

PUBLIC PARTICIPATION AND CONSULTATION

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS



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

ADOPTED | APRIL 2016



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COMMUNITY INPUT | PUBLIC PARTICIPATION AND CONSULTATION
LETTERS FROM AGENCIES/ORGANIZATIONS A-C

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February 1, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
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Los Angeles, CA 90017

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

The Alliance for a Healthy Orange County thanks you for the diligent effort your agency has made in producing the comprehensive 2016 Regional Transportation Plan and Sustainable Communities Strategy. Moreover, we are pleased with its honest and visionary approach in clearly linking land use, transportation, and quality of life within the context of environmental and fiscal sustainability.

SCAG's identification of future challenges has provided leaders throughout the region with the essential information with which we can preserve and, hopefully, enhance this place so many call home. We commend the inclusion of the Our Vision and Overarching Strategy sections in the Executive Summary demonstrating the leadership that SCAG is providing to guide the region into the future.

As a countywide collaborative of cities, healthcare organizations, community-based organizations, and universities, the Alliance is dedicated to enhancing health outcomes and reducing health disparities in Orange County. Achieving that goal requires cross-generational community engagement with a broad spectrum of specialists in physical safety, nutrition, education, spirituality, and physical activity.

Like SCAG, we recognize communities comprised of healthy people require multi-disciplinary attention to often competing variables. Yet everyone acknowledges personal health depends upon safe travel for recreation and transportation. With that in mind, we ask SCAG to consider the following as the final version of the 2016 RTP/SCS is completed:

- 1) **Safety of active transportation users.** Because SCAG's short trips strategies—which AHOC completely supports—focus on the large (33%) proportion of all trips made, safety of active transportation users needs to be more prominently discussed, especially within the context of Orange County's high speed arterials and the Caltrans' new separated bikeways standards (DIB 89, released 2015-12-30). Since SCAG states on page 90 that regional arterials comprise 80% of the total road

network and carry most traffic overall, addressing safety of pedestrians on bicyclists on those roads is operationally essential to the entire system. Additionally, since transportation to and from school comprises 1/4 to 1/3 of all average daily trips, we can't emphasize enough the operational *and equitable* significance of prioritizing safe routes to school for our children.

- a. The RTP/SCS Public Health Index cites government data sources showing bicyclists and pedestrians comprise 1/3 of all roadway fatalities in the SCAG region; each death is responsible for \$1.4M in costs; low income/minority neighborhoods are disproportionately at risk of pedestrian collisions, being four times more likely.

2) **More funding is needed for safe walking and biking facilities, especially on high speed Orange County arterial roadways.** California's Office of Traffic Safety consistently ranks Orange County among the most dangerous statewide for speed-related collisions. From 2010 through 2013, OC ranked 5th, 5th, 6th, and 3rd *worst*, chronologically, among 58 counties. Sharing and crossing roadways, especially high speed ones, is dangerous for both bicyclists and pedestrians. New infrastructure design guidelines acknowledge the need for physical protection.

- a. CalTrans' new separated bikeway design criteria (DIB 89) states a concrete barrier should be used on roadways with speed limits greater than 35 mph. Yet the cost of Class 1 segregated facilities is approximately \$1M/mile to build, so the number of such projects that can be built for the \$10B planned for active transportation construction is not sufficient from a public safety or transportation capacity perspective.
- b. If we are to reduce the vehicle load on the entire network, we need to prioritize funding for more efficient, non-motorized modes of travel over short distances. The a.t. funding proposed by SCAG is insufficient to accomplish the needed reduction in vehicle load.

3) **We should not represent active transportation expenditures without including discussion of balancing those investments with long term cost savings in health care, facility maintenance, and congestion relief and prevention.**

- a. Costs of active transportation investment are recoupable, whereas long-term healthcare costs are increasingly unsustainable.
- b. The 2016 RTP/SCS does not compare the cost of building safe walking and biking infrastructure to the cost of caring for people afflicted with preventable chronic diseases. With the fraction of national GDP spent on healthcare being 18% and projected to grow to 34% by 2040, these types of comparisons must be prominently discussed at all levels of government.
- c. Data discussion in the Public Health appendix must be included in the main document to provide decision makers with real cost comparisons. For example, the appendix, page 8, cites the Milken Institute projections that \$117B of the \$431B in 2023 health care costs statewide could be avoided through prevention; physical inactivity and obesity are estimated to have cost \$41.2B in 2006 statewide.
- d. Comparing the latter to the extremely small funding allocated to active

transportation construction, \$10B over the life of the 2016 RTP/SCS, the investment in safe walking and biking infrastructure, along with access to convenient public transit, is an entirely recoupable cost. In fact, for \$41.2B we could build 41,200 miles of protected, Class 1 pedestrian and bicycle paths, the type of facility most people want to use. We need to present those kinds of comparisons so all decision makers will be empowered to make informed choices on our behalf.

- e. Based on OCTA's Outlook 2035 projections, time for physical activity will diminish over the next 20 years, as the average motorist commute will increase by 166%, making a 30 minute commute become 80 minutes each way. Roundtrip, Orange County residents will spend 2 hours, 40 minutes of every day in their cars driving to and from work. Under those conditions, the likelihood of a wholesome diet and exercise are not good, particularly not for families with children. We are concerned the consumption of fast and unhealthful food will become the norm simply because the transportation system doesn't allow time for better choices.

4) **The "Highways and Arterials" section** (beginning on page 95) **overemphasizes management of the vehicular system and its bottlenecks while ignoring the operational and equitable necessity of safe pedestrian and bicycle travel.** The vehicular-centric discussion of highways and arterials is inconsistent with its first paragraph stating "costly expansions to address congestion are no longer financially feasible." Here are some examples of the inconsistency:

- a. "SCAG continues to advocate for a comprehensive solution based on a system management approach . . ." It's not comprehensive if it's not *equitably* multimodal. (see page 95);
- b. The highways and local arterials framework and guiding principals state "[s]upport complete streets opportunities where feasible and practical."
 - i. That bullet point is dead last (see page 99) and follows a 3-page list of 58 freeway projects, 1/3 of which are in Orange County.
 - ii. The 2016 RTP/SCS repeatedly mentions the financial INfeasibility of continuing the status quo but requires feasibility and practicality for the non-motorized infrastructure that could significantly reduce vehicular congestion for short trips. Considering SCAG asserts 38% of all trips are \leq 3 miles and 78% of those are made by driving full sized cars, we would like to see more equitable representation of active transportation in the RTP. Again, the RTP/SCS's lack of comparison between investment and future cost savings to the public and private sectors does not accurately represent the value of active transportation.
 - iii. If anything, active transportation modes should be described as *improving* feasibility and practicality for short trips. Please remove all feasibility and practicality requirements from discussion of walking, biking, and complete streets.
- c. The planned monetary investment in TDM/TSM is 50% greater than active transportation projects' construction. We hope SCAG revisits that relationship

and the message it sends.

- d. Chapter 9, "Looking Ahead," pp 173-74, the RTP/SCS says, ". . . active transportation will serve regional mobility, ensuring people can quickly, easily and safely transfer from one mode of transportation to the next . . . a critical role in helping the region to realize its vision . . . active transportation networks contribute to the attractiveness and economic vitality . . . *an important role in reducing congestion and increasing mobility.*"
 - i. That kind of language should not just be in the last chapter, it should be repeated throughout the 2016 SCAG RTP/SCS, especially the sections on congestion management and highways and arterials.

5) **Congestion management section omits important Federal and State congestion management law regarding walking and biking, safety, and the role pedestrians and bicyclists play in reducing congestion.** Rather than citing FHWA code regarding a systematic approach (page 79), referring to Federal and State law, particularly paragraphs on walking and biking, multimodality, and safety, would acknowledge the high-level recognition of the importance of active transportation to everyone, not just non-motorized travelers. We suggest including the following:

- a. **49 USC 5303(a)(1) Policy:** It is in the national interest to encourage and promote the safe and efficient management, operation, and development of surface transportation systems that will serve the mobility needs of people and freight . . .
- b. **49 USC 5303(h)(1):** The metropolitan planning process for a metropolitan planning area under this section shall provide for consideration of projects and strategies that will--**(B)** increase the safety of the transportation system for motorized and non-motorized users;
- c. **Calif code § 65089 (b)(2):** The [congestion management] program shall contain . . . A performance element that includes . . . measures to evaluate current and future *multimodal system* performance for the movement of people and goods.
- d. **Calif code § 65089 (b)(3):** The [congestion management] program shall contain . . . [a] travel demand element that promotes alternative transportation methods including . . . transit, bicycles . . .

6) **Congestion management expenditures focus on vehicular-centric approaches that are inconsistent with the 2016 RTP/SCS goals and guiding policies, particularly those promising a "Health in All Policies" approach.** We question the sustainability and efficacy of SCAG's congestion management approach within the context of the RTP/SCS goals and policies. From the perspective of community health and operational efficiency, it would be more effective to focus on (and fund) pedestrian and bicyclist safety and quality of experience as *obviating* the need for trendy or high-tech, high-cost, vehicular traffic management tools. We also take note of the following:

- a. The Congestion Management Appendix includes 4 pages of "CMP Toolbox and Strategies." Nowhere in those pages, 19-22, is active transportation mentioned. Every tool elaborates exclusively on vehicle traffic management techniques, with two small paragraphs mentioning transit passenger counting

and electronic fare systems. Consequently, the 2016 RTP/SCS multimodal integration and its potential for mutually complementary capacity across all modes of travel appears to be lacking. We would like to have seen more attention given to the multimodal foundation of Federal and State congestion management laws.

- b. Evidence of overly vehicular-centric planning are found in the Public Health appendix, page 14, where it states the 2016 RTP/SCS will create a 19% increase in access to jobs *by car* but access to jobs reached *by transit* will only increase by 3%.
- c. The Congestion Management Appendix, pages 19-20, itemizes \$9.2B in TSM improvements without addressing their sustainability or effective duration. Rather than spending billions on ramp metering, enhanced incident management, bottleneck removal, signal synchronization, and data collection, would it not be more cost effective to reallocate those funds on mass transit projects following the same path as the freeways and highways, complemented by rapid buses and safe pedestrian and bicycle facilities for the first and last miles?
- d. TDM and TSM strategies emphasize vehicle traffic flow optimization technologies that cost more than the RTP/SCS's planned active transportation infrastructure *projects*. For example, the combined funding plans for the optimization strategies are 50% greater than the total active transportation *construction* (physical projects) plans, \$16 billion vs. \$10 billion, respectively.
- e. The TDM discussion on page 80, does not identify safe routes to school as one of its 3 main focus areas. It should. That omission ignores the accepted 25-30% ADT rate for academic trips and their potential to reduce vehicular congestion if children had safer routes to walk and bike to school. Instead, the RTP/SCS mentions (see page 93) safe routes to school as a "comprehensive TDM strategy" under "Education/Encouragement Strategies." That placement and description diminishes the importance of safe routes to school from both a transportation and equity perspective. *Education/Encouragement is a complement to, not a substitute for, infrastructure safety as the RTP implies.*
- f. The introduction to "Highways and Arterials" is more representative of what our future priorities should be. The RTP states, ". . . costly expansions to address congestion are no longer financially feasible . . . improvements beyond TSM and TDM strategies need to be considered." We couldn't agree more. Please repeat that statement in the TSM/TDM section on page 80.

7) **We are concerned with expressions of hesitancy to fully embrace the Health in All Policies approach to transportation.** The Public Health Appendix offers hope for a new approach to transportation by recognizing the neighborhood and built environment category of the social determinants of health. We commend SCAG for incorporating such visionary language. However, the Public Health Appendix makes its commitment conditional upon feasibility and supportive literature. For example:

- a. The first guiding principal says, "[t]o reflect and provide information on the ways in which the investments and strategies [of the RTP/SCS] provide an opportunity to improve public health . . . , *as feasible*. We ask that the phrase, "as feasible," be removed. (See Public Health Appendix p. 11).

b. The description of the public health analysis framework says (*Ibid*), “[a]nalysis of the public health impacts will be targeted to focus areas where there *is literature to support* the relationship between public health and the built environment.” Yet on page 8 of the Public Health Appendix, the RTP/SCS states, “[b]uilding off of a *large body of research*, SCAG has examined the connection between the built environment, physical inactivity, and obesity. *SCAG has found that there is significant association between neighborhood land use/built environment characteristics and levels of obesity.*” The two sentences are plainly contradictory; there should be no hesitancy in applying evidence from bountiful sources of peer reviewed literature to implementation of the 2016 RTP/SCS. We ask that the phrase, “literature to support,” be removed, especially since that condition is not placed upon parts of the 2016 RTP/SCS we’ve identified as being overly vehicular-centric.

- 8) **Benefits of Uber/Lyft-type transportation are not linked to SOV trip or congestion reduction.** Uber/Lyft service is a substitute for car ownership and is most often used by individuals, not groups, adding vehicles to the roadway without obligating users to share the service with another rider. When used in that fashion, Uber/Lyft becomes just another SOV, albeit with a chauffeur. Therefore, we ask SCAG to remove Uber/Lyft from the TDM discussion.
- 9) **There is no mention of pursuing use of the vacant Pacific Electric Right of Way/West Santa Ana Branch Corridor as either a rail or active transportation corridor, or both.** The SCAG Alternatives Analysis Report completed in 2012 states the population of the corridor was 4.5 million people, projected to increase to 5 million by 2035; its population density is and will remain 3.0 times higher than Orange County’s average; 36% of all households in the corridor were low-income, twice Orange County’s average in 2012; 16% of households lack access to a car, 3 times the OC average; by 2035, more than 2.3 million jobs comprising 44% of Orange County’s total employment will exist within the corridor. Moreover, SCAG predicts almost all of the corridor’s roads, including freeways, will be functioning at LOS E or F, severely diminishing regional air quality, community health, and economic capacity. Moving forward with alternative transportation development within the corridor would have many benefits for its residents and the region. Including that corridor in the 2016 RTP/SCS is essential to maintaining awareness of its potential so decision-makers will, at a minimum, *not* forget its value as a multimodal transportation corridor.
- 10) **Rail transit network planning in Orange County is sorely lacking.** We applaud and enthusiastically support the central Orange County streetcar plans. But looking at the map in exhibit 5.2 illustrates the meager investment in and consideration of rail travel in Orange County: just two, very small orange lines for the street cars. Compared to exhibit 5.4’s representation of major highway projects in Orange County, the graphics state what the words do not: vehicles will still receive priority in coming decades. It would be wonderful to see exhibit 5.2 illustrate “possible future rail alternatives” parallel to or even elevated above major Orange County arterials. For example, rail linkage from the heart of the county to the ocean, as once existed between Santa Ana and Newport Beach, would recognize the need for efficient mountains to the sea connections. Since central Santa Ana is the county seat, linking coastal communities to that area would be a welcome alternative to SR-55.

- 11) **Railcar speed: we applaud the honest discussion of slow (37 mph avg) rail travel but we need to set higher goals than marginal improvements to 19th century rail technology.** Nationally, we “aspire” to the federal definition of “high speed rail” being 110 mph minimum. California needs to distinguish itself from that standard by aspiring to at least match Japan’s Shinkansen trains, which have been operating at a max speed of 150-200 mph since 1964.
- 12) **Regional Bikeway Network Map:** Exhibit 5.3 depicts regional bikeways only within the SCAG region, which makes our region appear disconnected from others, particularly SANDAG. The established, world famous Pacific Coast Bike Route linking Canada to Mexico is just one example of an interstate facility that should be represented. Please amend the map to show the extensions of the bikeways to other MPO regions.
- 13) **What are the standards for implementing bike share systems?** Safety of the transportation infrastructure surrounding the bike share stations is not mentioned as a criterion. We believe safety analysis should be required because the success of bike sharing depends on potential users’ perception of safety.
- 14) **Mitigation measures include encouragement of bike lanes but bike lanes don’t enhance bicycling.** The California Highway Design Manual, 2015 edition (& prior ones) state, “Generally, pavement markings alone will not measurably enhance bicycling.” (See § 1002.1(3)). A mitigation measure that doesn’t enhance something for the intended user doesn’t compensate the public for the impact of a project. We recommend you replace “bike lanes” with “Class IV/separated bikeways designed using best practices from the bicyclist’s point of view.” *Ibid*
- 15) **The 2016 RTP/SCS vehicular-centric congestion management priorities are plainly inconsistent with its Public Health Appendix explanation of the nexus of poverty, access to goods & services, and transportation safety as being regional “major public health drivers.”**
- a. The Public Health Appendix, page 3, states, “[a]ccess to daily needs and activities, such as schools, healthy food options, jobs, parks and open space and primary care *is central to* maintaining and improving public health.” AHOC concurs and suggests that statement be *central to* SCAG’s congestion management by reducing demand with increased investment in safe active transportation infrastructure, rather than the described vehicular flow optimization technology.
 - b. We cannot lose sight of SCAG’s recognition that “just five chronic diseases resulted in 72% of all deaths in the SCAG region in 2013.” (see public health append, p. 3).
- 16) **Reducing VMT *per capita* is not a meaningful way to improve public health outcomes if the absolute quantity of air pollutants in the SCAG region does not decrease.** Using *per capita* analysis is misleading. From an air quality perspective, the RTP/SCS strategy should pursue a non-comparative target number for each air pollutant. Damage to any particular individual’s health is not diminished by exposing more people to dangerous levels of air pollution (see Public Health Appendix p 1).
- a. The public health appendix states, “. . . low income and minority residents

suffer disproportionate health consequences from air pollution.” Given 17% of SCAG residents live in poverty, including 22% of all children, and \$540M annual costs due to asthma hospitalizations, prioritizing reduction in absolute levels of air pollutants by reducing vehicular congestion and its emphasis on active transportation investment is imperative. (see public health appendix, pp 6-7).

- b. AHOC recommends that the 2016 RTP/SCS include in the main document, not just the appendix, a direct comparison of investment in safe active transportation facilities to healthcare savings. Featuring those discussions will better illuminate the financial feasibility of active transportation and the unsustainability of costs of chronic disease.

17) **The Public Health Appendix inadequately represents the lack of parks in central Orange County where rates of preventable, chronic disease are high.** “Exhibit 1 2010 Access to Parks” is the only graphical representation comparing park space to population density and it does a poor job of illustrating a known issue: density, poverty, chronic disease, dangerous infrastructure, and lack of recreational opportunity are concentrated in areas with significant community health problems. We recommend including a chart that displays those variables numerically, with park space per capita, would better identify the problem and encourage efforts to address it. We also suggest the Public Health Appendix include data and maps from the California State Parks Dept [Park Access Tool](#), which maps existing parks/open space, park space per capita, and disadvantaged communities by census tract. By focusing on central Orange County cities of Anaheim, Garden Grove, and Santa Ana, the Park Access Tool easily represents significant disparities in park acreage that correlates with Orange County Health Care Agency data on obesity. Here is just one example of the obesity correlation:

- a. It is important to distinguish those communities from the countywide park access data revealing only 11% of 3 million OC residents live further than 1/2 mile from a park and 61% of residents countywide live where there is less than 3 acres of parks or open space per 1,000 residents.
 - i. Central OC populations living more than 1/2 mile distance from a park are 17% (Santa Ana), 29% (Garden Grove), and 14% (Anaheim).
 - ii. Populations in the same cities with less than 3 acres of parks/open space per 1,000 residents are: 83% (Santa Ana), 88% (Garden Grove), and 70% (Anaheim).
 - iii. Obesity rates for adults in those cities are 31.1% (Santa Ana), 24.2% (Garden Grove), and 27.8% (Anaheim). It is 18.2% countywide, according to OCHCA data from 2014.

In conclusion, the Alliance for a Healthy Orange County would like to thank the Southern California Association of Governments for its impressive effort to direct planning within its vast jurisdiction. We attended your public outreach events and were extremely impressed with the clear depictions of actual and future conditions in Southern California. SCAG staff was always available to answer questions; their professional enthusiasm is unparalleled. We very much appreciated the inclusion of a Public Health Appendix for the first time in the RTP/SCS and we truly commend you for a job well

done.

Thank you for the opportunity to comment on the 2016 Regional Transportation Plan/Sustainable Communities Strategy. We look forward to our ongoing collaboration as we all strive to make Southern California mobile—and healthy—for generations to come.

