DAMP) should be made under PEIR heading Orange County General Plan. The DAMP is Orange County's principle policy and program guidance document for urban nonpoint source pollution mitigation. The PEIR should reference the DAMP's agreements, structure, and programs, and, at the project level, make note to consider the specific water pollution control elements of the DAMP that apply to land development and redevelopment projects. Transportation infrastructure projects deemed to be Priority Projects, in accordance with DAMP designation (Exhibit 7.1 Table 7-1.1), would require the development of a Project Water Quality Management Plan (WQMP) in conformance with Orange County's Model WQMP.
32	Clarification	p. 3.10-17 Section 3.10.2, Existing Conditions	Table 3.10.2-1 lists San Juan Creek as a surface water resource within Santa Ana (Region 8) jurisdiction. San Juan Creek is located within the San Diego Regional Water Quality Control Board (Region 9) jurisdictional boundary.
33	Clarification	p. 3.10-56 Section 3.10.6, Mitigation Measures	Mitigation Measures: Parts of this section list mitigation measures that are already being required by municipal stormwater programs across the region. Instead of listing specific mitigation measures, the PEIR should make reference to these programs. In Orange County, for example, this program is detailed in the DAMP/Model WQMP. The Model WQMP describes the process that the cities and County employ for requiring a Project WQMP, which is a plan for minimizing the adverse impacts of urbanization on site hydrology, runoff flow rates, and pollutant loads at the project level. A reference to the Model WQMP and equivalent documents in the region's other counties, should replace the last ten bullet points of section MM-HYD-1(b).
34	Clarification	p. 3.10-56 Section 3.10.6, Mitigation Measures	If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 3.10-56 Section 3.10.6, Mitigation Measures & Table ES 4-1 (page ES-37)	The PEIR states that "where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project." While the intent with many mitigative measures is to preserve (emphasis added) perviousness, the PEIR should not be establishing performance measures for land development/redevelopment outside of established local stormwater programs.
36	Clarification	3.11-8&9, 3.11-13 3.11-16 & 17	<p>Need to specify the vacant areas that are permanently preserved or undevelopable, even park space that is vacant</p> <ol style="list-style-type: none"> i. Identify the source of the data used to identify vacant land. ii. What are the following items classified as (e.g. vacant, open space): HOA open space, HOA streets, private parking lots, lakes. <p>Table 3.11.2-2- Break out vacant land category into permanently preserved/undevelopable or developable</p> <p>Figure 3.11.2-7 Need to correctly label national forests as permanently preserved open space. Areas labeled vacant need to be reviewed to correctly allocate lands that are permanently preserved/undevelopable and which are developable.</p>
37	Clarification	3.11-10	Table 3.11.2-1- Define 'Established Communities'; Correct label or number of square miles by county
38	Define	3.11-11	Define 'carbon sinks'
39	Define	3.11-14	Define medium, high, and low density housing within text
40	Clarification	3.11-34	<p>3.11.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION IMPACT LU-1...</p> <p>It is likely that in some instances currently adopted general plans and other adopted plans will not General Plans are not required to be consistent with the 2016 RTP/SCS policies and land use strategies, and they are not required to be consistent for purposes of the SCS pursuant to SB 375. Implementation of mitigation measures MM-LU- 1(a)(1), MM-LU-1(a)(2), MM-LU-1(a)(3), MM-LU-1(a)(4), MM-LU-1(a)(5), MM-LU-1(a)(6), MM-LU- 1(a)(7), MM-LU-1(a)(8), and MM-LU-1(b) would may reduce some of these impacts. However, direct, indirect, and cumulative impacts would remain significant and unavoidable.</p>
41	Correction	3.14-9	Update Table 3.14.2-1 with May 2015 DOF data and label columns as 'Households' not 'Housing Units'



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
42	Correction	3.14-12	Update Table 3.14.2-3 with May 2015 DOF data
43	Correction	3.14-13	Update Table 3.14.2-5 with May 2015 DOF data
44	Define	Figures 3.14.2-1 3.14.2-2 3.14.2-3	Define subjects of maps
45	Clarification	3.14.22, paragraph 4	Clarify if discussion is on new lane miles or existing; Define “additional transportation facilities”
46	Clarification	4-1, 4.1 add after last bullet	“ <u>If an alternative is rejected and the project approved, it is the EIR for the proposed project that is to be used for future tiering purposes.</u> ”
47	Clarification	P. 4-6, and all related documents’ references to Alternative 3.	<p>Alternative 3: Intensified Land Use Alternative “The <u>hypothetical</u> land use pattern in this Alternative builds on the land use strategies as described in the 2016 RTP/SCS and beyond. Specifically, it increases densities and intensifies land use patterns of the Plan, especially around high quality transit areas (HQTAs) in an effort to maximize transit opportunities. The <u>hypothetical</u> growth pattern associated with this Alternative...”</p> <p>Comment: Update all references to Alternative 3 in all RTP/SCS documents where it mentions that the land use pattern was developed based on the Plan to say that Alternative 3’s land use plan is hypothetical.</p>



AFFILIATED AGENCIES

Orange County
Transit District

Local Transportation
Authority

Service Authority for
Freeway Emergencies

Consolidated Transportation
Service Agency

Congestion Management
Agency

Service Authority for
Abandoned Vehicles

January 11, 2016

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

Re: **Comments on the Draft 2016-2040 Regional Transportation Plan/
Sustainable Communities Strategy and Program Environmental
Impact Report**

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and associated Program Environmental Impact Report (PEIR). The draft RTP/SCS and PEIR reflect the transportation and funding challenges that the region will face in the coming years. These documents are critical to the region's ability to improve mobility, and to operate and maintain the transportation system.

The Orange County Transportation Authority (OCTA) appreciates that SCAG has included the commitments identified in OCTA's 2014 Long-Range Transportation Plan (LRTP), as well as the demographic forecasts approved and submitted by the Orange County Council of Governments. Additionally, OCTA recognizes the hard work and cooperation of SCAG staff throughout the RTP/SCS and PEIR development process.

OCTA has identified policy and technical issues related to the draft RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTC). The strategies include the assumed mileage-based user fee, regional express lane network, California High-Speed Rail, and the additional investments in transit, active transportation, and congestion management. OCTA's concerns and comments regarding each of the regional strategies are discussed below.

Mr. Hasan Ikhata
January 11, 2016
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Innovative Financing and New Revenue Sources

The draft RTP/SCS suggests that \$130.8 billion of the approximately \$200.4 billion regional shortfall can be addressed through actions at either the state or federal level. The innovative financing strategy, included in the RTP/SCS, assumes that a \$0.10 gas tax increase will be implemented by 2020. Additionally, by 2025, it assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.04 per mile, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee.

OCTA cannot support an increase in fees, including the introduction of a mileage-based user fee, until a comprehensive economic impact study is completed and presented to the OCTA Board of Directors for discussion. When considering support for any kind of a new user-based fee program, the region should place an emphasis on the need for return-to-source criteria that guarantee funds generated within a county are reinvested in that county's transportation system. Moreover, any user-based fees should be indexed appropriately to provide a justifiable and sustainable source of funding. Finally, throughout the development of any new funding mechanisms, opportunities should be sought to accelerate project delivery and reduce costs, consistent with OCTA's Breaking Down Barriers initiative. While these comments are generally consistent with SCAG's guiding principles for identifying reasonably available funding in the RTP/SCS, OCTA would like to reinforce these principles, particularly in consideration of the mileage-based user fee.

California High-Speed Rail

The draft RTP/SCS identifies Phase I of the California High-Speed Rail Authority (CHSRA) Project as a potential solution for improving interregional and intercity ground transportation. As described in the draft RTP/SCS, the project includes completing the first section through the San Joaquin Valley by 2018, extending to Palmdale and the Burbank Bob Hope Airport by 2022, connecting to San Jose/San Francisco by 2026, and finally reaching Los Angeles Union Station (Union Station) by 2028.

This also assumes upgraded commuter rail connections between Union Station and the Anaheim Regional Transportation Intermodal Center along the Los Angeles-San Diego-San Louis Obispo (LOSSAN) corridor. This upgraded service will be achieved through a \$1 billion program of projects identified in a memorandum of understanding (MOU) between the CHSRA and nine Southern California agencies. This investment is part of a phased delivery,

Mr. Hasan Ikhata
January 11, 2016
Page 3

known as the “blended approach”, which OCTA supports through the adopted Resolution 2012-020.

OCTA recommends that SCAG continue to provide regular updates to the Transportation Committee and Regional Council regarding the CHSRA business plan, financial status, implementation progress, and any changes in assumptions by the CHSRA. These updates should focus particularly on the status of the MOU.

Regional Express Lane Network

The draft RTP/SCS includes implementation of a regional express lane network. This network proposes to increase occupancy requirements from 2+ to 3+ persons per vehicle on select existing and planned high-occupancy vehicle (HOV) lanes throughout the region. Pricing for single-occupancy and dual-occupancy vehicles will then be used to increase the throughput of the corridor and reduce emissions from congestion. As a result, this concept would generate additional revenues. When combined with tolls from a new east-west freight corridor in Los Angeles County, the projected revenues would total \$23.5 billion. These funds are assumed to contribute toward the \$200.4 billion regional shortfall.

The proposed Regional Express Lane Network focuses on converting specific existing and planned HOV facilities to express lanes. However, the segment of State Route 55 (SR-55), between Interstate 405 (I-405) and State Route 91 (SR-91), is noted as a potential single or dual express lane facility. The potential for a dual lane facility is inconsistent with the projects submitted by OCTA in December 2014. The submittal identifies general purpose lane additions on SR-55, between I-405 and Interstate 5 (I-5), as well as between I-5 and State Route 22 (SR-22). OCTA did not submit any new capacity enhancements on SR-55 north of SR-22. If new capacity is proposed, over and above the OCTA LRTP, new funding would be required that is likely dependent on state and federal legislative action.

The 2016-2040 RTP/SCS should consistently recognize the capacity enhancements along SR-55, between I-405 and I-5, and between I-5 and SR-22, as general purpose lanes. This is consistent with how these projects are characterized in OCTA’s LRTP, OCTA’s 2006 program-level environmental document, and the current 2012-2035 RTP/SCS. Furthermore, the 2016-2040 RTP/SCS should clearly recognize that the proposed express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility before any final decisions on implementation can be made.

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January 11, 2016
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Other Regional Strategies

SCAG proposes a number of other investments within the draft RTP/SCS that affect Orange County, and go beyond the LRTP. These include additional investments in congestion management projects, transit service, and active transportation.

The congestion management projects were identified by the California Department of Transportation through studies required for corridors receiving Proposition 1B Corridor Mobility Improvement Account funding. In Orange County, these corridors included State Route 57, SR-22, I-5, Interstate 605, SR-91, and I-405.

The improvements consist of relatively low-cost operational improvements, such as ramp metering, auxiliary lanes, and other ramp and interchange enhancements. The draft 2016-2040 RTP/SCS estimates that an investment of \$5 billion is necessary to implement the improvements throughout the SCAG region. These are in addition to capacity and operational improvements submitted by the CTCs, and would be funded through the draft 2016-2040 RTP/SCS innovative financing strategy.

The draft 2016-2040 RTP/SCS also proposes additional transit enhancements throughout the region. The improvements consist of expanded local bus service, additional Bravo! and bus rapid transit services, and new express bus service. SCAG states that the additional cost to the region for these services, including capital and operations and maintenance costs, is estimated at about \$8.5 billion, which is again assumed to be funded with innovative sources. It should be noted that the proposed improvements in Orange County are generally consistent with the financially unconstrained element of the OCTA 2014 LRTP.

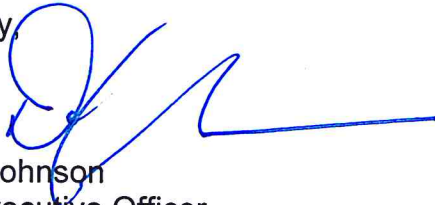
An additional emphasis is also placed on active transportation improvements, with the draft 2016-2040 RTP/SCS proposing to invest \$12.9 billion. Compared to the previous RTP/SCS, the active transportation investment has more than doubled. About \$1.7 billion of the total investment reflects active transportation projects submitted by CTCs. SCAG proposes investing another \$6.4 billion from the draft 2016-2040 RTP/SCS innovative financing strategy. SCAG then estimates that the remaining \$4.8 billion would be invested through active transportation elements from roadway operations and maintenance efforts. The \$12.9 billion investment results in more trips made by walking or bicycling, increasing from 11.9 percent of all trips in 2012, to 15.7 percent of all trips by 2040.

Mr. Hasan Ikhata
January 11, 2016
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OCTA recognizes that it is within SCAG's purview to plan for regional strategies that enhance transportation; however, it should be noted that OCTA is committed to delivering the projects within the LRTP. The 2016-2040 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies. OCTA will only consider additional investments after new revenues are realized and identified to account for these additional improvements.

OCTA appreciates SCAG's work on the RTP/SCS and PEIR, and looks forward to the adoption of the final 2016-2040 RTP/SCS and PEIR in April. If you have further questions, please contact Gregory Nord, Senior Transportation Analyst, at (714) 560-5885.

Sincerely,



Darrell Johnson
Chief Executive Officer

DJ:gn

c: OCTA Board of Directors
Executive Staff



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**PUBLIC HEALTH SERVICES
HEALTH PROMOTION**

February 1, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Dear Ms. Aguirre,

On behalf of the Orange County Health Care Agency (HCA), I am writing in response to the Southern California Association of Governments' (SCAG) invitation for comments about the draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Let me begin by thanking the leadership at SCAG for including the Public Health Appendix and also for integrating in public health co-benefits throughout the over 4000 pages of the draft RTP/SCS as well as the draft Program Environmental Impact Report (PIER). We, as the local health department, understand and appreciate the primary role of this document is to plan for transportation. Yet SCAG has shown consideration for ways in which public health can be affected by transportation options.

I have some clarification comments for specific parts of the Public Health Appendix.

PUBLIC HEALTH APPENDIX

TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
Clarification	p.1, column 1	“Public health is increasingly an area of emphasis for Metropolitan Planning Organizations (MPOs) and Departments of Transportation (DOTs) across the country, have an opportunity to impact due to the prevalence of chronic diseases such as obesity, hypertension, asthma and heart disease through transportation planning which promotes increased physical activity.”
Clarification	p.2, column 1	Introduction- first paragraph sentence beginning with “Public health outcomes are the product of Social Determinants of Health.....” consider adding “and other factors.
Correction	p.2, Figure 1	Please have arrows go both ways.

TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
Clarification	p.3, column 1, paragraph 2	"Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors <u>and related conditions</u> can play a role in supporting healthy behaviors."
Clarification	p.3, column 2, paragraph 3	"Access to healthy food environments such as grocery stores, farmers' markets and community gardens <u>decreases can play an important role in</u> food insecurity and obesity."
Clarification	p.7, column 2, paragraph 3	"...Creating infrastructure <u>policies and community conditions</u> and facilities that encourage active transportation such as biking and walking provide opportunities for residents to increase their daily physical activity."
Clarification	p.8, paragraph 3	Consider adding the recommendations for children which has a higher standard of one hour per day. This is valuable as jurisdictions look at health co-benefits of safe routes to school infrastructure changes and related programming.
Clarification	p.9, all figures	Recommend using the more current 2014 data. Also, it might be helpful to look at these metrics on a smaller level of geography and/or by poverty and/or by race/ethnicity. Especially since there are often funding set asides to reach disadvantaged communities, it might be interesting to see what each of these indicators looks like at a more refined level. The need is not equally distributed throughout any jurisdiction.
Clarification	p.9	Add table with data for walking.
Clarification	p.10, column 2	Consider including funding as both a challenge and an opportunity.
Clarification	p.10, column 2, paragraph 4	"With more than 18 million people, 191 cities, six counties and hundreds of local and regional agencies, Southern California is <u>one of the most complex regions on earth a diverse region</u> . Within the region, health outcomes vary widely based on <u>many factors</u> ."
Clarification	p. 22-29	Are these all "best practices" or are they local examples of promising practices? Since some of these are in process, are the results there to show that this particular practice has proven efficacy over another? These may have the potential to be best practices. If the project is based upon a best practice, it is recommended to link to the best practice so other jurisdictional leaders could consider for replication. If it is not already a proven practice, suggest calling it something different such as "local promising practices". Add the Complete Streets Guidelines that are being developed in Orange County (which integrates in best practices.)

We believe that these edits can contribute to an even more precise depiction of public health impacts and conditions. The HCA staff members have appreciated the many opportunities to collaborate with SCAG. We currently serve on the leadership team for the Go Human Campaign and enjoy our collaborative partnership. Congratulations for taking on the monumental task of developing the draft RTP/SCS as well as the draft PIER. We look forward to our continued partnership and will continue to strive to make the SCAG region a place where all residents have opportunities to live, work and play in healthy communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Buch", with a long horizontal flourish extending to the right.

Amy Buch, M.A.
Division Manager



ORANGE COUNTY LEAGUE OF CONSERVATION VOTERS

January 27, 2016

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

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Michael Wellborn
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RE: 2016 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR)

Dear SCAG:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization is now a part of this growing coalition in 2016.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

The **Orange County League of Conservation Voters** is the Political Action Arm of Orange County's Environmental Community

FAIR POLITICAL PRACTICES COMMISSION REGISTRATION # 1223961

ORANGE COUNTY LEAGUE OF CONSERVATION VOTERS

2016 RTP/SCS Comments
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SCAG focused many sections of the document on formal conservation plans, in the form of Natural Community Conservation Plans and Habitat Conservation Plans (NCCP/HCP), as the conservation method most identified by the agency. It is important to note that NCCP/HCP programs are only one conservation mechanism and they have limitations. For example, they are voluntary, property owner driven and generally only apply to larger land ownerships. Efforts underway by local, regional, state and federal agencies outside of these formal plans should not be discounted and must be included. Furthermore, many conservation organizations help facilitate, coordinate and find funding for land conservation transactions. We believe the conservation approach promoted by SCAG should include all of the ways land is protected, including those less regulated methods of conservation outside of NCCP/HCP programs.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Should you need to contact me, I can be reached at [REDACTED]. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to me at [REDACTED]

Sincerely,



Michael Wellborn, President
Orange County League of Conservation Voters



February 1, 2016

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

Dear Mr. Ikhata:

Thank you for the opportunity for the County of Orange (County) to review and comment on the Southern California Association of Governments (SCAG) Draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) and the associated Program Environmental Impact Report (PEIR). Development of the Draft 2016 RTP/SCS and PEIR is a huge undertaking and the County recognizes the significant role these documents play in the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction target and other air conformity standards.

The County not only submits its comments listed below and in Attachment 1, the County also concurs with the comments identified by the Orange County Transportation Authority (OCTA) and the comments submitted by the Orange County Council of Governments (OCCOG). Both OCTA and OCCOG have identified policy and technical issues which are of concern to all of the Orange County.

The County requests that this comment letter and attachments be included in the public record regarding SCAG's Draft 2016 RTP/SCS, PEIR, and all associated appendices.

GENERAL COMMENTS

1. Cities vs. Jurisdiction

Throughout the Draft 2016 RTP/SCS, PEIR, and associated appendices, there are references to "cities." Since the SCAG region also includes counties, it is recommended that references to "city" or "cities" are changed to "jurisdiction" or "jurisdictions" where appropriate.

Recommendation: Change references to "city" or "cities" to "jurisdiction" or "jurisdictions" where appropriate.

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2. "Can and Should"

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

Recommendation: Change language in all project level mitigation measures to read "~~can and should~~ consider where applicable and feasible." To clarify the intent that the project level mitigation measures are a menu of options for which feasibility has not been established for any given project, the "can and should" language should be changed in all project level mitigation measures to read "should consider where applicable and feasible."

3. Undevelopable/Protected Land Labeled as Vacant

This continues to be an ongoing issue with data and maps produced by SCAG for use in its various projects. The County is especially concerned about this issue due to the effort its staff has expended over the last several years to ensure that protected, and therefore undevelopable, land in the unincorporated area is not depicted on any land use maps as "vacant" and therefore available for development. During the outreach process for the Draft 2016 RTP/SCS, the County received a "SCAG Data/Map Book" from SCAG which included several maps for review and comment. In this Map Book, SCAG had included its list of General Plan Land Use Categories which included the category "8888 Undevelopable." County staff applied this category to all areas that are protected open space and submitted this data and maps to SCAG for use in the RTP/SCS and PEIR.

A review of the various figures (i.e., exhibits or maps) contained throughout the Draft 2016 RTP/SCS and PEIR has revealed the "8888 Undevelopable" category was not applied consistently to protected open space in the unincorporated area. For example, in the RTP/SCS Appendix titled "SCS Background Document," Exhibits 23 and 24 correctly identify the protected open space areas in the unincorporated area including the Cleveland National Forest (CNF). However, in the PEIR, Figure 3.11.2-2 "Existing Land Uses" and Figure 3.11.2-5 "General Plan Land Use Designations" both identify CNF as open space instead of undevelopable. Just a few pages later in the PEIR, Figure 3.11.2-7 "SCAG Region Open Space, Recreation, and Agricultural Land Uses" labels the CNF as "vacant." The CNF is not vacant land, it is protected open space and therefore undevelopable.

Mr. Hasan Ikhata
 Responses for Draft 2016 RTP/SCS and PEIR
 February 1, 2016

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Recommendation: Revise all figures, exhibits and maps to correctly identify protected open space in the unincorporated area as undevelopable. No undevelopable areas should be depicted as vacant, which has a connotation that it is available for future development.

4. Consistent Use of 500 Foot Buffer Reference

Throughout the Draft 2016 RTP/SCS and PEIR there are references to a possible 500, or even 1,000, foot buffer. The terminology “buffer” implies that there is a negative condition that needs to be addressed and that development is prohibited within this area. There is currently no requirement from the California Air Resources Board (CARB) or the South Coast Air Quality Management District (SCAQMD) that prohibit development near high quality transit areas or major transportation corridors.

There are numerous references to prohibiting certain uses (including residential and mixed use) within 500 feet of a major transportation corridor (like a freeway). This language should be eliminated or at least made more flexible and it should be indicated that additional study is pending by air quality agencies and SCAG. It should be made clear that is measure from the edge of travel lands and not the right-of-way. Precluding development within 500 feet takes a massive amount of land out of play where often times the greatest need for affordable housing exists. Furthermore, precluding development in these areas is directly contrary to the primary objectives of SB 375 to locate housing near job centers within previously urbanized areas.

Recommendation: Define the word “buffer” and use it consistently throughout all documents and clarity that development is not currently prohibited adjacent to transportation corridors.

DRAFT 2016 RTP/SCS

5. Growth Forecasts

Overall, the County supports the Draft 2016-2040 RTP/SCS (“The Plan”) growth forecast and the adoption of the growth forecast at a geographic level no lower than the jurisdictional level. The County supports The Plan since the growth forecast accurately reflects Orange County’s Projections dataset. The Plan growth forecast reflects all entitlements, development agreements, and projects recently completed or under construction in the unincorporated area. The County appreciates the ongoing coordination between SCAG and the Center for Demographic Research (CDR) at California State University Fullerton on behalf of all Orange County jurisdictions. The Orange County Projections has been used by OCTA in the development of its Orange County Long-Range Transportation Plan demonstrating that Orange County has integrated transportation and land use planning for decades.

On behalf of all Orange County jurisdictions, OCCOG representatives on the Regional Council and SCAG Policy Committees repeatedly requested that the growth forecast in the Draft 2016 RTP/SCS and all PEIR alternatives be based on the technically corrected growth forecast submitted to SCAG in August 2015 by the CDR. Use of any other growth forecast could result in unrealistic land use

Mr. Hasan Ikhata
 Responses for Draft 2016 RTP/SCS and PEIR
 February 1, 2016

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proposals such as depicted in Attachment 2, the proposed increase in the numbers of population, dwelling units and employment in long-established single-family residential areas such as Midway City and decrease in these numbers for newly built planned communities protected by development agreements.

The PEIR itself makes the following statements as to why Alternative 3 should not be supported:

- “Alternative 3 would result in a greater chance for there to be conflicts with existing plans or regulations including local general plans as a result of the policies encouraging a much more compact land use development pattern in urbanized areas such as HQTAs.”
- “Additionally, there would be a greater chance for there to be conflicts with an existing plan or regulation including local general plans because of the much more compact and aggressive land use development pattern in urbanize areas such as HQTAs.”
- “Alternative 3 would result in somewhat more adverse impacts as The Plan from the potential to displace substantial amounts of existing housing...Alternative 3 would result in greater impacts as The Plan from the potential to displace substantial numbers of people...”
- “However, Alternative 3 would have much more severe impacts on the built environment.”

Because the draft PEIR’s Intensified Land Use Alternative (Alternative 3) does not include the technically corrected growth forecast for Orange County, the County would not support consideration of this Alternative as the preferred alternative.

Recommendation: The County supports the adoption of the Draft 2016 RTP/SCS “The Plan” growth forecast at the jurisdictional level.

6. Maintain Unbiased, Objective Tone

Language throughout the Draft 2016 RTP/SCS and the associated appendices is leading and dramatic to emphasis certain key issues such as active transportation and public health. It is recommended that the document utilize an unbiased, objective tone. For example, the County recommends the removal of “Our Vision” and “Our Overarching Strategy” from the Executive Summary of the document. These two sections are highly speculative and are not necessary to the document. “Our Vision” and “Our Overarching Strategy” go above and beyond the requirements of the RTP/SCS when the focus of the document should be on the challenges we face and how the SCAG region can address those challenges through the adoption of the Draft 2016 RTP/SCS.

Recommendation: The Draft 2016 RTP/SCS should only contain unbiased and objective language throughout the document and associated appendices.

Mr. Hasan Ikhata
 Responses for Draft 2016 RTP/SCS and PEIR
 February 1, 2016

Page 5

PEIR

7. PEIR Mitigation Measures

It should be stated that in the event a mitigation measure is inconsistent with California State law, California law prevails. In addition, for all "Project-level Mitigation Measures," the word "require" should be replaced with "encourage" or "ensure." Examples include:

MM-AES-3(b), MM-Air-2(b), MM-Air-4(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), MM-BIO-5(b), MM-GHG-3(a)(11), MM-TRA-1(b), MM-TRA-2(b), MM-USS-6(b)

Recommendation: Revise mitigation measures as shown in the redline version provided in the matrix of comments in Attachment1.

8. Fees and Taxes

Several mitigation measures indicated that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval, and thus not be approved. They also represent prescriptive means to accomplish the mitigation.

Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

9. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under CEQA, it is intended that measures identified will mitigate impacts of the project. Existing regulations are assumed to already be complied with in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed from the PEIR, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: "Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations." Similar language is included in some mitigation measures.

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Examples of existing regulations included as mitigation measures are found within the Hydrology section of the draft PEIR. For example, Section 3.10.6, Mitigation Measures (page 3.10-56): Parts of this section list mitigation measures that are already being required by municipal storm water programs across the region. Instead of listing specific mitigation measures, the PEIR should make reference to these programs. In Orange County, for example, this program is detailed in the Drainage Area Management Plan (DAMP)/Model Water Quality Management Plan (WQMP). The Model WQMP describes the process that cities and County employ for requiring a WQMP, which is a plan for minimizing the adverse impacts of urbanization on site hydrology, runoff flow rates, and pollutant loads at the project level. A reference to the Model WQMP and equivalent documents in the region's other counties, should replace the last ten bullet points of section MM-HYD-1(b).

