

APPENDIX A

**NOTICE OF PREPARATION AND COMMENTS
ON NOTICE OF PREPARATION**

PREPARED FOR:

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The contents of this report reflect the views of the author who is responsible for the facts and accuracy of the data presented herein. The contents do not necessarily reflect the official views or policies of SCAG or DOT. This report does not constitute a standard, specification or regulation.



NOTICE OF PREPARATION

TO: Interested Agencies, Organizations and Individuals

SUBJECT: Notice of Preparation of a Program Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

DATE: March 9, 2015

LEAD AGENCY: Southern California Association of Governments
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The Southern California Association of Governments (SCAG), as Lead Agency, is publishing this Notice of Preparation (NOP) to prepare a Program Environmental Impact Report ("PEIR") in accordance with the California Environmental Quality Act (CEQA) for the 2016–2040 Regional Transportation Plan /Sustainable Communities Strategy ("2016 RTP/SCS" or the "Project").

This NOP has been prepared pursuant to Public Resources Code Section 21080.4 and CEQA Guidelines Sections 15082 and 15375. The purpose of this NOP is to notify local, state and federal agencies, and other interested agencies, organizations and individuals ("Interested Parties") that SCAG plans to prepare a PEIR for the 2016 RTP/SCS. For purposes of this NOP, Interested Parties include but are not limited to Responsible Agencies, Trustee Agencies, and the Governor's Office of Planning and Research as set forth under Section 15082 of the CEQA Guidelines.

SCAG is circulating this NOP to obtain input regarding the scope and content of the Draft PEIR for the 2016 RTP/SCS and on issues relevant to the 2016 RTP/SCS. The Project location, description, and the expected scope of environmental information and analysis are described on the following pages.

Two scoping meetings, each providing the same information, will be held at SCAG's Main Office (Los Angeles office, see above), Board Room, Tuesday, March 17, 2015, at 3 p.m. to 5 p.m.; and Wednesday, March 18, 2015, at 5 p.m. to 7 p.m. Videoconferencing will also be available from SCAG's regional offices (see last page for addresses).

To ensure full consideration of environmental issues with potential significant impacts in the Draft PEIR, **all comments must be received within thirty (30) days of the start of the 30-day public comment period, which begins March 9, 2015 and ends April 7, 2015.** If you wish to be placed on the mailing list to receive notices regarding the PEIR for the 2016 RTP/SCS, or have any questions or need additional information, please contact the person identified below. SCAG will accept **written comments** regarding this notice **through the close of business or no later than 5:00 p.m. on April 7, 2015.**

Please send written comments on this notice to **Ms. Lijin Sun, Senior Regional Planner**, to the address shown above or visit SCAG's website at <http://rtpscs.scag.ca.gov/2016PEIR>. For future coordination, please identify a point of contact of your agency and organization. Comments may also be submitted electronically to 2016PEIR@scag.ca.gov.

**NOTICE OF PREPARATION
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
2016–2040 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY**

INTRODUCTION

The California Environmental Quality Act (“CEQA”, Pub. Res. Code § 21000 *et seq.*) and its implementing regulations (“CEQA Guidelines”, codified at 14 C.C.R. § 15000 *et seq.*) require the Southern California Association of Governments (“SCAG”) as the Lead Agency to prepare an Environmental Impact Report (“EIR”) for any discretionary government action, including programs and plans that may cause significant environmental effects. Specifically, the 2016–2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (“SCS”) (“2016 RTP/SCS,” “Project,” or “Plan”) necessitates preparation of a Program EIR (“PEIR”), which is a “first-tier” CEQA document designed to consider “broad policy alternatives and program-wide mitigation measures” (*CEQA Guidelines* §15168). The PEIR for the 2016 RTP/SCS will provide an opportunity to inform decision-makers and the public about potential environmental effects associated with implementation of the 2016 RTP/SCS and Alternatives. The analysis provided in the PEIR will evaluate potential environmental effects, such as direct and indirect effects, growth-inducing impacts, and cumulative impacts of the 2016 RTP/SCS at a programmatic level; and will include program-level mitigation measures and performance standards to offset any identified potentially significant adverse programmatic level environmental effects. Potential or probable environmental effects of individual projects included in the 2016 RTP/SCS Project List would not be specifically analyzed in this PEIR. Project-level environmental analyses should appropriately be prepared by implementing agencies on a project-by-project or site-by-site basis as projects proceed through the design and decision-making process. The PEIR will provide a foundation for the subsequent, project- or site-specific environmental reviews that will be conducted by implementation agencies, as projects in the RTP/SCS are developed (*CEQA Guidelines* §15385).

This first-tier, programmatic environmental analysis for a long-range, regional-scale plan document will also help local agencies evaluate and reduce direct and indirect impacts, growth-inducing impacts, and cumulative environmental impacts with respect to local projects.

This Notice of Preparation (“NOP”) is prepared pursuant to Section 21080.4 and CEQA Guidelines Section 15082 and 15375. SCAG has determined that an Initial Study is not required to be prepared pursuant to CEQA Guidelines Section 15060(d). The NOP is intended to alert Interested Parties of the preparation of the 2016–2040 RTP/SCS PEIR. Comments regarding the PEIR received during the 30-day NOP review period will be used to refine the scope and content of the Draft PEIR, as appropriate.

PROJECT LOCATION AND BACKGROUND

Project Location

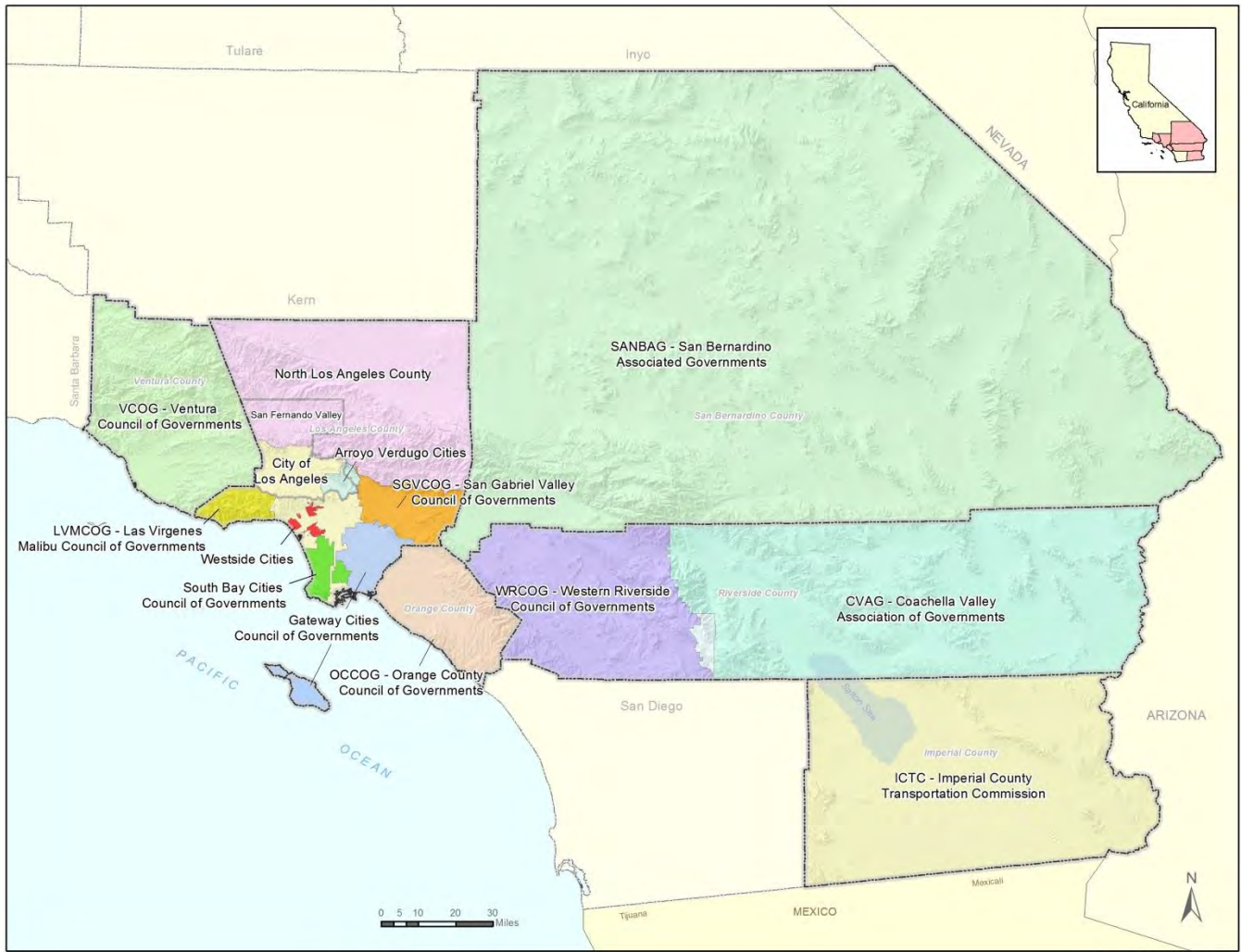
SCAG is the federally designated Metropolitan Planning Organization (“MPO”) under Title 23, United States Code (U.S.C.) 134(d)(1). SCAG is a six-county region that includes the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, and 191 cities (Figure 1, *SCAG Region*). To the north of the SCAG region are the counties of Kern and Inyo; to the east is State of Nevada and State of Arizona; to the south is the U.S.-Mexico border; to the west is the county of San Diego; and to the northwest is the Pacific Ocean. The SCAG region also consists of 15 subregional entities that have been recognized by the Regional Council, SCAG’s governing body, as partners in the regional policy planning process (Figure 2, *SCAG Subregions*).

SCAG is one of the 18 MPOs in the State of California. The total area of the SCAG region is approximately 38,000 square miles. The region includes the county with the largest land area in the nation, San Bernardino County, as well as the county with the highest population in the nation, Los Angeles County. The SCAG region is home to approximately 19 million people, or 49 percent of California’s population, representing the largest and most diverse region in the country.

Figure 1: SCAG Region



Figure 2: SCAG Subregions



SCAG Roles and Responsibilities

In addition to the federal designation as a MPO, SCAG is designated under California state law as the Multicounty Designated Transportation Planning Agency and Council of Governments (COG) for the six-county region. Founded in 1965, SCAG is a Joint Powers Authority, established as a voluntary association of local governments and agencies.

SCAG serves as the regional forum for cooperative decision making by local government elected officials and its primary responsibilities in fulfillment of federal and state requirements include the development of the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS); the Federal Transportation Improvement Program (FTIP); the annual Overall Work Program; and transportation-related portions of local air quality management plans. SCAG's other major functions include determining the regional transportation plans and programs are in conformity with state air quality plans; periodic preparation of a Regional Housing Needs Assessment (RHNA); and intergovernmental review of regionally significant projects.

Regional Cooperation and Subregions

SCAG places great importance on local input in the regional planning process. SCAG seeks feedback from local elected officials and their staff through 15 subregional organizations that have been recognized by the Regional Council as partners in the regional policy planning process (Figure 2). The subregional organizations represent various parts of the SCAG region that have identified themselves as having common interests and concerns. The subregions vary according to geographical size, number of local member jurisdictions, staffing, decision-making structure, and legal status.

SCAG provides opportunities to participate in regional planning through collaboration and participation in regional programs and dialogs. Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Regional Council, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees, while other groups are established on an ad hoc basis to assist with specific projects or address specific regional policy. The Regional Council is SCAG's governing body. It consists of 86 elected officials, representing cities, counties, county transportation commissions, transportation corridor agencies, tribal governments, and air districts in the region. The Regional Council has general authority to conduct the affairs of SCAG and directs the actions of the agency throughout the year. Additionally, the Regional Council implements the policy direction provided at the annual General Assembly of the membership, acts upon policy recommendations from SCAG's standing policy committees and external agencies, and appoints standing or ad hoc subcommittees to study specific programs or issues.

Regional Transportation Plan/Sustainable Communities Strategy

SCAG is required to adopt and update a long-range regional transportation plan every four (4) years, in accordance with federal and state transportation planning laws. The regional transportation plan (RTP) is used to guide the development of the Federal Transportation Improvement Program (FTIP) as well as other transportation programming documents and plans. The RTP outlines the region's goals and policies for meeting current and future mobility needs, providing a foundation for transportation decisions by local, regional and state officials that are ultimately aimed at achieving a coordinated and balanced transportation system. The RTP identifies the region's transportation needs and issues, sets forth actions, programs, and a plan of projects to address the needs consistent with adopted regional policies and goals, and documents the financial resources needed to implement the RTP.

Transportation investments in the SCAG region that receive state and federal funds or require federal approvals must be consistent with the RTP and must be included in SCAG's FTIP when funded. The FTIP covers six years and is updated biennially on an even-year cycle. It represents the immediate, near-term commitments of the RTP. SCAG does not implement individual projects in the RTP, as these projects will be implemented by local and state jurisdictions, and other agencies.

Moving Ahead for Progress in the 21st Century Act (MAP-21), enacted into law on July 6, 2012, sets forth a performance-based approach requiring the State and MPOs to set performance targets and track their progress in achieving those targets relative to past system performance. While the federal rules governing performance targets are not yet enacted, it is SCAG's intent to utilize a performance-based approach in preparing the 2016 RTP/SCS.

Further, MAP-21 continues to require, as under prior planning law, that "a long-range transportation plan shall include a discussion of the types of potential environmental mitigation activities and potential areas to carry out

these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan.” 23 U.S.C. § 134(i)(2)(B). Consultation and public outreach activities are a part of the 2016 RTP/SCS and PEIR development processes, and will be undertaken to the maximum extent practicable and feasible. SCAG is coordinating efforts to comply with MAP-21 planning requirements with efforts undertaken through the CEQA process. As such, particular emphasis in the RTP/SCS will be placed on these planning requirements, including those that prescribe coordinated planning and consideration of environmental resources. In addition, pursuant to Title VI of the Civil Rights Act of 1964 and Presidential Order 12898, the 2016 RTP/SCS includes an environmental justice analysis. The 2016 RTP/SCS will analyze how the benefits and burdens of transportation investments are distributed among minority and low-income populations in the SCAG region. Outreach efforts are underway to reach environmental justice communities during development of the 2016 RTP/SCS.

SCAG is also required to prepare a RTP pursuant to Section 65080 of the California Government Code. The State requirements largely mirror the federal requirements and require each transportation planning agency in urban areas to adopt and submit an updated RTP to the California Transportation Commission (CTC) and the California Department of Transportation (Caltrans) every four (4) years. To ensure a degree of statewide consistency in the development of RTPs, the CTC under Government Code Section 14522 prepared RTP Guidelines. The adopted guidelines include a requirement for program level performance measures, which include objective criteria that reflect the goals and objectives of the RTP. In addition, the initial years of the plan must be consistent with the FTIP.

State planning law further requires, pursuant to the Sustainable Communities and Climate Protection Act of 2008 (“SB 375”) that the RTP include a Sustainable Communities Strategy (SCS) component to reduce greenhouse gas (GHG) emissions from passenger vehicles (automobiles and light-duty trucks). SB 375 is part of California's overall strategy to reach GHG emissions reduction goals required by Assembly Bill (AB) 32, by promoting integrated transportation planning with the goal of creating more sustainable communities.

Pursuant to SB 375, SCAG’s SCS is required to meet reduction targets for greenhouse gas (GHG) emissions by 8 percent per capita by 2020 and 13 percent per capita by 2035 compared to 2005, as set by the California Air Resources Board (ARB). According to Section 65080(b)(2)(B) of the California Government Code, the SCS must:

- Identify existing land use;
- Identify areas to accommodate long-term population growth;
- Identify areas to accommodate an eight-year projection of regional housing needs;
- Identify transportation needs and the planned transportation network,
- Consider resource areas and farmland;
- Consider state housing goals and objectives;
- Set forth a forecasted growth and development pattern; and
- Comply with federal law for developing an RTP.