Sincerely,

Barry Ross,
Chair, [Alliance for a Healthy Orange County](#)

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February 1, 2016

Brenda Miller

SUBJECT: 2016 SCAG RTP AHOC comment letter

Dear Ms. Miller:

We have reviewed the comments by AHOC of SCAG's draft RTP and we are in general agreement with those comments. The City of Santa Ana and AHOC are partnering on a number of projects and programs, and we share the same concerns regarding access, mobility, and health of our community.

Thank you very much for reaching out to community agencies such as the City of Santa Ana, as well as other local agencies in our region which play a major stakeholder role in the revised RTP.

Sincerely,

Fred Mousavipour

SANTA ANA CITY COUNCIL



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February 1, 2016

Courtney Aguirre
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Via email: 2016PEIR@scag.ca.gov

Re: Comments on Draft 2016-2040 RTP and PEIR

Dear Ms. Aguirre:

The Alliance for a Regional Solution to Airport Congestion (ARSAC) appreciates the opportunity to provide input to the 2016-2040 SCAG Regional Transportation Plan and Program EIR.

Founded in 1995, ARSAC is a grassroots community organization dedicated to increasing utilization of unconstrained, outlying regional airports such as Ontario (ONT) and Palmdale (PMD) instead of expanding Los Angeles International Airport (LAX) to meet Southern California's future airport capacity needs. ARSAC supports a safe, secure, modern and convenient LAX so long as LAX does not expand into surrounding communities.

ARSAC would like SCAG to re-establish Airport Regionalization as a permanent, standing sub-committee of the Transportation Committee. While SCAG cannot force airlines to serve underutilized, unconstrained airports that want more airline service, SCAG can help create critical mass for these airports by advocating for ground transportation improvements such as rail, bus and freeway connections. The formation of a Regionalization sub-committee will cement SCAG's long-term commitment to effect regionalization of air service in Southern California. Regionalization Committee membership should be open to staff and other interested parties.

ARSAC would like SCAG to remove from consideration any and all plans to create a 405 interchange at Arbor Vitae. This interchange has been studied and rejected at least 3 times by the Federal Highway Administration (FHWA). It is a waste of taxpayer's money to conduct any further study here. Without completing rebuilding 4 four miles of the 405 freeway, it would be impossible to build an offramp from the 405 north freeway.

We have specific comments on three areas- Noise and Aviation and Ground Access.



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In the RTP Project List, Table 2, "Financially Constrained RTP Projects", there are a number projects related to the LAX Landside Access Modernization Plan (LAMP). These include projects 1160009 to 116027. Considering that LAMP has issued an NOP and the Draft EIR is not expected until April 2016, why are these projects included?

PEIR: NOISE

We disagree with the "Less than Significant Impact" on page 3.13-32. As we understand it, the last time SCAG performed airport-by-airport comprehensive noise impact analyses was in the 2001 RTP EIR (Reference Environmental Justice Appendix page 154). No such analyses were performed for the 2008 and 2012 RTP's since the overall regional passenger demand forecasts were progressively lower, and no airport exceeded its 2004 forecast. We hope that SCAG is not trying to employ this rationale once again. However, it is no longer credible with a new 96.6 Million Annual Passenger (MAP) forecast for LAX that exceeds the previous 78.9 MAP forecast by 22.4%. This increase cannot be offset by forecast reductions at outlying airports since those suburban and largely un-encroached airports have much less noise impacts per incremental MAP increase as does the urban and highly encroached LAX. It is also highly specious to claim that the airport land use plan for LAX that provides noise and land use guidance would mitigate noise impacts associated with the 2016 RTP Aviation Demand Forecast, since the current Part 150 study for LAX does not assume a forecast for LAX exceeding 78.9 MAP. For these reasons, without performing new airport-by-airport comprehensive noise analyses, there is no way of knowing whether or not the regional noise impacts associated with the new regional aviation demand forecast in the 2016 RTP are significant, and that the 2016 RTP EIR is glaringly deficient in this regard.

Less than Significant Impact

Implementation of transportation projects in the 2016 RTP/SCS would result in less than significant impacts related to projects located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, that would expose people residing or working in the project area to excessive noise levels.

The SCAG Region contains 57 airports, with 12 major commercial airports serving the region. There are approximately 41 linear miles of major projects and 10,785 acres of HQTAs within the 65 dBA CNEL of the 12 major airports. According to the 2012 RTP/SCS, the regional passenger demand forecast is 145.9 million air passengers (MAP) in 2035. According to the August 6, 2015, Staff Report to the Transportation Committee, the 2016 RTP/SCS has a regional passenger demand forecast of 136.2 MAP forecast in 2040, which is a decrease of approximately 7 percent at the regional level. Furthermore, major public airports have an airport land use plan that provides guidance on noise



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levels and land use in adjacent areas. Therefore, impacts would be less than significant, and the consideration of mitigation measures is not required.

We question the determination of “Less than Significant Cumulative Impact” in IMPACT-5 on page 3.13-35. The last sentence in the paragraph states, “Therefore, cumulative impacts would remain significant and unavoidable.” Why do the two statements contradict one another?

IMPACT NOISE-5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in the exposure of people residing or working in the project area to excessive noise levels.

Less than Significant Cumulative Impact

Implementation of the 2016 RTP/SCS would result in significant cumulative impacts related to projects located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, which would expose people residing or working in the project area to excessive noise levels. Areas that are within the noise contours of 65 dBA CNEL and above, associated with airport activities, are considered to be incompatible with certain land uses, including residences, schools, hospitals, and childcare facilities. There are approximately 23,082 locations of incompatible land uses and approximately 41 linear miles of major projects within the 65 dBA CNEL of the 12 major airports. The implementation of the 2016 RTP/SCS would add both construction and operation noise to an area that is already at the threshold for significant impact. Implementation of mitigation measures, as described below, would reduce impacts, but may not reduce impacts to below the level of significance in all instances. Therefore, cumulative impacts would remain significant and unavoidable.

RTP APPENDIX: AVIATION AND AIRPORT GROUND ACCESS

ARSAC has a number of questions and concerns about the Aviation and Airport Ground Access Appendix of the RTP. For simplicity, we have provided questions and comments by page number.



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As a general comment, the US commercial airline industry has completed consolidation for the time being. Major factors that are missing and need to be included in this document include:

1. “Open Skies” agreements between the U.S. and most countries that have removed most barriers to international service at airports in Southern California.
2. New, fuel efficient long range aircraft such as the Boeing 787 Dreamliner and the Airbus A350 XWB. The combination of Open Skies and the 787 has opened many new city pairs in California including:
 - a. Norwegian Long Haul- LAX to Copenhagen, Denmark; Stockholm, Sweden; and Oslo, Norway; Oakland to Stockholm and Oslo
 - b. All Nippon Airways- San Jose to Tokyo-Narita, Japan
 - c. Japan Airlines- San Diego to Tokyo-Narita, Japan
 - d. Hainan Airlines- LAX to Changsha, China and San Jose to Beijing, China
 - e. British Airways- San Jose to London Heathrow
3. Possible effects of FAA redesign of Southern California’s airspace
4. Possible effects of implementation of Next Generation Air Traffic Control System “NextGen”.

Comments on Exhibit 1- Southern California Regional Aviation Assets (PDF page 4). Please use a different symbol for commercial airline capable airports that presently do not have commercial airline service. This would include Oxnard (OXR), Palmdale (PMD), Riverside/March Inland Port (RIV), San Bernardino (SBD) and Victorville/Southern California Logistics Airport (VCV).

Comments on Airport Profiles, page 5 (PDF page 7). LA/Ontario International Airport. The transfer of Ontario International Airport (ONT) from Los Angeles World Airports (LAWA) to the Ontario International Airport Authority (OIAA) should be noted here.

Comments on Airport Profiles, page 6 (PDF page 8). Long Beach Airport. JetBlue began operations from LGB in 2001. The City of Long Beach recently raised the number of daily commercial flights allowed from 41 to 50. This Appendix should reflect the updated number in the text and in capacity calculations.

Comments on Airport Profiles, page 7 (PDF page 9), Imperial County Airport. SeaPort Airlines discontinued all service in California on January 15, 2016.

Comments on Airport Profiles, no page number. Missing commercial airports. Although these airports do not have commercial passenger and/or cargo service at the present time, profiles should be included for these airports: Oxnard, Palmdale, Riverside/March Inland Port, San Bernardino and Victorville/Southern California Logistics Airport.



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Comments on Page 9 (PDF page 11):

1. Overlapping catchment areas. Please provide a map of the commercial airport catchment areas in Southern California (including Kern, San Diego and Santa Barbara Counties).
2. Inclusion of San Diego, Carlsbad and Santa Barbara airports. We agree with the inclusion of these airports into the SCAG aviation forecast. Additional areas that need to be added include Bakersfield, Mojave and Inyo Kern airports. Bakersfield has had limited air service and a private bus service from Bakersfield to LAX has been operational for decades. The model should also include Tijuana International Airport, especially since the new Cross Border Xpress bridge has opened. Fares from Tijuana for flights within Mexico and to Central and South America can be less expensive than from U.S. airports. Additionally, SCAG needs to break out the numbers for each of these airports listed above.

Comments on Page 10:

1. The model does not appear to include increased utilization of alternatives to commercial airlines such as charter (e.g. Clay Lacy, JetSuite), fractional ownership (e.g. NetJets, Citation Shares) and membership plans (e.g. Surf Air). Private air transportation providers gained popularity after 9/11 for passengers wanting to avoid the hassle of commercial airport security and the convenience of business aircraft travel. Some of these business aircraft service providers fly into and out of some of the same airports as commercial airlines- e.g. Burbank, Long Beach and Santa Ana/John Wayne.

Comments on Page 12:

1. Combination of Canada and Greenland. We are mystified at this combination. While geographically Canada and Greenland are nearby, they are economically and politically an ocean apart. Greenland is an autonomous territory of the Kingdom of Denmark. The only flights to and from Greenland are to Denmark, Germany and Iceland.

Comments on Page 14:

1. Mexico/Central America/Caribbean O&D Market. How did was the evaluation the Caribbean O&D market conducted? Was Cuba included? Considering there are very few non-stop flights from SCAG area airports to the Caribbean, did the model consider one-stop or transfer flights to the Caribbean? Connecting airports should include Miami, Fort Lauderdale, Atlanta, Houston and Dallas/Fort Worth.

Comments on Page 15:

1. South America O&D Market. How did was the evaluation the South America O&D market conducted? Considering there are very few non-stop flights from SCAG area airports to South America, did the model consider one-stop or transfer



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flights to the South America? In addition to Mexico City, Mexico; San Jose, Costa Rica and Panama City, Panama, connecting airports should include Bogata, Columbia; Lima, Peru; Miami, Fort Lauderdale, Atlanta, Houston and Dallas/Fort Worth.

Comments on Page 16:

1. Trans-Atlantic O&D Market. How did was the evaluation the Trans-Atlantic O&D market conducted? While the number of non-stop flights from the SCAG area airports to Trans-Atlantic has increased with “Open Skies” bilateral aviation agreement and new fuel efficient long-range aircraft such as the Boeing 787 Dreamliner and Airbus A350 XWB , did the model consider one-stop or transfer flights over the Atlantic? The chart below shows potential traffic flows. Choices for these routing may depend on schedules (one-stop from West Coast offers earlier arrival in Europe than non-stop) fares and seating availability (sometimes affect frequent flyer redemptions).

| Connection | Air Canada | American | Delta | United | JetBlue |
|-------------------|-----------------------|-----------------|--------------|---------------|----------------|
| Atlanta | | | | | |
| Chicago | | X | | X | |
| Dallas/Fort Worth | | X | | | |
| Detroit | | | X | | |
| Houston | | | | X | |
| Miami | | X | | | |
| Minneapolis | | | X | | |
| Newark | | | | X | |
| New York JFK | | X | X | | X |
| Philadelphia | | X | | | |
| Salt Lake City | | | X | | |
| San Francisco | | | | X | |
| Seattle | | | X | | |
| Toronto | X | | | | |
| Vancouver | X | | | | |

Comments on Page 18:

1. Average growth forecast used. We agree with the 1.6 growth rate used for the air traffic model. Between the start of the “Jet Age” in October 1958 and up to 9/11, historically, world air traffic doubled every 20 years. Half of the world’s air traffic is in the United States. Since 9/11, we have seen dramatic change in the



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airline industry through consolidation and “right sizing” of aircraft to routes. U.S. airlines are now primarily focused on profits instead of market share.

2. Air Traffic Allocation Model. Price (air fare cost) is a major factor that is missing from this model. Passengers who live close to Burbank, Ontario and John Wayne airports are sometimes faced with significant fare differences between their home airport and LAX. In some cases, the fare difference is so great that it is worthwhile for the passenger to drive and park his car at or near LAX and still have money leftover for which he may have spent on flying out of his local airport. If airfare prices were similar at each SCAG airport (“co-terminal” pricing), then the problem of leakage of some passengers to LAX, and the attendant ground traffic congestion, could be reduced.

Comments on Page 19:

1. Airfield and Terminal Capacities. Please provide us with the data and calculations used each of the four airports listed here: Burbank, LAX, Long Beach and John Wayne. Data sought is airfield configuration used, number of gates and gate sizes, aircraft selection, aircraft engine assignment (critical for air quality evaluations), etc. We ask that the 2009 LAX Design Day Flight Schedule (DDFS) not be used here. The DDFS excluded the Airbus A330 and Boeing 717 aircraft from the 2009 and 2025 baselines and overestimated the Boeing 767 for 2025 which the airlines are now retiring in favoring of narrowbody aircraft such as the Airbus A321 and Boeing 737-900ER.

Comments on Page 20:

1. Los Angeles International Airport. The current north airfield separation of 700 feet meets current FAA standards for parallel runway separation (FAA Advisory Circular 150/5300-13A, Section 316)
2. LAX capacity. Please provide the backup materials and calculations for the LAX capacity described in the second column. The Petitioners (ARSAC and cities of El Segundo, et al) are seeking to extend the 153 gate cap and 78.9 MAP limit at LAX through the year 2040.
3. Long Beach Airport. Please update the daily commercial flight limit from 41 to 50.

Comments on Page 21:

1. Table 2. For LAX, please add, “Stipulated Settlement Agreement of 153 gates and 78.9 MAP limit” to the Source of Constraint column.
2. Forecast Air Passenger Allocation Scenarios. Please provide the data and calculations for the unconstrained and constrained scenarios.

Comments on Page 22:



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1. Airport Ground Access. As with page 18 comments, the price factor is missing in this discussion.
2. We challenge the use of “ranges” in Table 3 for LAX, ONT, PMD and SBD. Courts have held that the purpose of Environmental Impact Reports are supposed to be informational documents for the public and for decision makers. The use of ranges appears to be disingenuous to the public, especially when SCAG staff confirmed that the higher MAP numbers will be used for the regional air quality model.
3. We should also point out that it is nonsensical that the overall 136.2 MAP 2040 forecast would be the same for all four of the scenarios shown on page 22, particularly between the adopted scenario that respects airport capacity constraints, and the unconstrained scenario. Past RADAM modeling done by SCAG realistically reduced overall demand served in constrained scenarios (i.e. puts unserved demand in a "latent demand" category) since not all passengers that cannot be served by a nearby constrained airport would be expected to drive to other airports, and some would simply chose not to fly. Unconstrained airport systems would always be expected to serve the highest levels of demand. SCAG's demand allocations apparently went through an artificial and arbitrary exercise to keep the demand totals the same for all four scenarios, such as by arbitrarily eliminating service at some airports in the unconstrained scenario.

Comments on Page 23:

1. Burbank Airport (BUR). Please add in wording concerning the California High Speed Authority's plan to have a station at BUR.

Comments on Page 24:

1. Burbank Airport (BUR). Please add in wording concerning the California High Speed Authority's plan to have a station at BUR.

Comments on Page 25:

1. Los Angeles International Airport (LAX) FlyAway bus service. Please update this sentence to: LAWA operates LAX FlyAway, which provides non-stop bus service between each of the LAX terminals and seven locations: Van Nuys Airport, Union Station, Westwood, Hollywood, Santa Monica, Orange Line and Long Beach. Pursuant to the LAX Master Plan Mitigation and Monitoring Plan Air Quality Commitment 3 (MM-AQ3), LAX is supposed to have 8 additional sites operational (not including Van Nuys) by the end of 2015. This is a requirement before a building permit can be issued for the Intermodal Transportation Facility (ITF).
2. LAX bus service. Add in Bakersfield after Ventura County.
3. Transportation Networking Companies (TNC's). Add a sentence to end of the second to last paragraph, “In December 2015, LAX permitted TNC operators



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such as Lyft and Uber to pick-up and drop-off passengers at designated points on the Departures area on the upper level roadway.”

Comments on Page 26:

1. Recently Completed Ground Access Projects. After Hollywood, add in Orange Line and Long Beach.

Comments on Page 28:

1. Ontario International Airport. The transfer of Ontario International Airport (ONT) from Los Angeles World Airports (LAWA) to the Ontario International Airport Authority (OIAA) should be noted here.
2. Please add in wording concerning the California High Speed Authority’s plan to have a station at ONT.

Comments on Page 30:

1. Palmdale Regional Airport (PMD). Please add in wording that the Palmdale Airport Authority has a lease with the US Air Force for use of Air Force Plant 42’s two 12,000 foot runways and a 60-acre leasehold with a passenger terminal for use as Palmdale Regional Airport. Also, Los Angeles World Airports (LAWA) owns 17,750 acres to the east and south of Plant 42 for a future airport. Some of the land is leased for farming, a golf course, the NASA Dryden facility and a factory that supplies railcars for Metro.

Comments on Page 33:

1. San Bernardino International Airport (SBD). Add in a sentence that SBD has a passenger terminal with X passenger gates and Federal Inspection Service (Immigration, Customs, etc.) facilities. Also add in a sentence that SBD has Maintenance, Repair and Overhaul (MRO) facilities and is home to San Bernardino’s Sheriff’s Office air unit and US Forest Service air resources.

Comments on Page 35:

1. Southern California Logistics Airport (VCV). In the last sentence, change Oxnard Airport to Southern California Logistics Airport.
2. Technical and Policy Committee Review. ARSAC commends SCAG for reaching out to commercial airport operators to solicit their input on future passenger growth at their respective airports. ARSAC remains concerned that the data and calculations used for projecting future LAX passenger growth have been hidden. ARSAC requests release of that data and calculations.

ENVIRONMENTAL JUSTICE APPENDIX

Comments on page 154, Aviation Noise Impacts



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1. In Table 83- 2016-2040 RTP/SCS Aviation Plan and Scenario, there are issues here with the baselines for John Wayne and LAX. Where did these numbers come from? SNA has a legal constraint of 12.5 MAP and should not be given a higher number. Where did the 100.7 MAP come from for LAX?
2. Why are the other tables for airport forecasts not consistent throughout the RTP and PEIR?

We are happy to answer any questions. Please do not hesitate to contact us.

Sincerely,

Handwritten signature of Denny Schneider in black ink.

Denny Schneider
President

Handwritten signature of Robert Acherman in black ink.

Robert Acherman
Vice President

cc: Hon. Eric Garcetti, Mayor, City of Los Angeles
Hon. Mike Bonin, Los Angeles City Councilman, 11th District
Hon. Alan Wapner, Ontario City Councilman
Hon. Maxine Waters, Member of Congress
Hasan Ikharti, SCAG Executive Director
Ryan Hall, SCAG Aviation Program Manager

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Jan Vandersloot, M.D.
In Memoriam

February 1, 2016

Dear Southern California Association of Governments,

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

The Banning Ranch Conservancy works in Orange County and has since 2008. Our mission is to preserve the entire 400 acre Banning Ranch as open space. We have had important successes since our inception including cessation of excessive unpermitted mowing of coastal sage scrub on the Banning Ranch mesa.

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

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Jan Vandersloot, M.D.
In Memoriam

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

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

Conclusion

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Should you need to contact me, I can be reached at 714-719-2148. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to terrymwelsh@hotmail.com

Sincerely,



Terry Welsh, M.D.

President, Banning Ranch Conservancy

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Newport Beach,
CA 92659-5333

(310) 961-7610



January 27, 2016

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

Re: **BASPOA Comments on Draft 2016 RTP/SCS**, particularly
opposition to the Sepulveda Tunnel Reversible Lane Project (RTP ID
LA996425 from RTP/SCS Project List Appendix Table 2, page 124 and
PEIR Appendix B Table 1, page 18)

Dear SCAG Regional Council:

I am writing on behalf of Bel Air Skycrest Property Owners' Association (BASPOA) regarding the proposed Sepulveda Tunnel Reversible Lane project. My community travels the Sepulveda Pass on a daily basis, and we strongly oppose this project, which pre-dates and has now been made obsolete by the I-405 Sepulveda Widening. To be honest, we were all quite shocked to see this antiquated proposal show up on the 2016 Draft RTP/SCS Project List, given that **northbound traffic problems in the Pass have been resolved by the I-405 Widening Project**.