There are specific mitigation measures included in the Hydrology section that may be in conflict with Storm Water Permits issued by Regional Water Quality Control Boards. In the SCAG region, there are five water quality control boards each with its own Municipal NPDES Storm Water Permit. The regulations and requirements contained in these permits vary from each other. By listing specific measures in the PEIR that are not included in a project's applicable Municipal NPDES Storm Water Permit, the PEIR creates conflicting compliance requirements. To eliminate potential conflict with existing regulations, the mitigation measures regarding specific Best Management Practices (BMPs) should be removed and replaced with a single requirement that each project must comply with its applicable Municipal NPDES Storm Water Permit.

Recommendation: Because restatement of the current regulation in the proposed mitigation measures could result in future conflict between the stated mitigation and regulation, proposed mitigation measures should be revised with the language: "Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations."

Conclusion

The County recognizes the amount of work put into preparing these documents. They represent incredibly complex technical work and have important and far-reaching policy impacts for our region. However, because of this importance and complexity, the County would like to express concern about the timing of the release of the documents and hope that preparation of future RTP/SCS documents will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The current timeline of document releases, public comment period, and time allowed for the response to comments results in an inability to have credible discussion regarding possible changes because the timeline does not allow for recirculation or full discussion of requested changes. While the County is appreciative of the extended public comment period through February 1, 2016, there remains concern that only a few weeks are provided to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the Draft RTP/SCS on April 7, 2016.

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We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do not hesitate to contact me or Colby Cataldi, Deputy Director, OC Public Works/OC Development Services, at 714-667-8860.

Sincerely,



Shane L. Silsby, Director, OC Public Works

Attachments

ATTACHMENT 1

COUNTY OF ORANGE

DETAILED COMMENTS ON DRAFT 2016 RTP/SCS, PEIR, AND RELATED DOCUMENTS

2016 RTP/SCS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1.	General Comment	p.2	Delete Our Vision & Our Overarching Strategy strategies. These sections are highly speculative and not necessary for the rest of the document.
2.	Clarification	p.3, column 2, bullet 5	“Millions of people are in poor health... Millions of more people live with chronic diseases, such as asthma, every day.” Define ‘poor health’ Cite numbers or share of population for region instead of saying “millions”. Provide reference to what chronic diseases include.
3.	Clarification	P. 4, column 2, paragraph 2	“Among the milestones: a one-year demonstration of <u>the tolled Express Lanes</u> in Los Angeles County along Interstate 10 and Interstate 110 was made permanent in 2014...”
4.	Clarification	p. 7, column 2, paragraph 1	“In many instances, <u>the additional</u> these <u>chargers will create the opportunity to increase</u> may double the electric range of PHEVs, reducing vehicle miles traveled that produce tail-pipe emissions.”
5.	Clarification	p. 13, column 2, paragraph 2	“Since 2009, every MPO <u>in California</u> has been required to develop a Sustainable Communities Strategy...Once implemented along with the rest of the Plan, it will improve the <u>overall</u> quality of life for all residents of the region.”
6.	Clarification	p. 13, column 2, paragraph 3	“But these advances in mobility also have the potential to help Baby Boomers, <u>and the generations that follow them</u> , maintain their independence as they age.”

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
7.	Clarification	p. 14, column 1, paragraph 2	“In Southern California, striving for sustainability includes <u>will require</u> achieving state-mandated targets for reducing greenhouse gas emissions from vehicles and federal air quality conformity requirements, and also adapting wisely to a changing environment and climate.”
8.	Clarification	p. 14, column 2, paragraph 5	“It is particularly important that the Plan consider the <u>negative impacts consequences</u> of transportation projects, <u>especially</u> on low-income and minority communities and minimize negative impacts.”
9.	Clarification	p. 16, column 2	<p>“2. Collaborating with Member Agencies, Jurisdictions and Stakeholders. Implementing the Plan will require SCAG to continue working closely with its <u>all jurisdictions</u> member agencies...”</p> <p>“The agency will also have to work with key stakeholders to ensure the Plan benefits the economy and ensures social equity. To ensure that the region makes progress on its goals, SCAG will monitor its own progress toward achieving its targets and will share this information with <u>its relevant</u> partners and the public.”</p>
10.	Clarification	p. 20, column 1, paragraph 3	“However, of the remaining developable land, only a small portion of it can be developed <u>as transit-ready infill sustainably</u> – meaning it can be reached via planned transit service and that it can readily access existing infrastructure (water resources, sewer facilities, etc.). According to SCAG land use data <u>collected by SCAG</u> , only two percent of the total developable land in the region is located in High Quality Transit Areas (HQTAs). A more compact land development strategy is needed, which will be discussed in Chapter 5. ”
11.	Clarification	p. 20, column 1, paragraph 4	“ SCAG supports the fact that local jurisdictions conduct much of the planning for land use in our region. However, a As the agency prepared the 2016 RTP/SCS, it needed to organize the many different <u>land use</u> types and classifications of land uses in...”

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
12.	Clarification	p. 20, column 1, paragraph 5	<p>“To accurately represent land uses throughout the region, SCAG aggregated reviewed information from jurisdictions and simplified the types and classifications of land use <u>into a consolidated set of land use types</u>. The agency then <u>converted these consolidated land uses into identified</u> 35 “Place Types”... the Urban Footprint <u>Scenario Sustainability Planning Model (SPM), to demonstrate which guided and evaluated</u> urban development in the Plan in terms of form, scale and function in the built environment.”</p>
13.	Clarification	p. 20, column 2, paragraph 2	<p>“SCAG then <u>classified sorted</u> the 35 Place Types into three Land Development Categories. The agency used these categories to describe the general conditions that exist and/or are likely to exist within a specific area. SCAG did not intend to have them represent detailed policies for land use, development or growth. Rather, they and reflect the varied conditions of buildings and roadways, transportation options, and the mix of housing and employment throughout the region.”</p>
14.	Clarification	p. 21, column 1, paragraph 3	<p>Conversely, sSome areas, especially near the edge of existing urbanized areas, do not have plans for conservation and <u>may be slated for development are susceptible to development pressure</u>. ... – meaning these are areas that are home to a high number of species and serve as highly functional habitats.”</p> <p>“Some key habitat types are underrepresented within the 35 percent of the region already under protection.”</p> <p>Clarify why does there need to be an equal share of types of protected land? If not, delete sentence.</p>

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15.	Clarification	p. 22, column 1, paragraph 1	<p>“However, although these housing units are planned and zoned for, historical data shows that less than ten percent of the needed affordable housing has been built. In contrast, housing construction measured by building permits issued meets nearly 90 percent of projected market rate housing needs.”</p> <p>What is the data source that reports on building finals by income category? What is the time frame for the “less than ten percent”? What is the time period for the data on the market rate housing?</p>
16.	Clarification	p. 22, column 2, paragraph 1	<p>“... of our region’s jurisdictions have adopted housing elements.”</p> <p>Adopted or certified?</p>
17.	Define	p. 22, column 2, paragraph 3	Define “high quality” housing
18.	Define	p. 23, Figure	Define “demand response” in “Passenger Miles by Mode” figure
19.	Clarification	p. 25, column 2, paragraph 2	<p>“This network includes fixed-route local bus lines, community circulators, express and rapid buses, Bus Rapid Transit (BRT), demand responseparatransit,³ light rail transit, heavy rail transit (subway) and commuter rail.⁴”</p>
20.	Clarification	p. 26, column 1, paragraph 2	<p>“<u>Transit users directly typically pay about 25 percent</u> of the operating and maintenance cost of their travel, with the remaining 75 percent paid for by state and local public subsidies. Most capital expenditures are also funded <u>through various taxes with public subsidies</u>, including a larger share of federal grants.”</p>

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
21.	Clarification	p. 28, column 1, paragraph 2	<p>“The regional bike network is expanding evolving but remains fragmented. Nearly 500 additional miles of bikeways were built since SCAG’s 2012 RTP/SCS, but only 3,919 miles of bikeways exist regionwide, of which 2,888 miles are bike paths/ lanes (see EXHIBIT 2.3). This is compared with more than 70,000 roadway lane miles. One way to quantify bikeway quality and density is to calculate a ratio of bike path to lane miles. SCAG’s ratio of bike path/lane miles ratio is 0.039. To put this in perspective, Portland, Oregon and San Francisco have bike path/lane ratios to lane miles at 0.054 and 0.078, which are 38 percent and 100 percent higher than the SCAG region, respectively. Our region’s lack of consistent infrastructure discourages all but the most fearless people to bike.”</p> <p>Comment: There is typically only one bike lane in each direction whereas there could be multiple traffic lanes in each direction. It is not appropriate to compare lane miles to bike lane miles. Comparison, if any should be to centerline miles.</p> <p>Comparison of bike path/lane miles ratio for SCAG region to individual cities is not appropriate.</p>
22.	Clarification	p. 28, column 1, paragraph 2	<p>“Most walk trips (83 percent) are less than one half mile; walkers are less likely to travel often discouraged from traveling farther. Routes to <u>bus</u> stops and stations are often...”</p>
23.	Delete	p. 33, column 1, paragraph 2	<p>“A significant amount of travel in the region is still by people who choose to drive alone (42 percent of all trips and nearly 77 percent of work trips). So, the challenge of getting individuals to seek more environmentally friendly alternatives of travel remains.”</p>
24.	Clarification	p. 54, column 2, paragraph 4	<p>“Certainly, †The overall quality of life <u>is expected to</u> will increase for many people.”</p>

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
25.	Clarification	p. 55, column 1, paragraph 3	<p>“Chronic diseases including heart disease, stroke, cancer, chronic lower respiratory disease and diabetes are responsible for 72 percent of all deaths in our region. Millions of more people live with chronic diseases every day.”</p> <p>Cite number and source or delete sentence.</p>
26.	Clarification	p. 56, column 1, paragraph 1	<p>“<u>California is experiencing ongoing drought conditions, water shortages due to less rainfall as well as declining snowpack in our mountains, and an agriculture industry in crisis</u> have become hard realities in recent years.”</p>
27.	Clarification	p. 61, column 1, paragraph 2	<p>Add statement that says “<u>These preliminary scenarios are the not ones modeled in the PEIR.</u>”</p>
28.	Clarification	p. 64, column 1, paragraph 1	<p>Clarification should be made that attendance was self-selected as was the survey participation. Attendees were strongly encouraged by SCAG staff to fill out a survey. A more detailed description should be included that explains that these results are not scientific.</p>
29.	Clarification	p. 64, column 2, paragraph 2	<p>“...was also a principal concern, as was access to healthy food.”</p> <p>What percentage of respondents elevates an item to ‘principle concern’?</p>
30.	Clarification	p. 64, column 2, paragraph 4	<p>“Collectively, the survey responses offered an invaluable guide to help finalize the Plan’s investments, strategies and priorities. They reflect how regional stakeholders want us to address priority areas such as transit and roadway investments, system management, active transportation, land use and public health.”</p> <p>Did the survey responses change the Plan? Was priority in making changes given to survey respondents’ feedback over jurisdictional and CTC input?</p>

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31.	Clarification	p. 65, column 1, paragraph 4	<p>“Jurisdictions were asked to provide input on the growth scenario, including information on specific planned development projects with entitlements, other planned projects, or recently completed developments.”</p> <p>Comment: During the local input process, SCAG requested feedback on the distribution of new households and employment. SCAG <u>did not</u> request information from jurisdictions on specific planned development projects with entitlements, other planned projects, and recently completed developments. During review of the draft policy growth forecast (GPF) in summer 2015, technical errors throughout the draft GPF were identified. These “technical errors” in the dataset were that entitlements, development agreements, and projects currently under construction or recently completed were not properly reflected. It was then that SCAG stated that jurisdictions could provide the information if jurisdictions wanted corrections made to the PGF.</p>
32.	Clarification	p. 65, column 2, bottom note	<p>“*With the exception of the 6 percent of TAZs that have average density below the density range of local general plans.”</p> <p>Please clarify the footnote. Did SCAG lower the growth or is General Plan buildout expected after 2040?</p>
33.	Clarification	p. 70, column 1, paragraph 1	<p>“In addition, local jurisdictions <u>are encouraged to</u> should pursue the production of permanent affordable housing through deed restrictions or development by non-profit developers, which will ensure that some units will remain affordable to lower-income households.”</p>
34.	Clarification	p. 70, Table 5.1	Add note to table “Adopted in 2013”
35.	Define	p. 73, column 2, paragraph 4	Define “riparian”

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36.	Clarification	p. 76, paragraph 1	How many of these trips are alone vs. with others? Are these linked trips/trip segments?
37.	Clarification	p. 76, paragraph 3	The narrative implies that Neighborhood Mobility Areas (NMAs) are needed for Neighborhood Electric Vehicles (NEVs). If this is not true, reword section to allow for flexibility that one is not tied to another exclusively.
38.	Clarification	p. 77	Figure needs title
39.	Clarification	p. 79, Figure 5.2	Clarify if the preservation and operations expenditures apply to the SCAG region or California State.
40.	Clarification	p. 83, column 2, paragraph 5	“Bus lanes are even more effective at increasing speeds, however in our region there is a dearth of such lanes. Transit agencies should heavily lobby SCAG encourages transit agencies and local jurisdictions in which they operate to implement them, at least for peak-period operation.”
41.	Clarification	p. 88, column 1, paragraph 4	“The 2016 Active Transportation <u>portion of the 2016</u> Plan updates the 2012 Active Transportation Plan...”
42.	Clarification	p. 89, column 2, paragraph 2	“SCAG has identified <u>developed</u> 12 regionally significant bikeways that connect the region.”
43.	Clarification	p. 92, column 1, paragraph 2	“The launch date coincided with the <u>end of daylight savings time</u> decline in daylight hours , a period when bicycle and pedestrian collisions peak during the year.”
44.	Define	p. 93, column 1, paragraph 4	Define “no-maintenance exercise spots”
45.	Clarification	p. 103, column 1, paragraph 3	“...figure “2040 Airport Demand Forecasts” on the previous page...” Properly label figure and page reference

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
46.	Clarification	p. 105, column 1, paragraph 1	<p>“In recent years, airport operators, CTCs and SCAG have all undertaken their own initiatives to improve ground access at the region’s aviation facilities.”</p> <p>Clarify what initiatives SCAG has undertaken.</p>
47.	Clarification	p. 111, column 1, paragraph 2	<p>“Building on its strong commitment to the environment as demonstrated in the 2012 RTP/SCS, SCAG’s mitigation program is intended to function as a resource for lead agencies to consider in identifying mitigation measures to reduce impacts anticipated to result from future <u>transportation</u> projects as deemed applicable and feasible by such agencies.”</p>
48.	Clarification	p.111-119 & PEIR	Update language on the mitigation measures to be consistent with any language changes to the PEIR document.

ACTIVE TRANSPORTATION APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1.	General Comment	all	<p>Needs to include statement saying that pedestrians and bikes are also responsible (e.g. distracted walking by cell phones; bikers with headphones) and isn’t always vehicles as cause</p> <p>Everyone needs to be educated and follow the rules and enforcement needs to happen for all modes</p>
2.	General Comment	all	Acknowledge the improvement over time of AT usage and the lowering of accident and death rates

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
3.	Clarification	p. 5	<p>“Class I Bikeways</p> <p>...A Class I Bikeway provides a completely separated <u>right-of-way</u> designated for the exclusive use of bicycles and/or pedestrians with cross flows by motorists minimized. Some of the region’s rivers include Class 1 Bikeways. Increasing the number of bikeways in <u>along rivers, utility corridors, and flood control channels</u> may provide additional opportunities for “interested but concerned” cyclists.”</p>
4.	Clarification	p.6, column 1	<p>“INTERSECTION TREATMENTS</p> <p>...In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections.”</p> <p>Define how far away from the intersection an accident may occur to be included in the count of pedestrian injuries at intersections</p>
5.	Clarification	p.6, column 1	<p>“COMPLETE STREETS</p> <p>In recognition of the need to accommodate various types and needs of roadway users, the State of California adopted the Complete Streets Act of 2008 (AB 1358) requiring cities and counties to incorporate the concept of Complete Streets to any general plan’s substantive update <u>to their General Plan’s circulation element.</u>”</p>
6.	Clarification	p.8, column 1	<p>“COLLISIONS AND FATALITIES</p> <p>While the numbers of bicyclists and pedestrians are increasing, so are injuries and fatalities, although not as fast as the growth in active transportation. In California, 64,127 pedestrians were injured and 3,219 were killed between 2008 and 2012. In 2012 alone, 702 pedestrians were killed and <u>13,280 pedestrians were injured and 702 pedestrians were killed.</u>”</p>
7.	Clarification	p. 17, Table 5	<p>Create separate tables for columns 1 to 3 and columns 3 to 10.</p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8.	Define	p. 24, column 1, paragraph 1	<p>“2012 RTP/SCS PROGRESS</p> <p>The 2016 Active Transportation <u>portion of the Plan</u> ...The Plan examined access to transit, noting that 95 percent of SCAG residents would be within walking (0.5 mile) or biking (2 mile) distance from a transit station.”</p> <p>Define what constitutes a ‘transit station’</p>
9.	Clarification	p. 25, second column, top bullet (last under #4)	<p>“Success of this program depends on cities and counties conducting these counts and providing the data to SCAG.”</p> <p>Identify funding source and acknowledge that this is voluntary effort and may not be a priority, especially without funding</p>
10.	Add bullet	p. 25, second column, Bullet 6	<p>Add 4th bullet under #6: <u>“OCCOG is working on a comprehensive Complete Streets design manual for the entire county which will be completed in 2016.”</u></p>
11.	Correction	p.26, Table 9	<p>Change language for Orange County: Not yet Planned. <u>In Process</u></p>
12.	Clarification	p. 27, column 1, and any other references	<p>Clarify that the ‘2016 Action Transportation Plan’ is not a standalone plan, but is a portion within the RTP.</p>
13.	Clarification	p.66-67, Tables 16 & 17	<p>Add note to Table: “These draft scenarios are not the alternatives that were evaluated in the PEIR.”</p>

DEMOGRAPHICS/GROWTH FORECAST APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1.	General Comment	All	Label Y axis on all figures
2.	Clarification	p. 2, column 1, paragraph 3	Add text: <u>“The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>

PERFORMANCE MEASURES APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1.	Clarification	p.8-10, Table 4	Label all Performance Measures that were new in 2016 Plan
2.	Clarification	p.11	Add definition of HQTAs to map
3.	Clarification	p.20	LSPT was used for 2012 RTP. Add information on the SPM.
4.	Clarification	p. 31, Table 12	Add model sources to bottom of table

PUBLIC HEALTH APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1.	General Comment	All	Final document should contain hyperlinks to other documents
2.	General Comment	All	Spell out Acronyms in Tables/Figures Titles e.g. CHIS
3.	Clarification	p.1, column 1	“Public health is increasingly an area of emphasis for Metropolitan Planning Organizations (MPOs) and Departments of Transportation (DOTs) across the country, have an opportunity to impact due to the prevalence of chronic diseases such as obesity, hypertension, asthma and heart disease through transportation planning which promotes increased physical activity.”
4.	Clarification	p.2, column 1	Introduction- first paragraph sentence beginning with “Public health outcomes are the product of Social Determinants of Health.....” consider adding “and other factors.
5.	Clarification	p.1, column 2	“Climate Adaptation: Support efforts to prevent <u>mitigate</u> climate change and make the region more resilient to future changes with reductions in VMT and greenhouse gas emissions.”
6.	Correction	p.2, Figure 1	Arrows should go both ways
7.	Clarification	p.3, column 1, paragraph 2	“Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors <u>and related conditions</u> can play a role in supporting healthy behaviors.”
8.	Clarification	p.3, column 2, paragraph 3	“Access to healthy food environments such as grocery stores, farmers’ markets and community gardens decreases <u>can play an important role in</u> food insecurity and obesity.”
9.	Define	p.7, column 1, first line	Define “weather insurance”
10.	Clarification	p.7, column 2, paragraph 2	“... Providing access to <u>education and job training aligned with job opportunities in the region</u> jobs with a living wage is critical to ensuring communities become and stay healthy.”

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
11.	Clarification	p.7, column 2, paragraph 3	“...Creating infrastructure <u>policies and community conditions</u> and facilities that encourage active transportation such as biking and walking provides opportunities for residents to increase their daily physical activity.”
12.	Clarification	p.8, paragraph 3	Consider adding the recommendations for children which has a higher standard of one hour per day. This is valuable as jurisdictions look at health co-benefits of safe routes to school infrastructure changes and related programming.
13.	Clarification	p.9, all figures	Recommend using the more current 2014 data. Also, it might be helpful to look at these metrics on a smaller level of geography and/or by poverty and/or by race/ethnicity. Especially since there are often funding set asides to reach disadvantaged communities, it might be interesting to see what each of these indicators looks like at a more refined level. The need is not equally distributed throughout any jurisdiction.
14.	Clarification	p.9	Add table with data for walking.
15.	Clarification	p.10, column 2	Consider including funding as both a challenge and an opportunity.
16.	Clarification	p.10, column 1, last sentence	“Much of our local arterial system is also in need of pavement improvements, as local roadways in the SCAG region average a score of 69 out of 100 in the Pavement Condition Index (PCI), where a score of 70 or less typically translates to conditions that are inadequate <u>more costly to repair.</u> ”
17.	Clarification	p.10, column 2, paragraph 4	“With more than 18 million people, 191 cities, six counties and hundreds of local and regional agencies, Southern California is one of the most complex regions on earth <u>a diverse region.</u> Within the region, health outcomes vary widely based on <u>many things, such as geography, income and race.</u> ”

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
18.	Clarification	p. 15, column 2, paragraph 3; & throughout all	“500 foot buffer”- be consistent with usage and description throughout all documents in whether this is adjacent to just freeways or freeways, rail, and high frequency transit corridors.
19.	Clarification	p. 16, column 1, paragraph 1	“Region-wide, about ten percent of the land area within HQTAs is also within the 500 feet <u>feet</u> foot <u>feet</u> buffer of the freeway. To balance regional policy goals, the Plan accommodates the vast majority of growth within HQTAs <u>but beyond outside of</u> the 500 feet buffer of freeways...”
20.	Clarification	p. 17, column 1	“Water Consumption” and “Land Consumption” Specify the time period for the change or difference in numbers. Compare this to 2040 Baseline.
21.	Clarification	p. 19, column 2	“Public Health Work Program” Clarify if this work program was approved by the RC or SCAG staff is pursuing these tasks under direction of RC to incorporate more public health into RTP.
22.	Clarification	p. 22-29	Are these all “best practices” or are they local examples of promising practices? Since some of these are in process, are the results are there to show that this particular practice has proven efficacy over another? These may have the potential to be best practices. If the project is based upon a best practice, it is recommended to link to the best practice so other jurisdictional leaders could consider for replication. If it is not already a proven practice, suggest calling it something different such as “local promising practices”. Add the Complete Streets Guidelines that are being developed in Orange County (which integrates in best practices.)

SCS BACKGROUND DOCUMENTATION APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
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#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1.	Clarification	p.42-43	How do the SPM Place Types nest into the Land Development Categories?
2.	General Comment	All maps	<p>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. <u>The advisory sub-jurisdictional data shall not be required should not be used for purposes of qualifying for future grant funding or other incentives.</u> The data is controlled to be within the density ranges of local general plans and/or input received from local jurisdictions. the purpose of or determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA) streamlining, lead agencies have the sole discretion in determining a local project’s consistency with the 2016 RTP/SCS.”</p>
3.	Clarification	p.6/43	Move the definitions of Urban, Compact Walkable, and Standard Suburban from page 43 to page 6 before the maps
4.	Clarification	p. 41, column 1, paragraph 4	“Scenario modeling with UrbanFootprint brings meaningful, comprehensible, and timely results to those <u>local jurisdictions</u> wanting to understand how growth and development choices will impact their community, city, or region in the coming years and decades.”
5.	Correction	p. 41, column 2, paragraph 2	“Since 2012... Developers of UrbanFootprint have also met with regional agencies, such as SCAG, Sacramento Area Council of Governments (SACOG), and San Diego Association of Governments (SANDAG), Orange County Council of Governments (OCCOG). ”
6.	Clarification	p. 50, 51, 54, 56 maps	Clarify in map legends if growth refers to population, housing and/or employment.

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7.	Correction	p. 56 column 1, last paragraph	<p>“The scope of tThese four scenarios were developed in early 2015 by SCAG and their consultant and shared, which were developed in consultation with the CEHD Committee and the SCAG’s Technical Working Group (TWG), evolved throughout the first five months of 2015.”</p>
8.	Clarification	p. 56 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing, <u>but sometimes modernization of utilities needs to be considered and completed to accommodate the additional usage.”</u></p>
9.	Clarification	p. 58, column 2, paragraph 4	<p>“Saving water also saves on costs, and the RTP/SCS saves about \$1.2 billion over the span of the plan, and saves households in the SCAG region \$93 million on annual water bills.”</p> <p>Add <u>“Notwithstanding, infrastructure operations and maintenance costs need continued funding; these costs could offset ratepayer savings resulting from the implementation of such things as the RTP/SCS policies, conservation efforts, or installation and use of efficient appliances.”</u></p>
10.	Clarification	p. 83, column 2, paragraph 2	<p>“The SPM includes a suite of tools and analytical engines that help to quickly illustrate alternative plans and policies and to estimate their transportation, environmental, fiscal, <u>and public health and community regional</u> impacts.”</p>
11.	Clarification	p. 83, column 2, last sentence	<p>“SPM will serve as a common platform for communications between SCAG and local jurisdictions in the process of local input and public outreach, providing local planners advanced analytical capabilities.”</p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1.	General Comment	All	Any changes to mitigation measure language should be updated in both the Executive Summary and the chapters throughout the PEIR, as well as the RTP/SCS document.
2.	General Comment	All	Cite original source data, not other documents, e.g. SCAG's Local Profiles
3.	Clarification	ES-14	"MM-AES-1(b): Consistent ... the Lead Agency can and should consider mitigation measures..."
4.	Clarification	ES-14 & 15	"MM-AES-3(b): Consistent ...the Lead Agency can and should consider mitigation measures... <ul style="list-style-type: none"> •Require <u>Encourage</u> development of design guidelines... •Require <u>Encourage</u> that sites are kept in a... ""
5.	Define	ES-16	Define 'Natural Resource Inventory Database and Conservation Framework & Assessment'
6.	Define	ES-16	Define 'Conservation Plan'
7.	Define	ES-16	Define 'mitigation banks'
8.	Clarification	ES-19	MM-Air-2(b): <ul style="list-style-type: none"> •Require <u>Encourage</u> contractors to assemble... •As appropriate require <u>encourage</u> that..."
9.	Clarification	ES-19	MM-Air-4(b): <ul style="list-style-type: none"> •Require <u>Encourage</u> clean fuels, and reduce petroleum dependency."
10.	Clarification Gail verify this is only MM this applies to	ES-19	"MM-Air-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS <u>transportation</u> projects or development projects resulting from the land use patterns in the 2016 RTP/SCS would be located."