The SCS outlines SCAG’s plan for attaining the GHG emissions reductions targets set forth by ARB, by integrating the transportation network and related strategies with a forecasted land use pattern that responds to projected growth, housing needs and changing demographics, and transportation demands.

In addition, SCAG is required to submit to ARB the SCS developed as part of the RTP for the purpose of determining whether the GHG emissions reduction targets have been met. Furthermore, SB 375 specifically states that the SCS developed as part of the RTP cannot dictate local General Plan policies. Rather, SB 375 is intended to provide a regional policy foundation that local government may build upon if they so choose and generally includes the quantitative growth projections from each city and county in the region going forward.

Qualifying projects that meet criteria established by SB 375, and are consistent with the SCS are eligible for streamlined environmental review under CEQA.¹

PROJECT DESCRIPTION

The RTP/SCS is a long-range transportation plan that provides a vision for regional transportation investments over a 20-year period. In accordance with applicable federal and state laws, SCAG updates the RTP/SCS every four (4) years to reflect changes to the transportation network, the most recent planning assumptions, economic trends, and population and jobs growth forecasts.²

The RTP/SCS is developed and implemented through a collaborative, continuous and coordinated process that involves key stakeholders such as the six County Transportation Commissions (CTCs), Caltrans, transit operators, airport and port authorities, air districts and other agencies including local jurisdictions in our region. The 2016 RTP/SCS will be the culmination of a multi-year effort, which was initiated since the adoption of the 2012 RTP/SCS. For more information on the 2012 RTP/SCS, please visit SCAG's website, at <http://rtpscsc.scag.ca.gov/2012RTPSCS>. The 2016 RTP/SCS will largely embody the goals, objectives, and transportation improvements that have been considered in the adopted 2012 RTP/SCS, last amended in September 2014 (Amendment No. 2 to the 2012 RTP/SCS). For more information on the Amendment No. 2 to the 2012 RTP/SCS and the projects that were documented in the Project List of the 2012 RTP/SCS Amendment No. 2, please visit SCAG's website, at <http://rtpscsc.scag.ca.gov/Pages/Amendment-2.aspx>.

As a blueprint for the region's growth through 2040, the 2016 RTP/SCS will outline the region's goals, policies, and strategies that improve the balance between land use and transportation systems, both current and future. It integrates the multi-modal transportation network and related strategies with an overall land use pattern that responds to projected population and employment growth, housing needs and changing demographics, and transportation demands, including transit and active transportation. It outlines improvements to the existing transportation system, as well as the strategic expansion of the transportation system. While SB 375 places a great deal of attention on meeting GHG emission reduction targets set forth by ARB, SCAG has also established other important goals that are aimed to improving the overall quality of life in the region. The 2016 RTP/SCS is currently anticipated to build from the foundation of the adopted 2012 RTP/SCS, as amended in September 2014, as the baseline scenario to be utilized to review the progress in implementing strategies identified in the 2012 RTP/SCS.

2016 RTP/SCS Vision

Based upon extensive local collaboration, the 2016 RTP/SCS will contain projects, policies and strategies with the intent of achieving a range of quality of life outcomes. The 2016 RTP/SCS is intended to identify reasonably available sources of funding over the plan period, and allocate these funds to transportation projects and programs that benefit the SCAG communities and residents. The 2016 RTP/SCS will be designed to assure that, to the greatest extent possible, the money invested would have the best chance of achieving the objectives communities and residents care about. As such, the 2016 RTP/SCS, as currently envisioned by SCAG, will

¹ CEQA streamlining provisions are also available for eligible projects meeting the criteria established by Senate Bill 226 (Simitian, 2011), CEQA Guidelines Section 15183.3 (Streamlining for Infill Projects) and for eligible projects meeting the criteria established by Senate Bill 743 (Steinberg, 2013), Public Resources Code Section 21155.4 (Exemptions).

² The SCAG region encompasses 17 federally designated non-attainment and maintenance areas for air quality standards, pursuant to the federal Clean Air Act. The U.S. Department of Transportation (USDOT), Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) under Section 176(c) of the Federal Clean Air Act [42 U.S.C. 7506(c)] require that for a non-attainment area, air quality conformity determinations on updated transportation plans and programs must be made every four (4) years.

continue on a meaningful path towards advancing mobility, sustainability and economic growth as set forth in the 2012 RTP/SCS.³

Mobility

A successful transportation plan will allow the future residents of the region to access daily needs, including work, school, shopping, transit, and recreation without undue burdens of cost, time, or physical danger. This includes the pressing need to preserve and maintain infrastructure at adequate levels. Residents should be able to rely on their ability to get from one place in the region to another, timely and safely. They should be able to choose from a variety of transportation modes that suit their preferences and needs, including non-automobile modes, such as walking and biking that allow for physical activity.

As currently envisioned, the 2016 RTP/SCS will continue to promote active transportation options, improve accessibility and increase proximity to recreation, public services, community amenities, transit, and other transportation facilities, and ensure safety.

Sustainability

Building off the foundation of the 2012 RTP/SCS, the 2016 RTP/SCS is intended to include strategies linking future regional transportation and land use planning with the goal of promoting sustainability. This integrated development pattern forecasted for the 2016 RTP/SCS will be used to demonstrate that the SCAG region is expected to achieve the GHG emissions reduction targets required under SB 375.

The 2016 RTP/SCS will define sustainability in the broadest way possible. It will allow future residents to enjoy equal or better quality of life than today, including the ability to lead a healthy lifestyle, enjoy clean air and water, ample opportunities for active transportation, open space, recreation, public services, community amenities, physical activities, and housing choices for all income levels. In light of the recent economic downturn and recovery, the 2016 RTP/SCS will lay a path for the region's continued economic growth and sustainability by providing strategies that create jobs and attract additional businesses to Southern California communities. Moreover, policies and programs that will be included as part of the 2016 RTP/SCS are anticipated to create direct and substantial benefits to public health by reducing pollutant emissions and expanding the opportunities for active transportation.

Economy

A successful RTP/SCS creates opportunities for business, investment, and employment in Southern California. The 2012 RTP/SCS did so by identifying over \$524 billion of investment in a 25 year period. This includes the direct economic effect of designing, building, and maintaining projects, as well as the indirect and induced benefits of the investments. Moreover, the economic benefits of the RTP/SCS are likely far broader and greater. The investments and strategies in the draft RTP/SCS will set the conditions for economic activity in the region by improving mobility and reducing congestion and commute times, allowing businesses in the region to operate more efficiently and maintain their competitiveness. Also, by identifying areas to accommodate regional housing needs the RTP/SCS strives to provide residents with better access to affordable housing in all communities, and lower overall combined costs for housing and transportation. In more subtle ways, the RTP/SCS encourages continued investment and job creation by ensuring a more livable, efficient, desirable, and competitive region where employers want and are able to do business over the long term.

³ Southern California Association of Governments. April 2012. *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy*. Page 11. Available at: <http://rtpsc.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf>

2016 RTP/SCS Goals

The RTP/SCS goals demonstrate the need to balance many priorities in the most cost-effective manner. As currently being envisioned, the goals of the 2016 RTP/SCS are expected to remain substantively the same as the goals established in the 2012 RTP/SCS, adopted by SCAG's Regional Council in April 2012⁴:

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

In addition to meeting the GHG emissions reduction targets that the ARB has set for the SCAG region pursuant to SB 375, SCAG intends to address the goals set forth in Executive Order S-3-05 (to reduce GHG emissions to 1990 levels by 2020, and to reduce GHG emissions to 80 percent below 1990 levels by 2050).

2016 RTP/SCS Policies and Performance Measures

The 2016 RTP/SCS is currently being envisioned to include a set of guiding policies that focus future investments on the best-performing projects and strategies that seek to preserve, maintain, and optimize the performance of the existing transportation system. As set forth in the 2012-2035 RTP/SCS⁵, these policies will include the following and are intended to help track how well the region is performing in relation to a broad range of goals and objectives.

- Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.
- Ensuring safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system should be the highest RTP priorities for any incremental funding in the region.
- RTP land-use and growth strategies in the RTP will respect local input and advance smart growth initiatives.
- Transportation Demand Management (TDM) and non-motorized transportation will be focus areas.
- High-Occupancy Vehicle (HOV) gap closures that significantly increase transit and rideshare usage will be supported and encouraged.
- Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the 2016 Plan.

Consistent with the goals and performance-based transportation planning approach set forth under MAP-21, performance measures will play a critical role in the development of the 2016 RTP/SCS. Performance measures are intended to help quantify regional goals, estimate the impacts of proposed investments, and evaluate progress over time. SCAG intends to build upon and update the performance measures developed for the 2012 Plan⁶ in the 2016 RTP/SCS. This way, there is consistency when tracking and assessing the region's performance and whether the region is progressing towards meeting and exceeding federal and state requirements.

⁴ Id. at page 13.

⁵ Id. at page 15.

⁶ Id. at page 15.

The 2016 RTP/SCS is currently being envisioned to include a set of key categories of performance measures as follows:

- Location efficiency
- Mobility and accessibility
- Safety and health
- Environmental quality
- Economic well-being
- Investment effectiveness
- System sustainability

Preliminary 2016 RTP/SCS Scenario Planning Matrix

As part of the 2016 RTP/SCS planning process, SCAG is developing a suite of transportation and land use scenarios for public consideration. These scenarios focus on transportation and land use related inputs that are modified to vary across four (4) scenarios. The purpose of developing scenarios is to provide an analytical technique to layout the policy choices to be considered as the 2016 RTP/SCS is developed. The Preliminary 2016 RTP/SCS Scenario Planning Matrix outlines a number of plan elements that together build a framework for comparing potential regional scale choices on issues such as land use development patterns, transportation investments, transportation demand management/transportation system management (TDM/TSM), and technological innovations. Policy considerations currently outlined in the Preliminary Scenario Planning Matrix include land use, housing, farm and natural lands, roadway and highway network, transit, active transportation, technology/innovation, and TDM/TSM. Scenarios will be analyzed and compared using outputs from SCAG regional transportation model, Scenario Planning Model, or off-model analysis. The outputs from these modeling analyses will help illustrate variations between scenarios and policy elements at the regional scale for metrics such as public health, mobility, accessibility, and sustainability.

For more information on the Preliminary 2016 RTP/SCS Scenario Planning Matrix, please visit SCAG's website, at: <http://www.scag.ca.gov/committees/CommitteeDocLibrary/oswag021915draftscenario.pdf>.

Bottom-up Local Growth and Land Use Input Process

A critical component to developing a successful 2016 RTP/SCS is the participation and cooperation of all local government partners and stakeholders within the SCAG region. To this end, SCAG uses a bottom-up local input process by which all local governments are informed of the 2016 RTP/SCS planning process and have clear and adequate opportunities to provide input. Growth forecasts and land use updates for development of the 2016 Plan have been developed through this bottom-up local input process, including: 1) extensive, ongoing communication with SCAG partners and stakeholders on growth forecast and land use updates throughout the region; 2) implementation of a formal protocol to guide the communication between SCAG staff and local jurisdiction regarding the input and review process; 3) flexibilities in providing official input to SCAG through the use of a Data Verification and Approval Form; 4) adoption of a resolution designating a staff position at the local government level to add clarity and accountability to the process; and 5) development of an automated mapping workflow and a digitalized land use database in a geographic information system (GIS) format to facilitate the review and input process.

RTP/SCS Public Participation Plan and Process

Another key aspect of the 2016 RTP/SCS plan development is public participation. To provide early and meaningful public participation in the Plan's development and decision-making processes, SCAG has developed

and adopted a Public Participation Plan (“PPP”).⁷ The adoption of the PPP has demonstrated SCAG’s commitment in increasing awareness and involvement of interested persons in SCAG’s governmental processes and regional transportation and land use planning. SCAG is committed to providing information and timely public notice, ensuring full public access to key decisions, and supporting early and continuing public involvement in the development of the 2016 RTP/SCS. To this end, SCAG will continue to engage a wide range of stakeholder groups, elected officials, special interest groups, the general public, and other interested parties through a series of workshops and public meetings, as well as SCAG’s policy committees, task forces, and subcommittee structure during the development of the 2016 RTP/SCS and its associated CEQA review process.

SCOPE OF ENVIRONMENTAL ANALYSIS IN THE PEIR

The PEIR to be prepared for the 2016 RTP/SCS analyzes potential effects that the 2016 RTP/SCS may cause on the environment. Although the 2016 RTP/SCS includes individual transportation projects, the associated PEIR is programmatic in nature and does not specifically analyze potential environmental effects that any of the individual transportation projects may cause. Project-level environmental impact analyses will need to be prepared by implementing agencies on a project-by-project basis as projects proceed through the design and decision-making process. Project-specific planning and implementation undertaken by each project sponsor/implementing agency will depend on a number of issues, including: policies, programs and projects adopted at the local level; restrictions on federal, State and local transportation funds; the results of feasibility studies for particular corridors; and project-specific environmental review.

Potential scope of environmental effects that warrant analysis and consideration in the 2016 RTP/SCS Draft PEIR are as follows:

- Aesthetics and Views
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources and Open Space
- Cultural Resources
- Energy
- Geology, Soils and Mineral Resources
- Greenhouse Gas Emissions and Climate Change
- Hazards and Hazardous Materials
- Hydrology and Water Resources
- Land Use and Planning
- Noise
- Population, Employment, and Housing
- Recreation
- Transportation, Traffic, and Safety
- Public Services and Utilities

PRELIMINARY 2016 RTP/SCS ALTERNATIVES

It is anticipated that the PEIR will evaluate at least three potential alternatives to the 2016 RTP/SCS as follows: (1) No Project; (2) Refined 2012 RTP/SCS Alternative; and (3) Intensified Transportation and Land Use Integration Alternative. These alternatives will evaluate various planning scenarios capable of achieving most of the basic objectives of the 2016 RTP/SCS. More specifically, each Alternative, except the No Project Alternative, will include a range of policies and projects including, but not limited to, variations in land use density and intensity, transit and rail systems, active transportation, highway/roadway construction and widening and transportation demand/system management.

SCAG has the discretion to select one alternative in its entirety or to combine elements of various alternatives to complete the PEIR for the RTP/SCS. The development of alternatives in a PEIR is focused on avoiding or reducing potentially significant impacts of the 2016 RTP/SCS. Therefore, detailed alternative descriptions are normally

⁷ Southern California Association of Governments. Public Participation Plan. Adopted April 3, 2014. http://www.scag.ca.gov/Documents/PPP2014_Adopted-FINAL.pdf

developed as impacts of a project are identified through the PEIR process.

No Project Alternative

The No Project Alternative is required by Section 15126.6(e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative will consider continued implementation of the goals and policies of the adopted 2012 RTP/SCS, as amended in September 2014. The No Project Alternative includes those transportation projects that are included in the first year of the previously conforming RTP/SCS and/or FTIP, or those that have completed environmental review by December 2014. The growth scenario included in the No Project Alternative is based on the 2012 RTP/SCS regional population, housing and employment totals.

Refined 2012 RTP/SCS Alternative

A Refined 2012 RTP/SCS Alternative would include the most recent growth forecast data, including local input on land use, employment, population, and housing data, and new input on transportation projects from the County Transportation Commissions in the SCAG region. This Alternative will consider continued implementation of the policies, strategies and projects included in the 2012 RTP/SCS.

Intensified Transportation and Land Use Integration Alternative

An Intensified Transportation and Land Use Integration Alternative would focus on analyzing 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 could include more mixed-use, infill development, increased densities in urban cores, new technological innovations, and/or additional transit and active transportation strategies.