We urge that the reversible lane proposal be dropped.

At the same time we agree with the Sherman Oaks Homeowners Association (SOHA) that the big problem involving the Sepulveda Corridor is not the tunnel itself but the lack of rapid transit between the Valley and LA proper, and that more energies must be directed, without delay, to finding a viable north-south **rapid transit solution** for the City of Los Angeles, one that will take Valley dwellers to LAX, jobs, and more, while relieving traffic on the 405 and Sepulveda.

Respectfully,

Lois Becker

Lois Becker, Community Liaison / Bel Air Skycrest Property Owners' Association

cc: the Honorable Mike Bonin, CD-11; the Honorable Paul Koretz, CD-5; Supervisor Sheila Kuehl; Senator Ben Allen, 26th District; Assemblymember Richard Bloom

encl: corresponding MSWord doc



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February 1, 2016

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Coastkeeper
Peninsula Open Space Trust
Sea and Sage Audubon
Sierra Club
Angeles Chapter
Surfrider Foundation



To Whom it May Concern,

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

The Bolsa Chica Land Trust was formed in 1992 in Huntington Beach, Orange County, with the mission of the acquisition, preservation and restoration of all of Bolsa Chica and to educate the public as to Bolsa Chica's natural wonders and cultural significance. Today, more than 5,000 members of BCLT actively support these efforts and BCLT's projects and programs. We have had important successes since our inception and today, the Bolsa Chica Ecological Reserve spans over 1,200 acres, is home to many protected species and habitats, and sees more than 40,000 visitors each year.

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

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

Congratulations

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

Amendments to the Open Space Maps in the PEIR

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

Identify a Conservation Mechanism for the Natural and Farmlands Preservation

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

Formal Versus Informal Conservation Plans—All Are Important

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

Population Growth Impacts to Existing and Future Parklands

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

SCAG’s Support of Regional Wildlife Corridors

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

Conclusion

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Should you need to contact me, I can be reached at (714) 846-1001. In addition, we request to be included on any notifications (electronic or otherwise) about this policy’s creation and implementation, please send information to Kim@BCLandTrust.org.

Best regards,



Kim Kolpin
Executive Director



Building Industry Association of Southern California, Inc.

February 1, 2016

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

RE: Comments on the Draft 2016-2040 RTP/SCS and Draft Program Environmental Impact Report

Dear Mr. Ikhata:

The Building Industry Association of Southern California, Inc. (BIASC) is a regional trade association that represents more than 1,400 member companies within a six county region and comprised of Chapters in Orange, Los Angeles/Ventura, Riverside/Imperial and San Bernardino counties. Together, BIASC's members build most of the homes and communities throughout the same six-county region, co-extensive with the reach of Southern California Association of Governments (SCAG).

BIASC is pleased to comment on the draft 2016-2040 RTP/SCS and associated environmental documents during the public review period. We have participated in the development of the plan update since the passage of the original RTP/SCS in April 2012 via participation on the Energy and Environmental Committee, GLUE Council and Technical Working Group.

General Comments

We are pleased to support SCAG's Preferred Scenario as outlined and described in both the 20162040 RTP/SCS and the Draft Program Environmental Impact Report (DPEIR). SCAG's five core principles contained in the RTP/SCS document are reasonable and respectful of local growth forecast input as provided by the various jurisdictions and subsequently corrected and updated. The Plan's reliance and focus on technology and innovation, rather than solely increased land use constraints and density maximization to reduce Vehicle Miles Travelled (VMT), reflects a thoughtful and prudent planning approach applied in the current Preferred Scenario. With the increasing rate at which fleet change and alternative fuels are entering the market, this RTP/SCS update iteration is well timed to take advantage of the advances since the 2012 Plan was adopted.

**Comments on the Draft 2016-2040 RTP/SCS
February 1, 2016**

BIASC supports SCAG's commitment to advance the adoption of the RTP/SCS Growth Forecast at the jurisdictional level as demonstrated in the Preferred Scenario. Additionally, BIASC is opposed to the Alternative #3 Plan as analyzed in the DEIR on the premise that this "intensified" plan would, by design, negatively impact the existing built landscape region wide, potentially forcing jurisdictions to adopt land use and planning policies in conflict with their respective communities needs and individual character, in order to stay consistent with the 2016 RTP/SCS intensified scenario. It is also noted that the intensified scenario may not include all technical corrections to the growth forecasts for all counties.

Additionally, BIASC has worked closely with SCAG staff to insure the inclusion of identified development agreements and entitlements region wide were included in the preferred scenario and reflected in the resulting Traffic Analysis Zone (TAZ) mapping. BIASC must note, however, that some jurisdictions like Orange County expended greater time and resources to reconciling existing entitlements with SCAG modeling outcomes than others, and therefore are likely to have a higher degree of over-all accuracy than other counties. BIASC requests that any entitlements which may have not been captured through the extensive vetting process by SCAG, be included in the future as they might be identified.

BIASC sees this current iteration of the RTP/SCS as measured and reflective of both the progress made to date by the 2012 Plan and the current economic, technological and funding constraints that exist presently and will affect the implementation of this current RTP/SCS updated plan. Funding opportunities and strategies will continue to be a significant challenge in implementing the 2016 RTP/SCS update, and adherence to sound economic impact analysis will be crucial to assuring the Plan contributes to the continuing California economic recovery.

Draft Program Environmental Impact Report (DPEIR):

500' Buffer Commitment- The research and HRA analysis around this issue is well known and acknowledged as a significant public health concern. However, considering the pace at which fleet change, alternative fuels and cleaner technology options have been entering the market place, the adoption of this buffering strategy does not make sense from a long-term planning perspective, and is clearly in conflict with the greater goals of advancing creation of High Quality Transit Areas (HQTA) and VMT reductions. The plan has numerous references to prohibiting certain uses (including residential and mixed use) within 500 feet of a major transportation corridor (like a freeway). This language should be eliminated or at least made more flexible; and it should be indicated that additional study is pending by air quality agencies and SCAG. Also, if any such references remain, they should specify that

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any buffer is measured from the edge of travel lanes and not the edge of a right of way. Precluding development within 500 feet takes a massive amount of land out of play where transit-oriented, affordable housing might well be built. Furthermore, precluding development in these areas is directly contrary to the primary objective of SB 375, which is to locate housing near job centers within previously urbanized areas.

Lastly, community design and development would be hampered by imposition of this 500' buffer along roadways, potentially making some desirable projects less economically feasible or infeasible.

Mitigation Measures:

One of BIASC's early concerns with the 2012 RTP/SCS DEIR was the over-all quantity and level of intended prescriptiveness of the mitigation measures contained in the first draft of the DEIR. Through painstaking collaboration, a palatable and legally defensible compromise was arrived upon when a new Appendix G was created to house these recommended voluntary mitigation measures for jurisdictions to consider for project specific application. BIASC is satisfied with the comprehensive language below, with the suggested addition underscored below.

(General Description and Legal Requirements- P.1-11)

"SB 375 specifically provides that nothing in a SCS supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use policies and regulations, including their general plans, to be consistent with the SCS or an alternative planning strategy (Government Code Section 65080(b)(2)(K)). Moreover, cities and counties have plenary authority to regulate land use through their police powers granted by the California Constitution, art. XI, §7, and under several statutes, including the local planning law (Government Code Sections 65100–65763), the zoning law (Government Code Sections 65800–65912), and the Subdivision Map Act (Government Code Sections 66410–66499.37). As such, SCAG has no concurrent authority/jurisdiction to implement mitigation related to land use plans and projects that implement the RTP/SCS. With respect to the transportation projects in the RTP/SCS, these projects are to be implemented by Caltrans, county transportation commissions, local transit agencies, and local governments (i.e., cities and counties), and not SCAG. SCAG also has no authority/jurisdiction to require these agencies to implement project specific mitigation measures". **The Project Level Mitigation Measures are provided as suggested approaches to help jurisdictions and project proponents achieve the collective goal of mitigating impacts at the project level. These are not intended to be exclusive nor prescriptive in nature or application.**

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BIASC notes that several mitigation measures cite compliance with existing California regulatory law. This is unnecessary and duplicative as it is already assumed that existing law will be adhered to as a matter of practice by lead agencies and project stakeholders.

Funding (Long-term): (P.128)

The RTP/SCS Summary of Revenue Sources is very heavily dependent on tax and fee increases, including new politically sensitive and untested user based programs like a proposed VMT tax which is programmed to produce \$124 Billion in revenue closer to the planning horizon, via a four cent per mile fee. A second anticipated fee source is in County Development Impact Fees (DIF's) projected to provide upwards of \$10 Billion. These are both a major "leaps of faith" on multiple fronts and can have a dampening impact on both the affordability of housing and the viability of some already depressed markets such as the Inland Empire. **BIASC suggests that economic viability be highlighted again in this section to include language acknowledging the absolute need for balanced approaches to increasing taxes and fees, and the potential to negatively impact an already fragile California economy. It is important to underscore the vital nature of job creation and affordability to spurring consumer activity and the resulting tax revenue generation that is central to badly needed public sector investment.**

This is consistent with the RTP/SCS Goal #1, "Align the plan investments and policies with improving regional economic development and competitiveness."

Land Use Strategies: (P. ES-9)

With regard to the guiding land use strategies, BIASC respectfully asks SCAG to consider the following additions concerning SCAG's basic litany:

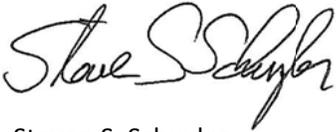
- Identify regional strategic areas for infill and investment, **including policies that provide incentives and avoid conflicts of purpose or intent;**
- Structure the plan on a three-tiered system of centers development;
- Develop "Complete Communities"; **(Please define Complete Communities)**
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing **and consumer preferences;**
- Continue to protect stable, existing single-family areas;

**Comments on the Draft 2016-2040 RTP/SCS
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- Ensure adequate access to open space and preservation of habitat, **while avoiding conflicts between wildlife and communities as much as possible**; and
- Incorporate local input and feedback on future growth.

BIASC provides these comments in the spirit of collaboration and good public policy development. We continue to be an active partner with SCAG in providing input on all regional planning documents and programs to assure that the best, safest and most livable communities are developed here in southern California.

Respectfully,

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

Steven S. Schuyler
Executive Vice-President, Government Affairs
Building Industry Association of Southern California

CC: Ms. Lijin Sun
Huasha Liu

February 1, 2016

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

Re: Comments - Draft 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, and Program Environmental Impact Report

Dear Ms. Aguirre,

California Construction & Industrial Materials Association (CalCIMA) appreciates the opportunity to comment on the draft 2016-2040 Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS), and Program Environmental Impact Report (PIER). 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 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.

CalCIMA is a statewide trade association representing construction and industrial material producers in California. Our members supply the minerals that build our state's infrastructure, including public roads, rail, and water projects; help build our homes, schools and hospitals; assist in growing crops and feeding livestock; and play a key role in manufacturing wallboard, roofing shingles, paint, low energy light bulbs, and battery technology for electric cars and windmills.

Current and future extraction of the diverse mineral resources present within the SCAG region, while minimizing impacts of this use on the public and the environment, is important to the region's economy and success of the regional transportation projects detailed within the 2016 RTP/SCS. Protecting access to areas that contain valuable minerals is critical to the SCAG region to allow continued prosperity and reduce environmental impacts from aggregates used within the region. Currently, the region receives about 1 million tons per year of aggregates by barge from Canada and a large portion of aggregates are imported from adjacent regions resulting in increased environmental impacts from greater transport distances as compared to aggregate sources located within the SCAG region.

CalCIMA appreciates the 2016 RTP/SCS providing a regional vision and pragmatic foundation for the six counties and 191 cities within its' region to facilitate general plans which are required to

identify significant mineral resource areas and apply appropriate land use designations to ensure their future availability. In order to further supplement the 2016 RTP/SCS, CalcIMA has drafted the following comments and recommendations for your review and consideration pursuant to our stakeholder's interest as it relates to mineral resources and the regional economy.

RTP/SCS

The Road to Greater Mobility & Sustainable Growth – 2016 RTP/SCS Environmental Mitigation – Mineral Resources

CalcIMA is encouraged by SCAG's proposed endeavor to coordinate with the Department of Conservation (DOC) and California Geological Survey (CGS) to maintain a data base of available mineral resources in the SCAG region including permitted and unpermitted aggregate resources, and the anticipated 50-year demand for aggregate and other mineral resources. As detailed in this section, SCAG plans to work with local agencies on strategies to address anticipated demand and avoid transport of materials long distances from locations outside the SCAG region, including identification of ways to encourage and increase recycling to reduce demand for aggregate. CalcIMA appreciates that industry will be included in the strategizing phase of this endeavor to provide perspective related to identification of ways to encourage and increase recycling of aggregate.

PIER

3.12 Mineral Resources – Definitions.

In the 'Definitions' section, we recommend that the terms 'non-permitted,' 'unpermitted,' and 'known mineral resource,' be added. Adding these terms to the existing list of definitions will allow readers to become familiar with the terms prior to review of related text. The following definitions are recommended for inclusion:

- Non-permitted and unpermitted aggregate: Deposits that may meet specifications for construction aggregate, are recoverable with existing technology, have no land overlying them that is incompatible with mining, and currently are not permitted for mining¹.
- Known mineral resource or identified resources: Resources whose location, grade, quality, and quantity are known or estimated from specific geologic evidence. Identified resources include economic, marginally economic, and sub-economic components. To reflect varying degrees of geologic certainty, these economic divisions can be subdivided into measured, indicated, and inferred².

3.12.2 Existing Conditions – Regionally Important Mineral Resources.

¹ Southern California Association of Governments. (Retrieved in January 2016). Program Environmental Impact Report – Mineral Resources – 3.12-4.

² Department of Conservation. (Retrieved in January 2016). California Surface Mining and Reclamation Policies and Procedures – Guidelines for Classification and Designation of Mineral Lands. Retrieved from: <http://www.conservation.ca.gov/smgb/guidelines/documents/classdesig.pdf>

In order to provide regional perspective related to converted land uses that may become incompatible with mining in correlation with the proposed RTP/SCS projects, in this section we recommend inclusion of a map that outlines both the identified mineral resource zones (MRZs) and the proposed RTP projects.

Table 3.12.2-1: Permitted Aggregate Resources and 50-Year Demand in the SCAG Region.

This table shows that just under one-third of the projected 50-year demand is currently permitted in the SCAG region exclusive of mines in Imperial County. Discussion following this table extrapolates that CGS estimates that there are up to 74 billion tons of nonpermitted resources state-wide, and that there is an estimated excess of 37 million tons of nonpermitted resources in the region. While the estimated amount of nonpermitted resources is large, access to these resources may be limited due to social, environmental, or economic factors. In this section we recommend inclusion of a map that clarifies the proposed RTP/SCS project locations in correlation with MRZs that are identified as permitted or nonpermitted, and urban or environmentally sensitive areas in order to illuminate mineral resources that may or may not be sufficiently located from potential markets which can impact economic viability.

San Diego Association of Governments (SANDAG) has created an overlay map showing mine locations, documents MRZs, and the relative scarcity of locations where aggregates could be mined in comparison to the total area where aggregate resources exist. This information is located within the application section of SANDAG's '2050 RTP/SCS Final Environmental Impact Report³.'

IMPACT MIN-1(a)(1): Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Please reference comments made pursuant to the RTP/SCS section 'The Road to Greater Mobility & Sustainable Growth – 2016 RTP/SCS Environmental Mitigation – Mineral Resources'

IMPACT MIN-1(a)(1): Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

CalCIMA is encouraged by SCAG's proposed endeavor to facilitate, encourage, and coordinate with local jurisdictions to review, identify, and update aggregate and mineral resources in their jurisdictions through cooperation, information sharing, and regional development as part of SCAG's ongoing regional planning efforts such as web-based planning tools for local government including CA Lots, and other GIS tools and data services, including but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts such as Compass Blueprint's Toolbox Tuesday Training series and sharing of associated online training materials. This proposed endeavor will provide cities and counties with GIS resources that reflect regional information that will be instrumental when general plans and infrastructure projects are being addressed. In parallel to this proposed endeavor, the County of Los Angeles has incorporated language within their 'General Plan' recognizing the regional importance of construction aggregates as well as the inclusion of designated resources within SB 375 which states:

³ SANDAG. (October 2011). 2050 RTP/SCS Final Environmental Impact Report. Retrieved from: <http://www.sandag.org/uploads/2050RTP/F2050RTPEIR47.pdf>

It is also important to work with the State Mining and Geology Board and the State Geologist in the permitting process, as well as to coordinate with different agencies to address mineral resources within regional efforts. This includes the prioritization of Mineral Land Classifications efforts of MRZ-3 and MRZ-4 lands adjacent to planned new or existing freight routes, or addressing mineral resources in the Sustainability Communities Strategy, per SB 375.

Other comments regarding the PEIR

Pursuant to RTP/SCS modeling recommendations for regions that are nonattainment for ozone or carbon monoxide, the '2010 California Regional Transportation Plan Guidelines' compiled by the California Transportation Commission (CTC) recommends that the largest of metropolitan planning organizations incorporate goods movement and commodity flow analysis. Specifically, page 46 of this document recognizes that "Freight models should be implemented in the short term commodity flows models within a few years." CalCIMA would like to encourage SCAG to implement this modeling recommendation to educate decision makers and the public regarding how related various options would potentially affect trip making, travel modes, vehicle miles traveled, land use plans, and greenhouse gas (GHG) issues. More specifically within this RTP/SCS process, SCAG could analyze the commodity flows of construction aggregate from the mineral facilities identified within the RTP/SCS as current and future sites to the proposed transit infrastructure projects and development areas proposed for growth as well as analyze the emissions of such commodity movement within the RTP/SCS. The RTP/SCS projects which SCAG lists are the projects eligible for CTC funding and absent being included within the RTP/SCS these projects could not be funded, a reasonably foreseeable impact of the RTP/SCS is at a minimum the transportation emissions associated with supplying materials for these projects. Consideration of these GHG emissions would enable the projects to avoid additional analysis at the project level under California Environmental Quality Act (CEQA) requirements.

This goes to say that SB 375, 'Transportation planning: travel demand models: sustainable communities strategy: environmental review,' was signed by the Governor on September 30, 2008. According to the Governor's press release:

Senate Bill 375 (Darrell Steinberg, D-Sacramento) requires the ARB to develop regional greenhouse gas emission reduction targets to be achieved from the automobile and light truck sectors for 2020 and 2035. The 18 [metropolitan planning organizations] MPOs in California will prepare a "sustainable communities strategy" to reduce the amount of vehicle miles traveled (VMT) in their respective regions and demonstrate the ability for the region to attain ARB's targets.

- *ARB would later determine if each region is on track to meet their targets.*
- *Builders also would get relief from certain environmental reviews under California Environmental Quality Act if they build projects consistent with the new sustainable community strategies.*
- *In addition, cities would get extra time -- eight years instead of five -- to update housing plans required by the state⁴.*

SB 375 is primarily concerned with automobile and light truck traffic, however the goal of reducing GHGs covers all transportation sources based on the need for sustainable communities.

⁴ Office of Governor Schwarzenegger. (October 2008). Fact Sheet – Senate Bill 375: Redesigning Communities to Reduce Greenhouse Gases. Retrieved from: <https://www.mwcog.org/uploads/committee-documents/bF5dXVhZ20081016085919.pdf>.

each transportation planning agency ... shall prepare and adopt a regional transportation plan directed at achieving a coordinated and balanced regional transportation system, including, but not limited to, mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities and service⁵s. (Section 65080(a), underline added.)

The regional transportation plan is to be an internally consistent document and include a SCS.

The sustainable communities strategy shall ...(v) gather and consider the best practically available scientific information regarding resource areas and farmland in the region⁶

Resource areas include:

...areas of the state designated by the State Mining and Geology Board as areas of statewide or regional significance pursuant to Section 2790 of the Public Resources Code, and lands under Williamson Act contracts⁷.