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
11.	Clarification	ES-20	<p>MM-BIO 1(b):</p> <ul style="list-style-type: none"> • Require <u>Encourage</u> project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.”
12.	Clarification	ES-22	<p>MM-BIO-2(b):</p> <p>“• Require <u>Encourage</u> project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.”</p>
13.	Clarification	ES-22	<p>MM-BIO-3(b):</p> <p>“• Require <u>Encourage</u> project design to avoid federally protected wetlands consistent with the provisions of Section 404...”</p> <p>“• Require <u>Encourage</u> review of construction drawings by a certified wetland delineator...”</p>
14.	Clarification	ES-23	<p>MM-BIO-4(b):</p> <p>“• Require <u>Encourage</u> review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDDB...”</p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15.	Clarification	ES-24	<p>MM-BIO-5(b):</p> <p>“• Require <u>Ensure</u> that no change in existing ground level occur from the base of any protected tree at any time. Require <u>It is recommended</u> that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.”</p> <p>“• Require <u>Encourage</u> that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require <u>It is recommended</u> that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require <u>It is recommended</u> that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require <u>It is recommended</u> that no sign, other than a tag showing the botanical classification, be attached to any protected tree.”</p> <p>“... require <u>ensure</u> replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed.”</p>
16.	Clarification	ES-31	<p>MM-GHG-3(a)(11):</p> <p>“• Require <u>Encourage</u> amenities for non-motorized transportation, such as secure and convenient bicycle parking.”</p>
17.	Clarification	ES-40	<p>MM-LU-1(a)(3): “SCAG shall work with its member cities and counties to encourage <u>but not require</u> that transportation projects and growth are consistent with the RTP/SCS.”</p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
18.	Clarification	ES-40	MM-LU-1(a)(4): "SCAG shall coordinate with member cities and counties to encourage <u>but not require</u> that general plans consider and reflect as appropriate RTP/SCS policies and strategies. SCAG will work to encourage <u>but not require</u> consistency between general plans and RTP/SCS policies."
19.	Clarification	ES-40	MM-LU-1(a)(8): "SCAG shall continue to use its Intergovernmental Review Process to provide comments to lead agencies on regionally significant projects, that may be considered for determining consistency with the RTP/SCS. "
20.	Clarification	ES-52	MM-TRA-1(b): "•... bicyclist accommodations, and require <u>encourage</u> new development and redevelopment projects to include bicycle facilities..."
21.	Clarification	ES-53	MM-TRA-1(b): "• Require <u>Encourage</u> new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use."
22.	Clarification	ES-53	MM-TRA--2(b) "•Where traffic signals or streetlights are installed, require <u>encourage</u> the use of Light Emitting..."
23.	Clarification	ES-54	MM-TRA--2(b) "•Diode (LED) technology, <u>or similar technology.</u>
24.	Clarification	ES-55	MM-TRA--2(b) "• Require <u>Encourage</u> the development of Transportation Management Associations for large employers and commercial/ industrial complexes;"
25.	Clarification	ES-59	MM-USS-6(b): "• Require <u>Encourage</u> the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard)."

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
26.	Clarification	ES-59	<p>MM-USS-6(b): “Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible.”</p> <p>Comment: Trash disposal should be addressed regionally while considering distance instead of being limited to within the SCAG region. It is possible that disposal could be done nearby while crossing regional boundaries.</p>
27.	Delete	p. 3.3-26 Regional Air Quality	It is not appropriate to use the American Lung Association grading system to rate the region’s transportation plan. This section (paragraph and Table 3.3.2-1) should be deleted.
28.	Clarification	p. 3.3-29	<p>“Sensitive Receptors by County”</p> <p>Clarify what the source data was and how the tally of sensitive receptors was made.</p>
29.	Clarification	Figure 3.3.2-3	Figure needs legend, labels, source of data and definition of sensitive receptors
30.	Clarification	p. 3.10-5 Section 3.10.1, Regulatory Framework	The definition of a Municipal Separate Storm Sewer System (MS4) is incomplete and incorrectly cited.

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
31.	Clarification	p. 3.10-15 Section 3.10.1, Regulatory Framework	Specific mention of the Orange County Stormwater Program's Drainage Area Management Plan (DAMP) should be made under PEIR heading Orange County General Plan. The DAMP is Orange County's principal policy and program guidance document for urban nonpoint source pollution mitigation. The PEIR should reference the DAMP's agreements, structure, and programs, and, at the project level, make note to consider the specific water pollution control elements of the DAMP that apply to land development and redevelopment projects. Transportation infrastructure projects deemed to be Priority Projects, in accordance with DAMP designation (Exhibit 7.1Table 7-1.1), would require the development of a Project Water Quality Management Plan (WQMP) in conformance with Orange County's Model WQMP.
32.	Clarification	p. 3.10-17 Section 3.10.2, Existing Conditions	Table 3.10.2-1 lists San Juan Creek as a surface water resource within Santa Ana (Region 8) jurisdiction. San Juan Creek is located within the San Diego Regional Water Quality Control Board (Region 9) jurisdictional boundary.
33.	Clarification	p. 3.10-56 Section 3.10.6, Mitigation Measures	Mitigation Measures: Parts of this section list mitigation measures that are already being required by municipal stormwater programs across the region. Instead of listing specific mitigation measures, the PEIR should make reference to these programs. In Orange County, for example, this program is detailed in the DAMP/Model WQMP. The Model WQMP describes the process that the cities and County employ for requiring a Project WQMP, which is a plan for minimizing the adverse impacts of urbanization on site hydrology, runoff flow rates, and pollutant loads at the project level. A reference to the Model WQMP and equivalent documents in the region's other counties, should replace the last ten bullet points of section MM-HYD-I(b).

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
39.	Define	3.11-14	Define medium, high, and low density housing within text
40.	Clarification	3.11-34	<p>3.11.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION IMPACT LU-1...</p> <p>It is likely that in some instances currently adopted general plans and other adopted plans will not General Plans are not required to be consistent with the 2016 RTP/SCS policies and land use strategies, and they are not required to be consistent for purposes of the SCS pursuant to SB 375. Implementation of mitigation measures MM-LU- 1(a)(1), MM-LU-1(a)(2), MM-LU-1(a)(3), MM-LU-1(a)(4), MM-LU-1(a)(5), MM-LU-1(a)(6), MM-LU- 1(a)(7), MM-LU-1(a)(8), and MM-LU-1(b) would may reduce some of these impacts. However, direct, indirect, and cumulative impacts would remain significant and unavoidable.</p>
41.	Correction	3.14-9	Update Table 3.14.2-1 with May 2015 DOF data and label columns as 'Households' not 'Housing Units'
42.	Correction	3.14-12	Update Table 3.14.2-3 with May 2015 DOF data
43.	Correction	3.14-13	Update Table 3.14.2-5 with May 2015 DOF data
44.	Define	Figures 3.14.2-1 3.14.2-2 3.14.2-3	Define subjects of maps
45.	Clarification	3.14.22, paragraph 4	Clarify if discussion is on new lane miles or existing; Define "additional transportation facilities"
46.	Clarification	4-1, 4.1 add after last bullet	<u>"If an alternative is rejected and the project approved, it is the EIR for the proposed project that is to be used for future tiering purposes."</u>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
47.	Clarification	P. 4-6, and all related documents' references to Alternative 3	<p>Alternative 3: Intensified Land Use Alternative</p> <p>“The <u>hypothetical</u> land use pattern in this Alternative builds on the land use strategies as described in the 2016 RTP/SCS and beyond. Specifically, it increases densities and intensifies land use patterns of the Plan, especially around high quality transit areas (HQTAs) in an effort to maximize transit opportunities. The <u>hypothetical</u> growth pattern associated with this Alternative....</p> <p>Comment: Update all references to Alternative 3 in all RTP/SCS documents where it mentions that the land use pattern was developed based on the Plan to indicate that Alternative 3’s land use plan is hypothetical.</p>

Differences in Growth 2012-2040
 SCAG Draft 2040 Policy Growth Forecast
 Less OCP-2014 (Local Input)
 Unincorporated

RED TEXT= Numeric Difference Population, Households, and Employment
 BLUE TEXT= Percent Difference Population, Households, and Employment

TAZ: 33046800
 POP: -1,501 -69%
 DU: -259 -33%
 EMP: -1 -17%

Legend

- Selected TAZ
- January 1, 2013 City Boundary
- SCAG Split TAZ
- Housing Construction 7/1/12 - 12/31/14
- Metrolink Stations
- Freeways

SCAG Draft Policy Growth Forecast less OCP-2014

- 1,503 to -1
- 0
- 1 to 199
- 200 to 499
- 500 to 967

Differences are shown by split TAZ

San Juan Capistrano

Ortega

Antonio

Differences in Growth 2012-2040 SCAG Draft 2040 Policy Growth Forecast Less OCP-2014 (Local Input) Midway City

RED TEXT= Numeric Difference Population, Households, and Employment
BLUE TEXT= Percent Difference Population, Households, and Employment

Legend

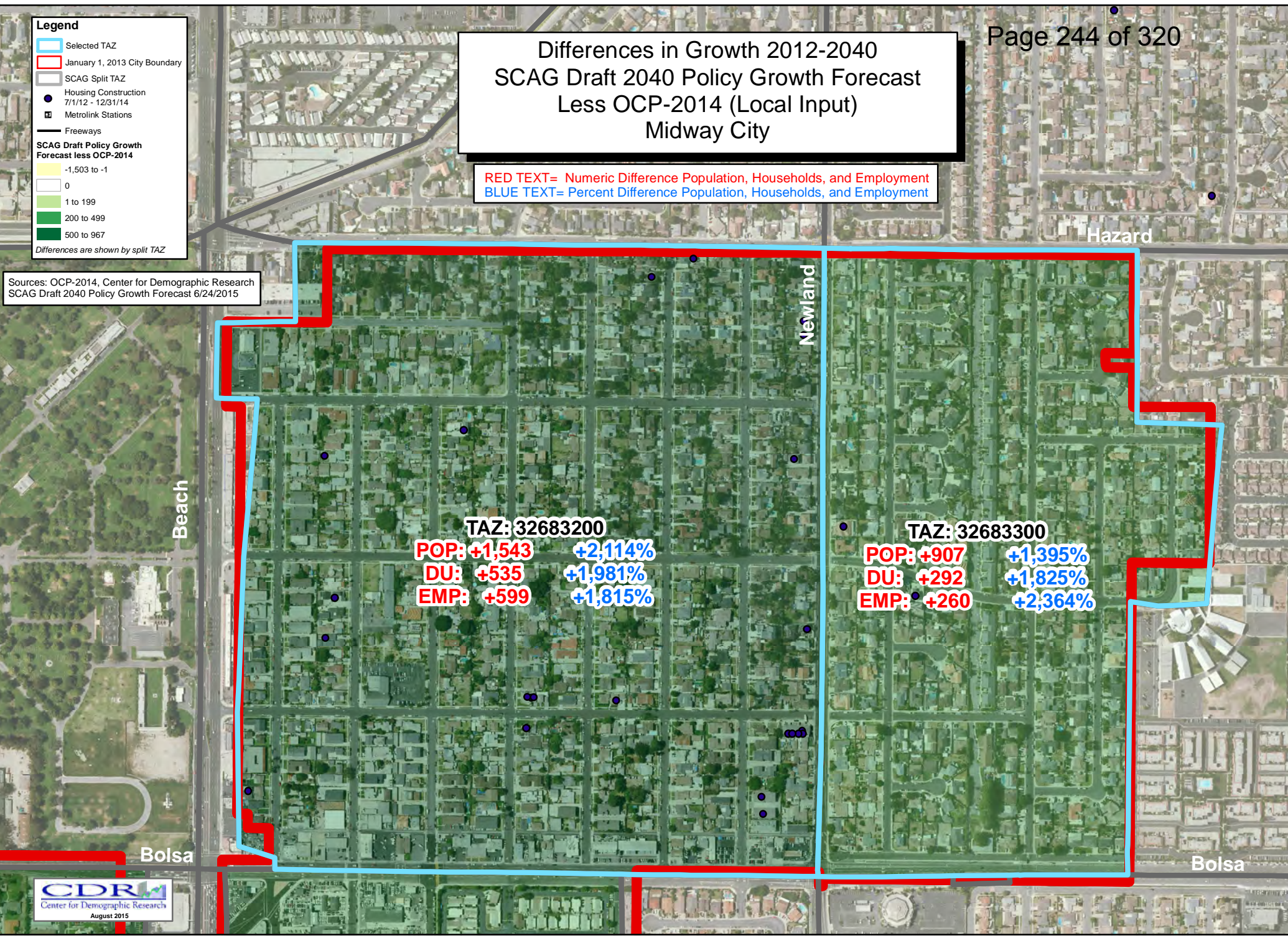
- Selected TAZ
- January 1, 2013 City Boundary
- SCAG Split TAZ
- Housing Construction 7/1/12 - 12/31/14
- Metrolink Stations
- Freeways

SCAG Draft Policy Growth Forecast less OCP-2014

- 1,503 to -1
- 0
- 1 to 199
- 200 to 499
- 500 to 967

Differences are shown by split TAZ

Sources: OCP-2014, Center for Demographic Research
SCAG Draft 2040 Policy Growth Forecast 6/24/2015



Beach

Bolsa

Newland

Hazard

Bolsa

TAZ: 32683200

POP: +1,543 +2,114%

DU: +535 +1,981%

EMP: +599 +1,815%

TAZ: 32683300

POP: +907 +1,395%

DU: +292 +1,825%

EMP: +260 +2,364%



AFFILIATED AGENCIES

Orange County
Transit District

Local Transportation
Authority

Service Authority for
Freeway Emergencies

Consolidated Transportation
Service Agency

Congestion Management
Agency

Service Authority for
Abandoned Vehicles

January 11, 2016

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

**Re: Comments on the Draft 2016-2040 Regional Transportation Plan/
Sustainable Communities Strategy and Program Environmental
Impact Report**

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and associated Program Environmental Impact Report (PEIR). The draft RTP/SCS and PEIR reflect the transportation and funding challenges that the region will face in the coming years. These documents are critical to the region's ability to improve mobility, and to operate and maintain the transportation system.

The Orange County Transportation Authority (OCTA) appreciates that SCAG has included the commitments identified in OCTA's 2014 Long-Range Transportation Plan (LRTP), as well as the demographic forecasts approved and submitted by the Orange County Council of Governments. Additionally, OCTA recognizes the hard work and cooperation of SCAG staff throughout the RTP/SCS and PEIR development process.

OCTA has identified policy and technical issues related to the draft RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTC). The strategies include the assumed mileage-based user fee, regional express lane network, California High-Speed Rail, and the additional investments in transit, active transportation, and congestion management. OCTA's concerns and comments regarding each of the regional strategies are discussed below.

Mr. Hasan Ikhata
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Innovative Financing and New Revenue Sources

The draft RTP/SCS suggests that \$130.8 billion of the approximately \$200.4 billion regional shortfall can be addressed through actions at either the state or federal level. The innovative financing strategy, included in the RTP/SCS, assumes that a \$0.10 gas tax increase will be implemented by 2020. Additionally, by 2025, it assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.04 per mile, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee.

OCTA cannot support an increase in fees, including the introduction of a mileage-based user fee, until a comprehensive economic impact study is completed and presented to the OCTA Board of Directors for discussion. When considering support for any kind of a new user-based fee program, the region should place an emphasis on the need for return-to-source criteria that guarantee funds generated within a county are reinvested in that county's transportation system. Moreover, any user-based fees should be indexed appropriately to provide a justifiable and sustainable source of funding. Finally, throughout the development of any new funding mechanisms, opportunities should be sought to accelerate project delivery and reduce costs, consistent with OCTA's Breaking Down Barriers initiative. While these comments are generally consistent with SCAG's guiding principles for identifying reasonably available funding in the RTP/SCS, OCTA would like to reinforce these principles, particularly in consideration of the mileage-based user fee.

California High-Speed Rail

The draft RTP/SCS identifies Phase I of the California High-Speed Rail Authority (CHSRA) Project as a potential solution for improving interregional and intercity ground transportation. As described in the draft RTP/SCS, the project includes completing the first section through the San Joaquin Valley by 2018, extending to Palmdale and the Burbank Bob Hope Airport by 2022, connecting to San Jose/San Francisco by 2026, and finally reaching Los Angeles Union Station (Union Station) by 2028.

This also assumes upgraded commuter rail connections between Union Station and the Anaheim Regional Transportation Intermodal Center along the Los Angeles-San Diego-San Louis Obispo (LOSSAN) corridor. This upgraded service will be achieved through a \$1 billion program of projects identified in a memorandum of understanding (MOU) between the CHSRA and nine Southern California agencies. This investment is part of a phased delivery,

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Page 3

known as the “blended approach”, which OCTA supports through the adopted Resolution 2012-020.

OCTA recommends that SCAG continue to provide regular updates to the Transportation Committee and Regional Council regarding the CHSRA business plan, financial status, implementation progress, and any changes in assumptions by the CHSRA. These updates should focus particularly on the status of the MOU.

Regional Express Lane Network

The draft RTP/SCS includes implementation of a regional express lane network. This network proposes to increase occupancy requirements from 2+ to 3+ persons per vehicle on select existing and planned high-occupancy vehicle (HOV) lanes throughout the region. Pricing for single-occupancy and dual-occupancy vehicles will then be used to increase the throughput of the corridor and reduce emissions from congestion. As a result, this concept would generate additional revenues. When combined with tolls from a new east-west freight corridor in Los Angeles County, the projected revenues would total \$23.5 billion. These funds are assumed to contribute toward the \$200.4 billion regional shortfall.

The proposed Regional Express Lane Network focuses on converting specific existing and planned HOV facilities to express lanes. However, the segment of State Route 55 (SR-55), between Interstate 405 (I-405) and State Route 91 (SR-91), is noted as a potential single or dual express lane facility. The potential for a dual lane facility is inconsistent with the projects submitted by OCTA in December 2014. The submittal identifies general purpose lane additions on SR-55, between I-405 and Interstate 5 (I-5), as well as between I-5 and State Route 22 (SR-22). OCTA did not submit any new capacity enhancements on SR-55 north of SR-22. If new capacity is proposed, over and above the OCTA LRTP, new funding would be required that is likely dependent on state and federal legislative action.

The 2016-2040 RTP/SCS should consistently recognize the capacity enhancements along SR-55, between I-405 and I-5, and between I-5 and SR-22, as general purpose lanes. This is consistent with how these projects are characterized in OCTA’s LRTP, OCTA’s 2006 program-level environmental document, and the current 2012-2035 RTP/SCS. Furthermore, the 2016-2040 RTP/SCS should clearly recognize that the proposed express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility before any final decisions on implementation can be made.

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Other Regional Strategies

SCAG proposes a number of other investments within the draft RTP/SCS that affect Orange County, and go beyond the LRTP. These include additional investments in congestion management projects, transit service, and active transportation.

The congestion management projects were identified by the California Department of Transportation through studies required for corridors receiving Proposition 1B Corridor Mobility Improvement Account funding. In Orange County, these corridors included State Route 57, SR-22, I-5, Interstate 605, SR-91, and I-405.

The improvements consist of relatively low-cost operational improvements, such as ramp metering, auxiliary lanes, and other ramp and interchange enhancements. The draft 2016-2040 RTP/SCS estimates that an investment of \$5 billion is necessary to implement the improvements throughout the SCAG region. These are in addition to capacity and operational improvements submitted by the CTCs, and would be funded through the draft 2016-2040 RTP/SCS innovative financing strategy.

The draft 2016-2040 RTP/SCS also proposes additional transit enhancements throughout the region. The improvements consist of expanded local bus service, additional Bravo! and bus rapid transit services, and new express bus service. SCAG states that the additional cost to the region for these services, including capital and operations and maintenance costs, is estimated at about \$8.5 billion, which is again assumed to be funded with innovative sources. It should be noted that the proposed improvements in Orange County are generally consistent with the financially unconstrained element of the OCTA 2014 LRTP.

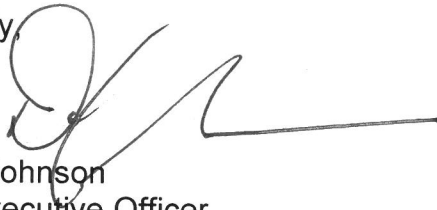
An additional emphasis is also placed on active transportation improvements, with the draft 2016-2040 RTP/SCS proposing to invest \$12.9 billion. Compared to the previous RTP/SCS, the active transportation investment has more than doubled. About \$1.7 billion of the total investment reflects active transportation projects submitted by CTCs. SCAG proposes investing another \$6.4 billion from the draft 2016-2040 RTP/SCS innovative financing strategy. SCAG then estimates that the remaining \$4.8 billion would be invested through active transportation elements from roadway operations and maintenance efforts. The \$12.9 billion investment results in more trips made by walking or bicycling, increasing from 11.9 percent of all trips in 2012, to 15.7 percent of all trips by 2040.

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January 11, 2016
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OCTA recognizes that it is within SCAG's purview to plan for regional strategies that enhance transportation; however, it should be noted that OCTA is committed to delivering the projects within the LRTP. The 2016-2040 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies. OCTA will only consider additional investments after new revenues are realized and identified to account for these additional improvements.

OCTA appreciates SCAG's work on the RTP/SCS and PEIR, and looks forward to the adoption of the final 2016-2040 RTP/SCS and PEIR in April. If you have further questions, please contact Gregory Nord, Senior Transportation Analyst, at (714) 560-5885.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darrell Johnson', with a long horizontal line extending to the right.

Darrell Johnson
Chief Executive Officer

DJ:gn

c: OCTA Board of Directors
Executive Staff

Dr. Manuel M. Lopez President
Arlene N. Fraser Vice President
Jason T. Hodge Secretary
Mary Anne Rooney Commissioner
Jess Herrera Commissioner

PORT MANAGEMENT

Kristin Decas CEO & Port Director



January 28, 2016

Foreign Trade Zone #205



WORLD TRADE CENTER
OXNARD

RTPSCS 2016-2040 Draft Plan Comments –Port of Hueneme

Dear Mr. Briglio,

Thank you for the opportunity to comment on the RTPSCS 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.

Overall the Draft Plan is very well structured. There is a strong vision, great overarching strategy and focus on future trends that will impact the challenges we face. Also, very well outlined are the comments for transportation funding being scarce and insufficient. The Draft Plan has done very well in charting the needed transportation improvements and the necessity for more investments in the transportation sector.

Here are some of the notations to the Draft December 2015:

Page 4 of Executive Summary- the Goods Movement section –Port of Hueneme is not mentioned as Environmental Steward, its Green Initiatives are:

- The Port, and every port tenant, is proactive about reducing emissions by using cleaner burning fuels in the vessels and equipment used to move cargo
- Clean energy at The Port includes using energy efficient utilities and alternative fuels
- Replacing conventional diesel with low emission propane-fueled trucks, and electrifying cargo handling equipment to reduce on-dock emissions
- The Port actively monitors water quality to mitigate impacts to marine life and provides shoreside power for vessels and air quality improvement (over the 30 year life of the project)
 - 92% reduction in Particulate Matter
 - 55% reduction in Greenhouse Gases
 - 98% reduction in NOx
- In 2010, the Port developed a Non-compliant Truck Reporting System (NCTRS) to document and report all trucks not in compliance with the California Air Resources Board (CARB) drayage truck regulation



- In 2009, the Port voluntarily prepared an Air Emissions Inventory (EI) to quantify the air quality impacts associated with maritime operations
- Implementing Phase I of a Stormwater Improvement Plan
- LED Lighting Project to reduce energy consumption
- In 2015 Port of Hueneme became the First California Port to join Green Marine
- Partnered with the US Navy and U.S. Army Corps of Engineers (USACE) to construct and monitor a Confined Aquatic Disposal Cell to dispose of contaminated sediment

Please find more information on Port of Hueneme's Green Program in case you would like to reference them as an example:

<http://www.portofhueneme.org/community/environment/>

<http://www.greenport.com/news101/Projects-and-Initiatives/hueneme-joins-green-marine>
<http://yosemite.epa.gov/opa/admpress.nsf/6424ac1caa800aab85257359003f5337/95d492f5d48c36a985257cb400541364!OpenDocument>

Page 7 of Executive Summary- Strengthening the Regional Transpiration Network for Goods movement-Ventura County projects are not added and there are several of them, please see link to the VCTC 2035 plan.

<http://www.goventura.org/?q=final-comprehensive-transportation-plan-ctp>

In Section-Our Progress Since 2012, Goods Movement Section- the Port of Hueneme Shore Side Power Clean Air Project that was done since then is not listed.

In Section-Challenges in a Changing Region- the Draft Plan is missing a section on Seaports, perhaps right before Rail, there is **segment on Seaports**, the increase of cargo volumes since 2012 and how that affects the rest of the infrastructure-rail, highway, and intermodal corridors.

If possible, please include **reference to the Port of Hueneme 2020 Strategic Plan** in the Draft Plan for RTPSCS. Here is the link to the plan. Thank you.

<http://www.portofhueneme.org/2020-strategic-business-plan/>

Thank you for your efforts and continued support.

Best Regards,

The Port of Hueneme

Eric Garcetti	<i>Mayor, City of Los Angeles</i>				
Board of Harbor Commissioners	Ambassador Vilma S. Martinez <i>President</i>	David Arian <i>Vice President</i>	Patricia Castellanos	Anthony Pirozzi, Jr.	Edward R. Renwick
Eugene D. Seroka	<i>Executive Director</i>				

January 25, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Please find attached minor comments from the Port of Los Angeles. We greatly appreciate the opportunity to work with SCAG on the RTP, and provide comments, which merely entail a few very minor project additions/modifications. If you have any questions, please do not hesitate to call me (310-732-7702).

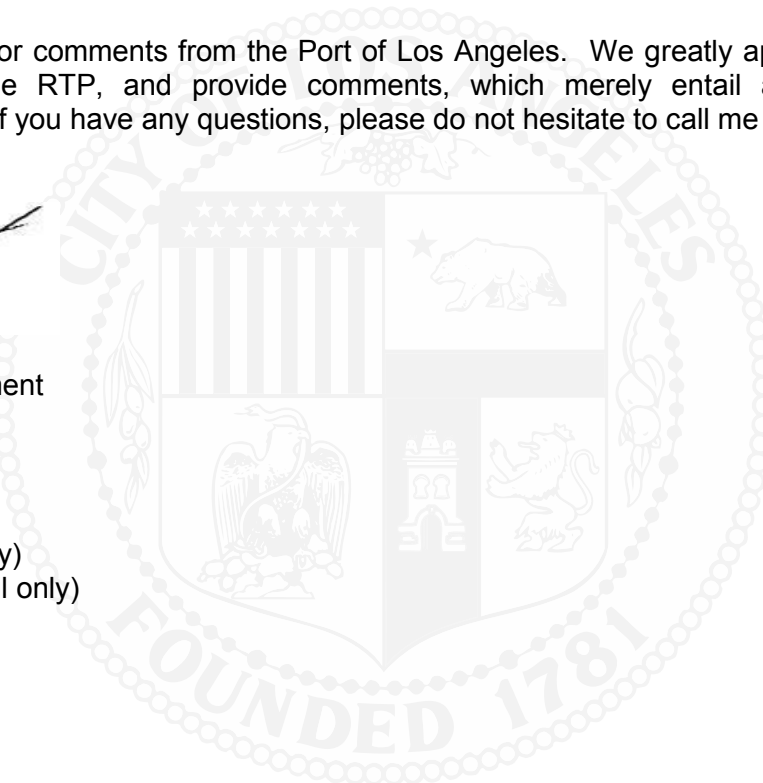
Sincerely,



Kerry Cartwright, P.E.
Director of Goods Movement

KC:ss
Attachment

cc: Annie Nam (email only)
Naresh Amatya (email only)



**SCAG 2016/2040 RTP/SCS
Port of Los Angeles Comments**

ACTIVE TRANSPORTATION APPENDIX

- *Page 48: “Assist the Cities of Los Angeles and Long Beach in providing a continuous pedestrian and bicycle access across the replacements for the Vincent Thomas Bridge and Gerald Desmond Bridge linking San Pedro to Long Beach.”*
- **Consistent with the final City of Los Angeles 2015 Mobility Plan**, remove Seaside Avenue on Terminal Island as part of the active transportation plan related to the California Coastal Trail.
 - Seaside Avenue is a high-speed (45 mph posted) expressway by function. It is also a major truck route and a federally designated National Highway System Intermodal Connector route, Countywide Strategic Truck Arterial Network (METRO CSTAN), and the Strategic Goods Movement Arterial Plan. Truck volumes will increase substantially over time. When the Gerald Desmond Bridge replacement is completed, the entire segment of Ocean Boulevard/Seaside Avenue between the I-710 and the State owned Vincent Thomas Bridge will be relinquished to Caltrans, and not suitable for bike lanes.
 - The Harbor Department has plans to eventually remove the last signal on Seaside Avenue, which will thus result in higher prevailing speeds on this major expressway, and not safe for bikes.
 - This area is an isolated segment in which there are not existing, planned, or proposed bike lanes easterly and westerly thereof.
 - Placing bike access through this area is not in line with the RTP goals and objectives for “Connectivity (pg. 48),” “Integrity (pg. 48),” and “Support and seek opportunities to promote safety” (pg. 73).
- Add the following two projects:
 - Alameda Corridor Terminus/California Coastal Trail Extension Grade Separation (Pedestrian/Class I Bicycle Path bridge)
 - Consistent with the final City of Los Angeles 2015 Mobility Plan: California Coastal Trail Ports O’ Call Promenade (30-foot wide public promenade/Class I bike path)

GOODS MOVEMENT APPENDIX

Rail Infrastructure Outside Marine Terminals

- Add: “Port of Los Angeles Rail Efficiency Program (Alameda Corridor – West Basin Area Gap Closures)”
 - This project will eliminate two short gaps in trackage between the West Basin area of the Port of Los Angeles and the Alameda Corridor (increasing the number of tracks from one to two in this area). This doesn’t change any on-dock railyard capacity assumptions, and thus doesn’t change any projections of train or truck volumes in the RTP. The project however does reduce train delays and idling.