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

SCOPING MEETINGS

SCAG will host two (2) scoping meetings during the 30-day public comment period that **begins March 9, 2015 and ends April 7, 2015** to review the various proposed Project elements and solicit information and comments in relation to this Notice and the CEQA analysis for the proposed Project. The two (2) scoping meetings, each providing the same information, will take place **on Tuesday, March 17, 2015, from 3 p.m. to 5 p.m., and on Wednesday, March 18, 2015, from 5 p.m. to 7 p.m., at SCAG Los Angeles (Main) office board room, located at 818 West 7th Street, 12th Floor, Los Angeles, California 90017.** For each of the two scoping meetings, videoconferencing is made available from the other sites, as listed below.

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

Coachella Valley Association of Governments (CVAG)
73-710 Fred Waring Drive
Palm Desert, CA 92260
(760) 346-1127
<http://www.cvag.org/>
This office is only available for the March 17, 3 p.m. meeting.


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

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

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

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

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

Signature: 
Jonathan Nadler, Manager of Compliance and Performance Assessment
Land Use & Environmental Planning Division
Southern California Association of Governments
Telephone: (213) 236-1884
E-mail: Nadler@scag.ca.gov; or 2016PEIR@scag.ca.gov

Date: 3/9/15

Antelope Valley Air Quality Management District

43301 Division St., Suite 206
Lancaster, CA 93535-4649

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MAR 28 2015

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Ms. Lijin Sun, Senior Regional Planner
Southern California Association of Governments
818 W. 7th St., 12th Floor
Los Angeles, CA 90017-3435

90017343512





Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heaston, Executive Director
In reply, please refer to AV0315/020

March 24, 2015

Ms. Lijin Sun, Senior Regional Planner
Southern California Association of Governments
818 W. 7th St., 12th Floor
Los Angeles, CA 90017-3435

Subject: Program Environmental Impact Report for the 2016-2040 Regional Transportation/Sustainable Communities Strategy

Dear Ms. Sun:

The Antelope Valley Air Quality Management District (AVAQMD) has received the request for comments for the Program Environmental Impact Report for the 2016-2040 Regional Transportation / Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is a long-range transportation plan that provides for a vision for regional transportation investments over a 20-year period. The RTP/SCS is updated every four years to reflect changes to the transportation network, the most recent planning assumptions, economic trends, and population and jobs growth forecasts.

The AVAQMD has reviewed the Notice of Preparation for the RTP/SCS and concurs with the proposed analysis of potential impacts in the Air Quality section. AVAQMD Designations and Classifications are available at <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=2908> .

If you have any questions regarding this letter, please contact me at (661) 723-8070 x2.

Sincerely,

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

Bret Banks
Deputy Director

BSB/bb

2016 PEIR

From: Duarte, Dolores@Wildlife <Dolores.Duarte@wildlife.ca.gov>
Sent: Monday, April 6, 2015 1:18 PM
To: 2016 PEIR
Cc: Harris, Scott P.@Wildlife; Wilson, Erinn@Wildlife; Found-Jackson, Christine@Wildlife; Courtney, Betty@Wildlife; state.clearinghouse@opr.ca.gov; Brandt, Jeff@Wildlife; Schmoker, Kelly@Wildlife; Chau, Victoria@Wildlife; Sevens, Gail@Wildlife; Fluharty, Marilyn@Wildlife; Calvert, Heidi@Wildlife
Subject: Copy of comment letter Re:SCAG Project 2016-2040 Regional Transportation Plan/SCH 2015031035/
Attachments: pdf SCAG Project NOP.pdf

M

Please see attached copy for your records. Original will follow.

If you have any questions, please contact Scott Harris at (626) 797-3170. Thank you!



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



April 6, 2015

Ms. Lijin Sun, Senior Regional Planner
Southern California Association of Governments
818 Seventh West Street, 12th Floor
Los Angeles, CA 90017-3435
Email: 2016PEIR@scag.ca.gov

**Subject: Comments on the Notice of Preparation of a Program Level Draft
Environmental Impact Report for the 2016 – 2040 Regional Transportation
Plan/Sustainable Communities Strategy; Los Angeles, Orange, Riverside, San
Bernardino, and Ventura Counties; SCH# 2015031035**

Dear Ms. Sun:

The California Department of Fish and Wildlife (Department), South Coast Region 5, has reviewed the 2016 – 2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Notice of Preparation (NOP) for a Draft Program Environmental Impact Report (DPEIR). The 2016 RTP/SCS, if approved by the Southern California Association of Governments (SCAG), will implement a long-range transportation plan that provides a vision for regional transportation investments over a 20-year period. SCAG updates the RTP/SCS every four years to reflect changes to the transportation network, the most recent planning assumptions, economic trends, and population and jobs growth forecasts.

The 2016 RTP/SCS would occur primarily in a six -county region that includes the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, and in 191 cities and 15 subregional entities within these counties. Subsequent activities or projects conducted under the 2016 RTP/SCS will require further CEQA analysis and may be noticed under separate CEQA documents.

The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources.

Specific Comments

Program Level Review Considerations - Realizing that the project is a Program Level planning document, the Department recommends that the DPEIR include descriptions on how the project will address the below general comments at the Program level to maximize consideration for biological resources during subsequent project reviews and to ensure that these reviews are consistent with the project's planning intent.

General Comments

- 1) Project Description and Alternatives. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to project component location and design features to ensure that alternatives to the proposed project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.

- 2) Lake and Streambed Alteration Agreements (LSA). As a Responsible Agency under CEQA Guidelines section 15381, the Department has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency, the Department may consider the Negative Declaration or Environmental Impact Report of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.¹
 - a) The project area supports aquatic, riparian, and wetland habitats; therefore, a preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.² Some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.
 - b) In project areas which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and

¹ A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

² Cowardin, Lewis M., et al. 1970. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

help maintain natural sedimentation processes; therefore, the Department recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.

- c) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.
- 3) Wetlands Resources. The Department, as described in Fish & Game Code § 703(a) is guided by the Fish and Game Commission's policies. The Wetlands Resources policy (<http://www.fgc.ca.gov/policy/>) of the Fish and Game Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion which would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values".
- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. The Department encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. The Department encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. The Department recommends mitigation measures to compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.
- b) The Fish and Game Commission's Water policy guides the Department to [insure] the quantity and quality of the waters of this state should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this state, and prevent the degradation thereof caused by pollution and contamination; and endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. The Department recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible.
- 4) California Endangered Species Act (CESA). The Department considers adverse impacts to a species protected by CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, candidate species, or state-listed rare

plant species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

- 5) Biological Baseline Assessment. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, fully protected, sensitive, regionally and locally unique species, and sensitive habitats, the DEIR should include the following information:
- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);
 - b) a thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <http://www.dfg.ca.gov/habcon/plant/>);
 - c) floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008³). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
 - d) a complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the project. The

³Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.

Department's California Natural Diversity Data Base (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp;

- e) a complete, recent assessment of rare, threatened and endangered and other sensitive species on site and within the area of potential effect, including California Species of Special Concern (CSSC) and California Fully Protected Species. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service; and,
 - f) a recent, wildlife and rare plant survey. The Department generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.
5. Biological Direct, Indirect, and Cumulative Impacts. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:
- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address project-related changes on drainage patterns and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included;
 - b) a discussion regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
 - c) the impacts of zoning of areas for development projects or other uses nearby or adjacent to natural areas, which may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document; and,

- d) a cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
6. Avoidance, Minimization, and Mitigation for Sensitive Plants. The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts. The Department considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2008).
 7. Compensatory Mitigation. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
 8. Long-Term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
 9. Nesting Birds. In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation and construction occur outside of the peak avian breeding season, which generally runs from February 1st through September 1st (as early as January 1 for some raptors). If project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds within three days prior to the work in the area, and ensure that no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

10. Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the project site and permanently moving it to a new location. The Department generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. The Department has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals, and their habitats.
11. Moving out of Harm's Way. The proposed project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, the Department recommends a qualified biological monitor approved by the Department be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.
12. Wildlife Movement and Connectivity. The project area supports significant biological resources and is located adjacent to a regional wildlife movement corridor. The project area contains habitat connections and supports movement across the broader landscape, sustaining both transitory and permanent wildlife populations. Onsite features, which contribute to habitat connectivity, should be evaluated and maintained. Aspects of the project could create physical barriers to wildlife movement from direct or indirect project-related activities. Indirect impacts from lighting, noise, dust, and increased human activity may displace wildlife in the general area.
13. Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.
 - a) The Department recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

- b) Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include, for example, retention of woody material, logs, snags, rocks and brush piles (see Mayer and Laudenslayer, 1988⁴, for a more detailed discussion of special habitat elements).

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Scott Harris, Environmental Scientist at (626) 797-3170 or scott.p.harris@wildlife.ca.gov.

Sincerely,



Betty J. Courtney
Environmental Program Manager I
South Coast Region

Ec: Erinn Wilson, CDFW, Los Alamitos
Jeff Brandt, CDFW, Ontario
Heidi Calvert, CDFW, Bishop
Kelly Schmoker, CDFW, Mission Viejo
Scott Harris, CDFW, Pasadena
Victoria Chau, CDFW, Los Alamitos
Gail Sevens, CDFW, San Diego
Marilyn Fluharty, CDFW, San Diego
Christine Found-Jackson, CDFW, Los Alamitos
State Clearing House, Sacramento

⁴Mayer, K. E. and W. F. Laudenslayer, Jr. 1988. Editors: A guide to wildlife habitats of California. State of California, The Resources Agency, Department of Forestry and Fire Protection, Sacramento, CA.

Lijin Sun

From: Kopulsky, Dan E@DOT <dan.kopulsky@dot.ca.gov>
Sent: Wednesday, April 08, 2015 9:49 AM
To: 2016 PEIR
Subject: RE: NOP Comment

Lijin,

Yes, they are formal comments.

The NOP refers to the Public Participation Plan which identifies the audience and methodology, but it wasn't clear to me, if the PEIR would strictly adhere to CEQA (Public Hearing, etc.), where the RTP would be following RTP guidelines and MAP-21.

Daniel Kopulsky

Chief, Regional Planning and Goods Movement
Caltrans, District 7
100 S. Main Street, MS-16
Los Angeles, CA 90012
(213) 897-0213

From: 2016 PEIR [<mailto:2016PEIR@scag.ca.gov>]
Sent: Wednesday, April 08, 2015 9:08 AM
To: Kopulsky, Dan E@DOT; 2016 PEIR
Subject: RE: NOP Comment

Hi Dan,

Is this clarification question a formal comment on the NOP of the Draft PEIR, since it was raised during the 30-day NOP scoping period? Thank you.

Sincerely,

Lijin Sun, J.D., Esq.

Senior Regional Planner
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017
T: (213) 236-1882 | F: (213) 236-1963
E: SunL@scag.ca.gov | W: www.scag.ca.gov

Stay Connected 

Join us for SCAG's 50th Anniversary Gala Celebration
at the 2015 Regional Conference & General Assembly,
May 7-8 @ the JW Marriott Desert Springs Resort & Spa
[in Palm Desert. Register online: www.scag.ca.gov/ga2015.](http://www.scag.ca.gov/ga2015)

From: Kopulsky, Dan E@DOT [<mailto:dan.kopulsky@dot.ca.gov>]
Sent: Tuesday, April 07, 2015 4:01 PM
To: 2016 PEIR
Subject: NOP Comment

Hi Lijin,

One clarifying question.

Will the public engagement for the Draft PEIR and Draft RTP/SCS occur together or separate/concurrently? Requirements slightly different for each one.

Daniel Kopulsky

Chief, Regional Planning and Goods Movement
Caltrans, District 7
100 S. Main Street, MS-16
Los Angeles, CA 90012
(213) 897-0213

2016 PEIR

From: Susan Kim <SKim@anaheim.net>
Sent: Monday, April 6, 2015 9:06 PM
To: 2016 PEIR
Cc: William Grigsby; David Kennedy
Subject: Notice of Preparation for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy Program Environmental Impact Report
Attachments: NOP Comment Letter.pdf

Dear Ms. Sun,

Attached are comments from the City of Anaheim for the Notice of Preparation for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy Program Environmental Impact Report. Please confirm receipt. Thank you for the opportunity to comment on this document, please contact me if you need any additional information.

Susan Kim, AICP, LEED AP ND

Acting Principal Planner

[Anaheim Planning Department](#) | [Planning Services](#)

200 South Anaheim Boulevard | Suite 162

[Anaheim](#), CA 92805

Office+ (714) 765-4958

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City of Anaheim
PLANNING DEPARTMENT

April 6, 2015

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

Sent via e-mail to 2016PEIR@scag.ca.gov

Re: **Notice of Preparation for the 2016-2040 Regional Transportation Plan/
Sustainable Communities Strategy Program Environmental Impact Report**

Dear Ms. Sun:

The City of Anaheim appreciates the opportunity to review and comment on the Notice of Preparation of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Program Environmental Impact Report (PEIR). The Notice of Preparation has been routed for review to our interdepartmental Environmental Review Committee for comment.

The following comments are from the Traffic Engineering Division of the Public Works Department. For further clarification, please contact David Kennedy at (714) 765-4920 or dkennedy@anaheim.net.

- RTP Land Use, both Existing and Future Year, should be coordinated with City of Anaheim Staff to ensure they are accurately represented. Developments such as ARTIC are now operational and should be included under the Existing Conditions.
- RTP Roadway and Highway network, both Existing and Future Year, should be coordinated with City of Anaheim Staff to ensure they are accurately represented.

The following comments are from the Advanced Planning Division of the Planning Department. For further clarification, please contact me at (714) 765-4958 or skim@anaheim.net.

- Mitigation measures included in the PEIR should be limited to issues that are within SCAG's purview.
- Mitigation measures should not be duplicative of existing regulations administered by or under the jurisdiction of other agencies. However, it is recommended that these regulations be referenced in the environmental analysis.
- Please provide documentation in the PEIR to demonstrate feasibility of all proposed mitigation measures.

Lijin Sun
April 6, 2015
Page 2 of 2

- SCAG may wish to consider providing a “tool box” of best practices for strategies that may reduce environmental impacts but are not within SCAG’s jurisdiction. However, these strategies should not be relied upon to mitigate project impacts.

Once again, thank you for the opportunity to provide comments on the Notice of Preparation for the 2016-2040 RTP/SCS PEIR. Please forward any subsequent public notices and/or environmental documents regarding this project to my attention at the address listed at the bottom of the first page of this letter. If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-4958.

Sincerely,

A handwritten signature in blue ink that reads "Susan Kim". The signature is written in a cursive style.

Susan Kim, AICP, LEED AP ND
Senior Planner

2016 PEIR

From: Bill Jacobs <bjacobs@ci.irvine.ca.us>
Sent: Tuesday, April 7, 2015 3:57 PM
To: 2016 PEIR
Cc: Barry Curtis; Marika Poynter; Farideh Lyons; Kerwin Lau; Katie Berg-Curtis
Subject: City of Irvine Comments on Notice of Preparation for Program EIR for 2016-40 RTP/SCS
Attachments: Sun-SCAG Itr 4-7-15 FINAL.pdf

Dear Ms. Sun:

Attached is a letter from the City of Irvine commenting on the above-noted project.

Thank you for your consideration.

-Bill

BILL JACOBS, AICP CEP | PRINCIPAL PLANNER

City of Irvine | Community Development Department

bjacobs@ci.irvine.ca.us

P. 949.724.6521 | F. 949.724.6440

Mailing: P.O. Box 19575 | Irvine, CA 92623

[Planning & Development Services](#) | [General Plan](#) | [Zoning Code](#) | [Irvine Quick Records](#) | [Property Zoning Lookup](#) | [Irvine Business Complex](#)



April 7, 2015

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

RE: Comments on the Notice of Preparation of a Program Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Sun:

The City of Irvine appreciates the opportunity to review and provide comments on the Notice of Preparation of a Program Environmental Impact Report (EIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The City of Irvine is requesting that Southern California Association of Governments (SCAG) staff consider the following comments during the preparation of the Program EIR.