SB 375 recognizes construction aggregate as a regionally significant resource that requires special consideration in transportation and land use planning efforts. Lastly, MPOs:

...shall consider financial incentives for cities and counties that have resource areas⁸.

It is a shared goal to develop and adopt a RTP/SCS that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders. CalCIMA looks forward to working with SCAG to achieve our collective goals to encourage land use and growth patterns that complement our transportation investment, and appreciate the consideration of our comments. If you have any questions regarding this letter, please contact me at (951) 941-7981 or at sseivright@calcima.org.

Sincerely,



Suzanne Seivright
Director of Local Government Affairs

⁵ Government Code. (Retrieved on January 2016). Title 7. Planning and Land Use [Section 65080(a)]. Retrieved from: <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=65001-66000&file=65080-65086.5>.

⁶ Government Code. (Retrieved on January 2016). Title 7. Planning and Land Use [Section 65080(b)(2)(B)(v)]. Retrieved from: <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=65001-66000&file=65080-65086.5>.

⁷ Government Code. (Retrieved on January 2016). Title 7. Planning and Land Use [Section 65080.01(a)(4)]. Retrieved from: <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=65001-66000&file=65080-65086.5>.

⁸ Government Code. (Retrieved on January 2016). Title 7. Planning and Land Use [Section 65080(b)(4)(C)]. Retrieved from: <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=65001-66000&file=65080-65086.5>.

February 1, 2016

Dear SCAG

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

CCRPA works in Orange County and has since 1995. Our mission is to protect and preserve cultural resources. We have had important successes since our inception including preservation of 100 acres of the Tomato Springs site in Irvine.

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

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

Congratulations

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

Amendments to the Open Space Maps in the PEIR

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

Identify a Conservation Mechanism for the Natural, Cultural and Farmlands Preservation

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

included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.

Formal Versus Informal Conservation Plans—All Are Important

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

OPTION 5 PARAGRAPH: A Request to Better Align Increased Population and Park Access (DELETE THIS HEADER)

Population Growth Impacts to Existing and Future Parklands

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

SCAG's Support of Regional Wildlife Corridors

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

Conclusion

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

Sincerely,

Patricia Martz, Ph.D., President
CCRPA

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, SUITE 100

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February 1, 2016

Mr. Hasan Ikhata, Executive Director
Southern California Association of Governments
818 W, 7th Street 12th Floor
Los Angeles, California 90017-3435

RE: Draft FY 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
Draft Program Environmental Impact Report (PEIR) State Clearinghouse (SCH) # 2015031035

Dear Mr. Ikhata:

The California Department of Transportation (Caltrans) wishes to thank the Southern California Association of Governments (SCAG) for the opportunity to review and comment on the Draft 2016 RTP/SCS and Draft PEIR.

Caltrans commends SCAG for reaching out and engaging state, regional, and local agencies and the public in extensive outreach efforts and for developing a comprehensive planning process that included Caltrans staff on several committees. We also commend SCAG for separating the closely related, but clearly distinct discussions about climate change, greenhouse gas (GHG) emissions, and air quality.

The 2016 Draft RTP/SCS was distributed to Caltrans' Divisions in Sacramento and Districts 7 (Los Angeles and Ventura Counties), 8 (San Bernardino and Riverside Counties), 11 (Imperial County) and 12 (Orange County). The offices within each Division and District were given the opportunity to review and comment on the document according to the California Regional Transportation Guidelines. The Division of Aeronautics provided comments through the Aviation Working Group.

Caltrans compliments SCAG on developing strategies that will allow the region to not just meet, but to actually exceed the GHG emission reduction goals mandated under SB 375. This Draft 2016 RTP/SCS is commendable for its broad vision, which, while recognizing mobility as a primary goal, also encompasses sustainability, the economy, employment, air quality and GHG emission reduction, safety, public health and integrated planning.

Mr. Hasan Ikhata
 February 1, 2016
 Page 2

Caltrans offers the following comments for your consideration:

- **Missing RTP Checklist** - Please note, per page 32 of the 2010 RTP Guidelines (http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/2010%20RTPGuidelines_Jan2011_Technical_Change.pdf), all MPOs are required to submit an RTP Checklist with the **Draft** and **Final** RTP when the document is submitted to Caltrans. This checklist establishes a minimum standard for developing the RTP for federal and state RTP requirements. California Government Code Section 14032(a) authorizes the CTC to request an evaluation of all RTPs statewide to be conducted by Caltrans. A completed checklist also assists in providing for an open and transparent public participation process for the general public, federal, state and local agencies.
- We recommend that SCAG address the newly adopted transportation act, "Fixing America's Surface Transportation Act (FAST Act)." Specifically, this act could be addressed in the Status of the Federal Highway Trust Fund section on page 124 as well as in other federal funding sections of the Draft RTP. Additionally, we would suggest the SCAG add the Fast Act to the glossary of the RTP.
- Per 23 CFR Part 450.322 (g), each RTP shall include a comparison with the California State Wildlife Action Plan (SWAP). It is unclear in SCAG's draft RTP where that comparison is being made. We recommend adding a simple comparison to issues that are relevant in the region such as climate change, growth, and development with SWAP in the body of the RTP.
- The SCAG RTP should mention how it is coordinated and consistent with the Public Transit-Human Services Transportation Plan. Currently, the Draft RTP only includes this information in the Transit Appendix. We suggest that SCAG also make reference to this coordination in the body of the RTP.
- The list of projects labels some projects as "non-reportable Transportation Control Measures (TCMs)". We suggest that SCAG provide a definition for this project type.
- Per Section 33 of the 2006 STIP Guidelines, RTPs need to contain a statement regarding consistency between projects in the RTP and the Interregional Transportation Improvement Program (ITIP). We suggest that SCAG include the consistency statement regarding projects in the RTP and the ITIP.
- Per 23 CFR Part 450.322(f)(10)(vi), the RTP must address the specific financial strategies required to ensure the identified TCMs from the SIP can be implemented. We suggest that SCAG further highlight the TCMs from the SIP that will be implemented within the body of the RTP.

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Page 3

- The RTP needs to contain a list of projects specifically identified as TCMs to be implemented in the region. While these projects are listed in the Transportation Conformity Analysis Appendix, we suggest that SCAG include some details as well as a reference to this information in the body of the RTP.
- **Affordable Housing** - The California Affordable Housing Sustainable Communities Program has helped many residents with incomes that are 30 percent below the area median to buy housing. Extending this program or other similar programs will continue the process to make housing more affordable in Southern California.

Specific comments on the RTP/SCS chapters and appendices are included in Attachment A and specific comments on the PEIR are included in Attachment B.

If you should have any questions in regard to the above comments, please do not hesitate to contact Dan Kopulsky of my staff at (213) 897-0213. If you should have any questions in regard to the PEIR comments, please do not hesitate to contact DiAnna Talton of my staff at (213) 897-9140.

Sincerely,



GARY T. SLATER
Deputy District Director for Planning

cc: Ray Deselle, D8
Bill Figge, D11
Lan Zhou, D12
Tami Podesta, D7
Katie Benouar, DOTP
Tracey Frost, ORIP

Attachments

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Attachment A – Specific Comments

EXECUTIVE SUMMARY

- Page 4 - *“California High-Speed Train system is under construction in the Central Valley, and scheduled to begin service to Burbank Bob Hope Airport in 2022 and reach Los Angeles Union Station in 2028.”* California High Speed Rail Authority (CHRSA) may be shifting strategy to build the Initial Operating Segment (IOS) North segment first. More details may be included in the 2016 CHSRA Business Plan. Please refer to CHRSA comments.
- Page 6 - *“The 2016 RTP/SCS calls for an investment in passenger rail of \$38.6 billion for capital projects and \$15.7 billion for operations and maintenance.”* Would operations include improving service span and frequency?
- Page 7 - Include a summary of the allocated funds, if any, for the subsections promoting walking, biking and other forms of active transportation, leveraging technology, improving airport access, and focusing new growth around transit.
- Page 7 - *“The 2016 RTP/SCS plans for continued progress in developing our regional bikeway network, assumes all local active transportation plans will be implemented, and dedicates resources to maintain and repair thousands of miles of dilapidated sidewalks.”* Would there be dedicated funding?
- Page 7 - In focusing new growth around transit, it is mentioned that the policies support the development of HQTAs on areas with frequency services of every 15 minutes or less during peak commuting hours. Does this mean that Metrolink Stations within San Bernardino Valley area would not be considered as HQTA; therefore, no fund would be allocated?

CHAPTER 2: WHERE WE ARE TODAY

- Page 25 - The positive effects on real estate values, retail sales, (gentrification) in HQTAs affects the affordability of the currently resides low incomes within certain distance of HQTAs. Please explain how that can be handled and how environmental justice can be served since they would be forced to relocate to a more affordable area further from the transit hubs?
- Page 27 - There are no references noting where the percentages for the different modes of transportation came from. There is no mention of the number of jobs tied to Goods Movement in the region.
- Page 28, Paragraph 2, last sentence - Is there a specific reference within the body of the RTP that addresses this concern (re: lack of bike infrastructure)? If there is, we would suggest that SCAG reference a link to it in this paragraph. As it is currently written in the Draft, it appears that SCAG is noting a problem with bicycle infrastructure but not addressing it.

*“Provide a safe, sustainable, integrated and efficient transportation
 system
 to enhance California's economy and livability”*

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- Page 33 - Under Seaports the document lists ‘...117 metric tons of imports and exports...’ Consider using Twenty-Foot Equivalent Units (TEU’s) instead of metric ton measurements, which is how goods movement interacts with our transportation systems (Ship to Rail and State Highway, and Local Roads Pages 3.17-39-40)

CHAPTER 3: CHALLENGES IN A CHANGING REGION

- Page 47 - First paragraph last sentence, needs to be re-stated, regionally there are career areas that have seen growth in jobs with increased pay (i.e. Computer Sciences, Medical, Engineering, Accounting, Logistics). Please describe more completely the issues related to slow or no recovery, following the recession. Include not only the lack of high income jobs for the median household, but the inability to access higher paying jobs that are available, but require higher education and/or technical skills.
- Page 53 - The current number of passenger and freight trains seem off on the Union Pacific Railroad’s Los Angeles, Alhambra and Yuma Subdivisions

CHAPTER 4: CREATING A PLAN FOR OUR FUTURE

- Pages 60-63 - We would recommend relating the California Transportation Plan (CTP) 2040 to SB 391 as it addresses GHG reduction targets from the transportation sector of AB 32. This is an example of what could be added: Senate Bill 391 (SB 391, 2009) requires the Caltrans to prepare the CTP, a long-range transportation plan, anticipated for approval in the next year, to reduce GHG emissions. GHG emissions must be reduced to 1990 levels from current levels by 2020, and 80 percent below the 1990 levels by 2050 as described by AB 32 and Executive Order S-03-05. The upcoming CTP 2040 will demonstrate how major metropolitan areas, rural areas, and state agencies can coordinate planning efforts to achieve critical statewide goals.
- Page 60 - Please explain the projects/programs to achieve goal #7 (Actively encourage and create incentives for energy efficiency, where possible). Also, please explain how the reduction of funds as a result of increase in Electric/Hybrid cars can be addressed.
- Page 61 - What was the percentage of participation in public outreach compared to the SCAG population? How diverse were the participants in terms of socioeconomic criteria such as education, income?
- Pages 60-65 - It is not mentioned here or in the appendix what the preliminary scenarios were before settling on a preferred scenario. A simple infographic on the process leading to the preferred scenario would help clarify this section.

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CHAPTER 5: THE ROAD TO GREATER MOBILITY & SUSTAINABLE GROWTH

- Pages 68-73 - We would suggest including a description of SB 743 since this section focuses on Transit Oriented Development (TOD) and HQTAs. It would provide background on SCAG's efforts to follow this bill.
- Page 71, EXHIBIT 5.1 - There is a gap in the 2040 rail stations on West Santa Ana Branch between Los Angeles and Orange County. The Metro West Santa Ana Branch (Measure R) and OCTA West Santa Ana Branch plans (streetcar) should be coordinated. This should be a unified transit corridor between Los Angeles and Santa Ana, to provide new travel options to I-5 and I-405 in the Gateway Cities and North Orange County.
- Page 73 - A table showing which cities have adopted these plans and policies would be useful.
- Page 78 - In order to strengthen the discussion on "fix-it-first," suggest citing or adding language from the California Transportation Agency's Infrastructure Priorities: <http://www.calsta.ca.gov/res/docs/pdfs/2013/CTIP%20Vision%20and%20Interim%20Recommendations.pdf>
- Page 81 - Under paragraph 1, please note that the SHSP is misidentified as the State Highway Safety Plan. The correct title is the Strategic Highway Safety Plan. Additionally, we would suggest that the SHSP should be added to the glossary of the RTP.
- Page 85 - No mention of the Slauson Light Rail Corridor in any other planning documents. The Western segment shown on the map is being planned as a bike path. The eastern segment, not shown on the map, continues through the Gateway Cities to North Orange County. The right of way could be an alternative route for Metro Gold Line Eastside extension to Whittier. There is a significant gap on the West Santa Ana Branch between Los Angeles County and the Santa Ana Streetcar. This corridor should be planned as a whole and not fragmented. The West Santa Ana Branch could provide an alternative to I-5, I-405 and connect the Gateway Cities to North Orange County.
- Page 88 - *"For example, the Rail2Rail pass allows Metrolink monthly pass riders who have origin and destination points along the LOSSAN corridor to ride Amtrak. In 2014, the North County Transit District (NCTD) reached an agreement with Caltrans Division of Rail (DOR), in which five daily Pacific Surfliner trains stop at all non-Pacific Surfliner Amtrak (Coaster) stops in San Diego County."* The LOSSAN Board and SCRRA have not reached agreement on continuation of Rail 2 Rail. The program may be eliminated.
- Page 90, Exhibit 5.3 - The "OC Loop" project is not included.

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- Page 95, second column **Highways and Arterials** - the Draft RTP/SCS states “...As part of the plan, strategic High Occupancy Vehicle (HOV) gap closures and freeway-to-freeway direct HOV connectors are proposed to complete the system.” Please modify to read as ‘...As part of the plan, strategic HOV gap closures, freeway-to-freeway direct HOV connectors, and HOV direct access ramps need to be proposed as a strategy to complete the system.’
- Page 96, **Table 5.5 Sample Major Highway Projects Committed by the Counties** - The term “Committed by the Counties” is misleading. There may be projects on these lists that were not environmentally cleared. Caltrans understands there are certain assumptions needed to assist with the planning process, but the descriptions should not imply project specifics that may be contradictory to any alternatives that still need to be analyzed. Consider including language that explains what assumptions were made (particularly in the FTIP), why they were needed, and that pending environmental clearance.
- Page 96, **Table 5.5 Sample Major Highway Projects Committed by the Counties** - List should include Mixed Flow (MF) lanes on I-405 between SR-73 and I-605.
- Pages 97-98, **Tables 5.6 and 5.7 Major HOV Projects/Freeway-to-Freeway HOV Connectors and Express/HOT Lane Network** – Consider adding the word ‘Lane’ after HOV to the main title for Table 5.6 (to clarify difference from Connector in the next section). Consider labeling the tables to reflect “Baseline 2040” or “Plan 2040”.
- Page 113 - It would be good to mention tribal cultural resources in this section since AB 52 identifies tribal cultural resources as a new addition of mitigation measures in CEQA and would require consultation with tribes to assess projects that may impact their resources.
- Page 118 – Typographical error: “...to smooth extreme congestion to more ARB friendly speeds.”

CHAPTER 9: LOOKING AHEAD

- Pages 170-171 – The document needs to resolve inconsistencies between narratives and tables regarding managed lanes – the Strategic Plan targets expansion of HOV, but not Planned Managed Lanes (Page 170), then proceeds to list “congestion pricing demonstration projects” and “expanded express/HOT lane network” as major projects on Table 9.1 (Page 172).
- Page 171 – The document does not provide enough detail and guidance on the term ‘Corridor Sustainability Studies’ (CSS).

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- Page 171 – The major strategic projects for each region are listed in Table 9.1. Imperial, San Bernardino and Ventura Counties have one project identified for each region. While in the comprehensive list of the strategic projects for the three regions as contained in Project List Appendix, Imperial County has 33 projects, San Bernardino County has 3 projects, and Ventura County has 3 projects. What criteria was applied to screen out projects? There is no information about the approximate costs associated with projects mentioned in the documentation. If the major projects are only relevant individually to the region, can we add more projects from into the “Major” category? The summary of the regions’ strategic projects is as follows:

| Counties | Number of Strategic Projects | Major Projects | Percentage | Formula OA, 2015 |
|----------------|------------------------------|----------------|------------|------------------|
| Los Angeles | 188 | 5 | 2.66% | 243,268,469 |
| Orange | 44 | 3 | 6.82% | 74,691,051 |
| Riverside | 29 | 3 | 10.34% | 54,129,417 |
| San Bernardino | 3 | 1 | 33.33% | 50,542,711 |
| Ventura | 3 | 1 | 33.33% | 17,347,316 |
| Imperial | 33 | 1 | 3.03% | 3,558,671 |

As shown in the above table, the percentage of major projects in the strategic plan follows a pattern. The larger regions with bigger shares of federal formula Obligation Authority (OA) tend to have lower percentage of major projects, probably because of competitions among their long lists of projects. However, Imperial County has the “major” percentage on a par with that of Los Angeles. Is this indicating the same level of competition among the Imperial strategic projects as that among the projects in Los Angeles or another way saying the Imperial region is underfunded?

- Page 173 – “Metrolink recently completed its long-range Strategic Assessment in 2015 and it forecasts growth in the number of daily trains from 165 current weekday trains today to 240 weekday trains by 2025. In addition, the 2012 Los Angeles – San Diego – San Luis Obispo Rail Corridor (LOSSAN) Strategic Implementation Plan (SIP) forecasts up to 310 weekday Metrolink trains by 2040.” Metrolink would need to operate over 500 trains per day to provide the level of service comparable to commuter rail systems in New York, Philadelphia, Chicago and the Bay Area. There should be regional funding mechanism to provide the level of capital and operating funds needed for this level of service. A Regional Express bus system could also fill gaps and provide extensions to the expanded commuter rail system.

GLOSSARY

- Page 178 – The definition for Baseline says it “is based on the adopted 2011 FTIP.” This looks like a carryover from the previous RTP, please correct year to 2015.

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APPENDICES

ACTIVE TRANSPORTATION

- Page 5 - A graphic on this page details the various bicycle classifications included in the Caltrans Highway Design Manual (HDM). The HDM was recently updated to include a new classification of Class IV facilities. Please update the graphic to include the new narrative of Class IV Separated Bikeways, instead of the term “Cycletracks”.
- Page 62, Exhibit 27 - A graphic on this page shows many “Regional Bikeways” and “Local Class 1 bikeways” detailed in red. According to the latest Orange County Bikeways Map, many of those areas included in solid red are not actually Class I bikeways, particularly SR-39 (Beach Boulevard) and SR-1 (Pacific Coast Highway). Additionally, SR-133 (Laguna Canyon Road) is listed as a Class III bikeway, which is inaccurate as well. Please cross reference with OCTA Bikeways Map at (http://www.octa.net/pdf/BikewaysMap_2013-0504.pdf) and Caltrans Transportation Concept Reports for SR-1, SR-39, and SR-133 (<http://www.dot.ca.gov/dist12/planning/>)

HIGHWAYS AND ARTERIALS

- In general, the report mentions existing HOV lanes and those that are planned. Overall, the projects listed in the report are somewhat similar to what we have. The report also mentions the success of the SR-91 Express lanes in OC County and the I-10 and I-110 Express lanes in LA County. The following is stated on page 6 of the Highways and Arterial Appendix “...integration of value pricing to better utilize existing capacity and to offer users greater travel time reliability and choices. As previously mentioned, Express/High Occupancy Toll (HOT) Lanes that are appropriately priced to reflect demand can outperform non-priced lanes in terms of throughput, especially during congested periods.”
- Also, it discusses Base Year 2012 network compared to Baseline 2040 network and Plan 2040 network on pages 23 through 26 of the Highways and Arterial Appendix. As stated in Table A5 below (Plan 2040), the number of miles of HOV lanes in Los Angeles County shows a significant drop from present numbers, whereas HOT lanes have significantly increased as compared to Table A3 below (Base Year 2012).
- The following is stated on page 95 of the Draft 2016-2040 RTP/SCS: “In addition to expanding the HOV network, another proposed strategy is to make certain HOV lanes continuously accessible. Various highways within Orange County feature this and studies show that continuous-access HOV lanes do not perform any worse compared with limited-access HOV lanes. Continuous-access HOV lanes give carpoolers greater freedom of movement in and out of the HOV lane network...”