San Pedro Bay Ports Access Projects

- SR 47/V. Thomas Bridge/Front St. Harbor Boulevard Interchange: Add to the description, “**The Project also includes realigned eastbound and westbound SR 47 on-ramps.**”

Courtney Aguirre

From: Cartwright, Kerry <KCartwright@portla.org>
Sent: Monday, January 25, 2016 5:23 PM
To: Annie Nam; Naresh Amatya; Courtney Aguirre
Subject: RE: RTP Comments
Attachments: POLA 2016 RTP comment letter.pdf

I forgot to include cost estimates for the requested 3 projects as follows:

- Alameda Corridor Terminus/California Coastal Trail Extension Grade Separation (Pedestrian/Class I Bicycle Path bridge): \$15 million (assume POLA funds for RTP purposes; POLA will be seeking State and possibly METRO ATP funds)
- California Coastal Trail Ports O' Call Promenade (30-foot wide public promenade/Class I bike path) (assume POLA funds for RTP purposes; POLA will be seeking State and possibly METRO ATP funds)
- Port of Los Angeles Rail Efficiency Program (Alameda Corridor – West Basin Area Gap Closures): \$20 million (assume included in total POLA cost for rail per Table 20.F in Goods Movement Appendix)

From: Cartwright, Kerry
Sent: Monday, January 25, 2016 2:31 PM
To: 'Annie Nam'; Amatya, Naresh; Courtney Aguirre (aguirre@scag.ca.gov)
Subject: RTP Comments

Annie/Naresh/Courtney:

Attached are very minor comments on the RTP.

Kerry Cartwright, P.E.
Director of Goods Movement
Port of Los Angeles
310-732-7702
310-357-4496 (cell)

-----Confidentiality Notice-----

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City of Long Beach
Department of Health
and Human Services

Los Angeles County
Department of Public Health

City of Pasadena
Public Health Department

County of Riverside
Department of Public Health

Santa Barbara County
Public Health Department

County of San Bernardino
Department of Public Health

County of San Diego
Health and Human Services
Agency

Ventura County
Public Health

Cheryl Viegas-Walker, President
Regional Council
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

February 1, 2016

Dear President Viegas-Walker:

The Public Health Alliance of Southern California (Alliance) is a collaboration of local health departments in Southern California. Our health departments are committed to realizing a vision in which all Southern California communities are healthy places to live, work, play and learn. We were pleased to participate in the development of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as part of our efforts to achieve this goal. Thank you for your efforts to include health in the development of the RTP/SCS, and for the opportunity to provide the following comments on the draft plan.

Overarching Comments

The 2016-2040 DRAFT RTP/SCS and the plan scenario point our region in the right direction, and represent important progress for considering the public's health when planning for our region's future.

We are pleased that the plan does the following:

- Puts the region on target to meet our AB 32 Greenhouse Gas Reduction goals of 8% by 2020. *Climate change is a threat to public health in our region, our Alliance strongly supports the climate change mitigation actions included in this plan.*
- Includes increased investment in transit and more active modes of transportation, particularly in Los Angeles County. *Transportation and built environment structures that support increased physical activity will significantly improve our region's health.*
- Includes performance measures that will help us understand the health impacts of the plan, and measure our progress toward implementation.
- Includes a more robust Environmental Justice analysis than prior plans, setting the stage for increased commitment to equity in our region.
- Includes a framework for operationalizing the ongoing consideration of health in our regional planning, as detailed by the Public Health Work Program in the Public Health Appendix.
- Is supported by data efforts, including the REVISION tool and the Urban Footprint Scenario Planning Module, which will allow us to project and understand trends in our region and plan impacts at a more granular level.
- Includes targeted land use strategies to help meet plan goals, including intensification of land use in high quality transit areas, complete streets strategies, and the livable corridor strategies.

We encourage SCAG members to work to implement these strategies within their local plans.

Recommendations for the Project List and Performance-Based Planning

- Consider a performance-based cost/benefit analysis of the largest projects as a way of building authentic public engagement around funding decisions included in plan.
- Consider setting aside a portion of funding for a public discussion/ referendum on the types of projects to be included in the plan as a way of building public engagement. At this time there is no clear mechanism for public input on the project list.
- Performance measures in general, and the public health and environmental justice measures in particular should include numeric targets rather than a simple directional goal/presentation of data.
- Include a performance monitoring measure in the RTP/SCS tracking the number of very low, low, and moderate income housing units available and constructed as a way of gauging progress towards the 2013 Regional Housing Needs Assessment by 2021.
- Maintain an updated public data portal that allows the public to measure the implementation of the plan based on the performance measures used for plan selection.
- In the PEIR, clarify which (if any) of the Strategic Projects are being modeled in the plan scenario. It is not clear from the existing documentation which projects were included at which stage in the modeling process.

Comments on the Public Health Process

- We commend the integration of Public Health into the development of the 2016-2040 RTP/SCS. In particular, we strongly support the new Public Health Appendix to the plan, and appreciate the hard work that went into the creation of this document.
- SCAG's Public Health Working Group has created a forum for public health professionals to engage with the plan and to advance work on the RTP, and the broader goals of the Public Health Work Program. SCAG's staff participation on the Alliance's Healthy Transportation Working Group has further built constructive engagement between transportation planning and public health and we commend and look forward to this continued participation.
- The Public Health appendix provides a primer explaining the Social Determinants of Health pathways through which planning and the RTP impact public health. We encourage SCAG to maintain the appendix as a living document and to include it in future RTP/SCSs to ensure future members and users understand these links.
- We applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the "Daily amount of walking and biking related to work and non-work trips" and the "Collision rates by severity and mode." We encourage SCAG members to collaborate with SCAG, Public Safety, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts/ benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes.
- We appreciate the inclusion of healthy food access on page 4 of the Public Health Appendix. Given the importance of this topic to health, we recommend integration of healthy food systems discussions into the broader RTP/SCS. An example would be to consider the impact of the food system on goods movement; i.e., how can preservation of local agriculture and development of urban agriculture in the region reduce the greenhouse gas emissions from that sector?
- We also encourage SCAG to update the data analysis and performance measures included in the public health appendix, where possible, provide this data at a granular level through the REVISION tool and other public data portals. This will facilitate the development of strategies

and projects to advance public health supportive built environments while making it easier for member jurisdictions to incorporate public health analyses in their plans.

Comments on Scenario Planning Model Health Benefit Analysis

- We appreciate the effort on the part of the Strategic Growth Council, SCAG and others to develop the Urban Footprint Scenario Planning Model (SPM) Public Health Module as a tool for helping evaluate the health impacts of proposed scenarios.
- While there is room for the refinement of this tool both in terms of including a risk exposure pathway and in addressing member's concerns related to the land use codes, we think the Urban Footprint SPM Health Module is useful in providing a ballpark assessment of some of the health benefits that may come from the plan.
- We are encouraged by the estimated health benefits of the plan scenario, which projects a 2.5% decrease in the regional obesity rate, 3% reduction in share of population with high blood pressure and a 13% reduction in total annual health costs for respiratory disease.
- We encourage SCAG and its member agencies to capture the value of our investments in active transportation by purchasing bicycle and pedestrian counters, and investing in National Household Transportation Survey (NHTS) oversample for active modes for the entire region. Detailed tracking of the physical activity increases resulting from the plan are key to understanding health impacts as well as how injury rates are related to exposure.
- In future years as data investments such as automated counters improves the granularity of our bike and walk mode share and trip length data, we encourage SCAG to analyze health co-benefits by using a relative risk assessment tool such as the Integrated Transportation Health Impact Model (ITHIM).

Comments on Environmental Justice Appendix and Disadvantaged Communities

- The Environmental Justice (EJ) outreach process and analysis is significantly more robust in this 2016-2040 RTP/SCS than in prior years. Thank you for incorporating the feedback we provided through the workshops and focus groups, and including the "Active Transportation Hazard" and "Climate Vulnerability" measures.
- We particularly appreciate SCAG's inclusion of multiple methods of identifying EJ communities. Due to the complex and localized nature of the issues EJ communities face, we would encourage SCAG to provide the detailed community-level analysis that is presented in aggregated form in the EJ appendix through a public data portal for use by individual communities.
- The Public Health Alliance has developed the "[California Health Disadvantage Index](#)" as a tool for identifying community disadvantage from a 'Social Determinants of Health' perspective. We encourage SCAG to consider the use of this tool for future EJ analysis, and as a layer for inclusion in future publicly available datasets on this topic.
- Given some of the unavoidable impacts of the plan on EJ Communities, we encourage SCAG to establish an ongoing process for elucidating and addressing these challenges in the region. A standing Environmental and Social Justice/Disadvantage Community workgroup could provide guidance for the integration of environmental justice/social justice/ disadvantage community prioritization processes in county and city-level transportation planning, ensuring that the project lists included in future RTPs have been developed with an eye toward more equitable transportation investment. Greater investment in disadvantaged communities' readiness will have the added benefit of increasing the competitiveness of the SCAG region in state funding competitions subject to SB 535 requirements.
- Displacement and gentrification are particularly important areas for action in the coming years. We appreciate the analysis of this issue in the EJ appendix, and its brief treatment in the Environmental Justice toolbox, however given the enormous affordable housing deficit in our region, and the trend of the displacement of transit-captive populations from the most transit-accessible urban core, more action on displacement will be necessary in order to realize the

VMT-reductions promised by our transit investments. We encourage SCAG members to convene a task force specifically dedicated to this issue. Because transit investment is a proven driver of displacement, this task force should seek to develop a fiscal structure for ensuring that the added land value of transit investment is captured for the development of affordable housing, with the minimum goal of achieving a 'no net loss' of affordable units within High Quality Transit Areas.

- The 2015 County of Riverside Community Health Assessment, which involved community forums and surveys, both homelessness and housing affordability surfaced as high priorities for residents. The fear of displacement is also a concern for residents of San Bernardino County. Strategies to address housing affordability should take the entire region into account.
- The EJ analysis should explicitly align the discussion with the Social Determinants of Health and the Public Health appendix, as there is no mention of the concept throughout. Consider using the California Planning Roundtable's Social Determinants of Health paper as a resource to explain the connection between these two appendices for newcomers to the field.
- Given the pressing nature of inequity, displacement, and poverty in our region, we recommend greater integration of the performance measures and mitigation actions included in the Environmental Justice appendix within the main body of the RTP/SCS.

Detailed comments on Draft RTP/SCS main document:

- **Page 5 and page 39:**
Please update this sentence: *In Riverside County, the Healthy Riverside County Initiative is working to have healthy cities resolutions adopted by a minimum of 15 cities.*
To read: *In Riverside County, the Healthy Riverside County Initiative has formed a Healthy City Network to continue to successfully work with the county's 28 cities to enact Healthy City Resolutions and Health Elements into their General Plans.*
- **Page 16, #2: Collaborating with Member Agencies, Jurisdictions and Stakeholders:**
Please explicitly mention public health departments as one of the key stakeholders, modifying the fifth sentence in that section to read: *The Agency will also have to work with key stakeholders including local public health departments to ensure...*
- **Page 20, Categorizing Land Use:** Rural development, which is neither suburban nor natural lands, does not fall into any of the listed categories. We would appreciate either a clarification of which of the categories rural land uses fall under, or a new, separate category addressing rural development.

Thank you for taking the time to consider our comments.


Sincerely,



Susan Harrington M.S., R.D.
Director, County of Riverside
Department of Public Health
Co-Chair, Public Health Alliance
of Southern California
sharring@rivcocha.org
p. 951.358.7036



Selfa Saucedo, MPH
Manager, Public Health and
Behavioral Health Depts.
Ventura County Health Care
Agency
Co-Chair, Public Health Alliance
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Selfa.saucedo@ventura.org
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Tracy Delaney Ph.D., R.D.
Executive Director,
Public Health Alliance
of Southern California
tdelaney@phi.org
office: 619.452.1180
direct: 619.722.340

2016 RTP/SCS

From: Eric Johnson <[REDACTED]>
Sent: Tuesday, January 26, 2016 8:29 PM
To: 2016 RTP/SCS
Cc: [REDACTED]
Subject: RTP/SCS comments

To whom it may concern,

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, the Puente-Chino Hills Task Force of the Sierra Club, is now a part of this growing coalition in 2016.

The mission of the Sierra Club Puente-Chino Hills Task Force is to work towards the preservation and biological integrity of Chino Hills State Park (CHSP) and the Puente-Chino Hills Wildlife Corridor, which extends from the Whittier Narrows to the Santa Ana Mountains, as well as providing open-space and recreational activities within the Puente-Chino Hills.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of “land use.” In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn’t be overlooked. We believe the opportunity before you isn’t to “plan for” the future of open space in the region—as that’s what you’ve been doing since the 2012 Plan. Instead, we believe SCAG can now start “implementing” a regional conservation program.

We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We have reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG’s mission with the Natural and Farmland policies.

Identify a Conservation Mechanism for the Natural and Farmlands Preservation

Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it likely relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Just

because the pressure is relieved doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.

SCAG's Support of Regional Wildlife Corridors

The current federal transportation bill, FAST Act, supports understanding transportation impacts on natural resources. The previous bill, MAP-21, supported restoring and maintaining environmental functions (i.e., wildlife corridors) affected by the infrastructure projects in the RTP. SCAG has even supported efforts in Los Angeles County to create a wildlife corridor over the 101 Freeway. Many efforts are underway across the region to connect landscapes to one another. This is very important to the region and its biodiversity. Wildlife corridors allow species to migrate and forage and expand genetic diversity. These corridors also allow ecosystems to maintain ecological functions, act as sources for repopulation after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by infrastructure projects.

Conclusion

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to [REDACTED].

Sincerely,

Eric Johnson, Chair
Puente-Chino Hills Task Force of the Sierra Club



January 29, 2016

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

Subject: Comments on the Draft 2016 Regional Transportation Plan Sustainable Communities Strategy
(RTP/SCS)

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) draft 2016 RTP/SCS. This monumental effort is appreciated and reflects various issues and challenges associated with a highly populated and diverse region that relies on an integrated transportation system encompassing all modes for the movement of people and goods. We commend staff for establishing the various committees and working groups in addition to working with cities, counties, transit operators, county transportation commissions, and community interest groups to develop a plan that addresses the various aspects of transportation and its impact on the environment, quality of life, public health, and environmental justice.

The effort SCAG undertook in developing the regional demographic forecast to reflect general plans and local input allows the jurisdictions and agencies to uphold established goals and policies at the local level and maintain consistency with regional goals and policies. We are also pleased that the document indicates capacity projects are supported in the SCAG region. Given the 40 percent population growth expected in Riverside County over the life of the plan, it is essential that we continue increasing capacity for all modes, including lane additions, new corridors, and increased transit options.

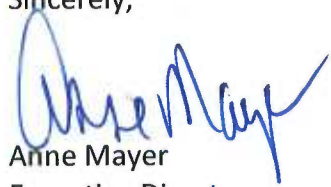
The draft 2016 RTP/SCS states that the shortfall in funding over the life of the plan can be filled through actions at the state and/or federal levels. We agree with this notion and urge SCAG to advocate for such actions, including the need to require federal participation in reducing criteria pollutants that are outside the region's control (e.g. regulating ships, trains, and planes). It is imperative that all emissions sources are addressed by the responsible entity in order to maximize emissions reductions.

Mr. Hasan Ikhata
January 29, 2016
Page 2

We are requesting that the actions and strategies for additional funding and regional projects, such as the Regional Bikeway Network and Regional Express Lane Network, be clearly delineated as to which projects are planned and included in county long range plans, and which projects are part of SCAG's strategic plan and are not included in county long range plans. The draft 2016 RTP/SCS should clearly distinguish the costs associated with these regional networks and that these networks are above and beyond what is identified in current county transportation plans.

The following is a list of comments that include clarifications, corrections, and minor edits. Please contact Shirley Medina at (951) 787-7141 if you have any questions on our comments.

Sincerely,



Anne Mayer
Executive Director

DRAFT 2016 RTP/SCS Comments:

Executive Summary

Pg. 4 – Under “Passenger Rail”, revise 2nd sentence “**Riverside County Transportation Commission** Metrolink is nearing completion on the **Metrolink** Perris Valley Line;”

The above change also needs to occur in Chapter 2 – Where We Are Today, Under “Passenger Rail”

Pg. 4 – Under “Highways”, Revise last sentence “...and the Interstate 215 Bi-County **HOV** project in Riverside and San Bernardino Counties,..” In addition, the 215 Bi-County HOV project should be included in the following section – “Regional High-Occupancy Vehicle (HOV) and Express Lane Network”.

The above changes should also be reflected in Chapter 2 – Where We Are Today, Under “Highways” and “Regional HOV and Express Lane Network” sections.

Pg. 4 - Under “Regional HOV and Express Lane Network”, revise 2nd sentence to include SR-91 HOV lanes. The 91 project added HOV lanes from the 60/91/215 Interchange to Adams Street, which is nearly complete and should be reflected as such in this section.

Chapter 2 – Where We Are Today

Pgs. 40 & 41, Under “Our Progress Since 2012 – Mobility Projects in the SCAG Region”, the map and project listing should include the SR-91 HOV project, from the 60/91/215 interchange to Adams Street, which will be open to traffic early 2016.

Chapter 4 – Creating A Plan For Our Future

Pg. 60 – Under Goals and Guiding Polices section, recommend adding “FAST ACT” federal transportation bill recently approved.

Pg. 62 – Under “Our County Transportation Commissions” 1st paragraph, 1st sentence, “...allocating locally-generated transportation revenues, **state and federal funding**, and, in some cases,...”

Pg. 62 – Under “Our County Transportation Commissions” 1st paragraph, 3rd sentence, “...to receive (or already receiving) federal **and state** funds.”

Chapter 5 – The Road to Greater Mobility & Sustainable Growth

Pg. 97 – Under Freeway to Freeway HOV Connectors, the SR-91/71 Interchange improvement will construct a freeway to freeway connector, however, it does not include HOV lanes. This project should be removed from this listing.

Pg. 109 – Throughout this page and other pages MAP-21 is mentioned, which should be updated to reflect FAST ACT.

Pg. 111 – Under Conservation Planning Policy, Riverside County has had in place a Multi-Species Habitat Conservation Plan (MSHCP) in Western Riverside County and a separate plan that covers Coachella Valley. Therefore, these plans could be mentioned in this section to inform the public of the plans that currently exist in the SCAG region.

Pg. 116 – Under Mineral Resources, editing comment on 1st sentence, remove repeated words “as well as well”.

Chapter 6 – Paying for the Plan

It isn't clearly delineated what areas of the plan are funded with Core Revenues, Reasonably Available Revenues, and New Revenue Sources and Innovative Financing Strategies. For example, do all of the Strategic Plan projects or strategies require New Revenue Sources and Innovative Financing Strategies? As an example, since the Active Transportation Program's Regional Greenway Networks are identified in the Strategic Plan, it could be construed that the majority of this strategy is unfunded and would require a new revenue fund source and/or an innovative financing strategy. The Plan states \$356.1 billion is from Core Revenues and \$556.5 billion equates to the revenue and expenditures of the Plan. How much of each project category (highways, transit, ATP, etc.) is considered Core Revenues and Reasonably Available Revenues versus New Revenue Sources and Innovative Financing Strategies? The Plan should clearly address what areas are “unfunded” requiring New Revenue Sources and Innovative Financing Strategies.

Chapter 8 – Measuring Our Progress for the Future

Pg. 147 – Under Vehicle Miles Traveled (VMT) Per Capita – this section should mention that VMT is a significant metric, however, with the increased usage of electric or alternative fueled vehicles reducing VMT will become less significant in achieve greenhouse gas emissions reductions.

Pg. 160 – Under SB 375 and Greenhouse Gas Emission Reductions, this section should reflect the importance of requiring other emissions sources, specifically from freight locomotives and rail yards and airplanes, to take on its fair share of GHG reduction measures.

Pg. 165 – Under Performance Measure 15: Rail-related Impacts, last sentence, suggest adding “...and examines environmental justice concerns that may potentially be alleviated by grade separation projects **and clean locomotives.**

Pg. 165 – Under Performance Measure 16: Public Health Analysis, last sentence, suggest adding in “It is a key goal of this Plan to provide more and better opportunities for physical activity and other healthy lifestyle choices **through improvements to transit access and transportation infrastructure** throughout the SCAG region.

APPENDIX – Active Transportation

Pg. 24 – Under “4. Encourage development of local plans” – include Riverside Transit Agency is developing a first/last mile study.

Pg. 28 – Table 12 does not indicate whether the strategies are constrained or unconstrained. In addition, the footnote indicates all projects were provided by County Transportation Commissions and local active transportation plans. However, the strategies are not reflective of CTC submittals, at least in the case with Riverside County, and include above and beyond what RCTC submitted. Please distinguish SCAG’s Regional Trip Strategies are above and beyond what the CTCs have submitted.

Pg. 29 – Under Regional Trip Strategies, the 1st sentence states that the ATP invests \$2.8 billion in the Regional Trip Strategy. Is the Regional Trip Strategy Constrained or Unconstrained or both? If both, how much is Constrained and Unconstrained/Strategic Plan?

Pg. 62 – Exhibit 28 Riverside County, is the network considered in the Unconstrained/Strategic Plan? Should be a footnote explaining this.

Pg. 69 – Under “Plan Implementation” – Include a bullet indicating that SCAG will advocate for state and federal funds to implement the SCAG Regional Bikeway Network and Regional Greenway Network.

APPENDIX: AVIATION AND AIRPORT GROUND ACCESS

Pg. 31 – Under “Ground Access Projects Currently Under Construction (or in Design)” – The I-215 North HOV project has not started design and should be removed from this listing, or indicate that it is a “future planned” project.

Pg. 32 – “Under 2016 RTP Ground Access Projects” – are these projects in the constrained plan? It should clearly highlight whether they are constrained or not.

APPENDIX: CONGESTION MANAGEMENT

Pg. 2 – Under “County Congestion Management Programs”, 1st sentence states that “Under California Law, urbanized areas must prepare a Congestion Management Program”. Under Section 65088.3 of the Govt code allows counties to opt out of adopting a CMP. Therefore, this sentence needs to be revised to reflect Section 65088.3. It is our understanding that if a county opts out of the State CMP requirements that federal Congestion Management Process must be adhered to.

Pg. 3 – Under “Roles and Responsibilities of Partner Agencies”, 1st sentence, suggest revising: “**Currently**, five of the six counties in the SCAG region (all but Imperial County) have adopted CMP’s that **generally** fall under the state congestion management requirements...” Also, last sentence in this paragraph misspelled “SCAG”.

Pg. 7 – Under “Roadways”, 2nd sentence, add word: “...-defined roadway network that is monitored for LOS **approximately** every two years.”

Pg. 10 – Under “County Congestion Management Program Trends”, 3rd paragraph, last sentence, revise wording “...in RCTC’s Capital Improvement Program (CIP) ~~where were~~ and are expected to improve the LOS to E or better”.

Pg. 27 – Under “According to GlowbalWorkplaceAnalysitcs.com:”, 3rd bullet, minor edit: “...the size of the overall ~~the~~ non-self-employed workforce”

Pg. 28 – Under “Bike Share”, paragraph should emphasize that Bike Share programs are successful in certain areas (e.g. HQTAs,) with biking infrastructure planned or in place.

Pg. 29 – Under “Short Trip Strategies”, 3rd paragraph, revise sentence to: “**The SCAG Region** is investing \$12.9 billion in active transportation projects...”

Pg. 29 – Under “Regional Bikeway Network”, add bullet stating that SCAG will advocate for additional federal and state funding sources for Active Transportation projects. Also, it would be helpful if SCAG could identify which bullets are short versus long term goals.

Pg. 31 – Under “The Federal Transportation Improvement Program (FTIP) – Single Occupancy Vehicle (SOV) Capacity-Enhancing Projects”, 1st paragraph, last sentence, “Under federal law, the FTIP must be updated every two years for funding”. I could not find this reference in the federal Congestion Management Process Guidebook. It does not mention a timeframe only recommends when planning documents are updated such as the RTP. Therefore, I suggest removing this sentence unless staff finds the specific reference.

Pg. 31- Under “Monitoring Projects for Compliance With the CMP”, 2nd bullet under 4, minor edit: “Environmental Impact Statement/Environmental Impact ~~Statement~~ **Report** (EIS/EIR)”

Pg. 32 – Under “Congestion Management Under MAP-21”, should be updated to reflect FAST ACT.

APPENDIX: ENVIRONMENTAL JUSTICE

Pgs. 122-130, the maps don’t cover the DACs/Areas of Concern in the Eastern Coachella Valley. Although the cities are listed further in the appendix it would be helpful if SCAG could widen the map to include this area.

APPENDIX: GOODS MOVEMENT

Pg. 2 – Under “Primary Freight Network”, 1st sentence, spell check “...for Progress in the 21st Century...”

Pg. 6 – Table 2, Adding up the columns for “All Goods Movement Dependent Industries” it shows that it is off by one. May be due to rounding.

Pg. 7 – Table 3, when you add “Percent of Total” column, you get 99%. May be due to rounding.

Pg. 8 – Under “Retail Supply Chains”, 2nd paragraph, 3rd sentence states: “...GDP contribution was \$106.87 billion for manufacturing and \$53.66 billion for retail (Table 4)”. However, these amounts cannot be found in the referenced Table 4.

Pg. 12 – paragraph above “Technology and Consumer Behavior Impacting Goods Movement”, last sentence “...a combined \$545 billion to regional GDP by 2040 (FIGURE 4)”. Can’t relate or find the \$545 billion in Figure 4.

Pg. 21 – Under “Benefits of the East-West Freight Corridor”, 5th bullet, “Reduction of Truck-Involved Accidents” – East-West Freight Corridor is referred to as EWFC many times in prior bullets on this page. Suggest referencing it as EWFC to be consistent.

Pg. 22 – 7th paragraph, last sentence: missing “to”, “...issues are anticipated **to** be monitored...”

Pg. 22 – bullets, suggest removing “Interstate”, “State Route” after colons. For example:

Interstate 5: At 210, between 2 and 710, South of 605, between 22 and 55.

Pg. 22 – Last paragraph, 2nd sentence “...the Corridor System Management Plan (CSMP)..” The abbreviation is already included in the 1st paragraph of this page, therefore, continue referencing CSMP in the last paragraph as well.