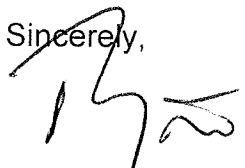
1. Limit mitigation measures included in the Program EIR for the 2016-2040 RTP/SCS to issues that are within SCAG's purview. All measures related to issues SCAG does not have the purview to implement should be included in an appendix of the RTP/SCS that can be used by local jurisdictions, local agencies and project sponsors as a menu of options or toolbox of strategies. This would be consistent with the Program EIR developed for the 2012-2035 RTP/SCS.
2. For the Program EIR for the 2016-2040 RTP/SCS, do not include any mitigation measures that are duplicative of existing regulations administered by or under the jurisdiction of other agencies. For each impact already administered by or under another agency, add language similar to "Local jurisdictions, agencies, and project sponsors should comply, as applicable with existing federal, state and local laws and regulations."
3. Provide documentation in the Program EIR for all mitigation measures deemed feasible.

Ms. Lijin Sun
April 7, 2015
Page 2

4. Provide clear language explaining that utilizing the Program EIR as a first-tier document in the preparation of any subsequent project-specific or site-specific environmental analyses is at the discretion of the implementing agencies.

The City of Irvine appreciates your consideration of the comments provided in this letter. It is a shared goal to develop and adopt an RTP/SCS that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels. The City of Irvine looks forward to working with SCAG to achieve this goal.

Sincerely,

The image shows a handwritten signature in black ink. The signature is stylized and appears to read 'Timothy N. Gehrich'. To the right of the signature, the word 'FOR:' is written in a similar handwritten style.

Timothy N. Gehrich, AICP
Acting Director of Community Development

cc: Barry Curtis, Manager of Planning Services
Katie Berg-Curtis, Project Development Administrator
Kerwin Lau, Project Development Administrator
Bill Jacobs, Principal Planner
Farideh Lyons, Senior Transportation Analyst
Marika Poynter, Senior Planner

2016 PEIR

From: Nueno, Fern <fnueno@newportbeachca.gov>
Sent: Tuesday, April 7, 2015 4:17 PM
To: 2016 PEIR
Cc: Brandt, Kimberly; Wisneski, Brenda
Subject: NOP Comments
Attachments: City of Newport Beach NOP PEIR 2016 RTP SCS.pdf

Good afternoon. Please see the attached comment letter and let me know if you have any questions. Thank you.

Fern Nueno, AICP, LEED AP BD+C
Associate Planner
fnueno@newportbeachca.gov
(949) 644-3227

City of Newport Beach | Planning Division | 100 Civic Center Drive | Newport Beach, CA 92660
A responsive, knowledgeable team of professionals guiding community development in the public interest.



CITY OF NEWPORT BEACH

100 Civic Center Drive
Newport Beach, California 92660

949 644-3200

newportbeachca.gov/communitydevelopment

VIA EMAIL

April 7, 2015

Ms. Lijin Sun
Senior Regional Planner
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017
2016PEIR@scag.ca.gov

RE: Comments on the Notice of Preparation of a Program Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Sun:

The City of Newport appreciates the opportunity to review and provide comments on the Notice of Preparation of a Program Environmental Impact Report ("PEIR") for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). The City of Newport Beach agrees with the comments submitted by the Orange County Council of Governments ("OCCOG") on March 26th (attached) and requests that SCAG staff consider those comments during the preparation of the PEIR.

It is a shared goal to develop and adopt a Regional Transportation Plan and Sustainable Communities Strategy that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels. The City of Newport Beach looks forward to working with the Southern California Association of Governments to achieve this goal and appreciates the consideration of our comments.

Sincerely,


Kimberly Brandt, AICP
Director

Attachment: OCCOG Comment Letter dated March 26, 2015



Orange County
Council of Governments
Member Agencies

- Aliso Viejo
- Anaheim
- Brea
- Buena Park
- Costa Mesa
- Cypress
- Dana Point
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- Irvine
- La Habra
- La Palma
- Laguna Beach
- Laguna Hills
- Laguna Niguel
- Laguna Woods
- Lake Forest
- Los Alamitos
- Mission Viejo
- Newport Beach
- Orange
- Placentia
- Rancho Santa Margarita
- San Clemente
- San Juan Capistrano
- Santa Ana
- Seal Beach
- Stanton
- Tustin
- Villa Park
- Westminster
- Yorba Linda
- County of Orange
- OCTA
- TCA
- OC Sanitation District
- ISDOC
- South Coast AQMD

March 26, 2015

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

RE: Comments on the Notice of Preparation of a Program
Environmental Impact Report for the 2016-2040 Regional
Transportation Plan/Sustainable Communities Strategy

Dear Ms. Sun:

The Orange County Council of Governments (OCCOG) appreciates the opportunity to review and provide comments on the Notice of Preparation of a Program Environmental Impact Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). OCCOG is requesting that SCAG staff consider the following comments during the preparation of the PEIR.

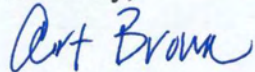
1. SCAG shall limit mitigation measures included in the PEIR for the 2016-2040 RTP/SCS to issues that are within SCAG's purview. All measures related to issues SCAG does not have the purview to implement shall be included in an appendix of the RTP/SCS that can be used by local jurisdictions, local agencies, and project sponsors as a menu of options or toolbox of strategies.
2. The PEIR for the 2016-2040 RTP/SCS shall not include any mitigation measures that are duplicative of existing regulations administered by or under the jurisdiction of other agencies. For each impact already administered by or under another agency, SCAG could add the language "Local jurisdictions, agencies, and project sponsors should comply, as applicable with existing federal, state, and local laws and regulations."
3. SCAG shall ensure that documentation is provided in the PEIR for all mitigation measures deemed feasible.

The OCCOG appreciates your consideration of the comments provided in this letter. It is a shared goal to develop and adopt a

OCCOG Comments
Page Two

Regional Transportation Plan and Sustainable Communities Strategy that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels. The OCCOG looks forward to working with the Southern California Association of Governments to achieve this goal.

Sincerely,

A handwritten signature in blue ink that reads "Art Brown". The signature is written in a cursive, flowing style.

Honorable Art Brown
Chair OCCOG Board of Directors

2016 PEIR

From: Margaret Lin <MLin@SouthPasadenaCA.gov>
Sent: Tuesday, April 7, 2015 3:46 PM
To: 2016 PEIR
Cc: City Council
Subject: SCAG 2016-2040 RTP/SCS PEIR Notice of Preparation
Attachments: SCAG NOP Comment Letter.pdf

Dear Ms. Sun,

Please find the attached comment letter submitted on behalf of the City of South Pasadena regarding the SCAG 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy Program Environmental Impact Report Notice of Preparation. A hard copy of the letter has been mailed to you and should arrive shortly.

If you have any questions or comments please feel free to contact me.

Sincerely,

Margaret Lin

Principal Management Analyst
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030
(626) 403-7236
MLin@SouthPasadenaCA.gov



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CITY OF SOUTH PASADENA

OFFICE OF THE CITY MANAGER
1414 MISSION, SOUTH PASADENA, CA 91030
TEL: 626.403.7210 • FAX: 626.403.7211
WWW.SOUTHPASADENACA.GOV

April 7, 2015

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

RE: Notice of Preparation of a Program Environmental Impact Report for the 2016-2040
Regional Transportation Plan/Sustainable Communities Strategy

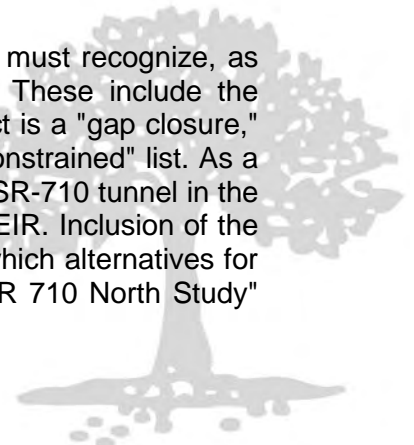
Dear Ms. Sun,

The City of South Pasadena (City) appreciates the opportunity to comment on the Southern California Association of Governments' (SCAG) Notice of Preparation (NOP) for the Program Environmental Impact Report (PEIR) of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The City would like to raise the following issues of concern regarding the 2016-2040 RTP/SCS PEIR:

1. Faulty Assumption that "SR-710 North Extension (tunnel)" should be included in the 2016-2040 RTP/SCS.

The NOP asserts that the 2016-2040 RTP/SCS "will largely embody the goals, objectives, and transportation improvements that have been considered in the adopted 2012 RTP/SCS, last amended in September 2014 (Amendment No. 2 to the 2012 RTP/SCS)." This assertion pretends that the law, state policy, and activities in the SR-710 corridor have been unchanged in the past four years, and that whatever assumptions and premises governed in 2012 should be repeated now.

To prepare an adequate PEIR on the 2016-2040 RTP/SCS, SCAG must recognize, as detailed below, the flawed assumptions built into the 2012 RTP. These include the premises, questioned in greater detail below, that the SR-710 project is a "gap closure," and that the tunnel project qualifies for inclusion in the "financially constrained" list. As a preliminary matter, however, regardless of the error of including the SR-710 tunnel in the 2012 plan, that error should no longer be perpetuated in the 2016 PEIR. Inclusion of the SR-710 tunnel places a heavy and unlawful finger on the scale by which alternatives for the SR-710 corridor are to be evaluated in the just-commenced "SR 710 North Study" draft EIS/EIR.



The SR-710 North Study declares that "[t]he purpose of the proposed action is to effectively and efficiently accommodate regional and local north-south travel demands in the study area of the western San Gabriel Valley and east/northeast Los Angeles." Putting aside whether that North Study fulfills that purpose, its stated intent is to compare several alternatives on a neutral field of functional capability and environmental and economic impact. But that study's actual comparison of build alternatives relies on the 2012 RTP/SCS to create a "valid" inconsistency of all non-tunnel alternatives (and the single-bore tunnel variation-alternative) with SCAG policies and objectives (SR-710 North Study 29, 2-89.). The flawed 2012 RTP will thus be argued as justifying a decision to select the tunnel, not because it is the superior project, but because only that choice avoids a conflict with SCAG. Furthermore, the recently released SR-710 North Study Draft Environmental Impact Report has stated that no preferred alternative has been identified or selected.

While the City recognizes that the 2016-2040 RTP/SCS "does not specifically analyze potential environmental effects that any of the transportation projects may cause," it nonetheless "includes individual transportation projects." In order for the PEIR to become a valid program EIR its program must not include a SR-710 project or any project that pre-empts the selection process that is to occur through the SR-710 North Study.

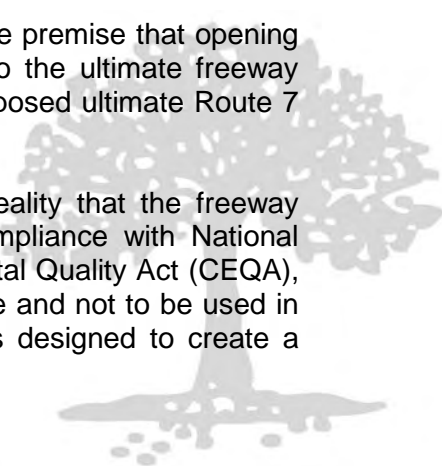
2. Faulty Assumption that a Corridor Project "Will Close [the] 710 Freeway Gap."

If the 2016 RTP/SCS DEIR includes projects as described in the 2012 RTP/SCS and amendments, it will perpetuate the error that the 710 Route Study and SR-710 North Extension serve to "close the freeway gap" (2012 RTP FTIP project list.28; 2012 Financially-Constrained RTP project list 164; Draft 2015 FTIP project list 11.). The SR-710 freeway ends at Valley Boulevard; the construction in Pasadena was allowed by judicial order that treats the construction as part of the I-210 interchange.

In the 1974-1998 EIS/EIR documents for the previously proposed surface route, the project was characterized as the extension of the existing I-710 north of Valley Boulevard. Los Angeles County Metropolitan Transportation Authority (LACMTA) adopted that terminology when the project changed from surface to tunnel, and was made a subject of Measure R. SCAG, however, continued in 2012, as it did in 2008, to refer to the project as a "gap closure", presumably on the premise that part of the I-710 freeway was completed south of the I-210 interchange. The 1976 judicial order that allowed the freeway component between I-210 and Del Mar Boulevard to be opened to traffic, however, treated this freeway component as part of the I-210 project, as its opening was funded by an I-210 contract. In the words of the court, "only the southern portion of the Long Beach Freeway has been completed and it now terminates at Valley Boulevard" (*City of South Pasadena v. Volpe*, 418 F. Supp. 854, 858 (C.D. Cal. 1976)).

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

To label the SR-710 project as a "gap closure" ignores the reality that the freeway construction north of Del Mar was never accomplished in compliance with National Environmental Protection Act (NEPA) and California Environmental Quality Act (CEQA), and was only allowed by the court as part of the 210 interchange and not to be used in favor of completing a I-710 freeway. The term "gap closure" is designed to create a



sense of inevitability or priority for this project over competing ones, will have effect on the ultimate decision in the SR-710 North Study and 2016 RTP/SCS PEIR, and should be removed in the environmental documentation.

3. Faulty Assumption that a SR-710 Tunnel Project Is "Financially-Constrained."

The 2012 RTP/SCS continued to represent the fiction that a tunnel project qualifies as a constrained project. While in 2012 some financing might have been deemed more "reasonably available" than previously because of the passage of Measure R and state legislation enabling a toll facility, Measure R accounts for no more than one-sixth of projected cost. SCAG failed in 2012 to provide evidence that private investors would consider entering into a Public Private Partnership for this project in light of competing projects of higher social and transportation value, and with greater promises of return. Moreover, the intervening years since 2012 have produced no further public financial commitments to the project, short of authorizing the SR-710 North Study, which is emphatically not funding any of the alternatives to be examined there.

The appropriate federal regulation, 23 C.F.R. § 450.104 offers the following definitions (emphasis added):

"Financially constrained" or "fiscal constraint" means that the metropolitan transportation plan, TIP, and STIP includes sufficient financial information for demonstrating that projects in the metropolitan transportation plan, TIP, and STIP can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained. For the TIP and the STIP, financial constraint/fiscal constraint applies to each program year. Additionally, projects in air quality nonattainment and maintenance areas can be included in the first two years of the TIP and STIP only if funds are "available" or "committed."

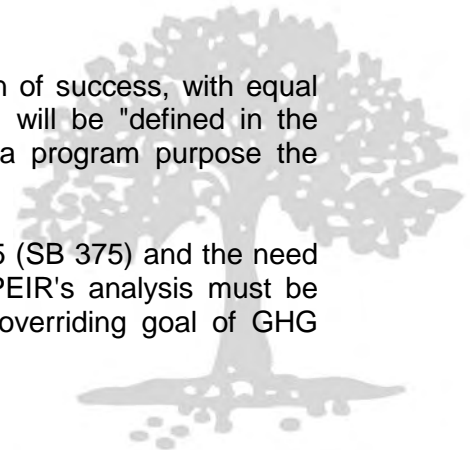
If anything, since 2012 the "reasonably available revenue sources" have become even more remote. Measure J failed at the ballot, and a second failure might be risked by including a tunnel in Measure R's successor. Moreover, the SR-710 North Study now introduces several previously-unstudied alternatives to a tunnel, and a more attractive alternative may emerge from the DEIR public circulation. LACMTA has represented that the Measure R funds are not required to be devoted to a tunnel. The increasing competition for these funds in the SR-710 corridor make any 2012 assumptions of "reasonably available," faulty as they were then, even less rational today.