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- Pages 40 map and page 41: Additional HOV projects completed in Los Angeles/Ventura Counties between year 2012 and 2015:
 - 1) LA I-5/SR-14 HOV Connector (Dec 2012)
 - 2) LA I-5 HOV lane from Hollywood Way to SR-118 (June 2015)
 - 3) LA SR-170/I-5 HOV Connector (June 2015)
 - 4) VEN 101 HOV lane from Mobile Pier Rd to Santa Barbara County line (March 2015)
- I-10 HOV lane project from I-605 to Puente Ave was completed in December 2013. Other segments of the I-10 HOV lane project from Puente Avenue to SR-57 are either in design phase or under construction. The map on page 41 of the report illustrates as the entire segment of the I-10 HOV lane from I-605 to SR-57 as existing.
- I-5 HOV lane from Orange County line to I-605 is currently under construction. The map on page 41 and description on page 42 of the report identifies this segment of the HOV lane as being completed.
- I-5 from Orange County line to I-605 is also an HOV lane project as stated on pages 33 and 141 of the project list in the appendix. The map on pages 42 and 94 of the report identifies this segment as mixed flow lane only.
- SR-71 from I-10 to San Bernardino County line involves the addition of 1 HOV lane and 1 mixed-flow lane as stated on pages 35 and 144 of the project list in the appendix. The map on pages 42 and 94 of the report identifies this segment as mixed flow lane only.
 The following comments are for HOV/HOT lanes in Los Angeles/Ventura Counties: “The result has been **27 more miles** of regional HOV lanes on Interstates 5, 405, 10, 215 and 605, on State Route 57 and on the West County Connector Project within Orange County.” Please consider specifying if the 27 miles is centerline or lane-miles.
- We did not see discussion of Senate Bill 788 that authorizes relinquishment of a large portion of State Route 86 and resignation of the section by Westmorland.
- The project list incorrectly labels the route as dual designated SR-78/SR-86. It is only designated SR-86 and will become SR-78 after the full relinquish is completed.
- Page 5 - Table 1, Please Include SR-91 Corridor System Management Plan (CSMP) for Orange County (from I-5 to Riverside County).
- Pages 9 & 20 - Maps of unconstrained network do not match tables for planned managed lanes – I-5 not included in network (Table 2 vs. Exhibit 8).
- Page 10 - Table 5 Highway Investments, consider adding the cost multiplicative factor (e.g. millions, billions, etc.).
- Page 10 - Table 5 Highway Investments, there is an Asterisk (*) after HOT Lanes but no accompanying footnote explaining what it denotes.
- Page 10 - Table 5 Highway Investments, Regional Total \$36.1. Consider labeling the table to denote which set of projects are included (e.g. Baseline 2040 vs. Plan 2040).

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- Page 95 - Please note that Orange County is not the only sub-region that has continuous access HOV facilities. (e.g. on the SR-210 between I-15 and I-215).
- Page 96, **Table 5.5 Sample Major Highway Projects Committed by the Counties** - The term "Sample" is misleading. If this list only shows what the county transportation commissions have stated in their planning documents, consider revising the title of the table and/or include a column stating the source (e.g. LA MTA LRTP, VCTC CTP, OCTA LRTP, ...etc.), or consider using the FTIP list as shown on Table 3 of the Highways & Arterials Appendix.
- Page 10 - Table 5 Highway Investments, Regional Total \$36.1. Consider labeling the table to denote which set of projects are included (e.g. Baseline 2040 vs. Plan 2040).

PROJECT LIST

- Los Angeles State Highway LA0G1116 Route 1: Pacific Coast Highway and Parallel Arterials I-105 to I-110: Signal Synchronization (EA 30990 PPNO 4800) ~~\$18,000~~ \$9,000
- Route 405: **Reconfigure** Crenshaw Blvd On/Off Ramps: Construct a New SB I-405 On-Ramp and Freeway & Local Streets Widening [EA 29360 PPNO 4551]
- The Orange County Transportation Authority's Renewed Measure M (M2) specifies that Projects A through M regarding freeway improvements will "add new lanes" or "add capacity". The M2 project descriptions in the 2016 RTP/SCS and PEIR need to be consistent with the languages in M2. Otherwise, it could be pre-decisional for upcoming projects. For example, District 12 is currently working with OCTA on the preferred alternative for the SR 55 widening project. The SR 55 project should be described as "Add a new lane in each direction on SR 55 between I-405 and I-5" without specifying as "Add a mixed-flow lane."
- In both Table 1 and Table 2, Orange County, State Highway section,- The description of projects on 405 (ORA 030605 and ORA 030605A) refer to phase 1 and phase 2. This project will not be phased anymore.
- In both Table 1 and Table 2, Orange County, State Highway section – For Project ID ORA131303; SR 57 Orangewood to Katella – Add 1 MF Lane Northbound between Orangewood and Katella (Utilize Toll Match for RSTP) ENG Only; the dollar amounts are different in Table 1 versus Table 2 (\$6,500K for FTIP Vs \$34,500K for Financially-constrained RTP). The correct total project (RTP ID 2TK01116) amount is \$124,600 (Project Cost \$1,000's). Please clarify the difference.

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- Please change the completion year and spelling noted in **bold** below in Tables 2 & 3:

Financially Constrained RTP Projects

| | | | | | | |
|------------------|--|-----------------------|---|---|-------------|----------|
| STATE HIGHWAY | ORANGE COUNTY TRANS AUTHORITY (OCTA) | 2H01143- ORA111001 | 5 | INTERSTATE 5 ADD 1 HOV IN EACH DIRECTION FROM SOUTH OF PACIFIC COAST HIGHWAY TO SAN JUAN CREEK ROAD. PPNO:2531F | 2018 | \$63,093 |
| STATE HIGHWAY | ORANGE COUNTY TRANS AUTHORITY (OCTA) | 2H01143- ORA111002 | 5 | INTERSTATE 5 ADD 1 HOV IN EACH DIRECTION FROM SOUTH OF AVENIDA VISTA HERMOSA TO SOUTH OF PACIFIC COAST HIGHWAY. PPNO 2531E | 2017 | \$68,711 |
| STATE HIGHWAY | ORANGE COUNTY TRANS AUTHORITY (OCTA) | 2H01143- ORA990929 | 5 | INTERSTATE 5 ADD 1 HOV IN EACH DIRECTION FROM SOUTH OF AVENIDA PICO TO SOUTH OF AVENIDA VISTA HERMOSA AND RECONFIGURE AVENIDA PICO INTERCHANGE. PPNO:2531D (UTILIZE TOLL CREDIT MATCH FOR IMD AND STIP) | 2018 | \$97,736 |

Strategic List 2016 RTP (spelling)

ORANGE STATE HIGHWAY S2160008 I-5/**MARGUERITE** PKWY ADD NEW
 INTERCHANGE ORANGE COUNTY TRANS AUTHORITY

- **Managed Lanes:** Please include the following tolling projects into the constrained RTP in Orange County: I-405 from SR-73 to SR-55; SR-55 from I-405 to SR-91; I-5 from SR-55 to SR-91.

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- The I-605 and SR-73 projects in the current draft proposal (Tier 1) will be replaced by the above-listed I-405 and I-5 projects, and the SR-55 project will stay the same.
- Successful regional implementation of managed lanes is best capitalized by solid toll reinvestment strategies. Leveraging toll revenues to fund transit improvements, Complete Streets initiatives, Intelligent Transportation System (ITS) technologies, or other eligible projects would have profound long-term benefits for the region. HOT facilities are a vital funding source and an integral component when completed of a multimodal transportation system that would facilitate greater travel choices and reduce regional greenhouse gas.

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Attachment B – PEIR Comments

- Caltrans commends SCAG for considering some of the health risks associated with the RTP. The Health Risk Assessment in Appendix J only analyzed emissions, cancer risk impacts associated with Air Quality, and was only focused on several corridors in the region. Caltrans recommends that Health Risk/Impacts should first be addressed at the policy level and analyze the potential health risks associated with Air Quality, Noise, Hazardous Waste and Community Impact for the complete RTP, considering all the projects included in the plan.
- **General/Section 1.9** - Caltrans supports the goals expressed in the draft PEIR prepared by SCAG. However, Caltrans wishes to emphasize that the use of the Sustainable Communities Project Exemption (as outlined in Section 1.9 of the DEIR) should only be done with great caution and only under limited circumstances. Two of the criteria indicated for the usage of the Exemption are that the proposed project site “does not include wildlife habitat of significant value or protected species,” and that the project site “would not significantly affect an historic resource.” If a project proponent were to rely solely on the information included in the Biological Resources Technical Report (Appendix E) and the Cultural Resource Technical Report (Appendix F), there would still be a substantial chance that wildlife habitats and/or historic resources could be impacted by the proposed project. The aforementioned Technical Reports are not analytical in nature, and instead are merely lists of previously identified and evaluated resources. Project-level studies would still be needed to assess the presence of previously unidentified or unevaluated habitats and resources. Thus, in many situations, the usage of the Sustainable Communities Project Exemption would not be advisable or adequate for the purposes of CEQA compliance. Project-level studies, including field surveys by qualified archaeologists and biologists, are essential for the identification and preservation of significant biological and historical resources.
- Page 3.17-39, Chapter 3.17 **Transportation, Traffic, and Safety** -Typographical error: “2The 2016 RTP/SCS...”
- Page 3.17-39, Chapter 3.17, **Transportation, Traffic, and Safety** - Methodology Section: The second paragraph mentions various HOV projects proposed in the near future, including “the I-405/SR-74 connector in Orange County”. Please note that there is no planned connection between I-405 and SR-74, please revise or remove statement accordingly.



January 26, 2016

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

Subject: Comments on Draft December 2015 2016/2040 RTP/SCS for the Southern California Association of Governments (SCAG)

Dear Ms. Aguirre:

Thank you for the opportunity to comment on SCAG's Draft December 2015 2016/2040 *Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)*. The California High-Speed Rail Authority (Authority) looks forward to continued collaboration and advancement of the Memorandum of Understanding with Southern California transportation agencies that outlines a shared commitment to improving passenger rail service across the region, full integration of high-speed rail (HSR) into the regional transportation system and reducing GHG emissions through the funding and delivery of local early investment projects that will improve rail service immediately as the first step to bringing HSR into the Southern California region. These efforts will also help to relieve automobile and train congestion, reduce vehicle emissions including greenhouse gas emissions, and improve safety. In addition, the Authority is actively working with its partners planning and identifying strategic investments in the Phase 2 Los Angeles to San Diego via the Inland Empire corridor, mutually beneficial to HSR service and local, regional and intercity service.

Beyond the HSR system itself, the Authority—in collaboration with many partner agencies—is also implementing a statewide rail modernization plan that will provide near- and long-term benefits to the regional transportation networks that connect to HSR, including the San Luis Obispo–Los Angeles–San Diego (LOSSAN) rail corridor, Metrolink, and Metro light rail systems. Some of these capital improvements contain funding from *The Safe, Reliable High-Speed Passenger Train Bond Act for the 21st Century* (Proposition 1A). Of the 15 Proposition 1A-funded HSR connectivity projects, five are located in SCAG's jurisdiction:

- **Metrolink Positive Train Control:** The project consists of installing predictive collision avoidance technology throughout the Metrolink system. As described in the 2016/2040 RTP/SCS, Metrolink is the first passenger railroad in the nation to have its entire system (territory, equipment, and crew) in-service with Positive Train Control (PTC). Accordingly, the Southern California Regional Rail Authority (SCRRA) will continue to perform version upgrades to its onboard software and upgrades to other PTC subsystems in order to maintain compatibility and inter-operability. The implementing agency is SCRRA who has received \$35 million in Proposition 1A funds for the project.

EDMUND G. BROWN JR.
GOVERNOR



Ms. Courtney Aguirre

Page 2

- **Metrolink High-Speed Rail Readiness Program:** The project consists of acquisition of 20 high-powered, Tier 4 locomotives. The implementing agency is SCCRA which has received \$68.5 million in Proposition 1A funds for the project. An additional \$20.2 million remains programmed and will be used for the Locomotive Rehabilitation project.
- **Positive Train Control, Los Angeles to Fullerton Triple Track:** The project includes the installation of PTC components, the scope of which includes but is not limited to, the installation of links between key transmission stations and control points along the BNSF Railway Company right of way; the installation of signal bungalows; and the installation of critical locomotive and cab car on-board equipment. The implementing agency is Caltrans, which has received \$2.94 million for the construction phase.
- **Positive Train Control, Moorpark to San Onofre:** The project will implement all aspects of PTC technology along the LOSSAN corridor between Moorpark and San Onofre. These improvements will provide direct benefits by improving operations and safety for Amtrak and Metrolink trains that serve the LOSSAN corridor. The implementing agency is SCCRA, which has received \$46.6 million in Proposition 1A funds for the project.
- **Regional Connector Transit Corridor:** The project consists of construction of a two-mile extension that will link the Metro light rail network and provide connections to HSR through Downtown Los Angeles, including construction of three new underground light rail stations. The implementing agency is Metro which has received \$114.9 million in Proposition 1A funds for the project.

The Authority is also actively engaged in station area planning activities with many HSR Phase 1 station cities to assist cities in planning for the transportation, access, land use, and economic effects of a new HSR station and prepare for opportunities for housing and infill development around the station locations that aligns with local priorities. Please note that the Authority and the Cities of both Burbank and Palmdale have recently entered into station area planning contracts.

Thank you for considering these comments. The Authority looks forward to ongoing collaboration with SCAG on issues of shared interest, including statewide rail modernization, expansion of complementary transit services, and station area planning that will leverage the investments being made in multi-modal transit infrastructure at the state, regional and local levels.

If you have any additional questions, please contact Ms. Melissa DuMond, Director of Planning and Integration, at melissa.dumond@hsr.ca.gov or 916-403-2583.

Sincerely,



MELISSA ELEFANTE DuMOND
Director of Planning and Integration

cc: Michelle Boehm, Southern California Regional Director
Fernando Castro, Caltrans District 7
Dan Kopulsky, Caltrans District 7

Daniel Tran

From: Van Dyken, David@HSR <David.VanDyken@hsr.ca.gov>
Sent: Thursday, January 28, 2016 3:41 PM
To: Daniel Tran
Cc: Dumond, Melissa@HSR
Subject: High-Speed Rail Authority additional comment to the SCAG draft 2016/2040 RTP/SCS

Greetings Daniel,

Per your request during our telephone conversation, I'm emailing you another comment regarding the SCAG draft 2016/2040 RTP/SCS. This comment is related to the list of station cities found in the Passenger Rail Appendix, page 27, under the heading "California High-Speed Train Phase One." The High-Speed Rail Authority's 2014 Business Plan shows the following station locations:

- Palmdale
- San Fernando Valley (one station site)
- Los Angeles
- Midway between Los Angeles and Anaheim (one station site)
- Anaheim

Thank you again for the opportunity to comment. You should be receiving our comment letter shortly.

David R. Van Dyken, AICP
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California Native Plant Society

ORANGE COUNTY CHAPTER

P.O. Box 54891

Irvine, CA 92619-4891

occnps.org

January 31, 2016

The California Native Plant Society is a statewide non-profit organization. Its membership is open to all.

CNPS' mission is to conserve California native plants and their natural habitats, and increase understanding, appreciation, and horticultural use of native plants.

The Orange County Chapter of CNPS focuses that mission on the native plants and natural vegetation of Orange County and adjacent Southern California.

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

RE: *Draft 2016 RTP/SCS/PEIR* Comments

Dear Sirs:

Thank you for the opportunity to review and comment on the Southern California Association of Governments (SCAG) *Draft 2016 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) and the Program Environmental Impact Report (PEIR)*.

The Orange County Chapter of the California Native Plant Society (OCCNPS) is a member of the cross-county coalition coordinated by Friends of Harbors, Beaches and Parks (FHBP). Beginning with the *2012 RTP/SCS*, the coalition has focused on working for the inclusion of policies that favor natural lands mitigation within SCAG's plans. Such natural-lands mitigation and land-use policies are important to OCCNPS' ongoing mission to conserve Orange County's native plants and habitats.

OCCNPS is pleased to see that the California Native Plant Society (CNPS) *On-Line Electronic Inventory of Rare and Endangered Vascular Plants of California* (CNPSEI 2015) is one of the technical databases reviewed to develop the *2016 RTP/SCS/PEIR's* bioresource lists. CNPS also publishes the online *Manual of California Vegetation* (cnps.org/cnps/vegetation/manual.php), a definitive system for describing vegetation statewide that has been accepted by state and federal agencies. The *Manual's* system would provide more accurate and detailed descriptions of the SCAG region's vegetation than does that used in the *2016 RTP/SCS/PEIR*.

January 31, 2016

OCCNPS' *Emergent Invasive Plants Program* (occnps.org/invasives.html), while focusing on invasive plant species that are new to Orange County, contains much information that is applicable to invasive plants anywhere in the coastal plain portion of the SCAG region; we offer it for SCAG's use. We hope that SCAG will espouse the use of Best Management Practices (BMPs) to help prevent the inadvertent spread of invasive plant seeds via vehicles, equipment and personnel at transportation-improvement project sites.

OCCNPS is glad to see that preserving natural lands is now a major initiative, with its own category, *Natural Lands and Farmlands*--in the *2016 RTP/SCS/PEIR*. The new category signifies a shift in thinking about what land's "best uses" may be, and is a great milestone in conservation planning for the region and for SCAG.

Preserving natural lands, with their native vegetation, will help SCAG reach all its environmental quality goals. That's because the most important thing about plants is that they take carbon dioxide out of the air, mix it with water and sunshine, then release oxygen back into the air and put the carbon into their bodies. This process--photosynthesis--is basic to life as we know it on this planet. And plants do it for free, all over the world, every day. The more plants, the more natural lands, the healthier, the more sustainable, the higher-quality is the natural environment that supports us all.

Preserving natural lands is thus a strong complement to the *RTP/SCS/PEIR*'s major initiatives for sustainability implementation, especially redirecting growth to infill in existing urbanized areas.

The *Natural and Farmlands Appendix* provides SCAG with the background and opportunity to start implementing a regional conservation program, rather than planning for the future of open space in the region. With such implementation, SCAG can take a more serious leadership role in regional conservation, can actively seek funding to implement conservation efforts by partnering with agencies, transportation commissions and non-profits. A strong focus on preserving natural lands would be a way that the *2012 Plan* can come to fruition through the *2016 Plan*.

Comments and suggestions, offered with the intent to clarify/strengthen the language and link its goals and SCAG's mission with the *Natural and Farmland Policies*.

1. Consistency is needed in the maps:

SCAG developed its own geographic information systems (GIS) dataset, the *Natural Resource Inventory*, as a result of the 2012 Plan. SCAG and its partner organizations put much work into developing the *Inventory*, and it was vetted by numerous organizations. So it is puzzling that so few of the *Inventory*'s GIS layers appear to have been used in the *RTP/SCS/PEIR*'s maps. The *Inventory*'s baseline information is the more accurate and should be the basis for the *RTP/SCS/PEIR*, especially for the "natural and farmland" maps.

For example, there seems to be confusion in the terms “undevelopable” and “undeveloped.” The *PEIR*'s Fig. 3.4.2-5 shows (in Orange County) much of Rancho Mission Viejo's land as Undevelopable. But the Rancho is at this time developing its lands according to its 2004 Ranch Plan. (The Ranch Plan includes that some 17,000 acres are to be dedicated as preserved open space once its planned 14,000 dwelling units have been built. So the 17,000 acres may indeed be “undevelopable” but the remainder of the Rancho's lands are certainly developable--though not all are developed at this time.) The *PEIR*'s Fig. 3.11.2-2 and Fig. 3.11.2-5 and Table 3.11.2-2 define the same lands as “Undevelopable or Protected.” Conversely, the *RTP/SCS' Natural and Farm Lands Appendix* Exhibit 3, “Protected Lands in the SCAG Region,” correctly shows the Rancho lands as partly private (i.e. developed, or soon to be) and partly as NGO (i.e. the 17,000 acres that will be The Reserve at Rancho Mission Viejo Habitat Reserve).