Pg. 25 – Table 9, missing “-” in front of 215, 57, and 23 should read “I-15/I-215”, etc.

Pg. 25 – Table 9, “SR-91 Fast Forward” project is located in what county? Description does not indicate location.

Pg. 31 – Under “On-Dock/Near-Dock Rail Capacity Enhancements”, 1st paragraph, 1st sentence, “...36.6 percent of the Ports’...” - For consistency, the full name of the ports have been referenced.

Pg. 52 – Table 18, correct the Auto Center Dr grade separation and show as “Complete”.

Pg. 53 – Table 18, correct the Riverside Ave grade separation and show as “Complete”.

Pg. 53 – Table 18, correct the Avenue 52 grade separation and show as “Complete”.

APPENDIX: TRANSPORTATION SYSTEM TRANSIT

Pg. 4 – Under “Riverside County”, recommend revising to: “In Riverside County, fixed route bus service is primarily operated by RTA and SunLine Transit. RTA’s service area is the western portion of Riverside County and SunLine’s service area is the Coachella Valley. RTA’s jurisdiction is among the largest transit systems in the nation, and SunLine has led the industry by being the first public agency to convert all of its vehicles to CNG. RCTC funds the county’s participation in the regional commuter rail service via Metrolink, and the cities of Riverside and Corona operate demand response and local circular service. The cities of Banning and Beaumont also provide service via the Pass Transit service brand, and Desert Roadrunner service is provided by the Palo Verde Valley Transit Agency covering the City of Blythe and unincorporated eastern Riverside County. Rural transit service in southwestern Riverside County is provided by the Reservation Transportation Authority, a collaborative of 18 federally recognized tribal groups.”

Pg. 12 – Under “Transit and Mobility in the SCAG Region”, 1st paragraph, 1st sentence - revise to “in addition to 388 miles route miles of rail...”.

Pg. 33 – Under “Historical Investments”, 2nd paragraph, 1st sentence - revise to “...for fixed route bus service, Nearly 6 percent...”. (add the period after service and take out comma)

Pg. 45 – last paragraph, 2nd sentence, delete extra period at the end of the sentence.

Pg. 64 – Under “Riverside County”, 2nd part of first paragraph, first sentence, “..local Measure I” should be “local Measure A”.

Pg. 66 – 4th paragraph, 2nd sentence, “This list includes bur...”, change bur to bus.

Pg. 85 – 2nd complete sentence found on the page, “...in the last years twenty often...” revise to “...in the last twenty years often...”.

Pg. 89 – 3rd paragraph, last sentence, “...funding shortfalls ~~in the~~ due to these...” remove “in the”.

Pg. 89 – 1st bullet found within the “Volunteer Driver Program” section, “Passengers are enabled choose and recruit...” revise to “Passengers are enabled to choose and recruit...”.

Pg. 90 – under “Growing Older Cohort”, 1st paragraph, 2nd sentence, add “of” before 65.

Pg. 90 – under “Growing Older Cohort”, 3rd paragraph, 1st sentence, revise “cost effect” to “cost effective”.

Pg. 91 – 4th paragraph, 2nd sentence, correct spelling of “form” to “from”.

Pg. 91 – 3rd bullet, “Graduated Driver’s License Regulations” section b – add “with” after “associated”.

Rural Canyons Conservation Fund

P.O. Box 556, Trabuco Canyon, CA 92678-0556
RuralCanyons.org



February 1, 2016

Dear SCAG:

The Rural Canyons Conservation Fund, founded in 1983, advocates for the preservation of Orange County's unique inland rural canyon areas through a program of public education and participation in land use decisions affecting the area's unique and scenic natural resources.

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Rural Canyons Conservation Fund is part of this coalition.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their *own* category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We've reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG's mission with the Natural and Farmland policies.

Congratulations

We are pleased to see an Appendix devoted directly to natural and farmlands protection in the 2016 Plan. We are glad that the Plan contains specific strategies addressing natural land and farmlands issues. This is certainly a step in the right direction. The culmination of the work from the last RTP/SCS is clearly visible in this Draft Plan. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful and science-based role in mitigating impacts to our natural environment from transportation, infrastructure and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

SCAG

February 1, 2016

Identify a Conservation Mechanism for the Natural and Farmlands Preservation

Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it likely relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.

Conclusion

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Should you need to contact me, I can be reached at [REDACTED]. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to [REDACTED]

Sincerely,



Ray Chandos
Secretary/Treasurer

Saddleback Canyons Conservancy

P.O. BOX 1022
 TRABUCO CANYON, CALIFORNIA 92678



January 30, 2016

VIA EMAIL TO: RTPSCS@scag.ca.gov and 2016PEIR@scag.ca.gov

Dear SCAG Policy Committee,

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR) (collectively, the Plan). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Saddleback Canyons Conservancy, is now a part of this growing coalition in 2016.

Saddleback Canyons Conservancy advocates in the rural canyon areas of southeast Orange County and has since 2001. Our mission is to protect and enhance the environment and quality of life in the Foothill-Trabuco Specific Plan (FTSP) and Silverado-Modjeska Specific Plan (SMSP) areas adjacent to the Trabuco District of the Cleveland National Forest. Our efforts include environmental advocacy and active involvement in land-use decisions for projects in these unique and biologically rich areas. We have had important successes since our inception including stopping inappropriate development encroaching on the Cleveland National Forest boundary and existing natural open space. We've also partnered with FHBP on the "Green Vision Map" for the rural canyon areas covered by the FTSP and SMSP. We advocated for the Orange County Transportation Authority's acquisition of the Ferber Ranch, Hafen, MacPherson, O'Neill Oaks, and Saddle Creek South Preserves. These acquisitions represent over 850 acres of natural landscape, rich with biological resources, that are now conserved in perpetuity.

The 2012 RTP/SCS provided an important stepping-stone for the 2016 Plan. In previous plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you is not to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions, and nonprofits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We have reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify and strengthen the language, as well as link the goals of the RTP and SCAG's mission with the Natural and Farmland policies.

We Need a Conservation Mechanism for Natural and Farmlands Preservation

We are pleased to see an Appendix devoted directly to natural and farmlands protection in the 2016 Plan and that the Plan contains specific strategies addressing natural land and farmlands issues. This is certainly a step in the right direction. The culmination of the work from the last RTP/SCS is clearly visible in this draft Plan. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the wildland-urban interface. When developments are built in infill areas, it likely relieves pressure on the fringe lands. However, the Plan does not outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Numerous organizations, including ours, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy, and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process, or plan on how the greenfield lands will be protected.

All Conservation Plans are Important, Whether Formal or Informal

SCAG focused many sections of the document on formal conservation plans, in the form of Natural Community Conservation Plans and Habitat Conservation Plans (NCCP/HCP), as the conservation method most identified by the agency. However, NCCP/HCP programs are only one conservation mechanism and they have limitations. For example, they are voluntary, property-owner driven, and generally only apply to larger land ownerships. Efforts underway by local, regional, state, and federal agencies outside of these formal plans should not be discounted and must be included. Furthermore, many conservation organizations help facilitate, coordinate, and find funding for land conservation transactions. We believe the conservation approach promoted by SCAG should include all of the ways land can be protected, including those less regulated methods of conservation outside of NCCP/HCP programs.

SCAG's Support of Regional Wildlife Corridors

The current federal transportation bill, the FAST Act, supports understanding transportation impacts on natural resources. The previous bill, MAP-21, supported restoring and maintaining environmental functions (i.e., wildlife corridors) affected by the infrastructure projects in the RTP. SCAG has even supported efforts in Los Angeles County to create a wildlife

corridor over the 101 Freeway. Many efforts are underway across the region to connect landscapes to one another. This is very important to the region and its biodiversity. Wildlife corridors allow species to migrate and forage and expand genetic diversity. These corridors also allow ecosystems to maintain ecological functions, act as sources for repopulation after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by infrastructure projects.

Conclusion

We look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Should you need to contact us, we can be reached at the email addresses below. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation. Please send information to our email addresses below. Thank you for considering our comments. Please include this letter in the official record for the 2016 RTP/SCS.

Sincerely,

SADDLEBACK CANYONS CONSERVANCY

Gloria Sefton, Attorney at Law, Co-founder
[REDACTED]

Richard Gomez, Co-founder
[REDACTED]



Draft 2016 RTP/SCS Comments
 Attn: Courtney Aguirre
 Southern California Association of Governments
 818 W. 7th Street, 12th Floor
 Los Angeles, CA 90017

Dear SCAG Regional Council members, Policy Committee members and staff:

Thank you for providing the opportunity to comment on the 2016 RTP/SCS. The Safe Routes to School National Partnership respectfully submits this comment letter on behalf of itself and the undersigned organizations: Alliance for a Healthy Orange County, California Bicycle Coalition, California Walks, Climate Resolve, East Yard Communities for Environmental Justice, Friends of Harbors, Beaches & Parks, Inland Empire Biking Alliance, Investing in Place, Leadership Counsel for Justice and Accountability, Los Angeles County Bicycle Coalition, Los Angeles Walks, Move LA, PEDal, Prevention Institute, Trust for Public Land and VC Cool. We would like to thank the Southern California Association of Governments (SCAG) staff, Regional Council and Policy Committee members for the opportunity to participate in the 2016 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) update process. We recognize the multitude of efforts required to develop this long-range plan and appreciate all of the hard work that has already been done.

Given the size, population, economic power, and visibility of the Southern California region, we are uniquely positioned to shape the future of California and beyond. Our regional goals, and the process by which we implement our plans to achieve these goals, will set a precedent for other regions across the nation. We, the undersigned organizations, envision a healthy, equitable, active future for Southern California. We believe that SCAG can be a champion for this vision by setting forth bold, comprehensive goals, strategies, and collaborative frameworks, and we stand ready as partners in this work.

Elements in the RTP/SCS that we particularly applaud include:

- **A doubling of the amount of investment in active transportation, from \$6.7 billion to \$12.9 billion and shifting these funds forward in time.** The 2012 RTP/SCS deferred active transportation spending to the latter years of the plan, with 80 percent of funding not programmed until after 2026. The updated plan spreads it out more evenly and includes more investments upfront, with 30.9% spent within the first ten years (compared to just 16.4% in 2012 RTP/SCS).
- **Significant investments in new transit service, especially in LA County, including funding for operations and maintenance to keep the system we already have in good condition.** The region continues to lead the nation in building new transit service, and many new lines will open during the time period of the RTP/SCS. The strong investment in transit will link more people to the destinations they need to go and reduce reliance on automobiles to get around.
- **Adding a Public Health Appendix to the RTP/SCS for the first time.** We applaud SCAG for the hard work in putting together this appendix. It analyzes how physical activity, chronic disease rates, air quality and other public health outcomes would fare under different land use and transportation scenarios, among other co-benefits.
- **Stronger attention to social equity and environmental justice, especially the more robust data analysis in the Environmental Justice Appendix.** A number of organizations sent a detailed comment letter on the EJ analysis in July 2015, which can be found here: <https://saferoutescalifornia.files.wordpress.com/2015/07/ltr-to-scag-on-ej-analysis-july-2015.pdf>. We are happy to see many of its recommendations materialize in this RTP/SCS, including:
 - The EJ Appendix identifies the most disadvantaged Communities of Concern and the environmental impacts of transportation investments.
 - The EJ analysis analyzes 18 metrics and provides thoughtful discussion of impacts.
 - The environmental justice analysis identifies gentrification and displacement as major impacts of the RTP/SCS. Affordable housing has long been a major issue in Southern California and a huge challenge for local governments.
 - The EJ Analysis calls for a robust strategy for getting local governments the tools and resources they need to prevent widespread displacement as a result of transportation investments.
- **The growth scenario reduces vehicle miles traveled by 10 percent over the next 25 years, a significant decrease for the region.** This is partly the result of the increased investments in transit and active transportation infrastructure, which will give people more choices to get around besides the car.

We have some concerns, however, with the following:

- **Outside of LA County the RTP/SCS is still primarily about funding highways.** While transit investments in capital, operations and maintenance make up significantly more than 50% of the regional plan, most of these investments are happening in LA County and not in the other five counties that could really benefit from greater investments in transit service.
- **Active transportation, while up from last time, still makes up less than 2% of the RTP/SCS funding amount, yet almost 20% of trips in the region are by walking and bicycling.** Given that SCAG is home to 68% of the State of California's Disadvantaged Communities and that by 2040, nearly one in five people in the region will be seniors, we need to ensure that these communities are mobile and can participate in everyday life through more transportation choices. The region needs a more balanced, multimodal plan to provide everyone in the region with more transportation options, as well as to meet the SB 375 greenhouse gas emission reduction goals and to realize the many co-benefits that the RTP/SCS identifies. Moreover, approximately 78% of trips in the region are less than three miles but are taken by car. More funding for active transportation can shift many of these trips to more sustainable modes, help reduce greenhouse gas emissions and promote public health.
- **The investment in active transportation is low compared to the need.** In LA County alone, Metro has estimated unmet needs of between \$11 and 29.5 billion according to the soon-to-be-released [Active Transportation Strategic Plan](#), and our own estimates for LA County calculate

approximately \$20 billion in unmet needs (Best Practices for Funding Active Transportation with County Transportation Sales Taxes). Thus we feel that \$12.9 billion for the whole region is too low compared to the need for walking and bicycling infrastructure in the entire six-county region.

- **The active transportation strategies' goal that half of all jurisdictions in the SCAG region would have a Safe Routes to School plan by 2040 is too low.** Given that approximately 37% of communities have a plan now or are in the processing of creating one, and that the Policy B scenario calls for 75% of communities having such a plan by 2040, there seems to be a greater opportunity to increase this number over the next twenty-five years.
- **SCAG does not adequately link RTP/SCS transit and active transportation funding to its environmental justice obligations.** The lack of transit and active transportation funding disproportionately affects immigrant, lower-income and communities of color because these neighborhoods have greater barriers to physical activity and transit access, higher numbers of busy regional arterials, poor pedestrian and bicycle infrastructure, safety concerns, and lack of safe storage for bicycles and safe crossings. Thus, these neighborhoods would benefit from an increase in funding allocations (in order for SCAG to meet its Title VI obligations) and from a detailed strategic plan. (see *links*: Do All Children Have Places to Be Active, Active Living Research; Low Income Resource Guide, Safe Routes to School National Partnership)
- **Accessibility and proximity to many destinations such as schools, jobs and parks does not improve for many disadvantaged communities in the region, according to the EJ analysis.** The RTP/SCS touts the many benefits of tying land use and transportation investments together, but the EJ analysis reveals that even with these investments, the region will fall short in improving accessibility and proximity to many destinations. This includes jobs and schools, two fundamental places that people need safe, convenient access to in order to economically succeed in the region.
- **There is no sense of scale in the EJ Appendix.** Most of the metrics are described as “improve” or “does not improve,” so it is hard to quantify the adverse impacts that some of the transportation investments in the RTP/SCS will create. This is especially critical for metrics where no data are given, just a paragraph description of the potential impacts. Often, the appendix reports that both disadvantaged communities and other communities would “improve.” Without quantification, readers cannot know whether the plan would worsen or shrink the gap between the haves and have-nots.
- **The environmental justice analysis, while more robust than the 2012 RTP/SCS, identifies gentrification and displacement as major impacts of making the transportation investments and land use changes identified in the RTP/SCS.** Affordable housing is a major issue in Southern California and the RTP/SCS overlooks the magnitude of the challenge this region faces. Recommending development in High Quality Transit Areas, Livable Corridors, Neighborhood Mobility Areas and other compact development patterns without a strategy to provide affordable housing in these areas, will result in higher-income people moving into these areas, and research shows that higher-income populations living near transit typically drive twice as many miles and own more than twice as many vehicles as extremely low-income households living within a ¼ mile of transit (California Housing Partnership Corporation & TransForm, 2014). We also fear that gentrification and displacement are happening in the region at a rate faster than the data can capture. SCAG is uniquely positioned to foster coordination across the six-county region and create frameworks for collaboration on issues that impact the region as a whole. SCAG must work diligently to provide regional analysis and leadership by better tracking trends in displacement and illustrating the repercussions of these trends, as well as connecting the dots between compliance with the Regional Housing Needs Allocation (RHNA) and its effect on GHG reduction.
- **The RTP/SCS relies on anticipated revenues from sales taxes, which have a record of success in the region, but also on mileage-based user fees and other future sources of revenue that have no track record and may not come to fruition during this timeframe, or that have equity implications for low-income households if they are implemented.** While the EJ analysis identifies the equity impacts of anticipated revenues, additional analysis is needed to truly understand how major shifts to a mileage-based user fee or other cost structure for driving would impact low-income and minority communities in the region. With two sales taxes under

consideration in the region, and gas and excise taxes under consideration by the state, additional analysis would help clear the extent to which EJ populations would be adversely affected.

- **The selection of the preferred scenario simply meets but does not exceed the targets for 2020 as it did in the 2012 RTP/SCS.** It appears from the PEIR Table 4.3-1 on page 4-4 that SCAG has selected a hybrid scenario between local input and Policy A, which meets the 8% GHG emissions reduction target required by 2020. However, in 2012, SCAG expected to exceed the 2020 target by one percentage point and hit 9%. We need greater reductions to both stem the impact of climate change and to meet future targets which are likely to be higher. If the region is already slipping behind, it foreshadows trouble meeting future targets. If the region is already slipping behind, it foreshadows trouble meeting future targets as well.
- **There is no local accountability to implementing the RTP/SCS.** We are concerned that there are big disparities between the RTP/SCS and the plans adopted by the SCAG region's cities and counties, and we recommend that local governments reconsider their plans for growth and bring them into alignment with the regional plan. Otherwise, its many benefits, including more housing and transportation choices, public health benefits and reducing greenhouse gases, may never come to life. These land use changes must be approved at the local level, and many jurisdictions will need to change their zoning codes, general plans and development regulations to facilitate more mixed-use and compact development. Without these changes, the benefits of an expanded transit system and more opportunities for walking and bicycling will be minimal.
- **The RTP/SCS' Goods Movement Appendix underscores the need to complement SCAG's focus on funding the expansion and maintenance of highways with a concomitant commitment to clean vehicles.** The Goods Movement Appendix breaks down the total miles of freight traveled within the Primary Freight Network by County. Los Angeles and San Bernardino account for 60 percent of total miles traveled. The PFN is a component of the National Freight Network, and was designed to "*assist states in strategically directing resources towards the improved system performance for the efficient movement of freight on the highway portion of the nation's freight transportation system.*" But without a parallel and significant effort to deploy clean truck and rail vehicles the expansion of roads and highways to support increased demand by the goods movement industry conflicts with our ambitious greenhouse gas emission reduction goals. While the Goods Movement Environmental Strategy and Action Plan seeks to advance zero-emission technology, it needs targets as well as funding to promote the prioritization and incorporation of emerging technologies into daily operations.
- **The RTP/SCS promotes the idea that supporting vibrant, well-planned, urban developments means natural lands are protected simultaneously is inaccurate.** Mechanisms and funding must be in place at the local and regional level to accommodate natural lands preservation. Furthermore, many conservation non-profits and regional/state agencies have identified important lands to conserve that aren't covered by the sweeping generalizations made in the RTP/SCS about what lands need to be protected. Finally, no real plan exists for actual conservation of lands, it is mentioned as a byproduct of the infill approach.

Based on the above, we offer the following recommendations to strengthen the 2016 RTP/SCS:

- **Invest greater amounts in active transportation.** We applaud SCAG and local jurisdictions for increasing active transportation investments in recent years, but we should go further. With approximately one-fifth of trips in the region by foot or bike, we should match that with greater investments in active transportation. Even with a doubling of funding compared to the last RTP/SCS, the region still need to do more to meet the needs. As mentioned above, in LA County alone, the estimated need for active transportation investments is close to \$20 billion. Moreover, many of the traditional sources of funding for active transportation are oversubscribed. The state's Active Transportation Program received over \$1 billion in requests for funding in each of the last two cycles, with only \$120 million per year available. The region needs to identify not only new sources, but also shift around existing funding, to invest in pedestrian and bicycle infrastructure that makes it safer and more convenient for people to get around using these modes.

- **It is critical to find a way to expand public transportation in all of the counties in the SCAG region and not just LA County** -- where according to the Transit Appendix 21% of all residents have access to frequent transit service compared to 5% in Orange County and only 2.5% in San Bernardino and Riverside counties. Public transit as well as first-last mile connections to transit are essential to achieving state goals for reductions in VMT, GHGs and petroleum use.
- **Include a target goal for complete streets components of highway projects.** The Active Transportation element of the RTP/SCS identifies complete streets as a strategy to incorporate more pedestrian and bicycle improvements into transportation projects, and while it identifies about one-third or \$4.8 billion of active transportation improvements on regionally significant local streets, we feel that this is not enough on its own to guarantee that money is spent on walking and bicycling infrastructure. We recommend setting a goal for a percentage of projects that will have complete streets components, much like the percentage goal for communities having a Safe Routes to School plan.
- **Include a target goal for integrating active transportation into transit projects through a first/last mile strategy.** Much like the above recommendation, we urge SCAG to set a goal for the number of transit projects that include active transportation components. The majority of people taking transit do not own cars, and thus are walking and/or biking to the station. Providing them a safe, convenient route is critical and should be done as part of transit planning projects.
- **Commit to completing active transportation planning efforts before the 2020 RTP/SCS.** During the 2012 RTP/SCS cycle, the National Partnership advocated for creating several regional active transportation plans: an Active Transportation Finance Strategic Plan, Regional Complete Streets Plan and Regional Safe Routes to School Plan. We commend the work that has been done since 2012 to increase staff devoted to active transportation and strengthen its place in the 2016 RTP/SCS. Yet investments in active transportation still comprise a paltry percentage of the RTP/SCS, partly because many communities do not have active transportation plans that would make them eligible for ATP funding. SCAG could play a key role in creating a regional plan and providing a guidebook for local jurisdictions to create their own plans at a low cost. A good example is the Orange County Council of Governments' (OCCOG) Complete Streets Guidebook, which will identify complete streets templates, sample language and typologies for each jurisdiction in the county to incorporate a complete streets policy into their general plan. SCAG could do something similar at a regional level for complete streets, Safe Routes to School and active transportation in general. We recommend having these plans in place before Cycle 4 of the ATP, which is expected in early 2018.
- **Bolster the Safe Routes to School Goal to 75%.** The RTP/SCS states a goal of 50% of communities having a Safe Routes to School plan by 2040. Given that 37% of communities currently have one or are planning to create one, we recommend going with the Policy B recommendation of 75% by 2040. This can be more easily achieved by completing the Regional Safe Routes to School Plan identified above.
- **Identify policies, strategies and investments to increase access to transit and active transportation in less urban areas.** SCAG should identify strategies, best practices and policy guidance that support increased opportunities for active transportation, access to transit (such as first mile / last mile strategies expanded service, vanpools and ridesourcing) that improve resident connectivity to education, employment, healthcare and other basic goods and services throughout this diverse region. We appreciate SCAG's commitment to increasing access to transit and active transportation but don't see policies in the SCS that will benefit much of the region, such as the more rural and suburban areas of Imperial, San Bernardino and Riverside.
- **Disaggregate transportation mode choice at smaller geographies.** Mode choice varies considerably by neighborhood and depends on multiple factors. SCAG should explore doing a deeper analysis of transportation mode choice, which would help identify gaps in the regional system and prioritize projects, plans and investments by addressing limited usage of modes of transportation such as transit and active travel.
- **Commit to creating a Regional Gentrification and Displacement Strategy.** While SCAG does not have local land use control to regulate the location of affordable housing, it can conduct a regional study of gentrification and displacement pressures that face particular parts of the region, including areas that are most vulnerable, as well as where people go when they are displaced. Much like the planned Regional Complete Streets and Safe Routes to School Plans, SCAG has

an important role to play in creating a regional vision and strategy to address displacement proactively, and provide local communities the tools they need to combat the impacts of it. We also encourage SCAG to convene a task force specifically dedicated to this issue.

- **Create a standing Environmental Justice/Disadvantaged Communities Working Group.** Given some of the unavoidable impacts of the plan on Environmental Justice Communities, we encourage SCAG to establish an ongoing process for elucidating and addressing these challenges in the region. A standing Environmental Justice/Disadvantaged Community workgroup could provide guidance for the integration of environmental justice/disadvantaged community prioritization processes in county and city-level transportation planning, ensuring that the project lists included in future RTP/SCSs have been developed with an eye toward more equitable transportation investment. Greater investment in environmental justice/disadvantaged communities' readiness will have the added benefit of increasing the competitiveness of the SCAG region in state funding competitions subject to SB 535 requirements.
- **Target Sustainability Planning Grants to Disadvantaged Communities.** Many small urban and rural communities lack comprehensive multi-modal transportation plans. Without plans in place, systematic improvements to active transportation infrastructure, improved first mile/last mile access and improved transit will be incomplete and ineffective. We recommend SCAG target Sustainability Planning Grants to disadvantaged communities, and especially rural, disadvantaged communities that lack plans, models and programs designed to secure and promote sustainable development.
- **Include target industry goals and include non-industry stakeholders into the Goods Movement Environmental Strategy and Action Plan.** The Goods Movement Environmental Strategy and Action Plan is comprised of four phases as a means to incorporate technological solutions. However, phases of the action plan do not include goals of how the plan can assist industries nor does the plan incorporate non-industry stakeholders into the process. Phase two of the plan includes the creation of a Logistics Working Group with many geographic representations. We recommend that the Working Group be expanded to include public health advocates from all regions, so this process has a larger perspective to address public health concerns. Although energy security, energy cost security, climate protection and green-sector job development are identified as important roles for the convening to address, public health is not. An important role for these partners should also be the consideration of health inequities from environmental justice communities as a result of emissions. Furthermore, Phase three and four address deployment and operational demonstration but it is unclear how industries will participate in development and deployment efforts since there are no industry goals attached to the plan.
- **Track implementation of the RTP/SCS between update cycles.** ClimatePlan has a new report that monitors the implementation of the 2012 RTP/SCS, and the region is falling short. SCAG should continually monitor how the region's land use and transportation investments are complying with the RTP/SCS. We need tools to better understand where investments from cap-and-trade, ATP and disadvantaged communities are going. We especially urge SCAG to track the efforts of CTCs to update their long-range transportation plans to align with the RTP/SCS, as ultimately it is at the local and county level that transportation projects are approved and then sent up to SCAG for inclusion in the RTP/SCS. Only by continually monitoring local efforts will SCAG be able to identify where our region is succeeding and even exceeding the SB 375 goals, and where it is falling short in meeting the SB 375 goals and where it needs to make changes to land use and transportation investments. We recognize SCAG is already doing this with the new REVISION tool, and hopefully that will help address some of these implementation challenges.

Overall, the draft RTP/SCS envisions a region where people have more transportation choices: they can walk, bike, take transit, and of course, drive. It has been said by SCAG's Executive Director that people aren't going to stop driving, but they will drive differently. By investing more in active transportation and transit, as well as embracing new shared use systems and technologies, we can give everyone in this region a variety of options to get around safely, efficiently and sustainably.

Thank you for the opportunity to provide comments, and we look forward to continuing to partner with SCAG as you implement this plan.