The 2016 RTP/SRS EIR must not treat an SR-710 tunnel alternative as a "financially constrained" project.

4. Need to Emphasize Greenhouse Gas (GHG) Reduction and Vehicle Miles Traveled (VMT) Reduction as Paramount Program Purposes.

The NOP seems to focus on "mobility" as the primary criterion of success, with equal billing given to "sustainability" and "economy." "Sustainability" will be "defined in the broadest way possible," and "economy" seems to make as a program purpose the construction of projects per se.

The City recognizes that the NOP also refers to Senate Bill 375 (SB 375) and the need to meet GHG reduction targets. To ensure that result, the PEIR's analysis must be driven by developing the 2016-2040 RTP/SCS to attain the overriding goal of GHG



reductions. Given developing land use and technological methodologies, the SB 375 targets should be treated as floors, not ceilings. Consistently with Senate Bill 743 (ch. 386, 2013 Cal. Stats.), program elements must be measured not just by their ability to improve Level of Service (LOS), but primarily by their ability to minimize VMT and trip generation. While by its terms SB 743's mandates apply in transit priority areas (Pub. Res. Code, § 21099(b)), enough of those areas are embraced within SCAG's area of responsibility to render SB 743's specifications applicable to the 2016-2040 RTP/SCS PEIR. Moreover, even beyond the letter of section 21099, general principles of CEQA assessment require that this contemporary methodology, designed to address the compelling contemporary environmental challenge, be applied in the new PEIR.

These observations do not preclude the inclusion of LOS and congestion analyses, provided that they take appropriate account of induced demand over time. Indeed, the proposed Office of Planning and Research (OPR) Guidelines for Implementing SB 743 expressly call out, as have the consensus of academic literature and several judicial decisions, the need to account for induced demand in transportation analysis. (See OPR Proposed CEQA Guideline 15064.3.) Both sound policy and legal compliance call for adherence to that requirement, since induced demand will be a required factor in the CEQA Guidelines before SCAG adopts its 2016 RTP/SCS, and independently judicially enforceable.

Thank you for your consideration of these comments. If you have any questions or comments please feel free to contact Margaret Lin, Principal Management Analyst, at MLin@SouthPasadenaCA.gov or (626)403-7236.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sergio Gonzalez', with a stylized flourish at the end.

Sergio Gonzalez
City Manager

cc: South Pasadena City Council



2016 PEIR

From: Juachon, Luz <ljuachon@ci.ventura.ca.us>
Sent: Tuesday, April 7, 2015 5:23 PM
To: 2016 PEIR
Cc: Maggie Ide
Subject: Response to SCAG NOP of Program PEIR for the 2016-2040
Attachments: DOC040715.pdf

Dear Ms. Sun,

Attached is the City of Ventura's response on the Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) for the 2016-2040.

The original copy of the attached document was sent to you via US Postal service today.

You may contact Dave Ward, Planning Manager at (805) 677-3964 or via email at dward@cityofventura.net if you have any questions or concerns regarding this matter.

Best regards,

Luz E. Juachon
Planning Division
City of Ventura
(T) 805/658-4725 | (F) 654-7560

Please consider the environment before printing this email

April 7, 2015

Southern California Association of Governments
Attn. Ms. Lijin Sun
Senior Regional Planner
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

Dear Ms. Sun:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). As was noted recently regarding the 2014 base year data development for the 2016-2040 RTP/SCS, SCAG assumes a higher rate of growth for the City of Ventura than has been in evidence in the City's history or will be possible under constraints to natural resources such as water. Furthermore, the City is currently undertaking development of a residential allocation/growth management policy which may further restrict what development may be allowed under current levels of public services provided by the City and other service providers. As such, the PEIR for the 2016 RTP/SCS should contain a thorough analysis of the 2016 RTP/SCS land use scenario as it relates to impacts to land use policy; constrained public resources; and public services levels, all at the local jurisdiction and local service agency level.

We look forward to review of the pending EIR and request retention on circulation lists for future documents and CEQA circulation pertaining to this project and ask that correspondence be sent to me at:

City of Ventura Planning Division
Attn: Dave Ward, AICP, Planning Manager
501 Poli Street
P.O. Box 99
Ventura, CA 93002

Should you have further questions I can also be contacted at (805) 677-3964 or dward@cityofventura.net.

Sincerely,

A handwritten signature in blue ink that reads "Dave Ward".

Dave Ward, AICP
Planning Manager

2016 PEIR

From: Jesse Marquez <jnm4ej@yahoo.com>
Sent: Tuesday, April 7, 2015 5:05 PM
To: 2016 PEIR; Jonathan Nadler
Cc: Drew Wood; Ricardo Pulido; Tom Williams - Sierra Club; Pastor Carrillo; Robina Suwol; Luis Olmedo; Shabaka Heru; Jesse Marquez
Subject: Submission of Public Comments on the PEIR for the 2016-2014 RTP/SCS
Attachments: SCAG RTP-SCS 2016-2040 PEIR Joint EJ Organization Public Comments 4-7-2015.docx

We respectfully submit the following joint public comments on behalf of our organizations, members and community.

Jesse N. Marquez
Executive Director
Coalition For A Safe Environment
310-704-1265

**Jesse N. Marquez - Executive Director
Coalition For A Safe Environment**

1601 N. Wilmington Blvd., Ste. B, Wilmington, CA 90744
jnm4ej@yahoo.com 310-704-1265

**Drew Wood - Executive Director
California Kids IAQ**

1601 N. Wilmington Blvd., Ste. B4, Wilmington, CA 90744
californiakidsiaq@gmail.com 916-616-5913

**Ricardo Pulido - Executive Director
Community Dreams**

1601 N. Wilmington Blvd., Ste. B2, Wilmington, CA 90744
mr.rpulido@aol.com 310-567-0748

**Pastor Alfred Carrillo
Apostolic Faith Center**

1508 E. Robidoux Street, Wilmington, CA 90744
alfredcarrillo@msn.com 310-940-6281

**Robina Suwol - Executive Director
California Safe Schools**

P.O. Box 2756, Toluca Lake, CA 91610
robinasuwol@earthlink.com 818-261-7965

**Tom Williams - Senior Technical Advisor
Citizens Coalition For A Safe Community**

4209 Jackson Avenue, Culver City, CA 90232
ctwilliams2012@yahoo.com 323-528-9682

**Luis Olmedo - Executive Director
Comite Civico del Valle, Inc.**

699 E Street, Brawley, CA 92227
comitecivico@sbcglobal.net 760-587-9952

**Shabaka Heru - Executive Director
Society For Society Action**

P.O. Box 59541, Los Angeles, CA 90059
shabaka4ej@yahoo.com 310-462-6732

Southern California Association of Governments
818 West Seventh Street, 12th floor
Los Angeles, CA 90017-3435
Attn: Ms. Lijin Sun
Senior Regional Planner
Jonathan Nadler
Manager of Compliance & Performance Assessment
213-236-1884
2016PEIR@scag.ca.gov
nadler@scag.ca.gov

April 7, 2015

Re: NOP of a PEIR for 2016-2040 RTP/SCS
Su: Submission of Public Comments

We the above organizations wish to jointly submit the following public comments on the SCAG proposed Program Environmental Impact Report for the 2016-20140 Regional Transportation Plan/Sustainable Communities Strategy.

We have attached a red-lined SCAG published document to reflect our requested additions and changes in the various sections.

The primary contact for correspondence and information is Jesse N. Marquez, Executive Director for the Coalition For A Safe Environment.

2016 RTP/SCS Goals

The RTP/SCS goals demonstrate the need to balance many priorities in the most cost-effective manner. As currently being envisioned, the goals of the 2016 RTP/SCS are expected to remain substantively the same as the goals established in the 2012 RTP/SCS, adopted by SCAG's Regional Council in April 2012⁴:

- Maximize mobility and accessibility for all people and goods in the region
- Ensure travel safety and reliability for the people and goods in the region
- Preserve and ensure a sustainable regional transportation system
- Maximize the security of the regional transportation system through improved monitoring, recovery planning, and coordination with other security agencies
- Maximize the productivity of our transportation system
- Protect the environment, improve air quality and promote energy efficiency
- Encourage land use and growth patterns that complement our transportation investments
- **Maximize the incorporation of green sustainable construction materials**
- **Protect and improve public health along transportation corridors**
- **Include 21st century zero emissions public & freight transportation technologies**
- **SCASG shall mitigate all negative direct, indirect, cumulative & growth inducing impacts**

In addition to meeting the GHG emissions reduction targets that the ARB has set for the SCAG region pursuant to SB 375, SCAG intends to address the goals set forth in Executive Order S-3-05 (to reduce GHG emissions to 1990 levels by 2020, and to reduce GHG emissions to 80 percent below 1990 levels by 2050).

2016 RTP/SCS Policies and Performance

The 2016 RTP/SCS is currently being envisioned to include a set of guiding policies that focus future investments on the best-performing projects and strategies that seek to preserve, maintain, and optimize the performance of the existing transportation system. As set forth in the 2012-2035 RTP/SCS⁵, these policies will include the following and are intended to help track how well the region is performing in relation to a broad range of goals and objectives.

- Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.
- Ensuring safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system should be the highest RTP priorities for any incremental funding in the region.
- RTP land-use and growth strategies in the RTP will respect local input and advance smart growth initiatives.
- Transportation Demand Management (TDM) and non-motorized transportation will be focus areas.
- High-Occupancy Vehicle (HOV) gap closures that significantly increase transit and rideshare usage will be supported and encouraged.
- Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the 2016 Plan.
- **Maximum achievable reduction of pollution emissions and greenhouse gases.**
- **Fastest and safest achievable logistical transportation movement.**

- Lowest life time maintenance cost and waste disposal.
- SCAG shall prioritize zero emissions public and freight transportation investments.
- SCAG shall include mitigation for indirect, cumulative and growth inducing negative public impacts.
- Transportation investments shall comply with the CARB and SCAQMD Land Use Planning Guidelines.
- Transportation investments shall include an assessment of community land loss for private industry freight transportation.
- Compliance to California Health & Safety Codes.
- Compliance to Title VI of the Civil Rights Act of 1974 and Presidential Order 12898.
- Compliance to AB 32 and SB 375.
- Adopted Green Sustainable Construction Policy, Plan & Requirements for the maximum incorporation of green sustainable construction materials.

Consistent with the goals and performance-based transportation planning approach set forth under MAP-21, performance measures will play a critical role in the development of the 2016 RTP/SCS. Performance measures are intended to help quantify regional goals, estimate the impacts of proposed investments, and evaluate progress over time. SCAG intends to build upon and update the performance measures developed for the 2012

Plan⁶ in the 2016 RTP/SCS. This way, there is consistency when tracking and assessing the region's performance and whether the region is progressing towards meeting and exceeding federal and state requirements.

The 2016 RTP/SCS is currently being envisioned to include a set of key categories of performance measures as follows:

- Location efficiency
- Mobility and accessibility
- Safety and health
- Environmental quality
- Economic well-being
- Investment effectiveness
- System sustainability
- Negative Environmental Justice Community Impacts vs Non-Environmental Justice Community
- CARB and SCAQMD Land Use Guidelines compliance
- Public externalized costs vs private industry contribution costs
- Public/Non-Profit Organization submitted projects/scenarios vs governmental agency projects/scenarios
- Identification and mitigation of negative indirect and cumulative impacts i.e. transportation investments cause a growth induced increase in number of ships and emissions
- An assessment of adopted and included public recommendations

Preliminary 2016 RTP/SCS Scenario Planning Matrix

As part of the 2016 RTP/SCS planning process, SCAG is developing a suite of transportation and land use scenarios for public consideration. These scenarios focus on transportation and land use related inputs that are modified to vary across four (4) scenarios. The purpose of developing scenarios is to provide an analytical technique to layout the policy choices to be considered as the 2016 RTP/SCS is developed. The Preliminary 2016 RTP/SCS Scenario Planning Matrix outlines a number of plan elements that together build a framework for comparing potential regional scale choices on issues such as land use development patterns, transportation investments, transportation demand management/transportation system

management (TDM/TSM), and technological innovations. Policy considerations currently outlined in the Preliminary Scenario Planning Matrix include land use, housing, farm and natural lands, roadway and highway network, transit, active transportation, technology/innovation, and TDM/TSM. Scenarios will be analyzed and compared using outputs from SCAG regional transportation model, Scenario Planning Model, or off-model analysis. The outputs from these modeling analyses will help illustrate variations between scenarios and policy elements at the regional scale for metrics such as public health, mobility, accessibility, and sustainability.

- SCAG shall solicit and include Public/Non-Profit Organization submitted projects/scenarios

Bottom-up Local Growth and Land Use Input Process

A critical component to developing a successful 2016 RTP/SCS is the participation and cooperation of all local government partners and stakeholders within the SCAG region. To this end, SCAG uses a bottom-up local input process by which all local governments are informed of the 2016 RTP/SCS planning process and have clear and adequate opportunities to provide input. Growth forecasts and land use updates for development of the 2016 Plan have been developed through this bottom-up local input process, including: 1) extensive, ongoing communication with SCAG partners and stakeholders on growth forecast and land use updates throughout the region; 2) implementation of a formal protocol to guide the communication between SCAG staff and local jurisdiction regarding the input and review process; 3) flexibilities in providing official input to SCAG through the use of a Data Verification and Approval Form; 4) adoption of a resolution designating a staff position at the local government level to add clarity and accountability to the process; and 5) development of an automated mapping workflow and a digitalized land use database in a geographic information system (GIS) format to facilitate the review and input process.

- SCAG shall assure that transportation investments shall comply with the CARB and SCAQMD Land Use Planning Guidelines.

RTP/SCS Public Participation Plan and Process

Another key aspect of the 2016 RTP/SCS plan development is public participation. To provide early and meaningful public participation in the Plan's development and decision-making processes, SCAG has developed and adopted a Public Participation Plan ("PPP").⁷ The adoption of the PPP has demonstrated SCAG's commitment in increasing awareness and involvement of interested persons in SCAG's governmental processes and regional transportation and land use planning. SCAG is committed to providing information and timely public notice, ensuring full public access to key decisions, and supporting early and continuing public involvement in the development of the 2016 RTP/SCS. To this end, SCAG will continue to engage a wide range of stakeholder groups, elected officials, special interest groups, the general public, and other interested parties through a series of workshops and public meetings, as well as SCAG's policy committees, task forces, and subcommittee structure during the development of the 2016 RTP/SCS and its associated CEQA review process.

- SCAG shall include sponsoring public hearings and workshops in all major transportation corridor communities/cities.

SCOPE OF ENVIRONMENTAL ANALYSIS IN THE PEIR

The PEIR to be prepared for the 2016 RTP/SCS analyzes potential effects that the 2016 RTP/SCS may cause on the environment. Although the 2016 RTP/SCS includes individual transportation projects, the associated PEIR is programmatic in nature and does not specifically analyze potential environmental effects that any of the individual transportation projects may cause. Project-level environmental impact analyses will need to

be prepared by implementing agencies on a project-by-project basis as projects proceed through the design and decision-making process. Project-specific planning and implementation undertaken by each project sponsor/implementing agency will depend on a number of issues, including: policies, programs and projects adopted at the local level; restrictions on federal, State and local transportation funds; the results of feasibility studies for particular corridors; and project-specific environmental review.