2. What Conservation Mechanism(s) Can or Will be Used for Natural and Farmlands Preservation?

The *RTP/SCS/PEIR* should identify mechanisms, processes or plans that will be employed to combine and marshal the time, energy, political will, strategy and other efforts needed to create successful conservation transactions that lead to permanently conserved land. Implementing such mechanisms is part of implementing the regional conservation program, in which SCAG could take a more serious leadership role now that the *Natural and Farmlands Appendix* provides the background and opportunity.

Policies to promote development in infill areas is one such mechanism, and likely relieves pressure to develop natural and farm lands. But the relief of pressure doesn't mean the natural and farm lands are automatically protected. Unless the lands are formally protected, they likely will again be proposed for development, whether or not infill is completed.

3. What Mechanism(s) Can or Will be Used to Accommodate Access to Preserved Lands?

The *RTP/SCS/PEIR* does not clearly differentiate between access appropriate to city and regional parks and access appropriate to habitat lands. Throughout the document, the *Plan* promotes providing more access to existing and new parks as infill projects are built. But infill, by definition, takes place within already-built areas. Parks within the built environment have fundamentally different purposes and uses than preserved natural lands. Such lands typically are focused on preservation of natural habitat and low-impact uses (flower-watching, birding, hiking, etc.). Limited and strictly managed public access may be part of the conditions under which these mitigation lands were preserved. Promoting “more” access to such habitat lands may have significant consequences for these lands and their managers.

4. Both Formal And Informal Conservation Plans Are Important:

SCAG seems to identify formal conservation plans, such as Natural Community Conservation Plans and Habitat Conservation Plans (NCCP/HCP), as the much-preferred conservation method. But NCCP/HCP programs are only one conservation mechanism and have the limitations of being voluntary, property-owner driven and generally only applicable to larger land ownerships.

SCAG should also promote conservation approaches that are less formal than NCCP/HCPs, such as:

- The programs of local, regional, state and federal agencies.
- The campaigns of many conservation organizations, who help facilitate, coordinate and find funding for land conservation transactions.

5. Support for Regional Wildlife Corridors:

The *RTP/SCS/PEIR's Natural and Farmlands* focus would be stronger if it supported the enhancement of and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by transportation infrastructure projects. Wildlife corridors allow species to safely migrate between preserved lands that are separated by development. The migration allows species to maintain genetic diversity across the region, thus helps regional ecosystems to maintain ecological functions and resiliency in the face of disturbance (fire, flood, e.g.) and climate change impacts.

Many efforts are underway across the region to connect landscapes to one another. In Orange County, there are two such efforts:

- Coast to Cleveland, connecting the southern and northern portions of the NCCP Reserve (i.e. connecting the coastal hills to the Santa Ana Mountains) across mostly-urbanized central Orange County. This corridor is essential to the long-term successful functioning of the overall NCCP Reserve.
- Chino-Puente Hills, which connect the northern end of the Santa Ana Mountains (i.e. the northerly end of the Peninsular Ranges) and the San Gabriel River Corridor (and thence to the Transverse Ranges and beyond). The Chino Hills end of this corridor is mostly in Orange County; some of the corridor is in San Bernardino County, most is in Los Angeles County. Each of these has tenuous portions, which may be suitable as mitigation projects for nearby transportation improvements that are outlined in Appendix B, the *2016 RTP/SCS Project List*.

6. On p. 177 of the 2016 RTP/SCS it is stated: "... A more climate resilient strategy would be to design sidewalks and bike paths with native drought tolerant shade trees. ..." Seven tree species are native to the Southern California coastal plain and hills (where much of what's proposed in the *RTP/SCS/PEIR* will be done). Of those, four are riparian-woodland species, needing year-round moisture at their roots, so could not be considered drought-tolerant: sycamore (*Platanus racemosa*), willow (*Salix spp.*), alder (*Alnus racemosa*), and poplar (*Populus spp.*). The other three are oaks (*Quercus agrifolia*, *Q. chrysolepis*) and California black walnut (*Juglans californica*). These are drought-tolerant once established, but are unhappy in poorly drained soils and/or hot exposures. Only the two oaks will grow tall and wide enough to accommodate bike paths and sidewalks under their canopies. For the trees' health:

- Barriers will be needed along the sidewalks/bike paths, so that the trees' root zones will not be compacted by off-path feet/bikes. Fuchsia-flowered gooseberry (*Ribes speciosum*) would make a natural barrier that would support hummingbirds and other wildlife.
- The oaks' fallen leaves must be left to form natural mulch under the canopies, so that the mulch layer's natural nutrient cycling can support and maintain the trees.

January 31, 2016

- No underplanting should be done, except of species natively found under oaks, and that only in the oaks' early years.
- Routine maintenance should be limited to removal of weeds, whose seeds will inevitably be blown in and/or dropped by birds.

Oaks large enough to form the desired canopies may well be a minimum 25 years old. Planning to grow such trees, in large boxes for transplantation to the eventual sidewalks/bike paths, ought to begin soon.

Thank you for reviewing OCCNPS' comments. We look forward to working with SCAG on the implementation of this Plan, especially as it relates to the Natural and Farmlands Appendix. Please include OCCNPS, at the email address below, on any notifications.

Respectfully,

Celia Kutcher, Conservation Chair



California Legislature

January 27, 2016

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

Subject: DRAFT 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

Dear Mr. Ikhata:

We are writing to express our strong support for the continued inclusion of the SR-710 Freeway Tunnel Project in the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A freeway tunnel directly comports with several SCAG goals including decreasing time on the road, enhancing economic opportunities, and improving air quality.

The freeway tunnel has strong local support and is consistent with voter mandate and local plans. Almost two-thirds (65.5%) of voters in the five cities that currently oppose the freeway tunnel also supported Measure R, which explicitly contained the freeway tunnel project. The tunnel, as you know, was also adopted in Metro's Long Range Transportation Plan.

Most importantly, the freeway tunnel would significantly improve air quality and reduce cancer risk for the majority of the study area. Unfortunately, lower income minority communities near the freeway are more impacted by poor air quality than those in more affluent areas to the north. The SR 710 North Study Draft Environmental Impact Report shows that cities south of the freeway have existing Cancer Risk levels 20% to over 60% higher than their neighbors to the north. This disparity is clearly an unacceptable environmental injustice for the Los Angeles Region.

A freeway tunnel also maximizes mobility and flow of traffic throughout the Los Angeles Region. Traffic must be moved from local streets back onto freeways where it was originally designed to go. A freeway tunnel solves this problem and reduces cut-through traffic on neighborhood streets by 43% or 57,600 vehicles per day.

Page 2

January 27, 2016

Subject: DRAFT 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

It's critical that SCAG maintain support for the tunnel and sustain inclusion of the project in the 2016-2040 RTP. Completion of the freeway is vital to the health and safety of thousands of Los Angeles area residents. We are confident that SCAG will remain steadfast in support for the tunnel as the best alternative for completion of the 710 freeway.

Sincerely,



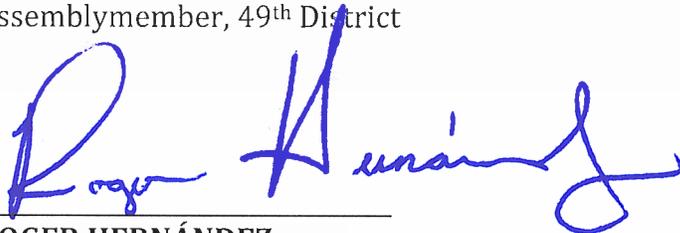
ED CHAU

Assemblymember, 49th District



ED HERNÁNDEZ, O.D.

Senator, 22nd District



ROGER HERNÁNDEZ

Assemblymember, 48th District



TONY MENDOZA

Senator, 32nd District

Sponsors:

California State
University, Fullerton

County of Orange

Municipal Water
District of
Orange County

Orange County
Council of
Governments

Orange County
Sanitation District

Orange County
Transportation
Authority

Orange County
Water District

Southern California
Association of
Governments

Transportation
Corridor Agencies

Contributing Partner:

Orange County
Local Agency
Formation
Commission

January 29, 2016

Courtney Aguirre
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Uploaded via: <http://scagrtpscs.net/Pages/2016-2040RTPSCSComments.aspx>

SUBJECT: DRAFT 2016 RTP/SCS COMMENTS

Dear Ms. Aguirre:

The Center for Demographic Research at Cal State Fullerton has reviewed the Draft 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, “the Plan”), its associated appendices, and the growth forecast datasets. We greatly appreciate the opportunity to do so and for all of the work SCAG staff has done to produce these reports and the work with local agencies during the development process.

We also want to extend our thanks for the close coordination between SCAG and the Center for Demographic Research (CDR) at California State University, Fullerton on behalf of Orange County jurisdictions to ensure that the 2014 Orange County Projections (OCP), Orange County’s growth forecast, and its updates were included in the 2016 RTP/SCS and PEIR preferred alternative to accurately reflect entitlements, development agreements, projects recently completed, and projects under construction. For decades, the Orange County Projections has been used by OCTA in the development of its Orange County Long-Range Transportation Plan demonstrating that Orange County has integrated transportation and land use planning for years.

We would like to express support of recommendations by the Orange County Council of Governments, the Orange County Transportation Authority, and other Orange County agencies whose comments support the Plan with its use of the Orange County’s growth forecast, the 2014 Orange County Projections and its updates. We thank you for the opportunity and ask for your consideration and response to the following comments:

1. Support for the Plan with its use of Orange County’s growth forecast.
2. Oppose the selection of the Intensified Land Use Alternative (Alternative 3) in the draft PEIR as it does not reflect entitlements, development agreements, and projects recently completed or projects under construction in Orange County.
3. Maintain objective, unbiased tone.
4. Provide consistency throughout all the documents regarding the 500 foot “buffer”.
5. References to “city” or “cities” are changed to “jurisdiction” or “jurisdictions” where appropriate.
6. Remain Technology Neutral- It should be noted that specific examples of technology identified are only examples and that future technologies should not be ignored. This will allow the document, including mitigation measures, to be more flexible.
7. Other Comments on the Draft 2016 RTP/SCS documents in Tables 1 through 7 below which include the OCCOG comment matrices plus additional comments.

Table 1. 2016 RTP/SCS COMMENTS

| # | TOPIC | PAGE REFERENCE | RTP NARRATIVE, COMMENT & RECOMMENDATION |
|----|-----------------|------------------------------|---|
| 1 | General Comment | p.2 | Delete Our Vision & Our Overarching Strategy strategies. These sections are highly speculative and not necessary for the rest of the document. |
| 2 | Clarification | p.3, column 2, bullet 5 | “Millions of people are in poor health... Millions of more people live with chronic diseases, such as asthma, every day.” Define ‘poor health’ Cite numbers or share of population for region instead of saying “millions”. Provide reference to what chronic diseases include. |
| 3 | Clarification | P. 4, column 2, paragraph 2 | “Among the milestones: a one-year demonstration of <u>the tolled Express Lanes</u> in Los Angeles County along Interstate 10 and Interstate 110 was made permanent in 2014...” |
| 4 | Clarification | p. 7, column 2, paragraph 1 | “In many instances, <u>the additional these</u> chargers <u>will create the opportunity to increase</u> may double the electric range of PHEVs, reducing vehicle miles traveled that produce tail-pipe emissions.” |
| 5 | Clarification | p. 13, column 2, paragraph 2 | “Since 2009, every MPO <u>in California</u> has been required to develop a Sustainable Communities Strategy...Once implemented along with the rest of the Plan, it will improve the <u>overall</u> quality of life for all residents of the region.” |
| 6 | Clarification | p. 13, column 2, paragraph 3 | “But these advances in mobility also have the potential to help Baby Boomers, <u>and the generations that follow them</u> , maintain their independence as they age.” |
| 7 | Clarification | p. 14, column 1, paragraph 2 | “In Southern California, striving for sustainability <u>includes will</u> require achieving state-mandated targets for reducing greenhouse gas emissions from vehicles and federal air quality conformity requirements, and also adapting wisely to a changing environment and climate.” |
| 8 | Clarification | p. 14, column 2, paragraph 5 | “It is particularly important that the Plan consider <u>and minimize the negative impacts consequences</u> of transportation projects, <u>especially</u> on low-income and minority communities <u>and minimize negative impacts.</u> ” |
| 9 | Clarification | p. 16, column 2 | “2. Collaborating with Member Agencies, Jurisdictions and Stakeholders. Implementing the Plan will require SCAG to continue working closely with its <u>all jurisdictions member agencies...</u> ” “The agency will also have to work with key stakeholders to ensure the Plan benefits the economy and <u>promotesensures</u> social equity. To ensure that the region makes progress on its goals, SCAG will monitor its own progress toward achieving its targets and will share this information with <u>its relevant</u> partners and the public.” |
| 10 | Clarification | p. 20, column 1, paragraph 3 | “However, of the remaining developable land, only a small portion of it can be developed as <u>transit-ready infill sustainably</u> – meaning it can be reached via planned transit service and that it can readily access existing infrastructure (water resources, sewer facilities, etc.). According to <u>SCAG</u> land use data collected by <u>SCAG</u> , only two percent of the total developable land in the region is located in High Quality Transit Areas (HQTAs). <u>A more compact land development strategy is needed, which will be discussed in Chapter 5.</u> ” |
| 11 | Clarification | p. 20, column 1, paragraph 4 | “ <u>SCAG supports the fact that local jurisdictions conduct much of the planning for land use in our region.</u> However, <u>as</u> the agency prepared the 2016 RTP/SCS, it needed to organize the many different <u>land use types and classifications of land uses in...</u> ” |

| # | TOPIC | PAGE REFERENCE | RTP NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|------------------------------|---|
| 12 | Clarification | p. 20, column 1, paragraph 5 | <p>“To accurately represent land uses throughout the region, SCAG aggregated reviewed information from jurisdictions and simplified the types and classifications of land use <u>into a consolidated set of land use types</u>. The agency <u>then converted these consolidated land uses into identified</u> 35 “Place Types”... the Urban Footprint Scenario Sustainability Planning Model (SPM), <u>to demonstrate which guided and evaluated</u> urban development in the Plan in terms of form, scale and function in the built environment.”</p> |
| 13 | Clarification | p. 20, column 2, paragraph 2 | <p>“SCAG then classified sorted the 35 Place Types into three Land Development Categories. The agency used these categories to: describe the general conditions that exist and/or are likely to exist within a specific area; SCAG did not intend to have them represent detailed policies for land use, development or growth. Rather, they and, reflect the varied conditions of buildings and roadways, transportation options, and the mix of housing and employment throughout the region.”</p> |
| 14 | Clarification | p. 21, column 1, paragraph 3 | <p>Conversely, s Some areas, especially near the edge of existing urbanized areas, do not have plans for conservation and <u>may be slated for development</u> are susceptible to development pressure. ... – meaning these are areas that are home to a high number of species and serve as highly functional habitats.”</p> <p>“Some key habitat types are underrepresented within the 35 percent of the region already under protection.” Clarify why does there need to be an equal share of types of protected land? If not, delete sentence.</p> |
| 15 | Clarification | p. 22, column 1, paragraph 1 | <p>“However, although these housing units are planned and zoned for, historical data shows that less than ten percent of the needed affordable housing has been built. In contrast, housing construction measured by building permits issued meets nearly 90 percent of projected market rate housing needs.”</p> <p>What is the data source that reports on building finals by income category? What is the time frame for the “less than ten percent”? What is the time period for the data on the market rate housing?</p> |
| 16 | Clarification | p. 22, column 2, paragraph 1 | <p>“... of our region’s jurisdictions have certified adopted housing elements.”</p> |
| 17 | Define | p. 22, column 2, paragraph 3 | Define “high quality” housing |
| 18 | Define | p. 23, Figure | Define “demand response” in “Passenger Miles by Mode” figure |
| 19 | Clarification | p. 24, Exhibit 2.1 | Define “High Value Habitat” Add county boundaries to map. |
| 20 | Clarification | p. 25, column 2, paragraph 2 | <p>“This network includes fixed-route local bus lines, community circulators, express and rapid buses, Bus Rapid Transit (BRT), demand response <u>paratransit</u>,³ light rail transit, heavy rail transit (subway) and commuter rail.⁴”</p> |
| 21 | Clarification | p. 26, column 1, paragraph 2 | <p>“<u>Transit users directly typically</u> pay about 25 percent of the operating and maintenance cost of their travel, with the remaining 75 percent paid for by state and local public subsidies. Most capital expenditures are also funded <u>through various taxes and with</u> public subsidies, including a larger share of federal grants.”</p> |

| # | TOPIC | PAGE REFERENCE | RTP NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|------------------------------|---|
| 22 | Clarification | p. 28, column 1, paragraph 2 | <p>“The regional bike network is expanding <u>evolving</u> but remains fragmented. Nearly 500 additional miles of bikeways were built since SCAG’s 2012 RTP/SCS, but only 3,919 miles of bikeways exist regionwide, of which 2,888 miles are bike paths/ lanes (see EXHIBIT 2.3). This is compared with more than 70,000 roadway lane miles. One way to quantify bikeway quality and density is to calculate a ratio of bike path to lane miles. SCAG’s ratio of bike path/lane miles ratio is 0.039. To put this in perspective, Portland, Oregon and San Francisco have bike path/lane ratios to lane miles at 0.054 and 0.078, which are 38 percent and 100 percent higher than the SCAG region, respectively. Our region’s lack of consistent infrastructure discourages all but the most fearless people to bike.”</p> <p>Comment: There is typically only one bike lane in each direction whereas there could be multiple traffic lanes in each direction. It is not appropriate to compare lane miles to bike lane miles. Comparison, if any, should be to centerline miles. Comparison of bike path/lane miles ratio for SCAG region to individual cities is not appropriate.</p> |
| 23 | Clarification | p. 28, column 1, paragraph 2 | <p>“Most walk trips (83 percent) are less than one half mile; walkers are <u>less likely to travel</u> often discouraged from traveling farther. Routes to <u>bus stops and stations</u> are often...”</p> |
| 24 | Delete | p. 33, column 1, paragraph 2 | <p>“A significant amount of travel in the region is still by people who choose to drive alone (42 percent of all trips and nearly 77 percent of work trips). So, the challenge of getting individuals to seek more environmentally friendly alternatives of travel remains.”</p> |
| 25 | Clarification | p. 36, column 2, paragraph 2 | <p>“Therefore, any passenger who arrives at or departs from an airport in our region is good for the region as a whole.”</p> <p>Move sentence to end of paragraph. Reference the Economic & Job Creation Appendix.</p> |
| 26 | Clarification | p. 54, column 2, paragraph 4 | <p>“Certainly, The overall quality of life <u>is expected to will</u> increase for many people.”</p> |
| 27 | Clarification | p. 55, column 1, paragraph 3 | <p>“Chronic diseases including heart disease, stroke, cancer, chronic lower respiratory disease and diabetes are responsible for 72 percent of all deaths in our region. Millions of more people live with chronic diseases every day.”</p> <p>Cite number and source or delete sentence.</p> |
| 28 | Clarification | p. 56, column 1, paragraph 1 | <p>“California is experiencing oOngoing drought conditions, water shortages due to less rainfall as well as declining snowpack in our mountains, and an agriculture industry in crisis have become hard realities in recent years.”</p> |
| 29 | Clarification | p. 61, column 1, paragraph 2 | <p>Add statement that says “<u>These preliminary scenarios are not the ones modeled in the PEIR.</u>”</p> |
| 30 | Clarification | p. 64, column 1, paragraph 1 | <p>Clarification should be made that attendance was self-selected as was the survey participation. Attendees were strongly encouraged by SCAG staff to fill out a survey. A more detailed description should be included that explains that these results are not scientific.</p> |
| 31 | Clarification | p. 64, column 2, paragraph 2 | <p>“...was also a principal concern, as was access to healthy food.”</p> <p>What percentage of respondents elevates an item to a ‘principle concern’?</p> |