Bill Sadler & Demi Espinoza, Southern California Regional Policy Managers
Safe Routes to School National Partnership

Barry Ross, Chair
Alliance for a Healthy Orange County

Brenda Miller, Founder
[PEDal](#)
2015 OC Register [100 Most Influential](#)
2014 APA [Advocate of the Year](#)

Bryn Lindblad, Associate Director
Climate Resolve

Caro Jauregui, Southern California Policy Manager
California Walks

Deborah Murphy, Founder and Executive Director
Los Angeles Walks

Denny Zane, Executive Director
Move LA

Jeanie Ward Waller, Policy Director
California Bicycle Coalition

Jean Watt, President
Friends of Harbors, Beaches & Parks

Jessica Meaney, Managing Director
Investing in Place

Manal J. Aboelata, MPH, Managing Director
Prevention Institute

Mark Friis, Executive Director and **Marven E. Norman**, Policy Director
Inland Empire Biking Alliance

Michele Hasson, Regional Director
Leadership Counsel for Justice & Accountability

Tamika Butler, Executive Director
Los Angeles County Bicycle Coalition

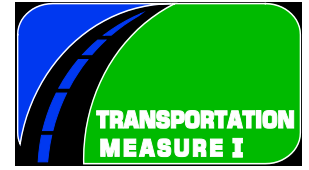
Taylor Thomas, Research and Policy Analyst
East Yard Communities for Environmental Justice

Tobias Smith, Program Manager
Ventura Bike Union a project of VCCool.

Tori Kjer, PLA, Los Angeles Program Director
The Trust for Public Land


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

Mr. Hasan Ikhata
 Southern California Association of Governments
 818 W. 7th , 12th Floor
 Los Angeles, CA 90017

Subject: Comments by San Bernardino Associated Governments on the draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and draft Program Environmental Impact Report

San Bernardino Associated Governments (SANBAG) appreciates the opportunity to provide comments on the Southern California Association of Governments' (SCAG's) draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and draft Program Environmental Impact Report (PEIR). Both documents have been very professionally prepared, with substantial input over the last several years from County Transportation Commissions (CTCs), councils of governments (COGs), local jurisdictions, other transportation agencies, advocacy groups, and the public. We appreciate the working relationship we have had with SCAG to bring the 2016 RTP/SCS to this point in its development. We look forward to the Regional Council's approval of the RTP/SCS in April.

Our comments can be classified into three general themes:

- A summary of SANBAG's activities over the last several years regarding the SANBAG/SCAG Sustainability Memorandum of Understanding (MOU). The MOU involves "Collaboration between SANBAG and SCAG to Implement the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy," and delineates a list of 16 activities demonstrating our commitment to implement the RTP/SCS.
- Overall perspectives on the 2016-2040 RTP/SCS
- Specific comments on the content of the draft RTP/SCS and PEIR.

STATUS OF THE SANBAG/SCAG SUSTAINABILITY MOU

We would like to begin our comments with a status report on the Sustainability MOU that SCAG and SANBAG jointly executed in early 2014 titled "Collaboration between SANBAG and SCAG to Implement the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy." The MOU delineates a list of 16 activities demonstrating SANBAG's commitment to implement the RTP/SCS. Although the draft 2016 RTP/SCS provides an overview of some of these activities region wide, it is useful to provide a more specific status report for San Bernardino County in SANBAG's comment letter.

HI160128 – SS

*Cities of: Adelanto, Barstow, Big Bear Lake, Chino, Chino Hills, Colton, Fontana, Grand Terrace, Hesperia, Highland, Loma Linda, Montclair
 Needles, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Twentynine Palms, Upland, Victorville, Yucaipa
 Towns of: Apple Valley, Yucca Valley County of San Bernardino*

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The San Bernardino Countywide Vision is a centerpiece of our sustainability activities. The Vision was adopted by the County of San Bernardino and SANBAG in June, 2011, even prior to the approval of the 2012-2035 RTP/SCS. It is very consistent with the direction of the RTP/SCS and gave San Bernardino County an important foundation for the activities listed in the Sustainability MOU. Extensive information is available on the Countywide Vision site at <http://cms.sbcounty.gov/cao-vision/Home.aspx>. The status report on our MOU activities is provided as Attachment 1 to this letter, and a copy of the MOU is included along with the status report.

OVERALL PERSPECTIVES ON THE 2016 RTP/SCS

Prior to the more detailed comments, SANBAG has some suggestions for how the RTP/SCS can be used to achieve the mobility, safety, and sustainability goals of the region in the coming years. These comments relate to our own Countywide Transportation Plan, funding issues, transit service and transit oriented development (TOD), and greenhouse gas (GHG) reduction.

SANBAG's Countywide Transportation Plan and Relationship to the 2016 RTP/SCS

SANBAG recently completed its Countywide Transportation Plan (CTP) and provided it to SCAG as background and input to the RTP/SCS. The CTP analyzed two future scenarios: a "baseline scenario" that assumed traditional revenue sources (generally consistent with what the RTP/SCS defines as "core revenues") and an "aggressive scenario" (generally consistent with RTP/SCS "Plan" revenues, including the innovative sources identified in the Plan).

The projects and programs in the aggressive scenario of SANBAG's CTP are consistent with the lists in SCAG's 2016 RTP/SCS. In addition, the jurisdiction-level growth forecasts for the CTP are consistent with the jurisdiction-level growth forecasts for the RTP/SCS. SANBAG has provided SCAG with technical corrections to the San Bernardino County portion of the RTP/SCS project list in a separate communication so that the changes can be incorporated into the modeling for the final RTP/SCS. It should be noted that agreement was reached in 2015 for the Los Angeles World Airports to transfer control of Ontario International Airport (ONT) to the Ontario International Airport Authority (OIAA). SANBAG and our partner agencies appreciate the regional support that has been provided by SCAG and other agencies around the region. We look forward to continuing local and regional efforts to make ONT a truly regional asset.

SCAG also indicates that the Program Environmental Impact Report (PEIR) for the RTP/SCS may be useful as a basis for streamlining CEQA clearance for certain types of projects. SANBAG looks forward to collaborating with SCAG to take advantage of this opportunity, where possible.

Funding Issues

Although the SCAG innovative revenue sources are projections of "reasonably available" revenue under the federal definition, much is unknown about how these will play out in the long run. In terms of project implementation, SANBAG bases its programs and budgets on the core

revenues, but will be working with SCAG, the State, and federal agencies on options to 1) derive the most benefit from the funds that have been entrusted to us by the public, 2) seek additional State and federal funding for projects that are of statewide and national significance (e.g. expansion of highway facilities that serve international goods movement), and 3) work with policy makers to determine if and when additional funding is needed and ways to provide that funding so as to minimize taxpayer burdens and fairly distribute project funding. Transportation infrastructure is fundamental to our competitiveness as a county and as a region. Infrastructure represents an asset that needs to be protected and invested in to sustain our economy, a significant portion of which is logistics-based. At the same time, it must be acknowledged that support for the overall RTP/SCS financial plan does not imply support for any individual piece of legislation related to the funding of transportation projects.

Fixing America's Surface Transportation Act (FAST Act) recently passed by Congress is an opportunity to continue to upgrade our transportation infrastructure, as it provides a stable source of federal revenue and includes a revenue stream for freight projects that are critical to San Bernardino County's economy. We believe that the regional freight collaboration that has worked so well for our regional project funding through the State's Trade Corridor Improvement Fund (TCIF) program should be re-invigorated to craft a program of projects that can be most competitive for these new federal freight program funds.

As highlighted in the RTP/SCS, a future funding mechanism based on vehicle miles of travel (VMT) is viewed to be one of the most significant innovative funding sources for the future. SANBAG has provided comments to the California Transportation Commission related to the SB 1077 "Road Charge" pilot program. One of our comments was that, depending on the results of the pilot, the State should consider phasing in this program, beginning with alternative fuel vehicles. We recognize that the State has accelerated the schedule for the Road Charge pilot, but it should not be at the expense of taking shortcuts or skipping steps that are important to designing an ultimate program that has a high probability of success. This is potentially a very complex program, and it is more important to do it right than to do it fast. SCAG can play an important role in suggesting ways to make this transition successful and acceptable to the public if, in fact, the pilot program concludes that replacement of the gas tax with a road charge is a viable path forward.

Transit Service and Transit Oriented Development (TOD)

As highlighted in Attachment 1, SANBAG and our partner agencies are investing heavily in passenger rail and premium bus services. Capital investments for premium transit, including rail and bus rapid transit (BRT) projects in the San Bernardino Valley will exceed \$600 million in the decade beginning in 2012. This will enable the planning and implementation of more transit-oriented development in the Valley subarea of the County.

This is a bold step for San Bernardino County, and we look forward to partnering with SCAG to encourage the State to invest in the suburban portions of the transit system, not just the more urban portions. San Bernardino County jurisdictions are supportive of TOD, but need additional flexibility from the State if we are to be able to compete for funding under the Affordable

Housing/Sustainable Communities (AHSC) program and related cap-and-trade programs. SANBAG and the County of San Bernardino have been involved in commenting on the AHSC grant guidelines which, unfortunately, are not friendly to TOD in suburban areas such as the Inland Empire, even though densities are increasing. Transit headways and density requirements for the TOD portion of the AHSC program are still too stringent for the Inland Empire market, even around passenger rail stations. That said, several of our local jurisdictions have built and are pursuing TOD projects around Valley transit stations at densities the market can support. Our jurisdictions also need enabling tools to lay further groundwork for TOD, in light of the dissolution of redevelopment agencies (RDAs) several years ago. In summary, we are highly supportive of transit/TOD development, but need additional help if our local jurisdictions are to be successful.

Greenhouse Gas (GHG) Reduction

The 2016 RTP/SCS demonstrates that the SB 375 GHG reduction targets for the region are met for 2020 and 2035. SANBAG has been aggressively working on greenhouse gas reduction strategies and implementation within San Bernardino County through our Regional Greenhouse Gas Reduction Plan (now being implemented through individual city climate action plans), the Home Energy Renovation Opportunity (HERO) program, truck retrofit programs, and other energy/GHG-related initiatives. As highlighted in Attachment 1, we are being very proactive on sustainability and GHG reduction initiatives.

At the same time, it is important to recognize that we need a robust highway network to remain competitive from a logistics standpoint. A strong economy is required for both the private and public sectors to afford the technology needed to meet air quality standards and achieve the requisite GHG reductions. It should also be understood that a thriving economy in a growing county like San Bernardino can result in an increase in vehicle miles of travel (VMT). While we understand that reductions in VMT can be helpful to GHG reduction, it should be noted that VMT has steadily increased in southern California at the same time that air quality has been dramatically improved over the last several decades.

The same thing could be true with our GHG reduction strategy if we do it right. We can achieve both GHG reduction and mobility/economic development goals, even if VMT should increase in some of the faster growing areas of the State like San Bernardino County. The GHG analysis in the draft 2040 California Transportation Plan demonstrated that vehicle and fuels technology will be the primary way in which GHG reduction goals will need to be met. VMT reduction is an appropriate goal, but technology will be the principal path to long term GHG reduction. See SANBAG's comments on the draft 2040 California Transportation Plan, previously provided to SCAG.

We make this point because individual transportation projects may increase VMT, but these projects are very necessary from a mobility standpoint. In terms of GHG reduction, it is the net result at the regional and statewide level that is most important, not the effect of an individual project. In other words, because SB 375 GHG reduction is evaluated at the regional level, individual transportation projects should not be held to a GHG reduction or VMT reduction

standard. We request that SCAG keep that in mind in ongoing discussions with the air districts, the California Air Resources Board, and other state agencies. SANBAG strongly supports initiatives to advance vehicle and fuels technology and to see that technology penetrating into the fleets of light duty and heavy duty vehicles. This is the path to success in GHG reduction for mobile sources.

SPECIFIC COMMENTS ON THE RTP/SCS AND PEIR

Comments on the RTP/SCS

1. Page 22 – It would be useful to provide the definition that SCAG uses to distinguish single family vs. multi-family
2. Page 23, Exhibit 2.1 – Putting county boundaries on the map would be helpful for geographic perspective
3. Page 40 – Legend – The blue dot may be better labeled “Transit Centers”
4. Page 41 – For I-10 widening, add the word “westbound” to the description; for Downtown San Bernardino Transit Center, add “and Metrolink extension” since the text mentions the extension. Also, under Omnitrans E Street sbX state: “A 16-mile bus rapid transit project ...”
5. Page 43, grant no. 50 – add “and Safe Routes to School Study” to the description.
6. Page 48 – it would be helpful to add definitions of “distressed,” “failed condition,” “functionally obsolete,” and “structurally deficient” in the text or on the graphic.
7. Page 50 – Preserving our Transportation System - SANBAG agrees with stressing the importance of system preservation. The statement on Page 50 says: *“Moving forward, the region needs to continue to make “fixing it first” a top priority – that is, focusing its funds on preserving the existing transportation network prior to investing in system expansions. Failing to adequately invest in the preservation of Southern California’s roads, highways, bridges, railways, bicycle and pedestrian facilities and transit infrastructure will only lead to further deterioration, which has the potential to worsen our congestion challenges.”* Page 79 further references the consideration of life-cycle costs beyond construction.

However, it should be noted that “prior to investing in system expansions” does not mean that capital projects can be put on hold while maintenance funding catches up to a defined state of good repair. Both need to proceed in parallel. A possible re-phrasing could be: *“focusing the necessary funds on preserving the existing transportation network while strategic investments are made in system expansions.”*

In addition, identification of a regional need for system preservation funding does not imply that a regional or sub-regional entity will be responsible for raising the funds needed for system preservation. Responsibility for system preservation funding will still need to rest with the facility owner except in cases where maintenance/operations costs are explicitly identified in agreements between the owner and a third party (e.g. an operator of express toll lanes). Caltrans needs to remain responsible for the funding of maintenance and operation of state highways, and local jurisdictions need to remain responsible for local roads. It is suggested that this clarification be added to the text.

8. Page 50 – Logistics Epicenter – The last paragraph on the page states that 750 million of the 1.2 billion square feet of industrial space is occupied. This seems like a low percentage of occupied square feet. Please clarify.
9. Page 95 – The first paragraph under Highways and Arterials states: *“Active transportation has grown in recent years, but the majority of trips in our region today is still made on our region’s highways and arterials. Yet, the expansion of our highways and arterials has slowed down over the last decade. Revenue from traditional sources to fund transportation improvements is declining and costly expansions to address congestion are no longer financially feasible. However, given that critical gaps and congestion chokepoints still exist within the network, improvements beyond TSM and TDM strategies need to be considered. Closing these gaps to complete the system will allow residents and visitors alike to enjoy improved access to opportunities such as jobs, education, recreation and healthcare.”* Please change *“are no longer financially feasible”* to *“may not always be financially feasible”* or similar language. Many transportation improvements are costly, but they are also important to regional mobility and the economy and are also financially feasible.
10. Page 95 near the bottom of the page states: - *“The 2016 RTP/SCS highways and local arterials framework and guiding principles are summarized here:*
 - a. *Focus on achieving maximum productivity through strategic investments in system management and demand management.*
 - b. *Focus on adding capacity primarily (but not exclusively) to:*
 - i. *Close gaps in the system; and*
 - ii. *Improve access where needed.*
 - c. *Support policies and system improvements that will encourage the seamless operation of our roadway network from a user perspective.*
 - d. *Any new roadway capacity project must be developed with consideration and incorporation of congestion management strategies, including demand management measures, operational improvements, transit and ITS, where feasible. Focus on addressing non-recurring congestion with new technology.*
 - e. *Support complete streets opportunities where feasible and practical.”*

SANBAG concurs with this language. While we are aggressively pursuing sustainability initiatives, as described earlier, highway capacity improvements are also needed particularly to support the mobility improvements required to sustain economic growth. This is particularly important for the movement of freight, as the logistics sector supports about one third of San Bernardino County’s economy.

Comments on the PEIR

The PEIR is comprehensive and very well done overall.

- PEIR, page 3.3-42 – The next-to-last paragraph on this page states that “the 2016 RTP/SCS aims to limit placing new growth within 500 feet” (i.e. within 500 feet of freeways). The actual statement on page 112 of the 2016 RTP/SCS is that *“SCAG shall pursue activities to reduce the impacts associated with health risks for sensitive receptors within 500 feet of freeways and high-traffic volume roadways.”* The PEIR statement should be revised to be consistent with the statement in the RTP/SCS. The RTP/SCS


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does not seek to limit growth in any particular area. In addition, as this region gets closer to attainment, the air quality impact of high-volume roadways will diminish. One could argue that the 500-foot guideline established by CARB should also be reduced as air quality improves. SCAG should examine this relationship in future RTP/SCSs.

- **Table ES.4-1, Page ES-50, MM-TRA-1(a)(7):** The mitigation measure states that SCAG shall develop a vanpool program for employees for commute trips. Perhaps this is intended to apply only to SCAG employees, and if so, this should be stated. If not, the statement should be removed, as there are vanpool programs throughout the region already managed by other entities. However, SCAG could encourage development and expansion of vanpool programs.

As stated earlier, SANBAG appreciates all the efforts by the SCAG Regional Council and SCAG staff to make the 2016 RTP/SCS a reflection of where the region is headed over the next 24 years. We look forward to continuing partnerships with SCAG to implement the projects and programs in the RTP/SCS.

Regards,

A handwritten signature in black ink, appearing to read "Ray Wolfe". The signature is fluid and cursive, with the first name "Ray" and last name "Wolfe" clearly distinguishable.

Raymond Wolfe
Executive Director

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Attachment 1

SANBAG Initiatives to Implement the 2012-2035 RTP/SCS

The attachment provides a status report on the Sustainability Memorandum of Understanding (MOU) that SCAG and SANBAG jointly executed in early 2014. The MOU concerns “Collaboration between SANBAG and SCAG to Implement the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy,” and delineates a list of 16 activities demonstrating the commitment to implement the RTP/SCS. Although the 2016 RTP/SCS provides an overview of some of these activities region wide, it is useful to provide a more specific status report for San Bernardino County in SANBAG’s comment letter. A copy of the MOU is included at the end of this attachment.

In overview, SANBAG and our partner agencies are investing in a growing network of rail and high-capacity bus transit routes to serve our population and employment base. This will enable the planning and implementation of more transit-oriented development (TOD) in the Valley subarea of the County.

For example, the San Bernardino Metrolink line is the highest ridership line on the Southern California commuter rail system. The line is being extended to downtown San Bernardino by 2016, and a nine-mile Redlands Passenger Rail system will be in operation between San Bernardino and Redlands by 2020. We are also initiating project development on the double tracking of a Metrolink segment in Rialto. Additionally, we are working with SCAG on the Los Angeles and San Bernardino Inter-County Transit and Rail Connectivity Study to coordinate planning and implementation for the Gold Line and Metrolink services in this corridor, including consideration of rail to Ontario International Airport.

The E Street sbX bus rapid transit (BRT) system began revenue service in April 2014 between Loma Linda and Cal State San Bernardino, and an additional express bus/BRT line is being advanced serving the West Valley subarea (Fontana, Rancho Cucamonga, Ontario including ONT, Montclair, and Pomona). We also now have four transit hubs in the Valley: Montclair, Fontana, San Bernardino (completed in 2015), and Yucaipa. The collective investment in high-capacity transit (rail and bus) from 2012 through 2020 will be over \$600 million in capital improvements, not counting the commitment to transit operations. This is a very substantial investment in an upgraded transit backbone for San Bernardino County agencies.

Our local jurisdictions are fully supportive of these transit initiatives and understand the importance of affordable housing, infill development, and mixed-use, pedestrian-oriented development focused in transit station areas. We have been involved in commenting on the state’s Affordable Housing and Sustainable Communities grant guidelines which, unfortunately, are not friendly to TOD in densifying, but still suburban, areas such as the Inland Empire. Transit headways and density requirements for the TOD portion of the AHSC program are still too stringent for the Inland Empire market, even around rail transit stations. Yet several of our local jurisdictions have built and are pursuing TOD projects around Valley transit stations.

The following highlight progress for specific initiatives referenced in the MOU:

1. Countywide Vision - All elements of the Countywide Vision are in action and our efforts are moving us closer to achieving the goals of a complete county. We are partnering with local business and educators to help us produce an educated workforce capable of sustaining our economic prosperity in the future. We are partnering with state and federal resource agencies, water agencies, local jurisdictions, the business community, and advocacy groups to provide direction on habitat conservation and open space. The water agencies are coordinating to conserve and plan for the future of our communities and environment. The County and local jurisdictions have made substantial progress on the health and wellness element and are implementing the Community Vital Signs initiative. Extensive information is available on the Countywide Vision site at <http://cms.sbcounty.gov/cao-vision/Home.aspx>.
2. Active Transportation – SANBAG and our local jurisdiction partners have aggressively pursued funding for pedestrian and bicycle improvements countywide. As a result, we have received over \$40 million in state Active Transportation Program (ATP) grant funds in Cycles 1 and 2 of that program. This includes over \$4 million for projects identified in the: SANBAG/SCAG report: “Improvement to Transit Access for Cyclists and Pedestrians,” which are focused around the stations along the Metrolink San Bernardino Line. Many of these projects are now in design.
3. Countywide Safe Routes to School Inventory – This project has been completed through means of the SCAG Sustainability Grant Program. It has led to a subsequent ATP grant that will be conducting inventories of existing conditions and bicycle/pedestrian improvement needs at schools throughout the County.
4. Conservation Planning – SANBAG has been an active participant in SCAG’s regional conservation planning initiative leading up to the 2016 RTP/SCS. In addition, SANBAG and the County of San Bernardino completed Phase 1 of the Countywide Habitat Preservation/Conservation Framework in 2015 funded, in part, with a SCAG grant. The Framework is led by the Environment Element Group, consisting of a cross-section of resource agencies, water agencies, local jurisdictions, the business community, and advocacy groups. Phase II is beginning in early 2016.
5. Additional Pedestrian/Bicycle initiatives – SANBAG has initiated the “Points of Interest Pedestrian Plan.” This project is identifying bicycle/pedestrian improvements around major activity centers in San Bernardino County (e.g. shopping centers, office/mixed-use areas, other employment areas, colleges/universities, etc.). It will result in an update of SANBAG’s Non-Motorized Transportation Plan (to be retitled Active Transportation Plan), including a more robust treatment of pedestrians.
6. (6 and 7 reported jointly) High Quality Transit Areas (HQTAs), including stations along the San Bernardino Metrolink Line – Exploration of TOD opportunities has now occurred on several existing and future transit corridors: Metrolink San Bernardino Line, Redlands Passenger Rail corridor, and bus rapid transit (sbX) lines in San Bernardino/Loma Linda (E Street) and Fontana/Rancho Cucamonga/Ontario/Montclair (West Valley Connector). Each of these corridors have HQTAs, and the demographic forecasts for these initiatives have been incorporated into the 2016 RTP/SCS growth forecasts. In the Metrolink corridor, the ARRIVE Corridor Study (ARRIVE = Advanced Regional Rail Integrated Vision - East) was completed, documenting specific land use,

infrastructure, and environmental challenges and associated strategies to encourage development at the six (soon to be seven) stations on our Metrolink line. A number of the challenges are related to site assembly, infrastructure readiness, and other market-related issues. The dissolution of redevelopment agencies (RDAs) has also dealt a serious blow to local jurisdictions being able to fund the types of economic and financial initiatives that are needed to lay the groundwork for TOD and infill development. Nevertheless, substantial TOD activity has occurred at the Montclair, Upland, and Rancho Cucamonga Metrolink stations. The ARRIVE Corridor study has explored public-private partnership models that may be of assistance in these areas. The specifics are documented in the ARRIVE Corridor Final Report, available at: http://www.sanbag.ca.gov/planning2/study_arrive.html.

7. Status included in Number 6.
8. Performance Measurement and Monitoring - Substantial progress has been made in performance measurement and monitoring processes since the adoption of the 2012 RTP/SCS. Community Indicators reports have been published through the Countywide Vision initiative. A travel time and congestion monitoring system (SANBAG iPeMS) has been implemented for arterial roadways on the Congestion Management Program (CMP) network. An update on the Community Vital Signs initiative can be found at <http://communityvitalsigns.org/>. SANBAG is also involved with SCAG in the further development of both the CALOTS/REVISION program (for monitoring land use activity and other community characteristics) and the Scenario Planning Model (SPM).
9. Complete Streets - SANBAG prepared a Complete Streets Strategy in 2015, supported in part by a SCAG Sustainability Grant. Appendix A of the 2015 update to the Non-Motorized Transportation Plan presents the results of that study, which can be found at: http://www.sanbag.ca.gov/planning2/plan_non-motor.html. The Complete Streets Strategy will help jurisdictions comply with Assembly Bill (AB) 1358, also known as the Complete Streets Act of 2008, which requires consideration of complete streets with any substantive revision to general plan circulation elements.
10. Funding and legislative initiatives – SANBAG has been proactively involved with Cap-and-Trade program funding opportunities that relate to the implementation of the RTP/SCS. This includes programs to fund transit capital improvements and operations (e.g. Low Carbon Transit Operations Program/LCTOP, Transit and Intercity Rail Capital Program/TIRCP, Affordable Housing/Sustainable Communities Program/AHSC, and Urban Forestry Grant Program). SANBAG regularly has provided comments on cap-and-trade grant guidelines to provide decision-makers with an understanding of the needs of San Bernardino County as we seek to address regional and statewide sustainability goals.
11. Clean energy for freight vehicles – SANBAG served as the lead agency on the acquisition of 204 natural gas trucks by Ryder and the construction of two natural gas fueling stations and one natural gas truck maintenance facility through state and federal grant programs. We are pursuing funding through a Caltrans Sustainable Transportation Planning grant to develop a strategy for implementation of clean fuels initiatives for both passenger vehicles and trucks. This will be an implementation element of the Climate Action Plans (CAPs) being approved by local jurisdictions subsequent to the Regional Greenhouse Gas Reduction Plan and EIR completed by SANBAG in 2014.

12. Progress reports – SANBAG has reported progress on the Sustainability MOU periodically at the CEOs sustainability Working Group and has provided periodic updates on sustainability initiatives to SANBAG policy committees. An overview of sustainability initiatives is provided in the SANBAG Countywide Transportation Plan.
13. Regional Sustainability Working Group – SANBAG has a seat at the Sustainability Working Group and regularly participates in these meetings.
14. San Bernardino County Active Transportation Network (SBCATN) – As stated in the MOU, the Network is a convening of county agencies, community organizations, residents and cities interested in improving the experience of and increasing facilities for walking and bicycling in San Bernardino County. The Network aims to: expand on the region's multi-modal planning efforts, especially for bicyclists and pedestrians; improve safety and accessibility for bicyclists and pedestrians; assist in the county implementation of the RTP/SCS; and further improve the quality of life in the county, including economic development, air quality, public health and connectivity. Meetings are held quarterly and have included walk audit tours as well as presentations on the activities of the partners.
15. Regional PEV Readiness Plan – SANBAG is seeking funding for more focused planning, facilitation, and implementation of plug-in electric vehicles. The SCAG PEV Readiness Plan is an important take-off point for these more focused efforts with the utilities, property managers, and funding partners.
16. Climate Action Plans – In 2014, SANBAG completed a 21-city partnership effort to develop a Regional Greenhouse Gas Emissions Inventory and Reduction Plan and its associated Environmental Impact Report. The Plan and EIR are being used as the foundation for the local jurisdictions' CAPs. Subsequent to the preparation of the regional Plan, SANBAG obtained a SCAG Sustainability Program grant to develop a set of Climate Action Plan implementation tools, including a model CAP for one of the participating cities that tiers off of the programmatic EIR. City councils in several cities have now adopted their CAPs.

Aside from the specific activities referenced in the MOU, it should be noted that SANBAG completed its Countywide Transportation Plan (CTP) in 2015. The CTP is built on a foundation of economic and environmental sustainability. It recognizes that mobility and smart land development are needed to sustain the economic growth and competitiveness necessary for survival within the global economy. This economic growth is needed, in turn, to fund the array of statewide and regional sustainability commitments. San Bernardino County must invest in all modes of transportation, including highways, to support its businesses and growing population.