Potential scope of environmental effects that warrant analysis and consideration in the 2016 RTP/SCS Draft PEIR are as follows:

- Aesthetics and Views
 - Agriculture and Forestry Resources
 - Air Quality
 - Biological Resources and Open Space
 - Cultural Resources
 - Energy
 - Geology, Soils and Mineral Resources
 - Greenhouse Gas Emissions and Climate Change
 - Hazards and Hazardous Materials
 - Hydrology and Water Resources
 - Land Use and Planning
 - Noise
 - Population, Employment, and Housing
 - Recreation
 - Transportation, Traffic, and Safety
 - Public Services and Utilities
- Public Health (Program/Project Health Impact Assessment)
 - Zero Emissions Transportation (Technology Assessment)
 - Identification of Indirect/Cumulative/Growth Inducing Projects (Negative Impact Assessment)

PRELIMINARY 2016 RTP/SCS ALTERNATIVES

It is anticipated that the PEIR will evaluate at least three potential alternatives to the 2016 RTP/SCS as follows: (1) No Project; (2) Refined 2012 RTP/SCS Alternative; and (3) Intensified Transportation and Land Use Integration Alternative. These alternatives will evaluate various planning scenarios capable of achieving most of the basic objectives of the 2016 RTP/SCS. More specifically, each Alternative, except the No Project Alternative, will include a range of policies and projects including, but not limited to, variations in land use density and intensity, transit and rail systems, active transportation, highway/roadway construction and widening and transportation demand/system management.

SCAG has the discretion to select one alternative in its entirety or to combine elements of various alternatives to complete the PEIR for the RTP/SCS. The development of alternatives in a PEIR is focused on avoiding or reducing potentially significant impacts of the 2016 RTP/SCS. Therefore, detailed alternative descriptions are normally developed as impacts of a project are identified through the PEIR process.

- SCAG shall solicit and include Public/Non-Profit Organization submitted projects/scenarios

No Project Alternative

The No Project Alternative is required by Section 15126.6(e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative will consider continued implementation of the goals and policies of the adopted 2012 RTP/SCS, as amended in September 2014. The No Project Alternative includes those transportation projects that are included in the first year of the previously conforming RTP/SCS and/or FTIP, or those that have completed environmental review by December 2014. The growth scenario included in the No Project Alternative is based on the 2012 RTP/SCS regional population, housing and employment totals.

Refined 2012 RTP/SCS Alternative

A Refined 2012 RTP/SCS Alternative would include the most recent growth forecast data, including local input on land use, employment, population, and housing data, and new input on transportation projects from the

County Transportation Commissions in the SCAG region. This Alternative will consider continued implementation of the policies, strategies and projects included in the 2012 RTP/SCS.

Intensified Transportation and Land Use Integration Alternative

An Intensified Transportation and Land Use Integration Alternative would focus on analyzing 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 could include more mixed-use, infill development, increased densities in urban cores, new technological innovations, and/or additional transit and active transportation strategies.

- Identification of special event day choke points on freeways & major public transit corridors

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

- Zero Emission Dedicated Freight Truck Routes/Lanes
i.e. Terminal Island 104 Freeway, Long Beach 110 Freeway
(Electric Battery, Fuel Cell, Hydrogen Fuel Cell)
- Zero Emission Electric Train Routes
i.e. Alameda Corridor, Terminal Island 104 Freeway, LA Harbor 110 Freeway, San Diego 405 Freeway, Riverside 91 Freeway, Pomona 60 Freeway, San Bernardino 10 Freeway, Foothill 210 Freeway
(MagLev Train Passenger & Freight Trains)

2016 PEIR

From: Jui Ing Chien <jchien@parks.lacounty.gov>
Sent: Tuesday, April 7, 2015 9:55 AM
To: 2016 PEIR
Cc: Norma E. Garcia; Kathline J. King; Clement Lau
Subject: Response - SCAG 2016 PEIR-NOP
Attachments: Response to SCAG 2016PEIR-NOP.pdf

Ms. Sun,

Attached please find the response letter for the NOP of the SCAG PEIR.
Thank you.

Jui Ing Chien - County of Los Angeles Department of Parks and Recreation - Planning and Development Agency | 510 South Vermont Avenue, Los Angeles, CA 90020 | ph# 213.351.5129 fax# 213.639.3959 | Business Hours 7:00 A.M. to 5:30 P.M. Monday through Thursday



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

"Parks Make Life Better!"

Russ Guiney, Director

John Wicker, Chief Deputy Director

April 7, 2015

2016PEIR@scag.ca.gov

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

Dear Ms. Sun:

**NOTICE OF PREPARATION OF A PROGRAM
ENVIRONMENTAL IMPACT REPORT (PEIR) FOR
THE 2016-2040 REGIONAL TRANSPORTATION PLAN (RTP)/
SUSTAINABLE COMMUNITIES STRATEGY (SCS)**

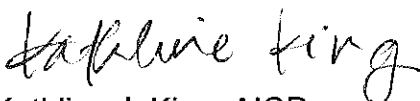
The Notice of Preparation for the above PEIR has been reviewed for potential impacts on the facilities under the jurisdiction of this Department. Please find below our comments on the PEIR:

1. The PEIR should include a map identifying the locations of all existing open space and recreation lands in the SCAG region, including public parks, recreational facilities, and other open space and recreational areas owned/maintained by local, state, federal, and non-profit, agencies.
2. The analysis in the PEIR for recreational resources should evaluate the proposed project's impacts on existing open space and recreation lands including public parks and recreational facilities/areas. Specifically, the following impacts should be examined:
 - Potential loss or disturbance of open space, recreation lands, and trails;
 - Accessibility and proximity to parks and recreation facilities as a result of the RTP projects;
 - Potential noise impacts to park patrons;
 - Potential increase in air pollutant emissions near a park or recreation area.
3. To address potential impacts on recreational resources, the PEIR should at a minimum include mitigation measures that would:

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

We were pleased to see that the 2016 RTP/SCS will continue to improve accessibility and increase proximity to open space and recreation lands in the SCAG region, which is consistent with our recent effort to provide alternative/non-auto directions for certain County regional parks on our website. Thank you for including this Department in the review of this environmental document. If you have any questions, please contact Ms. Jui Ing Chien at (213) 351-5129 or jchien@parks.lacounty.gov.

Sincerely,



Kathline J. King, AICP
Chief of Planning

KK:CL:JC/ Response to SCAG 2016PEIR-NOP

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



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

April 21, 2015

Lijin Sun, Senior Regional Planner
LA County Department of Regional Planning
Southern California Association
818 West Seventh Street
Los Angeles, CA 90017

Dear Ms. Sun:

NOTICE OF PREPARATION, "2016-2040 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY", THE 2016 RTP/SCS UPDATES THE LAST ADOPTED 2012 RTP/SCS, LAST AMENDED IN SEPTEMBER 2014, BY REFINING GOALS, OBJECTIVES, AND POLICIES, AND THE LIST OF PROJECTS, EXTENDING THE PLANNING HORIZON TO 2040, LOS ANGELES COUNTY (FFER 201500056)

The Notice of Preparation has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We will reserve our comments for the draft EIR.

LAND DEVELOPMENT UNIT:

1. The Land Development Unit appreciates the opportunity to comment on this project.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY

CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY

DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLEN DORA
HAWAIIAN GARDENS
HAWTHORNE

HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA FLINTRIDGE
LA HABRA

LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWNDALE
LOMITA
LYNWOOD

MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT
PICO RIVERA

POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

Lijin Sun, Senior Regional Planner
April 21, 2015
Page 2

2. This project does not propose construction of structures or any other improvements at this time. The Land Development Unit has no requirements at this time.
3. Should any questions arise regarding the Land Development Unit's comments, please contact FPEA Wally Collins at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Program Environmental Impact Report.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no comment or objection to the proposed plan/strategy.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad

County of Los Angeles
Fire Department
Forestry Division
5823 Rickenbacker Road, Room 123
Commerce, CA 90040-4335

SCAG

MAY 01 2015

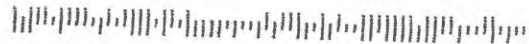
NOT CT CORPORATION

PLEASE REJECT
MAIL RECEIVED

Lijin Sun, Senior Regional Planner
LA County Department of Regional Planning
Southern California Association
818 West Seventh Street
Los Angeles, CA 90017



90017340799



PUBLIC COMMENT CARD

2016
2/10
RTPSCS

To make a public statement, please complete this card and submit it to a SCAG staff member prior to the public comment period. SCAG reserves the right to place reasonable time restrictions for public comments.

Si desea hacer un comentario en un idioma distinto del inglés, por favor póngase en contacto con un empleado de SCAG para solicitar ayuda. 如果你想用除英文以外的另一種語言發表評論，請聯繫南加州政府協會工作人員尋求幫助。

영어 외의 다른 언어로 의견을 제출하길 원하시는 분은 SCAG staff에게 도움을 요청하시기 바랍니다.

Nếu quý vị muốn bình luận bằng một ngôn ngữ khác hơn tiếng Anh, xin vui lòng liên lạc với nhân viên của SCAG.

Meeting Location: Los Angeles

Date: 3/18/2015

Name: EBONY DURBOIS

Phone: 323 360 7532

Agency or Affiliation:

Address: 17050 Passage Ave. Apt 37 Bellflower

Zip: 90706

Email: EBONYDURBOIS@gmail.com

Position or Title: Sign Language Interpreter

COMMENTS:

I know the requirement is to post the notice in

the paper however I would love to see the

Community that language is provided advised more directly. GLAD, Greater Los Angeles Agency Deafness



G. L. A. D.

(323) 478-8000

2222 Laverna Ave
Los Angeles CA 90041

2016 PEIR

From: calwatch <calwatch@gmail.com>
Sent: Thursday, March 12, 2015 5:41 PM
To: 2016 PEIR
Subject: NOP Comments

Some comments on the Notice of Preparation for the 2016 SCAG PEIR:

- Due to current uncertainty of the SR-710 project and lack of a locally preferred alternative for this corridor, modeling of the PEIR should exclude any project in the SR-710 corridor (i.e. freeway tunnel, light rail, bus rapid transit, TSM/TDM), with a future amendment to the PEIR made to add the project which is selected as the preferred alternative. This is to not bias the final EIR for the SR-710 project which is scheduled for completion in 2016.
- In addition to modeling the "Intensified Transportation and Land Use Integration Alternative" this alternative should include full implementation of all active transportation plans currently approved by local jurisdictions (both funded, strategic, and unconstrained projects), including modeling changes in environment due to road diets/additional bikeways at a programmatic level, so that the public can understand global impacts of implementing an unconstrained active transportation network. Projects currently under development by COGs such as the Coachella Valley Link and South Bay COG Neighborhood Electric Vehicles should also be included, as well as evaluating impacts of trip sharing technology and ride hailing services.

Sincerely,
Hank Fung, P.E.

2016 PEIR

From: Vivian Perez <VivianPerez@co.imperial.ca.us>
Sent: Wednesday, April 1, 2015 2:03 PM
To: 2016 PEIR
Cc: Monica Soucier
Subject: Notice of Preparation of a Program Environmental Impact Report for the 2016-2035 RTP/SCS
Attachments: Comment Ltr NOP PROGRAM EIR REGIONAL TRANSP PLAN.pdf

Good afternoon Ms. Lijin Sun;

Attach you will find the Air District's comment letter on the Notice of Preparation of a Program Environmental Impact Report for the 2016-2035 Regional Transportation Plan –Sustainable Communities Strategy. A hard copy will be mailed the Southern California Association of Governments.

Should you have any questions, please feel free to call our office.

Thank you

*****PLEASE NOTE NEW OFFICE AND FAX NUMBER BELOW*****

Vivian Perez, MPA
APC Environmental Coordinator
Imperial County APCD
150 S. 9th St.,
El Centro, CA 92243
Telephone: (442) 265-1790
FAX: (442) 265-1799



AIR POLLUTION CONTROL DISTRICT

April 01, 2015

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

RE: Comments on Notice of Preparation of a Program Environmental Impact Report
for the 2016-2035 Regional Transportation Plan – Sustainable Communities Strategy

Dear Ms.. Lijin Sun:

The Imperial County Air Pollution Control District has finalized the review of the Notice of Preparation of a Program Environmental Impact Report for the 2016-2040 Regional Transportation Plan - Sustainable Communities Strategy and is hereby providing its comments.

- (2) Refined 2012 RTP/SCS Alternative
A refined 2012 RTP/SCS Alternative would include the most recent growth forecast data, including local input on land use, employment, population, and housing data, and new input on transportation projects from the County Transportation Commissions in the SCAG region. This Alternative will consider continued implementation of the policies, strategies and projects included in the 2012 RTP/SCS.
- (3) Intensified Transportation and Land Use Integration Alternative
An intensified Transportation and Land Use Integration Alternative would focus on analyzing 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 could include more mixed-use, infill development, increased densities in urban cores, new technological innovations, and/or additional transit and active transportation strategies.

Imperial County Air Pollution Control District determines that the Alternatives as proposed aims to avoid or reduce potentially significant impacts of the 2016 RTP/SCS may cause on the environment. Both Alternatives implement ways to avoid, reduce, or otherwise mitigate the impacts of emissions, include a range of policies and projects. Alternative (2) is more basic and proposes a refined RTP/SCS and to incorporate recent growth forecast data and local input on various pertinent from the County Transportation Commissions in the SCAG region. Alternative (3) is a more aggressive approach proposes further analyzing various methods to reduce GHG and criteria pollutant emissions and ultimately improving mobility, accessibility, and sustainability. A combination of elements within the Alternatives may be the best approach to complete the Program Environmental Impact Report for the RTP/SCS, so long as there is an adherence to regulations, meet the objectives, feasibility, and most importantly that the ultimate goal is to improve the quality of life outcomes.

Sincerely,

Vivian Perez, MPA
APC Environmental Coordinator

PUBLIC COMMENT CARD

To make a public statement, please complete this card and submit it to a SCAG staff member prior to the public comment period. SCAG reserves the right to place reasonable time restrictions for public comments.

Si desea hacer un comentario en un idioma distinto del inglés, por favor póngase en contacto con un empleado de SCAG para solicitar ayuda.

如果你想用除英文以外的另一種語言發表評論，請聯繫南加州政府協會工作人員尋求幫助。

영어 외의 다른 언어로 의견을 제출하길 원하시는 분은 SCAG staff에게 도움을 요청하시기 바랍니다.

Nếu quý vị muốn bình luận bằng một ngôn ngữ khác hơn tiếng Anh, xin vui lòng liên lạc với nhân viên của SCAG.

Meeting Location:

Date: 3-17-15

Name: JESSE N. MARQUEZ

Phone: 310-704-1265

Agency or Affiliation: COALITION FOR A SAFE ENVIRONMENT

Address: 1601 N. WILMINGTON BLVD. STE B
City: WILMINGTON, CA Zip: 90744

Email: JNM4EJ@YAHOO.COM Position or Title: EXECUTIVE DIRECTOR

COMMENTS:

1. ADD TO 2016 RTP/SCS GOALS - PROTECT PUBLIC HEALTH
2. ADD TO " " " POLICIES & PERFORMANCE MEASURES -
SAAK COMPLY WITH SCAG AND CARB LAND USE GUIDELINES



3. ADD TO POLICIES + MEASURES - LAND USE GUIDELINES COMPLIANCE
4. ADD TO PEIR 2016/SCENARIO PLANNING MATRIX - INCLUDE PUBLIC PROPOSED PROJECT SCENARIOS
5. ADD TO SCOPE OF ENVIRONMENTAL ANALYSIS IN PEIR - PUBLIC HEALTH IMPACT ASSESSMENT.
6. ADD TO INTENSIVE TRANSPORTATION + LAND USE INTEGRATION -
 - ZERO EMISSION TRANSPORTATION TECHNOLOGY IS THE #1 PRIORITY
 - IDENTIFY KNOWN + FUTURE CRUISE TRANSPORTATION POINTS THAT ARE CAUSED BY SPECIAL EVENTS IE FOOTBALL
7. ADD TO POLICIES + PERFORMANCE MEASURES - SMALL ASSES PUBLIC COMMUNITY LAND USE LOSS FOR PRIVATE CORPORATE ECONOMIC INTEREST

2016 PEIR

From: Joyce Dillard <dillardjoyce@yahoo.com>
Sent: Tuesday, April 7, 2015 4:27 PM
To: 2016 PEIR
Subject: Comments SCAG PEIR 2016-2040 RTPSCS due 4.7.2015

YOU STATE:

2016 RTP/SCS Policies and Performance Measures

- *Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.*
- *Ensuring safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system should be the highest RTP priorities for any incremental funding in the region.*
- *RTP land-use and growth strategies in the RTP will respect local input and advance smart growth initiatives.*
- *Transportation Demand Management (TDM) and non-motorized transportation will be focus areas.*
- *High-Occupancy Vehicle (HOV) gap closures that significantly increase transit and rideshare usage will be supported and encouraged.*
- *Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the 2016 Plan.*

and

The adopted guidelines include a requirement for program level performance measures, which include objective criteria that reflect the goals and objectives of the RTP. In addition, the initial years of the plan must be consistent with the FTIP.