| # | TOPIC | PAGE REFERENCE | RTP NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|------------------------------|---|
| 32 | Clarification | p. 64, column 2, paragraph 4 | <p>“Collectively, the survey responses offered an invaluable guide to help finalize the Plan’s investments, strategies and priorities. They reflect how regional stakeholders want us to address priority areas such as transit and roadway investments, system management, active transportation, land use and public health.”</p> <p>Did the survey responses change the Plan? Clarify if a higher priority in making changes was afforded to survey respondents’ feedback over jurisdictional and CTC input?</p> |
| 33 | Clarification | p. 65, column 1, paragraph 4 | <p>“Jurisdictions were asked to provide input on the growth scenario, including information on specific planned development projects with entitlements, other planned projects, or recently completed developments.”</p> <p>Comment: During the local input process, SCAG requested feedback on the distribution of new households and employment. SCAG did not request information from jurisdictions on specific planned development projects with entitlements, other planned projects, and recently completed developments. During review of the draft policy growth forecast (PGF) in summer 2015, technical errors throughout the draft PGF were identified. These “technical errors” in the dataset were that entitlements, development agreements, and projects currently under construction or recently completed were not properly reflected. It was then that SCAG stated that jurisdictions could provide the information if jurisdictions wanted corrections made to the PGF.</p> |
| 34 | Clarification | p. 65, column 2, bottom note | <p>“*With the exception of the 6 percent of TAZs that have average density below the density range of local general plans.”</p> <p>Please clarify the footnote. Did SCAG lower the growth or is General Plan buildout expected after 2040?</p> |
| 35 | Clarification | p. 69, column 2, paragraph 1 | <p>“By 2040, the Plan integrated growth forecast projects that these figures will increase by 3.8 million people...”</p> |
| 36 | Clarification | p. 70, column 1, paragraph 1 | <p>“In addition, local jurisdictions are encouraged to should pursue the production of permanent affordable housing through deed restrictions or development by non-profit developers, which will ensure that some units will remain affordable to lower-income households.”</p> |
| 37 | Clarification | p. 70, Table 5.1 | Add note to table “Adopted in 2013” |
| 38 | Define | p. 73, column 2, paragraph 4 | Define “riparian” |
| 39 | Clarification | p. 76, paragraph 1 | How many of these trips are alone vs. with others? Are these linked trips/trip segments? |
| 40 | Clarification | p. 76, paragraph 3 | The narrative implies that Neighborhood Mobility Areas (NMAs) are needed for Neighborhood Electric Vehicles (NEVs). If this is not true, reword section to allow for flexibility that one is not tied to another exclusively. |
| 41 | Clarification | p. 77 | Figure needs title |
| 42 | Clarification | p. 79, Figure 5.2 | Clarify if the preservation and operations expenditures apply to the SCAG region or California State. |
| 43 | Clarification | p. 83, column 2, paragraph 5 | <p>“Bus lanes are even more effective at increasing speeds, however in our region there is a dearth of such lanes. Transit agencies should heavily lobby SCAG encourages transit agencies and local jurisdictions in which they operate to implement them, <u>where appropriate at least for peak period operation.</u>”</p> |

| # | TOPIC | PAGE REFERENCE | RTP NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|-------------------------------|---|
| 44 | Clarification | p. 88, column 1, paragraph 4 | “The 2016-Active Transportation portion of the 2016 Plan updates the 2012 Active Transportation Plan...” |
| 45 | Clarification | p. 89, column 2, paragraph 2 | “SCAG has <u>identified</u> developed 12 regionally significant bikeways that connect the region.” |
| 46 | Clarification | p. 92, column 1, paragraph 2 | “The launch date coincided with the <u>end of daylight savings time</u> decline in daylight hours , a period when bicycle and pedestrian collisions peak during the year.” |
| 47 | Define | p. 93, column 1, paragraph 4 | Define “no-maintenance exercise spots” |
| 48 | Clarification | p. 103, column 1, paragraph 3 | “...figure “2040 Airport Demand Forecasts” on the previous page...” Properly label figure and page reference. |
| 49 | Clarification | p. 105, column 1, paragraph 1 | “In recent years, airport operators, CTCs and SCAG have all undertaken their own initiatives to improve ground access at the region’s aviation facilities.” Clarify what initiatives SCAG has undertaken. |
| 50 | Clarification | p. 111, column 1, paragraph 2 | “Building on its strong commitment to the environment as demonstrated in the 2012 RTP/SCS, SCAG’s mitigation program is intended to function as a resource for lead agencies to consider in identifying mitigation measures to reduce impacts anticipated to result from future <u>transportation</u> projects as deemed applicable and feasible by such agencies.” |
| 51 | Clarification | p.111-119 & PEIR | Update language on the mitigation measures to be consistent with any language changes to the PEIR document. |
| 52 | Clarification | p. 159, column 2, paragraph 2 | “Since new development is focused in areas where infrastructure already exists, <u>sometimes</u> there is not as much need to extend or build new local roads, water and sewer systems, and parks, <u>but in other instances, modernization of utilities needs to be considered and completed to accommodate the additional usage.</u> ” |
| 53 | Define | p. 165, column 1, paragraph 1 | Define ‘sensitive receptors’ |

Table 2. DEMOGRAPHICS/GROWTH FORECAST APPENDIX COMMENTS

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

Table 3. SCS BACKGROUND DOCUMENTATION APPENDIX COMMENTS

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|-----------------|--------------------------------|--|
| 1 | Clarification | P.42-43 | How do the SPM Place Types nest into the Land Development Categories? |
| 2 | General Comment | All maps | “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. <u>The advisory sub-jurisdictional data shall not be required should not be used for purposes of qualifying for future grant funding or other incentives.</u> The data is controlled to be within the density ranges of local general plans and/or input received from local jurisdictions. the purpose of or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA) <u>streamlining, lead agencies have the sole discretion in determining a local project’s consistency with the 2016 RTP/SCS.</u> ” |
| 3 | Clarification | p.6/43 | Move the definitions of Urban, Compact Walkable, and Standard Suburban from page 43 to page 6 before the maps |
| 4 | Clarification | p. 41, column 1, paragraph 4 | “Scenario modeling with UrbanFootprint brings meaningful, comprehensible, and timely results to those <u>local jurisdictions</u> wanting to understand how growth and development choices will impact their community, city, or region in the coming years and decades.” |
| 5 | Correction | p. 41, column 2, paragraph 2 | “Since 2012... Developers of UrbanFootprint have also met with regional agencies, such as SCAG, Sacramento Area Council of Governments (SACOG), and San Diego Association of Governments (SANDAG); Orange County Council of Governments (OCCOG). ” |
| 6 | Clarification | p. 50, 51, 54, 56 maps | Clarify in map legends if growth refers to population, housing and/or employment. |
| 7 | Correction | p. 56 column 1, last paragraph | “ The scope of These four scenarios were developed in early 2015 by <u>SCAG and their consultant and shared, which were developed in consultation with the CEHD Committee and the SCAG’s Technical Working Group (TWG), evolved throughout the first five months of 2015.</u> ” |
| 8 | Clarification | p. 56 column 2, paragraph 2 | “Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing, but sometimes <u>modernization of utilities needs to be considered and completed to accommodate the additional usage.</u> ” |
| 9 | Clarification | P. 58, column 2, paragraph 4 | “Saving water also saves on costs, and the RTP/SCS saves about \$1.2 billion over the span of the plan, and saves households in the SCAG region \$93 million on annual water bills.” Add “ <u>Notwithstanding, infrastructure operations and maintenance costs require continued funding; further, these costs could offset ratepayer savings resulting from the implementation of RTP/SCS policies, conservation efforts, or installation and use of efficient appliances.</u> ” |
| 10 | Clarification | P. 83, column 2, paragraph 2 | “The SPM includes a suite of tools and analytical engines that help to quickly illustrate alternative plans and policies and to estimate their transportation, environmental, fiscal, <u>and public health and community regional impacts.</u> ” |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|--------------------------------|--|
| 11 | Clarification | P. 83, column 2, last sentence | “SPM will serve as a common platform for communications between SCAG and local jurisdictions in the process of local input and public outreach, providing local planners advanced analytical capabilities.” |

Table 4. ACTIVE TRANSPORTATION APPENDIX COMMENTS

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|-----------------|--|---|
| 1 | General Comment | all | Needs to include statement saying that pedestrians and bikes are also responsible (e.g. distracted walking by cell phones; bikers with headphones) and isn't always vehicles as cause Everyone needs to be educated and follow the rules and enforcement needs to happen for all modes |
| 2 | General Comment | all | Acknowledge the improvement over time of AT usage and the lowering of accident and death rates |
| 3 | Clarification | p. 5 | “Class I Bikeways ...A Class I Bikeway provides a completely separated <u>right-of-way</u> designated for the exclusive use of bicycles and/or pedestrians with cross flows by motorists minimized. Some of the region's rivers include Class 1 Bikeways. Increasing the number of bikeways in <u>along</u> rivers, <u>utility corridors</u> , and <u>flood control channels</u> may provide additional opportunities for “interested but concerned” cyclists.” |
| 4 | Clarification | p.6, column 1 | “INTERSECTION TREATMENTS ...In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections.” Define how far away from the intersection an accident may occur to be included in the count of pedestrian injuries at intersections |
| 5 | Clarification | p.6, column 1 | “COMPLETE STREETS In recognition of the need to accommodate various types and needs of roadway users, the State of California adopted the Complete Streets Act of 2008 (AB 1358) requiring cities and counties to incorporate the concept of Complete Streets to any general plan's substantive update to their General Plan's <u>circulation element.</u> ” |
| 6 | Clarification | p.8, column 1 | “COLLISIONS AND FATALITIES While the numbers of bicyclists and pedestrians are increasing, so are injuries and fatalities, although not as fast as the growth in active transportation. In California, 64,127 pedestrians were injured and 3,219 were killed between 2008 and 2012. In 2012 alone, 702 pedestrians were killed and 13,280 pedestrians were injured <u>and 702 pedestrians were killed.</u> ” |
| 7 | Clarification | p. 17, Table 5 | Create separate tables for columns 1 to 3 and columns 3 to 10. |
| 8 | Define | p. 24, column 1, paragraph 1 | “2012 RTP/SCS PROGRESS The 2016 Active Transportation <u>portion of the Plan</u> ...The Plan examined access to transit, noting that 95 percent of SCAG residents would be within walking (0.5 mile) or biking (2 mile) distance from a transit station.” Define what constitutes a ‘transit station’ |
| 9 | Clarification | P. 25, second column, top bullet (last under #4) | “Success of this program depends on cities and counties conducting these counts and providing the data to SCAG.” Identify funding source and acknowledge that this is voluntary effort and may not be a priority, especially without funding |
| 10 | Add bullet | P. 25, second column, Bullet 6 | Add 4 th bullet under #6: “ <u>OCCOG is working on a comprehensive Complete Streets design manual for the entire county which will be completed in 2016.</u> ” |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|---|---|
| 11 | Correction | P.26, Table 9 | Change language for Orange County: Not yet Planned. <u>In Process</u> |
| 12 | Clarification | p. 27, column 1, and any other references | Clarify that the '2016 Action Transportation Plan' is not a standalone plan, but is a portion within the RTP. |
| 13 | Clarification | P.66-67, Tables 16 & 17 | Add note to Table: "These draft scenarios are not the alternatives that were evaluated in the PEIR." |
| 14 | Clarification | P. 71 | Delete "Strategic Plan Beyond 2040" section. The inclusion of this section is not consistent with other appendices. It creates confusion as to what the RTP's Strategic Plan is. |

Table 5. PERFORMANCE MEASURES APPENDIX COMMENTS

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

Table 6. PUBLIC HEALTH APPENDIX COMMENTS

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|-----------------|----------------------------|--|
| 1 | General Comment | All | Final document should contain hyperlinks to other documents. |
| 2 | General Comment | All | Spell out Acronyms in Tables/Figures Titles e.g. CHIS |
| 3 | Clarification | p.1, column 1 | "Public health is increasingly an area of emphasis for Metropolitan Planning Organizations (MPOs) and Departments of Transportation (DOTs) across the country, have an opportunity to impact due to the prevalence of chronic diseases such as obesity, hypertension, asthma and heart disease through transportation planning which promotes increased physical activity." |
| 4 | Clarification | p.2, column 1 | Introduction- first paragraph sentence beginning with "Public health outcomes are the product of Social Determinants of Health....." consider adding "and other factors. |
| 5 | Clarification | p.1, column 2 | "Climate Adaptation: Support efforts to prevent <u>mitigate</u> -climate change and make the region more resilient to future changes with reductions in VMT and greenhouse gas emissions." |
| 6 | Correction | p.2, Figure 1 | Arrows should go both ways. |
| 7 | Clarification | p.3, column 1, paragraph 2 | "Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors <u>and related conditions</u> can play a role in supporting healthy behaviors." |
| 8 | Clarification | p.3, column 2, paragraph 3 | "The costs of poor <u>public</u> population health and chronic disease..." |
| 9 | Clarification | p.3, column 2, paragraph 3 | "Access to healthy food environments such as grocery stores, farmers' markets and community gardens decreases <u>can play an important role in</u> food insecurity and obesity." |
| 10 | Define | p.7, column 1, first line | Define "weather insurance" |
| 11 | Clarification | p.7, column 2, paragraph 2 | "... Providing access to <u>education and job training aligned with job opportunities in the region</u> jobs with a living wage is critical to ensuring communities become and stay healthy." |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|--|---|
| 12 | Clarification | p.7, column 2, paragraph 3 | “...Creating infrastructure <u>policies and community conditions</u> and facilities that encourage active transportation such as biking and walking provides opportunities for residents to increase their daily physical activity.” |
| 13 | Clarification | p.8, paragraph 3 | Consider adding the recommendations for children which has a higher standard of one hour per day. This is valuable as jurisdictions look at health co-benefits of safe routes to school infrastructure changes and related programming. |
| 14 | Clarification | p.9, all figures | Recommend using the more current 2014 data. Also, it might be helpful to look at these metrics on a smaller level of geography and/or by poverty and/or by race/ethnicity. Especially since there are often funding set asides to reach disadvantaged communities, it might be interesting to see what each of these indicators looks like at a more refined level. The need is not equally distributed throughout any jurisdiction. |
| 15 | Clarification | p.9 | Add table with data for walking. |
| 16 | Clarification | p.10, column 2 | Consider including funding as both a challenge and an opportunity. |
| 17 | Clarification | p.10, column 1, last sentence | “Much of our local arterial system is also in need of pavement improvements, as local roadways in the SCAG region average a score of 69 out of 100 in the Pavement Condition Index (PCI), where a score of 70 or less typically translates to conditions that are <u>inadequate more costly to repair.</u> ” |
| 18 | Clarification | p.10, column 2, paragraph 4 | “With more than 18 million people, 191 cities, six counties and hundreds of local and regional agencies, Southern California is one of the most complex regions on earth a diverse region. Within the region, health outcomes vary widely based on <u>many things, such as</u> geography, income and race.” |
| 19 | Clarification | p. 15, column 2, paragraph 3; & throughout all | “500 foot buffer”- be consistent with usage and description throughout all documents in whether this is adjacent to just freeways or freeways, rail, and high frequency transit corridors. |
| 20 | Clarification | p. 15-20, Tables 5,6,7,8,9,10,11 | Cite sources of table data. Define SHSP in Table 11 |
| 21 | Clarification | p. 16, column 1, paragraph 1 | “Region-wide, about ten percent of the land area within HQTAs is also within the 500 feet foot buffer of the freeway. To balance regional policy goals, the Plan accommodates the vast majority of growth within HQTAs <u>but beyond outside of the 500 feet buffer</u> of freeways...” |
| 22 | Clarification | p. 17, column 1 | “Water Consumption” and “Land Consumption” Specify the time period for the change or difference in numbers. Compare this to 2040 Baseline. |
| 23 | Clarification | p. 19, column 2 | “Public Health Work Program” Clarify if this work program was approved by the RC or SCAG staff is pursuing these tasks under direction of RC to incorporate more public health into RTP. |
| 24 | Clarification | p. 22-29 | Are these all “best practices” or are they local examples of promising practices? Since some of these are in process, are the results are there to show that this particular practice has proven efficacy over another? These may have the potential to be best practices. If the project is based upon a best practice, it is recommended to link to the best practice so other jurisdictional leaders could consider for replication. If it is not already a proven practice, suggest calling it something different such as “local promising practices”. Add the Complete Streets Guidelines that are being developed in Orange County (which integrates in best practices.) |

Table 7. GOODS MOVEMENT

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

Again, we thank you for your time and consideration of the comments above. If you have any questions, please do not hesitate to contact me.

Sincerely,



Deborah S. Diep
Director, Center for Demographic Research

Email CC: CDR Management Oversight Committee
CDR Technical Advisory Committee
Hasan Ikhata, SCAG
Huasha Liu, SCAG
Naresh Amatya, SCAG
Frank Wen, SCAG
Jason Greenspan, SCAG
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January 11, 2016

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

RE: DRAFT 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

Dear Mr. Ikhata,

I am writing to express strong support for the continued inclusion of the SR-710 Freeway Tunnel Project in the Southern CA Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A freeway tunnel directly comports with several SCAG goals including decreasing time on the road, enhancing economic opportunities, and improving air quality.

The freeway tunnel has strong local support and is consistent with voter mandate and local plans. A recent poll shows 2-1 support for a tunnel, proving that a vocal minority is not representative of the broader community. Almost two-thirds (65.5%) of voters in the five cities that currently oppose the freeway tunnel also supported Measure R, which explicitly contained the freeway tunnel project. The tunnel, as you know, was also adopted in Metro's Long Range Transportation Plan.

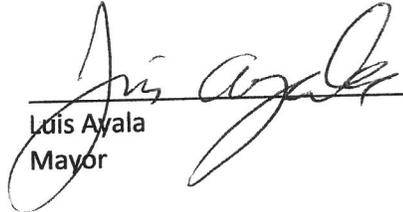
Most importantly, the freeway tunnel would significantly improve air quality and reduce cancer risk for the majority of the study area. Unfortunately, lower income, minority communities near the freeway are more impacted by poor air quality than those in more affluent areas to the north. The SR 710 North Study Draft Environmental Impact Report shows that cities south of the freeway have existing Cancer Risk levels 20% to over 60% higher than their neighbors to the north. This disparity is clearly an unacceptable environmental injustice for the Los Angeles Region.

A freeway tunnel also maximizes mobility and flow of traffic throughout the Los Angeles Region. Traffic must be moved from local streets back onto freeways where it was originally designed to go. A freeway tunnel solves this problem and reduces cut-through traffic on neighborhood streets by 43% or 57,600 vehicles per day.



It's critical that SCAG maintain support for the tunnel and sustain inclusion of the project in the 2016-2040 RTP. Completion of the freeway is vital to the health and safety of thousands of Los Angeles area residents. I am confident that SCAG will remain steadfast in support for the tunnel as the best alternative for completion of the 710 freeway.

Sincerely,



Luis Ayala
Mayor



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Mr. Garrett Damrath
Deputy District Director
Division of Environmental Planning
California Department of Transportation
Los Angeles, CA 90012

August 5, 2015
Hand Delivered

Leland C. Dolley,
Special Counselor for the
City of Alhambra

RE: SCH# 1982092310 SR 710N Gap Closure Project;
Comments on Draft EIR/EIS & Section 4 De Minimis Findings

Dear Mr. Damrath,

The City of Alhambra welcomes the release of the long awaited environmental impact documents for the SR 710N Gap Closure project. We thank you for the opportunity to comment on this exhaustive and most complete, adequate set of data and analyses that unequivocally demonstrate, qualitatively and quantitatively, that State Route 710 North must be extended with the long planned highway tunnel project approved by Los Angeles County voters in 2008.

We have been an active participant in this multi-year environmental study effort and in all previous evaluative efforts to assess a Tunnel on the sub regional, regional and statewide levels to implement the Measure "R" voter mandate. These efforts include the 2006 Metro 710N Tunnel Study, a precursor to the federally funded 2009 Tunnel Feasibility Study, which found five potential routes for the Tunnel (including the one in the Draft EIR/EIS) to be geologically feasible. We also monitored the two subsequent Metro Public Private Partnership (PPP) Business Case Studies which found a 710N Freeway Tunnel to be financially viable. (One study identified the Tunnel as the priority project with the most attraction to investors.)

Alhambra is a long time, active participant in regional planning and has worked on the last 5 cycles of The Regional Transportation Plan (RTP) prepared by the 6 county regional planning agency, the Southern California Association of Governments (SCAG). SCAG's RTP was first to identify a freeway Tunnel in the existing Cal Trans right of way as the most equitable solution to close the gap and to accommodate future growth in the region.

The State of California Transportation Commission's Public Infrastructure Assessment Committee (CTC/PIAC), after all the above long range plans, evaluations, and feasibility studies were completed, then undertook a yearlong study of projects statewide. The SR 710N Freeway Tunnel was identified as one of the CTC's six "pipeline projects" eligible for Public Private Partnership (PPP) funding and most important in the state to be constructed.