MEMORANDUM OF UNDERSTANDING NO. M-008-14-00

**BETWEEN THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG)
AND THE
SAN BERNARDINO ASSOCIATED GOVERNMENTS (SANBAG)**

**CONCERNING COLLABORATION BETWEEN SANBAG AND SCAG TO IMPLEMENT
THE 2012-2035 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES
STRATEGY (RTP/SCS)**

Whereas, the development of a regional Sustainable Communities Strategy is required by state law under California's Sustainable Communities Strategy and Climate Protection Act, commonly referred to as Senate Bill 375, and is a critical element of achieving statewide greenhouse gas (GHG) reduction goals established in the Global Warming Solutions Act of 2006 (Nunez, Chapter 488, Statutes of 2006), commonly referred to as AB 32;

Whereas, a regional Sustainable Communities Strategy is a component of the Regional Transportation Plan that specifies how the GHG reduction targets established for a region by the California Air Resources Board (CARB) will be achieved;

Whereas, on April 4, 2012, the Southern California Association of Governments Regional Council unanimously approved the region's first RTP/SCS;

Whereas, the adopted RTP/SCS includes land-use and transportation strategies that will support the region in meeting the established GHG reduction targets of 8% per capita by 2020 and 13% per capita by 2035;

Whereas the Air Resources Board on June 4, 2012, accepted the SCAG Sustainable Communities Strategy as having met the GHG target;

Whereas, by virtue of having met the state established GHG target, local governments in the SCAG region may choose to access a streamlined process under the California Environmental Quality Act (CEQA) for certain types of qualifying development projects;

Whereas, the RTP/SCS provides additional co-benefits including reducing land consumption, infrastructure costs, household costs, health incidences as well as improving mobility and creating jobs;

Whereas, SCAG developed the RTP/SCS in collaboration with SANBAG, other County Transportation Commissions, and local governments from the six-county Southern California region through a bottom-up, collaborative process that engaged a wide range of stakeholder groups, elected officials, special interest groups, and the general public through a series of workshops and public meetings;

Whereas, the RTP/SCS addresses many challenges including projected growth, changing demographics, climate change adaptation, housing needs, and transportation demands;

Whereas, the RTP/SCS includes a land-use strategy and growth forecast that focuses growth in High-Quality Transit Areas and along main streets, downtowns and other appropriate infill locations; recognizes a shift in development from single-family toward multi-family residential development to reflect recent market trends; and promotes the implementation of Compass Blueprint Demonstration projects and other supportive land use implementation;

Whereas, the RTP/SCS includes transportation policies and investments that: reflect the investments being made by the County Transportation Commissions through 2035; triple the amount of funding available in the previous RTP to support Active Transportation; emphasize and provide additional resources for transportation demand management strategies and transportation systems management; maintain a focus on efficient goods movement; and establish a financial plan that addresses deferred maintenance and includes new revenue sources and innovative financing techniques to transition our fuel tax-based system to a more direct, user fee approach;

Whereas, while SCAG develops the RTP/SCS, the land-use and transportation changes within it are largely driven by the actions of local governments and County Transportation Commissions, like SANBAG, that program the majority of transportation funds flowing into the region;

Whereas, it is therefore critical that SANBAG be engaged in the implementation of the RTP/SCS in order for the RTP/SCS's benefits to be realized, as well as to ensure the region continues to make progress that can be reflected in the 2016 RTP/SCS;

Whereas, CARB through the AB 32 Cap-and-Trade Program may be providing funding for programs and projects throughout the state that reduce GHG emissions and help implement local climate action plans;

Whereas, SANBAG submitted a letter to SCAG dated February 14, 2012, supporting approval of the RTP/SCS by the April 2012 deadline and has committed staff support in the implementation of the RTP/SCS;

Whereas, SANBAG has demonstrated leadership and strong support for advancing sustainable transportation options in the region through a broad range of actions including: adopting the San Bernardino Countywide Vision (Countywide Vision), which includes multiple elements related to sustainability; investing in transit; preparation of the countywide Non-Motorized Transportation Plan; coordinating with local jurisdictions on land use strategies for transit corridors; participating in 14 local Compass Blueprint Projects since 2006; collaborating with the San Bernardino County Active Transportation Network; leading the effort to develop the San Bernardino County Regional Greenhouse Gas Inventory and Reduction Plan; programming federal funding for clean fuel buses; programming federal and State funding for bicycle infrastructure; advancing bicycle policies; supporting applications for sustainability grant programs; implementing the San Bernardino County HERO (Home Energy and Renovation Opportunity) program and joint Solar Power Purchase Agreement program; developing countywide public health framework; applying state and federal grants in partnership with a private fleet to deploy a clean fuel truck fleet; and adopting policies that reduce the agency's environmental footprint as well as promote

cleaner air, GHG reduction, healthier communities, and a stronger economy through transportation planning and programming, among others;

Whereas, to continue to demonstrate countywide leadership on sustainability issues, SANBAG will continue to implement the Countywide Vision in partnership with local jurisdictions and stakeholder groups. Five Vision Elements are pertinent to sustainability in varying degrees: the Environment, Housing, Infrastructure, Quality of Life and Wellness Elements. Although the Vision will not contain a stand-alone sustainability policy, sustainability principles will be integrated within the elements listed above. In addition, individual jurisdictions incorporate sustainability planning policies into their General Plans. The further development and sharing of this information will continue to occur through regular meetings of the SANBAG Planning/Community Development Directors and SANBAG policy committees;

Whereas, implementation of the Countywide Vision, in conjunction with the implementation of the RTP/SCS, will advance SANBAG's mission of creating a more efficient and effective transportation system in concert with a broad set of sustainability priorities that are increasingly important to SANBAG's member agencies and constituents; and

Whereas, SANBAG and SCAG currently collaborate on a broad range of initiatives to advance common transportation objectives, and it is in the interest of both agencies to continue to leverage resources toward achieving the common goals expressed in the RTP/SCS and the Countywide Vision and toward creating a more sustainable transportation system.

Now, therefore, be it resolved by the Board of Directors of the San Bernardino Associated Governments that the Executive Director is authorized to initiate and/or continue the following RTP/SCS implementation activities, to be referred to collectively as the **RTP/SCS Joint-Work Program**:

PLANNING WORK/PRODUCTS

(1) Continue SANBAG's leadership role in the development and implementation of the San Bernardino Countywide Vision. The SANBAG role is to facilitate several of the Vision Elements and to serve as a convener of leadership and ideas for moving the county forward with Countywide Vision implementation. The Vision effort includes groups working in the following subject areas: education, environment, housing, jobs/economy, public safety, water, and wellness. SANBAG will be involved in all elements to link these subject specific groups to the elected leadership and policy makers from every city. SANBAG will also be the lead on the environment and jobs/economy groups.

(2) Initiate implementation of the recommendations in the Final Report entitled "Improvement to Transit Access for Cyclists and Pedestrians" to "extend" the station areas and expand the reach of transit in transit catchment areas and at transit stops in the Metrolink and E Street sbX corridors. The report documents processes, guidelines, and specific improvements that serve as a resource for local governments seeking to partner with the SANBAG, Omnitrans, and SCAG on bicycle/pedestrian improvements in

high-capacity transit station catchment areas. Additional funding will be sought to advance implementation of these improvements. Opportunities to optimize access through programmatic, technology and/or marketing solutions in the transit catchment areas will also be explored.

(3) Develop a Countywide Safe Routes to School Inventory to help local communities identify SRTS needs and to prioritize the most cost-effective and competitive projects. The Inventory will: document current SRTS efforts and needs; coordinate with agencies, organizations, and stakeholders for exchange of information and ideas; and identify options for pursuing additional funding sources to increase SRTS investment in San Bernardino County.

(4) Support SCAG in developing a Conservation Planning Policy, as recommended in the 2012-2035 RTP/SCS. This policy is intended to build upon already-established programs that assist with more efficient transportation project delivery, including but not limited to, OCTA's Measure M Environmental Mitigation Program and Riverside County's Multiple Species Habitat Conservation Plans (MSHCP). The policy will explore opportunities to optimize the use of transportation mitigation funds to support natural land restoration, conservation, protection and acquisition, and will offer GHG emissions reduction benefits. The deliverables will likely include identification of priority conservation areas and the development of regional mitigation policies or approaches for the 2016 RTP/SCS. SANBAG will coordinate with SCAG on the development of policies appropriate for San Bernardino County in conjunction with proposals for more comprehensive habitat preservation/conservation approaches undertaken within the Environment Element of the Countywide Vision.

(5) Explore opportunities, together with SCAG, to expedite Active Transportation funding planned in the RTP/SCS for local infrastructure to support the operation and expansion of the rail and Express Bus/Bus Rapid Transit systems and for improved bicycle/pedestrian connectivity county-wide. SANBAG will complete a bicycle system "Gap-closure Analysis" in conjunction with local jurisdictions, and will amend the San Bernardino County Non-Motorized Transportation Plan (NMTP) accordingly. SANBAG will develop a funding strategy for specific Active Transportation priority projects in the NMTP and identify specific funding opportunities for each project, such as grant applications, calls for projects, and allocation of Federal, State, and local formula funds, as appropriate. This will include pursuing funding for improvements identified in the study "Improvement to Transit Access for Cyclists and Pedestrians". A mobile bicycle map application will also be developed under the SCAG Sustainability Grant program, as funding becomes available.

(6) Support SCAG in conducting a High Quality Transit Area Study to review possible incentive programs that could be offered by SANBAG and SCAG to help realize the RTP/SCS vision for reducing GHG emissions and capturing growth in High Quality Transit Areas (as defined in the RTP/SCS). The study should document existing rules and practices, consider best practices, and provide recommendations for program modifications. The study will be initiated when additional SCAG funding or staff resources become available.

(7) Conduct the study “**Creating a Vision and Implementation Strategy for Sustainability in the San Bernardino Metrolink Corridor**” under the Caltrans Statewide or Urban Transportation Planning Grant program. The purpose of the effort is to provide focus on the corridor in San Bernardino County with the greatest near-term opportunities for transit-oriented development. The study will identify ways to overcome barriers to further TOD implementation in Metrolink station areas and will identify investment needs for additional transit infrastructure to stimulate the additional TOD planned for in the RTP/SCS.

(8) Continue collaborative efforts to improve **Performance Measurement and Monitoring** of the benefits and co-benefits (health, greenhouse gas reduction, etc.) of transportation projects and plans through efforts such as: monitoring of travel time on major highways through upgrades to the Congestion Management Program (CMP); monitoring of transit performance; collection of bicycle use data through the bicycle data clearinghouse; monitoring of milestones for the Countywide Vision; continuation of the San Bernardino County Community Indicators Reports, and preparation of the San Bernardino County Community Vital Signs Report.

(9) Support the SCAG RTP/SCS through the coordinated development of complete streets policies and implementable strategies by identifying the following: achievable opportunities for deployment of complete streets strategies in a way that recognizes the diversity of urban and rural contexts in San Bernardino County; principles for integration of “complete streets thinking” into arterial network and land use planning within the County; specific locations that could serve as opportunities for low cost “early action” complete streets projects; possible incentives for the planning and development of complete streets projects in the County.

ADVOCACY

(10) Seek funding and support legislative initiatives to assist local agencies with planning, programming, and/or capital funds to implement Compass Blueprint projects or other innovative, multimodal approaches that exemplify the direction of the Countywide Vision and transit-oriented development (TOD).

(11) Pursue grant funding to incentivize additional freight vehicle conversion to clean energy sources and to support the installation of associated fueling stations, similar to the Ryder fleet conversion previously sponsored by SANBAG. SANBAG will track advancements in technology in the clean fuels arena and will work with public and private sector partners to marry funding opportunities with cost-effective fleet conversion opportunities.

(12) Work with state and federal representatives to **Develop Legislation** in support of the above activities and the broader goals of the RTP/SCS. Progress on these items shall be reported to the SANBAG General Policy Committee, or other appropriate ad hoc committee, and SCAG's Energy and Environment Committee on a quarterly basis starting January 2014. An interim report on the RTP/SCS Joint-Work Program shall be prepared by January 2015 and include recommendations to the SANBAG Board and SCAG Regional Council for inclusion in the 2016 RTP/SCS.

COORDINATION

(13) Appoint a representative to the **Regional Sustainability Working Group**, an effort initiated by the CEOs of County Transportation Commissions and led by SCAG, to actively work on the implementation of the RTP/SCS, document and monitor progress, and develop recommendations for opportunities in the upcoming 2016-2040 RTP/SCS.

(14) Continue SANBAG's involvement in the San Bernardino Active Transportation Network (Network). The Network is a convening of county agencies, community organizations, residents and cities interested in improving the experience of and increasing facilities for walking and bicycling in San Bernardino County. In addition to SANBAG, some of the stakeholders include Omnitrans, San Bernardino County Public Health Department, Safe Routes to School (SRTS) National Partnership, American Lung Association and Inland Empire Bicycle Alliance. The Network aims to: expand on the region's multi-modal planning efforts, especially for bicyclists and pedestrians; improve safety and accessibility for bicyclists and pedestrians; assist in the county implementation of the RTP/SCS; and further improve the quality of life in the county, including economic development, air quality, public health and connectivity. It is also intended to create a space for cities, agencies, organizations and communities to collaborate, educate and impact local and regional policies as partners.

(15) Continue to support SCAG and collaborate with regional stakeholders on the Regional Plug-In Electric Vehicle (PEV) Readiness Plan, to identify the best locations for charging infrastructure based on market demand and travel patterns. The Regional PEV Readiness Plan will become part of a larger effort to support regional sustainability while promoting economic development within the green technology sector. SCAG will continue to work with a diverse group of stakeholders to serve as a clearinghouse for zero and near-zero emission vehicle resources and implementation strategies. The key deliverables include a Regional PEV Readiness Plan and two model Subregional PEV Readiness Plans (South Bay and Western Riverside COGs). This effort is funded with grants obtained from the California Energy Commission and the U.S. Department of Energy.

(16) Support local jurisdictions in developing Climate Action Plans (CAPs) that would serve as the local implementation and monitoring documents for the reduction of greenhouse gases in response to Assembly Bill 32, the Global Warming Solutions Act of 2006. SANBAG will collaborate with local jurisdictions to develop templates jurisdictions may use as starting points for incorporation of specific schedule, funding, and implementation action items into their CAPs. SANBAG is nearing completion on a 21-city partnership effort to develop a Regional Greenhouse Gas Emissions Inventory and Reduction Plan and its associated Environmental Impact Report. The Plan and EIR will be used as the foundation for the local jurisdictions' CAPs.

Be it further resolved by the Regional Council of the Southern California Association of Governments that its Executive Director or his designee is authorized to lead the work effort of Items No. 4 (Conservation Planning Policy), No. 6 (High Quality Transit Area Study), No. 9 (Complete Streets policies and implementation strategies) and No. 15 (PEV Readiness Plan) of the above-referenced RTP/SCS Joint Work Program, and to work cooperatively with SANBAG on all other remaining Items as appropriate.

This Memorandum of Understanding (MOU) No. M-008-14-00 is executed by duly authorized representatives of SANBAG and SCAG to memorialize the partnership of the two agencies in the RTP/SCS Joint Work Program, and shall be effective as of the last date signed below by the parties. This MOU may be amended only by the execution of the parties of a written amendment.

San Bernardino Associated Governments (SANBAG)



Bill Jahn
President

Date: 3-12-14


APPROVED AS TO LEGAL FORM:



Eileen Monaghan Telchert
General Counsel

Date: 3/15/14

Southern California Association of Governments (SCAG)



Greg Pettis
President
Councilmember, Cathedral City

Date: 2/26/14



February 1, 2016

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1st Vice President
Kevin Stapleton

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Cynthia Sternquist

3rd Vice President
Margaret Clark

Mr. Hasan Ikhata
Executive Director
Southern California Association of Governments
818 W. 7th St., 12th Floor
Los Angeles, CA 90017

RE: 2016 RTP/SCS

Dear Hasan:

The San Gabriel Valley Council of Governments (SGVCOG) appreciates this opportunity to comment on the December 2015 draft of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("Plan") for our regional transportation and land use network.

First, SGVCOG appreciated the opportunity to provide information about the San Gabriel Valley's priority transportation projects to SCAG staff leading up to the release of the draft document. The document captures the transportation, land use, demographic and economic challenges facing our region and outlines the strategies, projects and programs needed to meet those challenges. We appreciate the monumental undertaking presented in preparing this comprehensive 25-year planning document and we applaud SCAG for moving our region toward a consensus vision of and strategic plan for our future.

Regarding the plan document, we offer the following comments:

- (1) The Plan intentionally does not pre-suppose the adoption of proposed ½ cent transportation sales tax measure being considered for the Los Angeles County ballot in November 2016. If such a sales tax measure is put to the voters and adopted, the funding and implementation outlook for transportation projects in Los Angeles County and our sub-region will significantly improve. We anticipate working with SCAG staff on a subsequent Plan Amendment that will reopen project lists and incorporate and/or revise the schedules for the priority transportation projects and programs in the San Gabriel Valley identified in the ballot measure expenditure plan and other projects identified in the Subregional Mobility Matrix for the San Gabriel Valley prepared in 2015 for Los Angeles County Metro.
- (2) A transit accomplishment important to the San Gabriel Valley is the latest extension of the Foothill Gold Line Phase 2A to Azusa which completed construction in late 2015 and is being prepared for passenger traffic this spring. This significant accomplishment warrants inclusion in the sections of the Plan discussing transit projects progress on page 4 and page 38.
- (3) The "Fixing America's Surface Transportation Act" or FAST Act signed into law in December 2015 authorizes federal transportation project and program funding for the next five fiscal years, including two new freight programs that will provide

MEMBERS

Alhambra

Arcadia

Azusa

Baldwin Park

Bradbury

Claremont

Covina

Diamond Bar

Duarte

El Monte

Glendora

Industry

Irwindale

La Cañada Flintridge

La Puente

La Verne

Monrovia

Montebello

Monterey Park

Pasadena

Pomona

Rosemead

San Dimas

San Gabriel

San Marino

Sierra Madre

South El Monte

South Pasadena

Temple City

Walnut

West Covina

*First District, LA County
Unincorporated Communities*

*Fourth District, LA County
Unincorporated Communities*

*Fifth District, LA County
Unincorporated Communities*

SGV Water Districts

significant funding. Discussion of the FAST Act should be included in the federal transportation initiatives section on page 60.

- (4) The current and projected 2040 train volumes identified for regional rail segments on page 53 shows a decline in future passenger train volumes and insignificant growth in future freight train volumes on the Union Pacific Railroad (UPRR) Los Angeles & Alhambra Subdivisions in the San Gabriel Valley. The modest growth in freight trains is contrary to our understanding and UPRR's plans to double-track the Alhambra Subdivision, which is noted elsewhere in the Plan, and to expand the capacity of the LA Subdivision. Regarding future passenger train volumes, we have not been informed of any planned future reductions of Metrolink or Amtrak service on these subdivisions. We request that the basis for these projections be re-examined in light of this information and adjusted accordingly.
- (5) SGVCOG continues to have concerns about the designation by SCAG of State Route 60 as part of a proposed network of truck-only lanes due to the potential for obstructing the alignment of the proposed SR 60 light rail extension and potential displacement of future long-haul truck traffic by shorter haul on this regional corridor. We are concerned that the demand for such a facility has not been conclusively defined. Trucking demands are rapidly changing as product delivery to the end user is being redefined by technology and consumer demands. For example "Uber" type services are becoming more common to deliver goods from local manufacturers and the ports to local and regional distribution centers. This may result in a decline of the traditional long haul truck trips along the SR 60 and will make a truck-only facility less viable along this corridor. We request that SCAG work closely with the SGVCOG and the staffs of communities adjacent to the proposed East-West Corridor to create a truck mobility plan for the SR 60 corridor which takes into account the proposed alignment of the SR 60 light rail project and that will address the changing needs of the trucking industry.

I appreciate your attention to these comments and look forward to your response. Questions regarding these comments may be addressed to me.

Sincerely,



Philip A. Hawkey
Executive Director
San Gabriel Valley Council of Governments



*Sea &
Sage Audubon*

P.O. BOX 5447, IRVINE, CA 92616-5447

January 29, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

RE: Support for RTP

Dear Ms. Aguirre,

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR). Following the release of the 2012 RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Sea and Sage Audubon Society is now a part of this growing coalition in 2016.

Sea and Sage Audubon, incorporated in 1958, is an Orange County chapter of National Audubon Society with nearly 3,500 local members. Our mission is to protect birds, other wildlife, and their habitats through education, citizen science, research, and public policy advocacy. We strongly advocate for and support Orange County's open spaces through participation in the NCCP processes, Orange County Park and other open space reserves from the coast to the mountains.

The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for

the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. **We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts** by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.

We've reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG's mission with the Natural and Farmland policies.

Congratulations

We are pleased to see an Appendix devoted directly to natural and farmlands protection in the 2016 Plan. We are glad that the Plan contains specific strategies addressing natural land and farmlands issues. This is certainly a step in the right direction. The culmination of the work from the last RTP/SCS is clearly visible in this Draft Plan. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful and science-based role in mitigating impacts to our natural environment from transportation, infrastructure and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

Identify a Conservation Mechanism for the Natural and Farmlands Preservation

Our organization supports the idea that as new growth occurs it should focus on the existing infill areas, where it is appropriate and sustainable. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it has the possibility to relieve pressure from the fringe. However, the Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.

Conclusion

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Should you need to contact me, I can be reached at [REDACTED]. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to [REDACTED].

Sincerely,

A handwritten signature in blue ink that reads "Scott Thomas". The signature is written in a cursive style.

Scott Thomas, Conservation Committee Special Projects
Sea and Sage Audubon Society

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January 25, 2016

Southern California Association of Governments
Attention: Courtney Aguirre
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

Subject: SOHA Comments on SCAG Draft 2016 Regional Transportation Plan

References:

- (1) Draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS)
- (2) Draft Program Environmental Impact Report (PEIR) for 2016 RTP/SCS (SCH#2015031035)

Dear SCAG Regional Council,

The Sherman Oaks Homeowners Association (SOHA) strongly supports improvements to Los Angeles County and all other Southern California transportation and mobility infrastructure. We understand that many changes are both necessary and inevitable with regards to all types of regional transportation. SOHA has been a long-time supporter of rapid transit for the San Fernando Valley and has been providing inputs to various plans, such as LA Metro's Long-Range Transportation Plan. We have recently reviewed SCAG's Draft 2016 regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, Reference 1) and accompanying Draft Program Environmental Impact Report (PEIR, Reference 2), and appreciate the breadth and depth of mobility enterprises and issues encompassed. However, in its current form, SOHA opposes the SCAG Draft 2016 RTP/SCS because it provides insufficient focus on a near-term rapid transit solution for the Sepulveda Pass Corridor.

SOHA Comment 1 – The Sepulveda Pass Corridor is the greatest rapid transit challenge facing Los Angeles County (and probably Southern California). The corridor connects the San Fernando Valley (with a population of about 1.8 million people) to Los Angeles' Westside, coastal areas, LAX, and soon the new LA Rams stadium complex. Yet, there is essentially zero rapid transit through the corridor. More appallingly, current transportation plans for the corridor project completion dates in the 2030-2040 timeframe. This is ludicrous, especially because rapid transit in the corridor is the critical missing link in an otherwise fairly well integrated transit network. If transportation planners want to move people from their cars to other modes of transit, the first place they should focus on is the Sepulveda Pass.

Instead, the SCAG Draft 2016 RTP/SCS and PEIR completely ignore rapid transit in the Sepulveda Pass Corridor. The RTP/SCS notes already completed improvement works in the corridor only twice (RTP page 84, and RTP Transit Appendix page 52 in Table 19). These are I-405 freeway improvements and not rapid transit improvements. The RTP/SCS lists the Sepulveda Pass Transit Corridor only once in the

Project List Appendix (page 162 as RTP ID 1160001). This same list entry appears in the PEIR (Table 3.17.1-1 on page 3.17-15). The entry identifies a transit project through the Sepulveda Pass Corridor, from the Metro Orange Line Van Nuys station (in the Valley) to the Metro Expo Line, with a completion date of 2039 and a project cost of approximately \$2.4 billion. To our knowledge, the noted project is inconsistent with LA Metro's latest transportation planning, first that it is too late and second that the cost is too low (we have seen Metro estimates ranging from \$8 to \$20 billion). Most importantly, the listed project is completely inconsistent with the first sentence in the RTP/SCS: *"In our vision for the region in 2040, many communities are more compact and connected seamlessly by numerous public transit options, including expanded bus and rail service."* Rapid Transit in the Sepulveda Pass Corridor is the cornerstone of integrated rapid transit in Los Angeles County and an absolute near-term necessity, yet the Draft RTP/SCS relegates the project to a single listing in a table and no discussion. SOHA recommends that SCAG develop a mandatory rapid transit project list that integrates with and fulfills their vision. This list should obviously include a near-term rapid transit project through the Sepulveda Pass Corridor, probably as the highest-priority entry. The project should have a completion date in the early 2020 timeframe and should be funded at realistic levels consistent with LA Metro's latest projections.

SOHA Comment 2 – The Draft RTP/SCS includes a discontinued project in the Sepulveda Pass that should be eliminated, as it is no longer needed and not currently being considered by LADOT. The installation of a reversible lane on Sepulveda Boulevard through the Mulholland Tunnel was once considered a quick fix to traffic alleviation (RTP ID LA996425 from RTP/SCS Project List Appendix Table 2 on page 124, and also Program Environmental Impact Report Appendix B Table 1 on page 18). Sepulveda Boulevard comprises three lanes through the Mulholland Tunnel – two southbound lanes and one northbound lane. The project would convert the central southbound lane to a reversible lane, thereby providing two lanes in each direction at certain times of the day. Because of improvements to the I-405 freeway in this area, including addition of the new Skirball on- and off-ramps, recent observations have confirmed that there is no longer significant evening rush-hour northbound traffic on Sepulveda Boulevard. Two northbound traffic lanes and the reversible lane project are no longer necessary.

Thank you. If you have any questions, please contact me at [REDACTED] or [REDACTED].

Sincerely,



Bob Anderson
Chair, Transportation Committee
Sherman Oaks Homeowners Association



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January 29, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Re: Comments on the 2016 Draft Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS)

Dear Ms. Aguirre,

Congratulations to you and SCAG staff on producing the 2016 Draft of the RTP/SCS. It is a comprehensive, complex document and provides a framework for discussing the future of the region.

The South Bay Cities Council of Governments (SBCCOG) Governing Board voted on January 28, 2016 to approve the following comments:

1. We appreciate that the 2016 RTP/SCS introduced the Neighborhood Mobility Area (NMA) concept. Like the land use component of the South Bay's Sustainable Strategy, NMA's have the potential to provide jurisdictions an opportunity to develop without reliance on high quality transit areas. (HQTA) We would like to see SCAG further develop the concept with criteria and implementation options.
2. Carrying Capacity: The policy of increasing density in the built-out counties and preserving open space in the outer counties doesn't appear to consider the carrying capacity of the already built-out areas. The idea of preserving green fields as a strategy to avoid building costly infrastructure on the edge does not take into account the potential to exacerbate infrastructure issues in the core. For example, landfills, sewers and utility infrastructure in many built-out jurisdictions are overloaded and in need of repair; open space per capita has been declining, roads and sidewalks are in disrepair, and so forth. We believe that such an analysis should be undertaken so that the true cost of the infill density, Transit Oriented Development (TOD) and HQTA strategy is understood.
3. Vehicle Miles Traveled (VMT): Reducing VMT is the key metric of success in the draft 2016 RTP/SCS and may be consistent with state requirements; however, it is too coarse a measure to actually guide carbon reduction in the region. Going forward, SCAG should distinguish between electric VMT and carbon VMT. Focusing only on total VMT binds the plan to transit, cycling and walking which will have very minimal impacts on either total VMT or zero emission VMT.