COMMENTS:

According to our notes for the 2015 FTIP:

FTIP expenditures are categorized by function into three broad industries:

- construction,
- transit operations, and
- architectural and engineering services

Highway operations and maintenance expenditures are included with construction given their similarity.

We are not clear how program level performance measures will be chosen and executed considering the overlap of agencies involved. Since you are LEAD AGENCY for this PEIR, and other agencies are LEAD AGENCIES for the individual projects in the FTIP

across the many county jurisdictions, who is ultimately responsible. FTIP covers COUNTY TRANSIT COMMISSIONS that are responsible for:

- Highway
- Local arterial
- Bridge
- Public transit
- Rail
- Bicycle
- Pedestrian
- Safety
- Maintenance
- Operational
- Planning projects

We find that some of the responsibilities will be covered by CALTRANS, or CITY or COUNTY GOVERNMENTS. How as you, the LEAD AGENCY, plan to substantiate program performance measures.

YOU STATE:

2016 RTP/SCS Goals

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

And

Pursuant to SB 375, SCAG's SCS is required to meet reduction targets for greenhouse gas (GHG) emissions by 8 percent per capita by 2020 and 13 percent per capita by 2035 compared to 2005, as set by the California Air Resources Board (ARB). According to Section 65080(b)(2)(B) of the California Government Code, the SCS must:

- *Identify existing land use;*
- *Identify areas to accommodate long-term population growth;*
- *Identify areas to accommodate an **eight-year projection of regional housing needs**;*
- *Identify transportation needs and the planned transportation network,*
- *Consider resource areas and farmland;*
- *Consider state housing goals and objectives;*
- *Set forth a forecasted growth and development pattern; and*

- *Comply with federal law for developing an RTP.*

COMMENTS:

Land use is not a function of this body, but a function of the GENERAL PLANS in form of the COMMUNITY PLANS for the urban areas. HOUSING ELEMENTS are also under the purview of the local governments.

You estimation for the RHNA has no assignment to the LAND USE ELEMENT in the GENERAL PLANS. Your results are divided by cities, not PLANNING AREAS.

We are missing the nexus between LAND USE and GREENHOUSE GAS EMISSIONS REDUCTIONS. The infrastructure may be deteriorated and cannot sustain increased populations in TOD Transit Oriented Districts, yet there is an assumption that building such projects produce the desired result. Missing is the analysis showing increased congestion in traffic due to density, increased vehicle idling and possible increase in GREENHOUSE GASES.

YOU STATE:

*In addition, SCAG is required to submit to ARB the SCS developed as part of the RTP for the purpose of determining whether the GHG emissions reduction targets have been met. Furthermore, SB 375 specifically states that the **SCS developed as part of the RTP cannot dictate local General Plan policies.***

And

*Rather, **SB 375 is intended to provide a regional policy foundation that local government may build upon if they so choose** and generally includes the quantitative growth projections from each city and county in the region going forward.*

And

The 2016 RTP/SCS is currently being envisioned to include a set of key categories of performance measures as follows:

- *Location efficiency*
- *Mobility and accessibility*
- *Safety and health*
- *Environmental quality*
- *Economic well-being*
- *Investment effectiveness*
- *System sustainability*

COMMENTS:

These performance measures cannot encompass any sense of reality of functional government when the governments who have the legal authority under the State yet

have an option to ignore these plans and, ultimately, the responsibility to State compliance.

YOU STATE:

As part of the 2016 RTP/SCS planning process, SCAG is developing a suite of transportation and land use scenarios for public consideration. These scenarios focus on transportation and land use related inputs that are modified to vary across four (4) scenarios.

And

The Preliminary 2016 RTP/SCS Scenario Planning Matrix outlines a number of plan elements that together build a framework for comparing potential regional scale choices on issues such as land use development patterns, transportation investments, transportation demand management/transportation system management (TDM/TSM), and technological innovations.

COMMENTS:

Models only work with data both factual and applicable under any scenario. Please set up the parameters for the Scenario Planning Matrix. Four models may not be sufficient to cover the vast area under your jurisdiction.

Bottom-up Local Growth and Land Use Input Process seems to be about communication not data.

YOU STATE:

Scope of Environmental Effects

- *Aesthetics and Views*
- *Agriculture and Forestry Resources*
- *Air Quality*
- *Biological Resources and Open Space*
- *Cultural Resources*
- *Energy*
- *Geology, Soils and Mineral Resources*
- *Greenhouse Gas Emissions and Climate Change*
- *Hazards and Hazardous Materials*
- *Hydrology and Water Resources*
- *Land Use and Planning*
- *Noise*
- *Population, Employment, and Housing*
- *Recreation*
- *Transportation, Traffic, and Safety*
- *Public Services and Utilities*

COMMENTS:

Please include Watershed Health and permit compliance in these reviews. Though each region is governed by a local State Regional Water Quality Control Board, the compliance issues can be costly when a region has more TMDLs Total Daily Maximum Load compliance issues as well as Wastewater issues.

Groundwater is important during this Declared Drought. Those aspects of decreased water should be considered in land and transportation issues.

CIRCULATION ELEMENT requirements in **Government Code Section 65302 (b)** are:

*(b) (1) A circulation element consisting of the general location and **extent of existing and proposed major thoroughfares, transportation routes, terminals, any military airports and ports, and other local public utilities and facilities, all correlated with the land use element of the plan.***

*(2) (A) Commencing January 1, 2011, upon any substantive revision of the circulation element, the legislative body shall modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for **safe and convenient travel** in a manner that is suitable to the rural, suburban, or urban context of the general plan.*

(B) For purposes of this paragraph, "users of streets, roads, and highways" mean bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors.

YOU STATE:

PRELIMINARY 2016 RTP/SCS ALTERNATIVES

(1) No Project

(2) Refined 2012 RTP/SCS Alternative

(3) Intensified Transportation and Land Use Integration Alternative.

COMMENTS:

Any Alternative presented **MUST** have the condition of the infrastructure, capital needs assessment (outside of those stated in the FTIP) and economic analysis.

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

2016 PEIR

From: Michele Hasson <mhasson@leadershipcounsel.org>
Sent: Tuesday, April 7, 2015 4:31 PM
To: 2016 PEIR
Cc: Phoebe Seaton; Veronica Garibay
Subject: Comments to Notice of Preparation of a Program Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy
Attachments: Leadership Counsel comments to SCAG SCS RTP 2016 NOP.pdf

Dear Ms. Lijin;

Please accept the attached Comments to Notice of Preparation of a Program Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.

We look forward to seeing our comments addressed in the PEIR.

Thank you for your consideration,

Michele Hasson

--

Michele Knab Hasson-- Regional Director, Coachella Valley
Leadership Counsel for Justice and Accountability
<http://www.leadershipcounsel.org>
mhasson@leadershipcounsel.org
cell: 347-578-0220



April 7, 2015

Delivered via electronic mail

VIA ELECTRONIC MAIL (2016PEIR@scag.ca.gov)
Ms. Lijin Sun, Senior Regional Planner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, California 90017-3435

RE: Comments to Notice of Preparation of a Program Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Lijin:

As a complement to observations we provided in the recent Southern California of Governments Environmental Justice Workshop for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) held on November 20, 2014, we would like to submit these comments on the Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) for the 2016 RTP/SCS. We welcome the opportunity to discuss the following recommendations in person.

Analyze and address the impacts of scenarios on low income communities and communities of color to ensure that the benefits and burdens of the RTP/SCS are fairly distributed.

According to state law, “environmental justice” means the equitable treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. (Gov. Code, § 65040.12, subd. (e).)

Fairness, in the context of the 2016 RTP/SCS, means the *benefits* of a healthy environment should be available to all residents of the SCAG region, and the *burdens* of inequitable investments should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.¹ “Environmental justice cannot be achieved . . . simply by adopting generalized policies and goals. Instead, environmental justice requires an ongoing commitment to identifying existing and potential problems, and to finding and applying solutions, both in approving specific projects and planning for future development.”²

The NOP of the PEIR should, for each scenario, including the “no build baseline” scenario, explicitly and robustly identify, analyze, and address the impacts of the scenario on low income communities

¹ Kamala D. Harris, Attorney General, *Environmental Justice at the Local and Regional Level*, available at: http://oag.ca.gov/sites/all/files/pdfs/environment/ej_fact_sheet.pdf.

² *Id.*

and communities of color, specifically disaggregating analysis per SCAG sub-regions with particular focus on small urban and rural communities within SCAG boundaries.

Such an analysis should include the impacts and benefits of each scenario, disaggregated by race, income and geography related to: access to transit, high transportation and housing cost burdens, lack of affordable housing (or poor jobs-housing fit), risk of direct and indirect displacement, and other public health factors (including those related to air quality, access to active transportation, and related chronic diseases).

Ensure that the tools and models used to analyze the PEIR alternatives are sensitive to differences among the behaviors of and the scenario/policy impacts on low-income people and people of color, and adopt appropriate mitigation measures to address these differences.

The PEIR must account in its analysis for the differences in behaviors, housing opportunities and transportation needs (including transportation to work) among different economic and racial segments of the population and between and among different geographical areas within SCAG boundaries.

If the modeling tools used to analyze the 2016 RTP/SCS scenarios do not account for the differences in vehicle miles traveled (VMT) among different economic and racial segments of the population, the environmental impacts of the scenarios, such as affordable housing distribution, anti-displacement policies, and inadequate transit, could not be accurately measured or considered in the PEIR. This may not only lead to inaccuracies in determining the significance of impacts, it would overlook several of the policy priorities that should be adopted in the SCAG 2016 RTP/SCS update and limit performance targets and equity analysis measures.

The PEIR and its tools should take into account such issues and the following factors, among others:

- The impact of the reliability, accessibility and affordability of transit for disadvantaged communities disaggregated by sub-region.
- The sprawl-inducing impacts of the suite of transportation and land use scenarios for the 2016 RTP/SCS, with specific focus on the environmental impacts resulting from leap-frogging of low-income residents to the outer suburbs, particularly from coastal sub-regions to the Inland Empire.
- The VMT of lower-income residents in affordable housing, which tends to be lower than the VMT of more affluent auto-owning residents, disaggregated per sub-region as well as between small and rural communities.
- Jobs-housing fit of each scenario by income level and geographic location to determine whether the plan indeed encourages development of workforce housing that would reduce VMT and GHG emissions.

Such an analysis will ensure the environmental impacts of 2016 RTP/SCS attributes will be accurately measured and considered in the PEIR.

Conduct as part of the EIR a Health Impact Assessment to study the health impacts of the proposed scenarios specifically on disadvantaged communities.

SCAG should conduct a Health Impact Assessment (HIA) as a component of the PEIR.³ We recommend that the assessment focus specifically on the differential impacts on and potential benefits for more affluent, urban communities in SCAG's region as compared to low income communities and communities of color, specifically per sub region as well as small urban and rural communities.

Such an HIA would help SCAG identify appropriate actions to understand and address differential impacts and benefits of the 2016 RTP/SCS. SCAG should also consider and identify mitigations for the public health effects and disparities related to transit connectivity (reliability, accessibility, and affordability), availability of affordable housing (including the amount of affordable housing in healthy and high-opportunity areas), and displacement risk.

Ensure that the PEIR analyses the regional differences in the SCAG region.

The SCAG region is a diverse region that includes both rural and urban communities, and areas with well-developed transit and active transportation networks and those without. Accordingly the PEIR should:

- Regional Performance Indicators should be dis-aggregated by sub region and small urban and rural geographies.
- Regional performance indicators should be assessed for sub-region and both rural and urban regions and communities.
- The impacts of proposed large scale growth on existing lower income communities with respect to infrastructure, housing, access to water.

Include Environmental Justice Performance Measures to the core performance measures for the 2016-2040 RTP/SCS and include them in the PEIR.

The Environmental Justice Performance Measures are important to other RTP goals; specifically to improving prosperity and health outcomes for all residents. The inclusion of the EJ performance measures as a core RTP measure reflects their importance to advancing greater equity in the region. Furthermore, SCAG should identify disadvantaged communities' burdened by environmental justice issues and develop a project list that would mitigate such impacts.

Given the specific environmental justice challenges facing the region's rural communities, the performance measures should be stratified by and separately address rural areas, and provide separate analysis of each measure in these areas.

The Environmental Justice Performance Measures should include, but not limited to, the following:

- Analyze specific geographic areas and provide analysis over time. Use San Francisco Bay Area's "Communities of Concern" as a model. (<http://onebayarea.org/plan-bay-area/plan-elements/equity-analysis.html> , <http://geocommons.com/maps/118675>)

³ An HIA is a "combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended, effects of a policy, plan, program or project on the health of a population and the distribution of those effects within the population." See Gothenburg consensus statement. See U.S. Centers for Disease Control and Prevention, *Health Impact Assessment*, available at: <http://www.cdc.gov/healthyplaces/hia.htm>.

- Supplement regional maps with local scale maps (at least on-line). Only using data at the county scale obscures the disparate impacts that happen within counties, when the EJ Analysis is aimed at identifying disparate impacts.
- Provide analysis. Maps and charts are no substitute for calling out trends, to identify both success and areas of concern.

Study the Jobs, Health and Quality of Life Scenario as one of the 2016 RTP/SCS PEIR scenarios.

We will continue to work with SCAG staff to develop this alternative. In order to ensure that this alternative is given adequate consideration, we request that we have equal opportunity to use the modeling tools to iteratively develop the Jobs, Health and Quality of Life Scenario that the other alternatives will be given.

* * * * *

We welcome sustained collaboration with SCAG and will continue to engage in all stakeholder processes about the 2016 RTP/SCS and we look forward to seeing our comments addressed in the PEIR.

Thank you for your consideration,

Michele Hasson
Regional Director of the Coachella Valley, Leadership Counsel for Justice and Accountability

COJAVE
oil quality management district
DESERT
14306 Park Avenue
Victorville, CA 92392

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Mojave Desert Air Quality Management District

14306 Park Avenue, Victorville, CA 92392-2310

760.245.1661 • fax 760.245.2699

Visit our web site: <http://www.mdaqmd.ca.gov>

Eldon Heaston, Executive Director

March 19, 2015

Ms. Lijin Sun, Senior Regional Planner
Southern California Association of Governments
818 W. 7th St., 12th Floor
Los Angeles, CA 90017-3435

**Subject: Program Environmental Impact Report for the 2016-2040 Regional
Transportation/Sustainable Communities Strategy**

Dear Ms. Sun:

The Mojave Desert Air Quality Management District (MDAQMD) has received the request for comments for the Program Environmental Impact Report for the 2016-2040 Regional Transportation/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is a long-range transportation plan that provides for a vision for regional transportation investments over a 20-year period. The RTP/SCS is updated every four years to reflect changes to the transportation network, the most recent planning assumptions, economic trends, and population and jobs growth forecasts.