LOCAL GOVERNMENTS IN ACTION

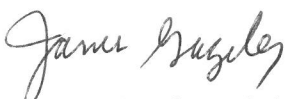
Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

4. Alternate Vehicles: Page 7 of the RTP states that SCAG has focused on Plug-In Hybrid Electric Vehicles. With the market getting larger for PEVs with more range, this plan should not focus just on hybrids. This document should be a realistic vision of how the region can meet state goals as well as regional needs. Since it takes 15 to 25 years to turnover a fleet, it is vitally important to increase the number of all Plug-in Electric Vehicles on the road each year.
5. The SBCCOG is concerned that there are policies and strategies proposed in the Appendices that are not included in the main body of the RTP/SCS or are included in a general way. All of the recommendations for specific actions should be in the main document or in one place in an Action Document. It is possible that some of the strategies and policies have already been adopted by SCAG but the document doesn't say that is the case. If they have already been approved, that should be stated. If they have not, does voting for this plan constitute agreement with all of the recommendations going forward? Please see the following appendices:
 - Mobility Innovation – pages 2 - 5 of the Appendix include Policy Recommendations. Page 106 of the main document does state: “*These mobility innovations are discussed further in the Mobility Innovations Appendix*”. At a minimum, this sentence should be revised to state that the appendix contains policy recommendations.
 - Natural and Farm Lands – pages 6 and 7 of the Appendix have Strategies and Next Step Recommendations. Page 111 of the main document states: “*Please see the Natural and Farm Lands Appendix for additional detail*”. At a minimum, this sentence should be revised to state that the appendix contains policy recommendations.
 - Public Health - Page 19 of the Appendix contains the Public Health Work Program. It is not clear from the text whether the SCAG Board has adopted this work program already or whether it is being adopted with the passage of the RTP/SCS.
 - Transportation Safety and Security – Page 33 of the Appendix has Policies and Recommendations which are more detailed than the main document. At a minimum, the main document should include a sentence which states that there are more specific recommendations in the Appendix.

The SBCCOG is also submitting recommendations for the 2020 RTP/SCS in a separate letter to Hasan Ikrata.

Thank you for the opportunity to participate in this process.

Sincerely,


James Gazeley, Chair
Mayor, Lomita

cc: Hasan Ikrata, Executive Director



A  Sempra Energy utility

February 1, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Dear Hasan Ikhtrata,

SoCalGas welcomes the opportunity to comment on the Southern California Association of Government's ("SCAG") Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"). We appreciate the time and effort SCAG staff has spent working with various stakeholders and subject matter experts in developing this plan.

As a preliminary matter, SoCalGas appreciates SCAG's ongoing focus on public health and air pollution, specifically the challenges of ozone reduction for Southern California, which is reflected in the RTP/SCS. At SoCalGas we also remain focused on the end goal – emission reduction – whether it be reducing ozone for public health or reducing greenhouse gas ("GHG") emissions for global health. At the same time, we believe SCAG should take advantage of the best of what innovation can deliver, and welcome technology advancements that move us toward our collective goals.

Pathways to Reach the State's Greenhouse Gas Reduction Goal

SoCalGas emphasizes the importance of natural gas to the California environment and economic health. We continue to work with our customers and technology developers to identify clean technology solutions through energy efficiency programs, customer education and outreach initiatives, and by supporting near-term and long-term technology development that can reduce both GHG and criteria pollutant emissions and better meet our customers' changing energy needs. SoCalGas seeks to meet a range of customer needs, including serving traditional and new uses such as heating, power generation and transportation fueling, as well as continuing to leverage natural gas resources to deploy industry leading energy efficiency, conservation and emerging technology programs.

Diversity in the State's energy portfolio is also important for prudent risk management to support resiliency in the energy infrastructure as a climate adaptation strategy and should be a factor in the overall analysis of future pathways. As weather becomes more extreme from droughts, wildfires, hurricanes and El Nino events, there are risks to overreliance on one source of energy. Hurricane Sandy provided an example where every system dependent on electricity was jeopardized, from the refueling

pumps at gasoline stations to the water pumps for putting out fires. Developing micro-grids supported by natural gas distributed technologies can operate for a limited timeframe separate from the grid; they can create more diversity in the electric grid since the natural gas system is mostly underground and relatively immune to extreme weather events.

Further, the natural gas energy sector continues to create jobs and grow our economy. In California, the existing natural gas energy industry supports (directly and indirectly) more than 250,000 jobs and adds over \$36 billion to the State's economy. Future natural gas infrastructure improvement projects offer significant job opportunities and contribute to the local and State economy. Additionally, the manufacturing, industrial, and building sectors rely on natural gas as a low-cost energy source to run profitable operations. SoCalGas alone employs more than 8,000 Southern Californians and, in 2014, spent \$571.4 million with diverse suppliers encompassing 48.4 percent of SoCalGas' procurement. SoCalGas' natural gas energy efficiency programs have created approximately 8,000 jobs in California.

Natural Gas Fuel and Technology

We appreciate that the RTP/SCS includes a clear, recognized role for near-zero emission natural gas vehicles in both the near term and long term, especially in the goods movement sector. The RTP/SCS allocates \$74.8 billion in goods movement strategies, which include **“reducing environmental impacts by supporting the deployment of commercially available low-emission trucks and locomotives; and in the longer term advancing technologies to implement a zero- and near-zero emission freight system” (page 7)**. Supporting the deployment of commercially ready technologies that significantly reduce criteria pollutants and greenhouse gas emissions is critical to meet SCAG's regional goals.

With the recent California Air Resources Board (“CARB”) certification of the Cummins Westport Innovations (“CWI”) near-zero emissions engine, California has the opportunity to reduce NOx emissions by 90% from heavy duty trucks.¹ The RTP/SCS should include a discussion on this near-zero emission CWI engine, which was certified recently with lower NOx and methane emissions. CARB established an Optional Low NOx Standard to incent engine development of trucks with emissions in the range of 0.02 to 0.1 grams of NOx per brakehorse power (“g/bhp”). The SCAQMD refers to 0.02 g/bhp as power plant equivalent emissions because electric vehicles may have zero tailpipe emissions but if full life cycle emissions are considered they are not zero emission. The near-zero CWI engine actually certified to emissions of 0.01 g/bhp, which means a natural gas truck or bus would have lower overall emissions than an equivalent battery electric truck.

The commercialization of this *game changing* technology for heavy-duty trucks and buses is a vital step in meeting our air quality goals and improving health in disadvantaged communities along Southern California's transportation corridors. CWI's first near-zero 8.9L engine can be utilized by transit fleets, waste haulers and some regional goods movement trucks. This provides an opportunity for transit and waste hauling fleets in Southern California to continue using compressed natural gas (“CNG”) buses with even greater environmental benefits- achieving emission levels below electric buses and trucks. Commercialization of this technology also provides opportunities for transit districts in the northern and eastern portions of SCAG's region to transition to cleaner fleets today, as many of Southern California

¹ <http://www.cumminswestport.com/press-releases/2015/near-zero-nox-emissions-isl-g-natural-gas-engine-proprietarytechnology-capable-of-reducing-nox-emissions-by-90>

transit agencies have already done. All of these fleets can move to near-zero levels with the acquisition of the new CWI engine. Further, with the use of increasing volumes of renewable natural gas (RNG), the transit sector has the potential to drive the carbon intensity of its emissions *below* electric buses. We can do this in the next several years and not wait 20 years – a generation – before we begin to realize these emission reductions.

In addition, CARB has included deployment of low emission, low-carbon fueled trucks, such as low NOx, RNG fueled trucks as part of their 2014 Scoping Plan Update on how to meet the AB32 2020 GHG reduction goals.² The 2016 RTP/SCS should clearly articulate this pathway.

In addition to the certified 8.9L engine, CWI is also working on applying the same technologies to a larger engine, which can be commercialized for the goods movement sector in the next twelve to eighteen months. Goods movement is an important economic driver in Southern California. Maintaining cost effective solutions for long-haul drayage truckers will help the region remain competitive and meet stringent emissions goals.

The Goods Movement Environmental Strategy quotes, **“the regional strategy supports the deployment of commercially available low emission trucks and locomotives while centering on continued investments into improved system efficiencies. For example, the region envisions increased market penetration of technologies already in use, such as heavy-duty hybrid trucks and natural gas trucks.”** (pg. 101). We look forward to partnering with SCAG and membership organizations to making this a reality.

Sustainable Freight and Transport Sector Opportunities

SoCalGas supports that the RTP/SCS recognizes the role of natural gas in locomotive sector. The Long-Term Emission-Reduction Strategies for Rail quotes, **“Opportunities for near-zero emissions include incorporating liquid natural gas tender cars and after treatment systems. Tier 4 engines and earlier engine types can be retrofitted to operate with natural gas.”** (pg. 170). The Goods Movement Appendix quotes, **“Liquid natural gas has also been considered as a fuel for rail locomotives. It is estimated that use of LNG with a Tier 4 locomotive would lead to NOx and PM reductions of 70 percent beyond the Tier 4 locomotive”**.

Beyond heavy-duty truck engines, LNG is an ideal choice to replace diesel and bunker fuel for the goods movement industry, especially for marine and rail operators. Using LNG to reduce GHG and criteria pollutant emissions has been discussed by the rail and marine industries as well as the ports. This is not required through regulation- it is being driven by the fuel price differential between natural gas and diesel. Nationally and internationally, we have seen an increase in the number of LNG-fueled vessels in the marine sector, as well as LNG-fueled engine pilot programs by railroads. SoCalGas has had discussions with the Ports of Long Beach and Los Angeles about the possibility of utilizing LNG as a multi-sector transportation fuel, and natural gas as an energy source, at the ports. The Port of Long Beach identified this as a potential strategy in their Energy Island proposal.³

² <http://www.arb.ca.gov/cc/scopingplan/document/updatedscopingplan2013.htm>

³ Port of Long Beach Press Release, “Energy Island, The Port’s Power Plan,” June 25, 2015,

This opportunity is only marginally addressed in the RTP/SCS and we request that the plan should more clearly include a focus on reducing NOx emissions by investing in natural gas transportation technologies and fueling infrastructure at the ports.

SCAG's goods movement strategies should also consider the advantages that switching from diesel to natural gas can have in the off-road and marine sectors will have for improvement of cancer risk in nearby communities affected by goods movement-related emissions. The Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Risk Assessment Guidelines Version 8.0 published in March 2015, shows natural gas has a significant advantage over diesel. SoCalGas calculated two examples of the difference between cancer risk from just switching from diesel to natural gas. In the case of a marine engine transiting near a port terminal, the calculation of the change in absolute residential cancer risk from just fuel switching (diesel to natural gas) shows that the diesel risk is 314 times the natural gas risk. In the case of locomotives, using an example of arrival and departure trains (1 train/day; 4 hours/train at 50% load), the calculation of the change in absolute residential cancer risk from fuel switching (diesel to natural gas) shows that the diesel risk is 107 times the natural gas risk. We wish to point out that no specific facility was examined in our sample calculations, and no inference about actual risk at a specific facility can be derived from just this tier 2 screening level analysis information.

Renewable Natural Gas and Transportation

SoCalGas supports SCAG's inclusion of renewable natural gas ("RNG") as an alternative transportation fuel in the Goods Movement Appendix. Reducing emissions and petroleum use within the transportation sector is critical to meeting both air quality and climate change policy goals for California. We believe supporting the development and deployment of RNG in the transportation sector should be included as a key strategy to achieve emission reduction goals.

Meeting the federal ozone and particulate matter standards in Southern and Central California are the most significant air quality challenges for the state. Natural gas vehicles ("NGVs") that can meet the optional low-NOx standard and run on renewable fuels can help California meet its GHG reduction and petroleum displacement goals, and should be included as a key pathway, especially in the heavy-duty vehicles sector.

The transportation sector can also be an important catalyst for building an RNG market and encouraging the utilization of methane resources. CARB's Low Carbon Fuel Standard identifies RNG from existing organic sources, such as dairy waste, landfills, and waste water treatment as the lowest carbon intensity standard pathway available, even lower than the current electricity mix and hydrogen. Today, due

<http://www.polb.com/news/displaynews.asp?NewsID=1464>.

"The Port will explore options that include liquefied natural gas (LNG) as fuel for ships and locomotives, hydrogen generation, fuel cell technology and related infrastructure. This goal builds on existing progress the Port has made under its Clean Trucks Program and Technology Advancement Program to support drayage trucks that run on LNG, compressed natural gas, and hydrogen fuel cell technology."

largely to this policy, RNG is already being used in California's transportation sector. For example, Waste Management, Inc., uses RNG produced at its Altamont Landfill and Resource recovery Facility to fuel its waste hauling fleet in that region. Clean Energy Fuels Corporation offers RNG at their CNG and LNG stations throughout California. A review of the CARB's Low Carbon Fuel Standard reporting tool shows that RNG, as a percentage of total natural gas used in the transportation sector, has increased from approximately 10% to 40-60% in the past year. SCAG needs to look at policies and incentives to promote more development of RNG in the region. Support for heavy-duty natural gas vehicles is a key to this development. The transportation sector can be an important catalyst for building the renewable natural gas market.

In addition, renewable natural gas creates jobs. The Renewable Natural Gas Coalition estimates that biomethane projects in California have resulted in the creation of more jobs per year average (11.5) than any other renewable energy technology. According to *Renewable Natural Gas Coalition's California Biofuels Cap and Trade Initiative*, developing biomethane projects at 200 candidate sites throughout the state (located at landfills, waste water recovery facilities, and agricultural sites) would create more than 20,000 direct and indirect jobs in 42 California counties. Also, as many as 100 temporary construction jobs could be created as a result of each project (page 8).

In the long term, and as transportation options evolve, more RNG can be injected into the pipeline and redirected to traditional natural gas end-uses, like cooking, space and water heating, achieving our Governor's goal announced in this year's State of the State speech to "clean our heating fuels."

We need to re-think methane. Capture and management of methane emissions (primarily from agriculture, dairies, landfills, etc.) will have a proportionately greater impact than efforts to control CO₂ emissions because of the higher global warming potential of methane. Combustion of methane, i.e. conversion to CO₂, reduces its global warming potential by a factor of greater than 20 times. Other management techniques, e.g. sequestration, are untested and still have significant issues to resolve, e.g. the ability to sequester the methane for long periods without leakage. Therefore, combustion of captured and recovered methane emissions will play an important role in current and future plans to reduce global warming.

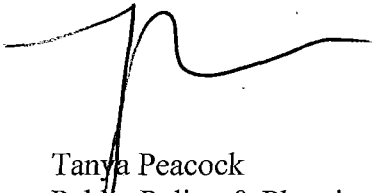
Conclusion

We applaud SCAG's effort in creating a technology neutral, performance-based RTP/SCS that looks to take advantage of the best that technology can offer. SoCalGas looks forward to working with SCAG and membership communities over the coming years to develop clear and actionable strategies to take advantage of and invest in opportunities to utilize natural gas' potential as a clean energy solution. Decisions today are defining the course of our clean energy future in all sectors of our economy. Simply put, Southern California has the unique challenges and opportunities presented by its comprehensive environmental targets that cannot be met by staying on the current course. There will always be ongoing regulatory initiatives that are being undertaken by various agencies in the state, but this should not deter SCAG from taking the lead in affirming natural gas' role in the long-term energy mix as a clean and affordable way to reduce smog and greenhouse gas emissions and improve the health of all Californians.

SoCalGas supports expanded research, development and deployment agendas for natural gas technologies. We are pleased SoCalGas' progress was noted in the Goods Movement Appendix, **“Southern California Gas Company (SoCalGas) has also been involved in several technology development projects and has worked with Original Equipment Manufacturers to develop and test several engines and vehicles. These projects have been funded by partners including the CEC, DOE, SCAQMD, in addition to funding invested by SoCalGas” (page 48).**

We believe the next step will be to prioritize these research opportunities and identify specific action plans to advance strategies for realizing the benefits of natural gas. We appreciate the opportunity to provide comments and input on the 2016 Regional Transportation Plan/Sustainable Communities Strategy. Southern California is our home and we share SCAG's goals to strive at the highest levels to preserve and take care of it. We embrace a big picture view and shall continue to work diligently to provide safe, clean, reliable and affordable service to 21 million people. We believe natural gas offers an affordable, clean and practical way to meet California's goals and look forward to continuing to work together to develop action plans to align state and regional policies and identify funding resources to advance cleaner natural gas technologies to meet the state's environmental goals, improve the health of our local communities through NOx, particulate matter and ozone emissions reductions, as well as global health through GHG reductions.

Sincerely,



Tanya Peacock
Public Policy & Planning Manager



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February 1, 2016

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

**Re: Comments Concerning Southern California Association of Government’s
(SCAG’s) Draft 2016-2040 Regional Transportation Plan/Sustainable Communities
Strategy (“RTP/SCS”) and accompanying Draft Program Environmental Impact
Report (“PEIR”)**

Dear Hasan:

On behalf of the Southern California Leadership Council and the undersigned group of partner organizations, we thank you for the opportunity to review and comment on the draft 2016 RTP/SCS and the accompanying draft PEIR. Our group is comprised of leading Southern California business and industry organizations.

Each of our organizations appreciates the assistance provided by and hard work of SCAG’s able staff in the months leading up to the present draft documents. As we bring the issues set forth below to your attention for consideration concerning the final policy document and PEIR, we look forward to additional discussions about these important policies and promulgations.

Our group is particularly focused on assuring that the RTP/SCS will provide positive economic impacts and job creation. With that in mind, we applaud SCAG’s commitment to providing thorough economic analysis, including an evaluation of the plan’s impact on jobs and job creation. The economist’s analysis of the plan has produced some very positive data, projecting that the benefits of the RTP/SCS, in terms of job creation and economic growth in the region, will exceed the costs of the plan. Our group is encouraged by this analysis and will continue to work with SCAG and other stakeholders to assure that these projected benefits are brought to fruition through the plan’s effective implementation.

As you read the comments below, please recognize that we are – overall – very positively impressed with the high quality, comprehensiveness and cohesion of the Draft 2016 RTP/SCS and accompanying PEIR. Our comments are intended to be constructive rather than critiquing. They are few and relatively minor when compared to the scope and depth of the work brought forth by SCAG’s staff and consultants. We hope that these comments will be well received and helpful towards the pending final plan, strategy and report.

With that in mind, we provide the following comments:

I. Limited Legal Jurisdiction of SCAG to Impose Mitigation Measures

The Legislature has made clear that “[i]n mitigating or avoiding a significant effect of a project on the environment, a public agency may exercise only those express or implied powers provided by law other than this division [i.e., laws other than CEQA].” (Pub. Res. Code section 21004.) Because SCAG is not empowered under existing laws to fund or approve construction of specific transportation or housing projects, and is instead a joint powers authority enabled with limited powers, we agree that most of the mitigation measures identified in the draft PEIR are appropriately identified as recommendations for consideration by those agencies that are themselves empowered with the requisite statutory authority over the transportation and development activities contemplated by the RTP/SCS. SCAG lacks the legal jurisdiction to directly impose such mitigation measures.

II. Impacts of the Environment on the Project

Based on a recent Supreme Court case, *California Building Industry Association v. Bay Area Air Quality Management District*, 196 Cal. Rptr. 3d 94 (Cal. 2015) (“*CBIA*”), any impacts of the existing environment on new projects (including occupants or residents of future projects) fall outside the scope of CEQA. This decision removes from CEQA several of the topics that are addressed in the draft PEIR as CEQA impacts requiring mitigation measures, including but not limited to certain thresholds derived from Appendix G of the CEQA Guidelines.

We recommend that the final PEIR include a discussion of the Supreme Court’s *CBIA* decision, and note that the analysis and consideration of environmental impacts on a project (e.g., air quality impacts from existing roadways and highways on nearby residential and other uses) may be considered in planning policy discussions, notwithstanding that such considerations have been adjudged to be outside CEQA’s scope.

III. Consistency with State CEQA Guidelines Appendix G Thresholds

We commend SCAG for generally using Appendix G of the State CEQA Guidelines in completing a comprehensive evaluation of the environmental impacts of the RTP/SCS project (as well as the now-unnecessary evaluation of Appendix G topics that address the impacts of the existing environment on the project). In several cases, however, the draft PEIR deviates from Appendix G by adding to CEQA analysis thresholds of significance which are not identified in Appendix G. Because SB 375 requires that SCAG prepare a PEIR as required by CEQA for the RTP/SCS, and because SCAG lacks the legal jurisdiction to dictate mitigation under CEQA where other agencies act as the respective lead agencies (as discussed in Section I above), we request that the final PEIR clarify that thresholds included in the draft PEIR that go beyond the thresholds listed in Appendix G are provided for informational purposes only and are not required by CEQA. These extraneous, non-Appendix G thresholds are listed in Attachment A to this letter.

IV. Specific Concerns Regarding Proposed Thresholds of Significance and Suggested Mitigation Requirements and Goals

A few concerns deserve more pointed consideration because they loom relatively large in their importance. They involve (1) the instruction to use “vehicle miles traveled” (VMT) traffic analysis; (2) the failure to account for certain constitutional limitations on the imposition of mitigation requirements; (3) the draft documents’ various references to creating a 500-foot buffer next to highways, (4) specification of a particularly problematic aesthetic significance threshold.

First, the PEIR and its appendices instruct local lead agencies to consider VMT in their project- and plan-level CEQA analyses, in lieu of a “level of service” (LOS) traffic analysis. This instruction is premature as the Governor’s Office of Planning and Research (OPR) has recently proposed an approach for incorporating VMT into CEQA, the comment period on this OPR proposal is still underway, there is no pending proposal to amend the Guidelines to incorporate VMT as an impact under CEQA. SCAG should defer to any eventual OPR decision. Additionally, labeling VMT in and of itself as an environmental impact under CEQA is highly controversial because it simply measures a unit of accomplishment or mobility which does not necessarily correspond to any adverse environmental impact. Therefore, we commend SCAG for taking into account aggregate and per capita VMT in transportation planning, but we request clarification that SCAG is not directing lead agencies using the RTP/SCS as a tiering document for CEQA purposes to label VMT as a negative impact under CEQA. We also note that lead agencies retain the discretion under CEQA to select significance thresholds. Lastly concerning VMT, we respectfully request that SCAG clarify that Section 1.17 (entitled Transportation, Traffic, and Safety) of the final PEIR is not intended to imply that each project or plan that “increases the daily VMT” conflicts with “the established measures of effectiveness for the performance of the circulation system.” This statement cannot be correct as it suggests that all VMT in a growing population must be mitigated, which would conflict with existing plans and forecasts and the ongoing prerogatives maintained by local government, as well as the constitutional limitation discussed below.

Second, the PEIR recommends thresholds of significance concerning cumulative impacts that fail to mention and take into account the federal constitutional mandate that mitigation requirements may be imposed to cumulative impacts only to a degree that is no more than roughly proportional to a proposed project’s impacts. Not only do the VMT thresholds of significance discussed above omit any reference to this constitutional limitation, but the recommended threshold of significance concerning energy consumption does so as well. The final EIR should state that any threshold of significance for cumulative impacts, or at least the imposition of mitigation requirements related to such thresholds, should be limited so that the imposition does not conflict with the constitutional prohibition related to mitigation requirements.

Third, the draft policy document and PEIR make various references to imposing a buffer applicable to land uses in close proximity to major highways and roads. We respectfully request that SCAG clarify that the final PEIR and policy document are not intended to create land use restrictions or prohibitions on lands immediately adjacent to roads and highways. Concerning new development near existing transportation infrastructure, the Supreme Court’s recent *CBIA* decision, discussed above, should also be addressed in SCAG’s response.

Finally, the draft PEIR states that a significant aesthetic impact results whenever a new structure built pursuant to the RTP/SCS would “cast shade over sensitive uses for more than three hours in the wintertime or for more than four hours in the summertime.” We respectfully request clarification that SCAG is not intending to direct lead agencies that may use the RTP/SCS as a tiering document for CEQA purposes to use this “shade threshold,” given that Appendix G does not indicate this as a negative impact under CEQA. As noted above, lead agencies also retain the discretion under CEQA to select significance thresholds.

V. Minor Plan Adjustments to Conform to General Plan Designations and Reasonably Foreseeable Future Projects Identified in COG-Certified EIRs

In a very few instances, the proposed SCS was analyzed using population and development forecasts that are below both the densities included in existing General Plan designations and the densities forecasted by the respective local jurisdictions. Fortunately, these deviations are relatively small in number and extent. However, in order to abide by the planning principles that were expressly adopted prefatory to the draft documents, these should be corrected.

VI. Conclusion

Once again, we wish to applaud SCAG, its staff and its consultants on a herculean and well-done effort. In the next RTP/SCS cycle, we hope to work with SCAG’s staff to bring even greater transparency to the land use and transportation modeling which underpins the projected greenhouse gases reductions that the RTP/SCS might facilitate. The aim should be to facilitate harmonization and consistency among the myriad planning documents that together project the region’s future and those of the region’s parts at smaller scales. We look forward to meeting that aim with SCAG and all concerned stakeholders.

Respectfully submitted,



Richard Lambros
Managing Director



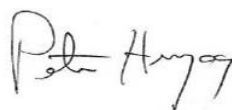
Mike Lewis
Senior Vice-President



Wes May
Executive Director



Paul Granillo
President & CEO



Peter Herzog
Assistant Director of Legislative Affairs



Bryan Starr
Senior Vice President, Govt. Affairs



Attachment A

Non-Appendix G Thresholds Included in the 2016 RTP/SCS PEIR

3.1 Aesthetics

- If shadow-sensitive uses would be shaded by project-related structures for more than three hours in the winter or for more than four hours during the summer.

3.3 Air Quality

- Expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially.

3.5 Cultural Resources

- Disturb any human remains, including those interred outside of formal cemeteries and those interred in Native American Sacred Sites.

3.6 Energy

- Increase petroleum and non-renewable fuel consumption in the regional transportation system.
- Increase residential energy consumption.
- Increase building energy consumption in anticipated development.
- Increase water consumption and energy use related to water in anticipated development.

3.8 Greenhouse Gas Emissions and Climate Change

- Increase GHG emissions compared to existing conditions (2015).
- Conflict with SB 375 GHG emission reduction targets.

3.17 Transportation, Traffic, and Safety

- Conflict with the established measures of effectiveness for the performance of the circulation system, by increasing the daily VMT, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
- Conflict with an applicable congestion management program, including, but not limited to, VMT and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways.
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections), increased volumes or incompatible uses (e.g., farm equipment).



February 1, 2016
Mr. Hasan Ikhata
Executive Director
Southern California Association of Governments
818 W. 7th St., 12th Floor
Los Angeles, CA 90017

RE: 2016 RTP/SCS

Dear Hasan:

The SR60 Coalition Cities have been advocating for the SR60 Light Rail Alternative since 2007. Our coalition has been successful in having the SR60 Light Rail Alternative selected as one of the two alternatives selected for further study. In November of 2014, the Metro Board voted to move our alternative to the next phase of technical study and analysis.

Our Coalition is very concerned about the proposed dedicated truck lanes on the SR60 Highway as proposed in the 2016 RTP/SCS . We have stated that SR60 Highway can not be the solution to all the transportation needs in the region. There are plans for the highway expansion and possible HOV lanes. The SR60 Coalition is concerned that many of these proposals, especially the dedicated truck lanes will be in direct conflict with the SR60 Light Rail Project.

We ask that further discussion on transportation proposals on the SR60 State Highway be addressed with our SR60 Coalition and San Gabriel Valley Council of Governments.

Sincerely

A handwritten signature in black ink, appearing to read 'Joseph J. Gonzales', is written over the typed name.

Joseph J. Gonzales
Chair, SR60 Coalition
City of South El Monte, City Councilmember