The MDAQMD has reviewed the Notice of Preparation for the RTP/SCS and concurs with the proposed analysis of potential impacts in the Air Quality section. MDAQMD Designations and Classifications are available at http://www.mdaqmd.ca.gov/rules_plans/documents/CEQAGuidelines.pdf.

If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122.

Sincerely,

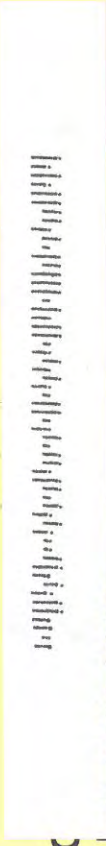
A handwritten signature in black ink, appearing to read "Alan J. De Salvio".

Alan J. De Salvio
Deputy Director – Mojave Desert Operations

AJD/tw

SCAG 2016 RTP SCS

CITY C



P.O. BOX 3070

Garden Grove, California 92842

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SOUTHERN CALIFORNIA ASSOCIATION
OF GOVERNMENTS
MS. LIJIN SUN, SR. REGIONAL PLANNER
818 WEST SEVENTH ST. 12TH FLOOR
LOS ANGELES, CA 90017-3435

SCAG

MAR 30 2015

MAIL RECEIVED



March 26, 2015

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

RE: Comments on the Notice of Preparation of a Program Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Sun:

The Orange County Council of Governments (OCCOG) appreciates the opportunity to review and provide comments on the Notice of Preparation of a Program Environmental Impact Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). OCCOG is requesting that SCAG staff consider the following comments during the preparation of the PEIR.

1. SCAG shall limit mitigation measures included in the PEIR for the 2016-2040 RTP/SCS to issues that are within SCAG's purview. All measures related to issues SCAG does not have the purview to implement shall be included in an appendix of the RTP/SCS that can be used by local jurisdictions, local agencies, and project sponsors as a menu of options or toolbox of strategies.
2. The PEIR for the 2016-2040 RTP/SCS shall not include any mitigation measures that are duplicative of existing regulations administered by or under the jurisdiction of other agencies. For each impact already administered by or under another agency, SCAG could add the language "Local jurisdictions, agencies, and project sponsors should comply, as applicable with existing federal, state, and local laws and regulations."
3. SCAG shall ensure that documentation is provided in the PEIR for all mitigation measures deemed feasible.

The OCCOG appreciates your consideration of the comments provided in this letter. It is a shared goal to develop and adopt a Regional Transportation Plan and Sustainable Communities Strategy that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels. The OCCOG looks forward to working with the Southern California Association of Governments to achieve this goal.

Sincerely,

A handwritten signature in blue ink that reads "Art Brown".

Honorable Art Brown
Chair OCCOG Board of Directors

2016 PEIR

From: Gregory Nord <gnord@octa.net>
Sent: Tuesday, April 7, 2015 2:22 PM
To: 2016 PEIR
Cc: Kia Mortazavi; kbrotcke@octa.net; clarwood@octa.net; Joseph Alcock
Subject: SCAG 2016-2040 RTP/SCS PEIR NOP comments
Attachments: 4.7.15 - Lijin Sun - RTP PEIR NOP comments.pdf

Attached are comments from the Orange County Transportation Authority for consideration in the development of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and associated Program Environmental Impact Report. A hard copy of the letter is also being mailed. If you have any questions, please contact me, Greg Nord, at 714-560-5885 or gnord@octa.net.

Thank you,

Greg Nord
Senior Transportation Analyst
Strategic Planning, OCTA

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Chief Executive Officer

April 7, 2015

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

**Re: Notice of Preparation for the 2016-2040 Regional Transportation Plan/
Sustainable Communities Strategy Program Environmental Impact
Report**

Dear Ms. Sun:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review and comment on the Notice of Preparation of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Program Environmental Impact Report (PEIR). OCTA thanks you in advance for taking full consideration of the comments provided below.

OCTA understands the purpose of the PEIR as a broad-level analysis of the entirety of the program of projects, policies, and strategies that are being considered as part of the financially constrained plan, and viable alternatives. Regarding the selection of the alternatives to be analyzed as part of the PEIR, the 2012-2035 RTP/SCS PEIR states, "Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration". Based on our understanding of the purpose of the PEIR, and to be consistent with past PEIR practice, OCTA makes the following request:

The 2016-2040 RTP/SCS financially constrained alternatives should accurately reflect the projects submitted by the county transportation commissions (commissions). Furthermore, as discussed between the commissions and the Southern California Association of Governments (SCAG) staff, projects from the financially unconstrained (Strategic Plan) project submittals should not be modeled, or otherwise analyzed for performance or impacts, as part of this RTP/SCS or PEIR because they are conceptual and require further study prior to modeling.

As for the process to develop the alternatives, Scenario 2 is described as a technical update to the 2012 RTP/SCS, which includes the strategies that allowed the 2012 RTP/SCS to demonstrate conformity with air quality emission budgets, financial constraint, greenhouse gas emission reduction targets, and system preservation goals. OCTA understands that SCAG must perform scenario planning and consider stakeholder input in the development of the 2016-2040 RTP/SCS and PEIR,

Ms. Lijin Sun
April 7, 2015
Page 2

but the strategies and efforts that went into the 2012-2035 RTP/SCS should also be recognized as effective yet challenging at the same time. Therefore, we encourage SCAG to take advantage of performance gains provided by Scenario 2 as Scenarios 3 and 4 are developed. For this reason OCTA requests that:

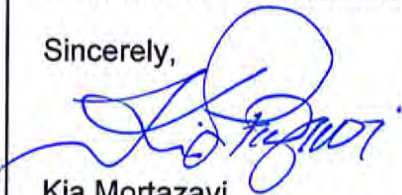
The model results from the currently proposed Scenario 2 should be shared with the commissions and the members of the SCAG Technical Working Group at the earliest opportunity, and goals or strategies that go beyond Scenario 2 should only be discussed in general terms as potential opportunities or enhancements until after these results have been discussed with the noted parties.

Finally, OCTA agrees that the PEIR should not analyze performance and/or environmental impacts at the project-level. As the Notice for Preparation states, "Project-level environmental analysis should appropriately be prepared by implementing agencies on a project-by-project or site-by-site basis as projects proceed through the design and decision-making process". However, OCTA recommends emphasizing the following:

Provide clear language explaining that utilizing the PEIR as a first-tier document in the preparation of any subsequent project-specific or site-specific environmental analyses is at the discretion of the implementing agencies.

Once again, thank you for the opportunity to provide comments on the Notice of Preparation for the 2016-2040 RTP/SCS PEIR. In addition, OCTA appreciates SCAG's willingness to discuss and consider suggestions from partner agencies in the RTP/SCS development process. If you have any questions regarding the comments above, please contact Greg Nord, Senior Transportation Analyst, at (714) 560-5885 or gnord@octa.net.

Sincerely,



Kia Mortazavi
Executive Director, Planning

KM:gn



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

March 9, 2015

To: Reviewing Agencies

Re: 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy
SCH# 2015031035

Attached for your review and comment is the Notice of Preparation (NOP) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Ms. Lijin Sun
Southern California Association of Governments
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2015031035
Project Title 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy
Lead Agency Southern California Association of Governments

Type NOP Notice of Preparation
Description The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.

Lead Agency Contact

Name Ms. Lijin Sun
Agency Southern California Association of Governments
Phone 213-236-1882 **Fax**
email
Address 818 W. 7th Street; 12th Floor
City Los Angeles **State** CA **Zip** 90017-3435

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets
Lat / Long
Parcel No.

Township	Range	Section	Base
-----------------	--------------	----------------	-------------

Proximity to:

- Highways
 - Airports
 - Railways
 - Waterways
 - Schools
 - Land Use
-

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Department of Fish and Wildlife, Region 6; Department of Housing and Community Development; Office of Emergency Services, California; Native American Heritage Commission; Caltrans, Division of Transportation Planning; California Highway Patrol; Air Resources Board; State Water Resources Control Board, Division of Water Quality

Date Received 03/09/2015 **Start of Review** 03/09/2015 **End of Review** 04/07/2015

Notice of Completion & Environmental Document Transmittal

2015031035

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Teath Street, Sacramento, CA 95814

SCH #

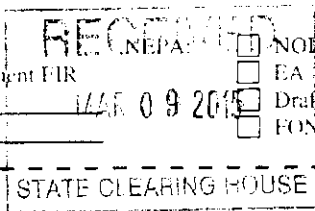
Project Title: 2016-2040 Regional Transportation Plan-Sustainable Communities Strategy

Lead Agency: Southern California Association of Governments Contact Person: Ms. Lijin Sun, Senior Regional Pl
Mailing Address: 818 West Seventh Street, 12th Floor Phone: 213-236-1882
City: Los Angeles, California Zip: 90017-3435 County: Los Angeles

Project Location: County: 6 County Area (see NOP) City/Nearest Community: N/A
Cross Streets: N/A Zip Code: N/A
Longitude/Latitude (degrees, minutes and seconds): N/A N/A N/A N/A N/A N/A N/A W Total Acres: N/A
Assessor's Parcel No.: N/A Section: N/A Twp: N/A Range: N/A Base: N/A
Within 2 Miles: State Hwy #: N/A Waterways: N/A
Airports: N/A Railways: N/A Schools: N/A

Document Type:

CEQA: [X] NOP [] Draft EIR [] NEPA [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other:



Local Action Type:

[] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (Subdivision, etc.) [] Other: N/A

Development Type:

[] Residential: Units _____ Acres _____
[] Office: Sq.ft. _____ Acres _____ Employees _____
[] Commercial: Sq.ft. _____ Acres _____ Employees _____
[] Industrial: Sq.ft. _____ Acres _____ Employees _____
[] Educational: _____
[] Recreational: _____
[] Water Facilities: Type _____ MGD _____
[] Transportation: Type _____
[] Mining: Mineral _____
[] Power: Type _____ MW _____
[] Waste Treatment: Type _____ MGD _____
[] Hazardous Waste: Type _____
[] Other: Regional Transportation Plan/Sustainable Communities

Project Issues Discussed in Document:

[X] Aesthetic/Visual [X] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Hood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [X] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [X] Minerals [X] Soil Erosion/Compaction/Grading [X] Growth Inducement
[X] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[X] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:

N/A

Project Description: (please use a separate page if necessary)

The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in September 2014, by refining goals, objectives, and policies and the list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document), please fill in

NOP Distribution List



County: LOS ANGELES, ORANGE, SAN BERNARDINO, VENTURA, IMPERIAL, RIVERSIDE SCH#

2015031035

Regional Water Quality Control Board (RWQCB)

- RWQCB 1**
Cathleen Hudson
North Coast Region (1)
- RWQCB 2**
Environmental Document
Coordinator
San Francisco Bay Region (2)
- RWQCB 3**
Central Coast Region (3)
- RWQCB 4**
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S**
Central Valley Region (5)
- RWQCB 5F**
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R**
Central Valley Region (5)
Redding Branch Office
- RWQCB 6**
Lahontan Region (6)
- RWQCB 6V**
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7**
Colorado River Basin Region (7)
- RWQCB 8**
Santa Ana Region (8)
- RWQCB 9**
San Diego Region (9)

Resources Agency

- Fish & Wildlife Region 1E**
Laurie Harnsberger
- Fish & Wildlife Region 2**
Jeff Drongesen
- Fish & Wildlife Region 3**
Charles Armor
- Fish & Wildlife Region 4**
Julie Vance
- Fish & Wildlife Region 5**
Leslie Newton-Reed
Habitat Conservation
Program
- Fish & Wildlife Region 6**
Tiffany Ellis
Habitat Conservation
Program
- Fish & Wildlife Region 6 I/M**
Heidi Sickler
Inyo/Mono, Habitat
Conservation Program
- Dept. of Fish & Wildlife M**
George Isaac
Marine Region

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- Food & Agriculture**
Sandra Schubert
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Agriculture
- Dept. of General Services**
Public School Construction
- Dept. of General Services**
Anna Garbeff
Environmental Services
Section
- Delta Stewardship Council**
Kevan Samsam
- Housing & Comm. Dev.**
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

- Delta Protection Commission**
Michael Machado

Native American Heritage Comm.

- Public Utilities Commission**
Leo Wong
- Santa Monica Bay Restoration**
Guangyu Wang
- State Lands Commission**
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)**
Cherry Jacques

Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics**
Philip Crimmins
- Caltrans - Planning**
HQ LD-IGR
Terri Pencovic
- California Highway Patrol**
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

- Caltrans, District 1**
Rex Jackman
- Caltrans, District 2**
Marcelino Gonzalez
- Caltrans, District 3**
Eric Federicks - South
Susan Zanchi - North
- Caltrans, District 4**
Erik Alm
- Caltrans, District 5**
Larry Newland
- Caltrans, District 6**
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- Caltrans, District 7**
Dianna Watson

- Caltrans, District 8**
Mark Roberts
- Caltrans, District 9**
Gayle Rosander
- Caltrans, District 10**
Tom Dumas
- Caltrans, District 11**
Jacob Armstrong
- Caltrans, District 12**
Maureen El Harake

Cal EPA

Air Resources Board

- All Other Projects**
Cathi Slaminski
- Transportation Projects**
Nesamani Kalandiyur
- Industrial/Energy Projects**
Mike Tollstrup
- State Water Resources Control Board**
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Division of Financial Assistance
- State Water Resources Control Board**
Jeffery Werth
Division of Drinking Water
- State Water Resources Control Board**
Student Intern, 401 Water Quality
Certification Unit
Division of Water Quality
- State Water Resources Control Board**
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control**
CEQA Tracking Center
- Department of Pesticide Regulation**
CEQA Coordinator

Resources Agency

- Resources Agency**
Nadell Gayou
- Dept. of Boating & Waterways**
Nicole Wong
- California Coastal Commission**
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- Colorado River Board**
Lisa Johansen
- Dept. of Conservation**
Elizabeth Carpenter
- California Energy Commission**
Eric Knight
- Cal Fire**
Dan Foster
- Central Valley Flood Protection Board**
James Herota
- Office of Historic Preservation**
Ron Parsons

- Dept of Parks & Recreation**
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Section
- California Department of Resources, Recycling & Recovery**
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.**
Steve McAdam
- Dept. of Water Resources**
Resources Agency
Nadell Gayou

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April 2, 2015

Jonathan Nadler, Manager of Compliance and Performance Assessment
Land Use & Environmental Planning Division
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

**Notice of Preparation of a CEQA Document for the
2016-2014 Regional Transportation Plan/ Sustainability Communities Strategy Project**

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

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts

when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

Data Sources

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

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at Jwong1@aqmd.gov or call me at (909) 396-3176.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

April 6, 2015

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

Subject: Request for Review of Notice of Preparation of a Program Environmental
Impact Report for the 2016-2040 Regional Transportation
Plan/Sustainable Communities Strategy

Dear. Ms. Sun,

Air Pollution Control District staff has reviewed the subject notice of preparation for a program environmental impact report for a long-range transportation plan that provides a vision for regional transportation investments over a 20-year period. The Regional Transportation Plan/Sustainable Communities Strategy will be a blueprint for the region's growth through 2040 and will outline the region's goals, policies and strategies that improve the balance between land use and transportation systems, both current and future. We concur with the inclusion of air quality, greenhouse gas emissions and climate change as potential environmental effects that warrant analysis in the program environmental impact report. We look forward to reviewing the air quality, greenhouse gases and climate change chapters of the draft program environmental impact report.

Thank you for the opportunity to review this project. If you have any questions, please call me at (805) 645-1426.

Sincerely,

Alicia Stratton
Air Quality Specialist
Planning, Rules and Incentives Division