The Draft EIR/EIS (DEIR/EIS or Draft) demonstrates the dual bore freeway Tolloed Tunnel is the ONLY project that meets pent up vehicular traffic demands and improves the southern California freeway system by directly connecting the SR 110, the I-210, the I-10 and the I-710. Making this connection, or “closing the gap” also improves the traffic flows on the I-5, the SR-2, the SR- 134 and the I-605. The Draft now gives us a definitive, regional resource which demonstrates these positive tunnel gap closure benefits in mobility, congestion, air quality and overall environmental improvement. We applaud Caltrans and Metro on the open, transparent participatory process and the exhaustive work that has been completed.

Injunction Status

No announcement has been made by the City of South Pasadena that all of the issues which were involved in the stipulated injunction issued in 1973, and which exists in one form or another since then, have been resolved.

Organization of Alhambra’s Draft EIR/EIS Comment Letter

We have reviewed the entire Draft EIR/EIS and Appendices and find that the DEIR/EIS meets or exceeds Caltrans environmental standards in the implementation of CEQA/NEPA for project selection of a dual bore tolled freeway tunnel. Many of our comments are presented with an intent to improve the EIR/EIS with suggestions for certain emphases and clarity in presenting data and conclusions in the Final EIR/EIS. We make reference to Alhambra’s April 14, 2011 Scoping Letter and hereby include it by reference as a part of this letter.

Our comments are divided into 9 parts as follows:

- Part 1 Letter Summary and Comments
- Part 2 Purpose and Needs Analysis and Comments
- Part 3 Comments/Findings supporting the Dual Bored Tolled Tunnel as the Preferred, Environmentally Superior Alternative in the Final EIR/EIS
- Part 4 General Comments
- Part 5 Regional Comments
- Part 6 Alhambra City Specific Comments
- Part 7 Transportation Elements Analysis and Comments
- Part 8 Air Quality and Health Risk Assessment Analysis and Comments
- Part 9 Environmental Justice Analysis and Comments

There are three attachments (A, B and C) to this letter that are to be considered a part of the comments:

Attachment A Evaluation of Transportation Elements of the SR710 North Study Draft Environmental Impact Report/Environmental Impact Statement prepared by Gibson Transportation Consulting, Inc.

Attachment B State Route 710 (SR710) Draft Environmental Impact Report and Draft Environmental Impact Statement (DEIR/DEIS) Air Quality and Health Risk Impacts Review prepared by Ramboll Environ.

Attachment C Staff prepared Technical Memorandum on Environmental Justice for the SR 710 DEIR/EIS

In order to be as concise as possible, we often make reference to these attachments in the main body of the letter by making a main comment in the letter and then presenting our review and analyses that led to this comment in the attachments. We respectfully ask that Caltrans read a comment with such a reference in conjunction with the attachment and respond to both the comment and the analyses leading to the comment contained in the attachment. We request the Response to Comments in the FEIR/EIS respond to all the comments in both the letter and these attachments.

This letter, with Attachments A, B and C comprise the full submittal of the City of Alhambra's Comment Letter on SR 710N Gap Closure Draft EIR/EIS.

The remainder of this letter are our comments beginning with Part 1.

Part 1 Letter Summary/Comments

1. Southern California needs the 710N Gap to be closed with a dual bore tolled freeway tunnel with possible truck restrictions.
2. Only a freeway tunnel was identified by project name in Measure "R", approved by Los Angeles County voters in 2008 and has a dedicated revenue stream being collected from the sales tax ever since. No other alternative in the DEIR/EIS has been approved by voters or has this revenue stream.
3. Progress on the tunnel has been delayed through countless studies and debate, before and after the 2008 vote. The time for action on completing the tunnel is NOW.
4. After the 2008 Measure "R" vote, opponents delayed the freeway tunnel project for almost 3 years by involving elected officials who brought millions of federal dollars to Caltrans to study the "feasibility" of a tunnel. As the study progressed it was determined a tunnel was indeed feasible to close the gap and one route (the connection to the existing stubs under Caltrans owned right of way) was becoming the most obvious choice. These same opponents and elected officials then insisted no recommendations about a preferred route were to come from this study.
5. Many of today's freeway tunnel opponents have previously stated public support or neutrality of a tunnel if any and all options for a surface freeway route to close the gap were removed once and for all.
6. The freeway surface route and any partial surface route were removed prematurely in the environmental process, thereby also removing mention of all the benefits and advantages of the dual bored tolled tunnel as mitigation and a feasible alternative to the surface routes.
7. The Purpose and Needs Statement for the project calls for reduced congestion on arterials and freeways; only the freeway tunnel alternative delivers this.
8. Freeway tunnel alternatives do the best job of alleviating traffic and improving air quality on local arterials. Cut-through trips on arterials **increase** with LRT and BRT alternatives.

9. Less truck traffic on arterials means less health risk from traffic emissions.
10. Today, minority communities south of the 710N stub have higher cancer risk levels than communities north of the 210 with fewer minority residents. The tunnel alternatives do the most to reduce this disparity, although risk levels in East Los Angeles would still be higher than in La Canada-Flintridge.
11. The dual bore tolled tunnel with unrestricted truck access analysis in the DEIR/EIS identifies the maximum impacts that would result with the tunnel. The benefits of truck restrictions in the tunnel (e.g. truck weight restrictions or hours of use restrictions) were not analyzed in the DEIR/EIS. Even using this maximum impact (i.e. "worst case") analysis, the EIR/EIS still demonstrates how effective a dual bore tunnel is in closing the gap.
12. The tunnel utilizes state of the art scrubbing technology that benefits all.
13. The LRT is not a viable or feasible alternative in that the increase in projected transit ridership is going to happen anyway.
14. The LRT described in the Gap Closure EIR would divert resources and hurt the standing of current San Gabriel Valley light rail system priority projects. The LRT should not be permitted to be hastily added to the light rail plans, programs and budgets developed over many years in a collaborative process with SCAG, SGVCOG and Metro.
15. The choice of alternatives (including no-build) makes little difference to projected future transit mode share, transit accessibility, and north-south transit throughput.
16. The BRT is not a viable or feasible alternative in that it is replacing an existing, successful, heavily used bus line with nominal projected additional ridership at great impact to local communities such as Monterey Park, Alhambra and South Pasadena.
17. The Dual Bore Tunnel Alternative is projected to result in increases to vehicles miles traveled (VMT) and person throughput along with a decrease in vehicles hours traveled (VHT). Thus, the Tunnel Alternative is able to move more persons through the system, as demonstrated by the daily person throughput, to greater distances and in less time than the other alternatives.
18. The I-210 freeway north of the Tunnel portal connection is one of the best performing freeways in the freeway network and it will remain so with the tunnel connection, in part because its capacity design anticipated the 710N Gap Closure freeway connection.
19. Alhambra has borne the significant unhealthful impacts of allowing local streets to fill the 710 North Gap over these past many decades. This has significantly reduced our quality of life. Alhambra will not continue to accept these impacts or any more delay in the tunnel project now that we have complete, comprehensive and transparent environmental documents with which to proceed.

- Ultimately transit neutral relative to other Build Alternatives.
per the matrix presented in Part 2 and on page 11 of Attachment A to this letter.

COMMENT/FINDING 3-2: The BRT, LRT and TSM/TDM alternatives together do not meet the purpose and need statement and do NOT provide the traffic and congestion relief needed locally, area wide and regionally that is provided by the Tunnel.

COMMENT/FINDING 3-3: A BRT Alternative that merely replaces existing bus service with new equipment and tries to move the bus faster for a nominal ridership increase does not meet the purpose and needs statement and is not a true alternative to improving the local, area wide or regional transportation system.

COMMENT/FINDING 3-4: An LRT alternative with an almost 2.5 Billion dollar cost of public monies that requires significant land takings from private property owners, has no funding source, has significant adverse visual impacts, was never included in any SCAG, Metro or Long or Short Range Plans, that disrupts long standing San Gabriel Valley rail priorities and costs more money annually to operate and maintain than the Dual Bore Freeway tunnel is not a viable or reasonable use of taxpayer monies.

COMMENT/FINDING 3-5: Tunnel scenarios in the DEIR/EIS tested against the dual bored tolled tunnel with tolls either do not meet the project's purpose and needs or are infeasible.

COMMENTS/FINDINGS 3-6: The Dual Bored Tolled Tunnel (the Tunnel) is the **Preferred, Environmentally Superior Alternative** because it avoids Unacceptable Community Impacts Area Wide:

- The Tunnel requires the least amount (4) of eminent domain private property takings compared the LRT (69) the BRT (45) because Caltrans already owns the entire right of way for the SR 710N Gap Closure.
- The Tunnel displaces a minor number of businesses/employees (2/35) compared to the LRT (74/ 675).
- The Tunnel causes the loss of 0 permanent parking places compared to significant losses for the BRT (114) and the LRT (60).
- The Tunnel does not disrupt local street parking availability for local businesses compared to over 1045 spaces restricted" No Parking" in peak periods for the BRT and over 180 spaces similarly restricted for the LRT.
- The Tunnel requires no new parking structures or parking lots compared to 4 new facilities (2 in South Pasadena, 1 in Alhambra, 1 at Floral) with over 1500 new spaces for the LRT.

- The Tunnel requires no loss of parkland and creates no adverse visual impacts while the BRT takes portions of scarce parkland in Monterey Park and the LRT creates significant adverse visual impacts in East Los Angeles, Monterey Park and Alhambra.
- The Tunnel best alleviates long standing air quality, health and safety impacts on residents along local streets and arterials in the southern communities and along the I-10 who suffer a disproportionate impact from the pass- through traffic and associated emissions. These residents have a higher percentages of minority populations than in the County as a whole, and thus the Tunnel improves the existing disproportionate impacts on minority communities and the potential continued disproportionate impact from the other alternatives.
- All the alternatives EXCEPT the Tunnel do nothing to address the existing and future air quality impacts in the San Gabriel Valley.
- All the alternatives EXCEPT the Tunnel result in significant adverse land use impacts.

COMMENT/FINDING 3-7: The dual bored tolled freeway tunnel is the only alternative identified in and consistent with the long range Federal planning document for California (FTIP), the long range State planning document for California (STIP), the 6 county Regional Transportation Plan for southern California (RTP), Metro's Los Angeles County Long Range Plan (LRTP). Thus, the dual bored tolled tunnel has no significant adverse impacts in this impact area requiring planning consistency and does not require mitigation or a Statement of Overriding Consideration in order to be identified and selected as the **Preferred, Environmentally Superior Alternative**.

COMMENT/FINDING 3-8: A freeway Tunnel project to close the 710N Gap was named as a project and approved by a majority of Los Angeles County voters in 2008 in Measure "R". Sales tax monies are now being collected for the project. No other alternative was included in Measure "R" or has been approved by voters county wide. No other alternative has this ongoing funding stream from Measure "R".

COMMENT/FINDING 3-9: There is a reasonable expectation of project funding for only the dual bored tolled tunnel through the Public Private Partnership (PPP) and Cap and Trade innovative funding opportunities, thus making the Tunnel feasible as the **Preferred, Environmentally Superior Alternative**.

COMMENTS/FINDINGS 3-10: The traffic and congestion analyses support the Dual Bore Freeway Tunnel as the **Preferred, Environmentally Superior Alternative** because only the Tunnel:

- Dramatically reduces congestion and VHT.
 - Within the Study Area, VHT decreases while VMT and person throughput increase on a daily basis. This means that less time is spent moving more people further through the roadway network.
- Saves 6.7 million hours of travel per year in the region!

- Regional benefits are also anticipated with over 26,000 VHT saved on a daily basis; no other Build Alternative results in this magnitude of regional travel time savings on an annual or daily basis.
- Saves over 5.7 million hours of travel while serving 22.9 million more person trips annually within the Study Area.
 - This means that *more people* can move through the roadway network *in less time*; no other Build Alternative increases mobility while providing this magnitude of congestion relief.
- Reduces traffic volume on the arterial streets by redirecting traffic to the Study Area freeways.
 - This is consistent with the purpose of the freeway system and indicates a positive effect of the gap closure.
- Dramatically reduces cut-through traffic on city streets.
 - Arterial cut-through traffic is reduced by 525,000 daily VMT in the Study Area; a 40% reduction in the percentage of PM peak hour cut-through traffic is anticipated. No other Build Alternative provides this magnitude of cut-through traffic reduction.
- Reduces auto and truck traffic on key freeways and arterials throughout the Study Area – especially on Alhambra arterials.
 - Traffic effects of the Tunnel are not isolated to the local area, rather north-south and east-west travel will benefit throughout the Study Area.
- Is essentially transit neutral; i.e. all alternatives, including the light rail alternative itself, make little difference to projected future transit mode share
 - Only 5,000 new daily transit trips separate the Build Alternatives; transit mode share, person throughput, and transit accessibility are nearly identical across the Build Alternatives.

COMMENTS/FINDING 3-11: Based on the VMT data comparisons to the No-Build Alternative the BRT Alternative **increases** VMT five percent on arterials through South Pasadena and San Marino, retarding future improvements in those areas.

COMMENT/FINDING: 3-12: Arterial VMT for the Tolloed, Dual-bore Freeway Tunnel **decreases** for the cities of South Pasadena, Pasadena, San Gabriel, and Alhambra (-12%, -9%, -7%, and -14%, respectively) compared to the No-Build.

COMMENT/FINDING 3-13: Based on the VMT data comparisons to the No-Build Alternative, the BRT Alternative and the LRT Alternative do not have an appreciable effect on VMT levels with the exception of an 8% increase in VMT on the freeways running through Monterey Park

COMMENT/FINDING 3-14: The LRT Alternative has essentially no appreciable effect on either all vehicle or truck-only trips in any city

COMMENTS/FINDINGS 3-15: The Air Quality Analyses Support the Dual Bore Tunnel with Tolls (the Tunnel) as the **Preferred, Environmentally Superior Alternative** because the Tunnel:

- Is the only alternative that now meets regional EPA and FHWA air quality conformity requirements.
- Is the only Alternative that reduces air emissions and Decreases Cancer Risk in areas that have had the worst air quality impacts for years because of the SR710 Gap and is the **only** Alternative that does not increase Cancer Risk from current levels in any location.
- Areas where Health Risk is the Worst (note: the accepted level of measurement used by air quality experts to assess risk change is above or below 10 in a million):
 - South Stub cites (such as Alhambra) have existing Cancer Risk levels 20% to over 60% higher than Pasadena and La Canada / Flintridge (100 to 280 in a million)
 - New cancer risk calculations would make the difference between south stub cities and Pasadena and La Canada/Flintridge even greater (270 to 750 in a million)
 - Only the Tunnel enhances future reductions in cancer risk in the greater Alhambra area (further reductions of 10 to 50 in a million)
- Is the only alternative that reduces emissions on local arterials in Alhambra, South Pasadena and Pasadena
 - Emissions are a function of vehicle miles travelled, which decrease 14%, 12% and 9%, respectively compared to doing nothing
 - Further reductions would occur: only the Tunnel improves mobility (fewer travel hours) and emissions are worst in stop and go traffic
 - The Bus Rapid Transit and Light Rail Transit alternatives would NOT reduce local arterial emissions (increasing them in Pasadena and South Pasadena for the Bus Rapid Transit Alternative) and generally have no effect or retard air quality and health risk improvements in the local area.
 - The Freeway Tunnel offers more local air quality benefits (and more reasons WHY the dual bored tunnel is environmentally superior) compared to the No-Build than the BRT and LRT alternatives.
- is the only alternative that reduces freeway emissions in a unique way by capturing and scrubbing/filtering ALL vehicle emissions in the Tunnel

- Particulates from exhaust AND brake/tire wear AND road dust will be reduced at least 80% and probably more than 95%
- The Freeway Tunnel is a unique opportunity for cleaner air because the Freeway Tunnel with the proposed control technologies (i.e., electrostatic precipitators, scrubbers) can reduce roadway emissions on vehicles of all model years. All particulate matter, not just tailpipe emissions, can be reduced 80% or more. No other alternative offers this opportunity.
- Is the only alternative that further reduces freeway emissions by reducing traffic on nearby freeways
 - Emissions are a function of vehicle miles travelled, which decrease on the I-5 and I-605 (-3%), SR-110 (-5%) and SR-2 (-15%) compared to doing nothing
 - Freeway tunnels can carry over 5x or more VMT than a surface freeway with no significant increases in pm emissions

Part 4 General Comments

COMMENT 4-1: RE: Volume 1 Draft EIR General Information/What Happens Next (unnumbered page) and Executive Summary page 15: Please clarify the roles of Cal Trans as the Lead Agency and Metro as a responsible agency under the state and federal statutes for EIR/EIS preparation through completion and noticing.

This section of the DEIR/EIS, as written, implies the role of Lead Agency could potentially change, before the FEIR/EIS is completed, based only on the transportation mode of the selected preferred alternative in the FEIR/EIS. If Caltrans and Metro have such intentions, please cite the authority for such a change. The City of Alhambra implores such a change not happen until after completion and noticing of the FEIR/EIS by Caltrans.

COMMENT 4-2: Please clarify the process that will be used to implement statements that Metro, a responsible agency, will be “consulted” regarding selection of the preferred alternative. Please identify the authority for Metro’s role in the upcoming “consultative” alternative selection and what other responsible agencies identified on the SCH#1982092310 document and possible other parties are being offered this opportunity for consultation outside of the state clearing house process and the general public review and comment process.

We further request confirmation that such “consultations” will not hinder or delay the selection of a preferred alternative, will not hinder or delay completion of the FEIR/EIS and will not hinder or delay the issuance of public notices regarding the completion of the EIR/EIS. We further request confirmation that such a process will not create a formal or informal opportunity for additional comments on the DEIR/EIS outside of the environmental process identified under CEQA/NEPA.

COMMENT 4-3: Metro recently released a Cost Benefit Analysis (CBA) prepared in response to a June, 2010, Metro Board direction. The CBA is not an environmental document and, as such, should not be made a part of Comments or Responses to Comments in the FEIR/EIS.

Please confirm that any type of process or public review Metro may choose to hold on the CBA will not create a formal or informal opportunity for additional comments on the DER/EIS outside of the environmental process identified under CEQA/NEPA. Please further confirm that comments pertaining to the CBA submitted during the comment period for the DEIR/EIS will not be included in the FEIR/EIS.

COMMENT 4-4: Please change the titles of the Final EIR/EIS, the CEQA Notice of Completion and the NEPA Record of Intent to “SR 710North Gap Closure Project”, or, at the very least, have a subtitle added ” SR 710North Gap Closure Project” to the existing titles.

The formal title of the Draft issued in March 2015 says “SR 710 North Study Draft Environmental/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings”. How are legally required, state and federal, environmental analyses performed on a “Study”? Within each volume of the Draft and all appendices, various references are made to the “gap closure project”. In fact, much of the analyses identifies “the project” as “the Tunnel” and then discuss alternatives to a freeway tunnel.

There are different titles on each public notice and related documents that only result in public confusion:

- The Notice of Preparation issued 2-28-11 says “State Route 710 North Gap Closure Project”
- The Federal Register Notice of Intent 3-9-11 says “Draft Environmental Impact Statement on a proposal for the State Route 710 Gap Closure project in Los Angeles County” and identifies the preparation of the EIS as “a proposed highway project”.
- The combined State and Federal Notices of Completion of the Draft dated 3-3-15 say “Improvements on the SR 710 and/or the surrounding area, north to I-210, south to I-10, east to I-605, and west to I-5 and SR-2”.
- various regional, state and federal planning documents over the past 15 years have called this project either the” SR 710North Tunnel” or the “SR 710N Extension”.
- Measure “R” identified it as “I 710North Gap Closure (Tunnel).

COMMENT 4-5: Executive Summary page 4 & Draft Volume 1 page 1-51 and elsewhere in the document: Please be more definitive by using the actual, complete language in the voter approved Measure “R” Ordinance i.e. Measure “R” identified 780 million dollars for project #36 “I 710North Gap Closure (Tunnel).”

COMMENT 4-6: Draft Volume 1 page 1-52 Please add the state legislation regarding Measure “R”, design build options for Caltrans (SB1026), the PPP and Cap and Trade legislation creating funding opportunities for transportation infrastructure and the Measure “R” Ordinance to this list.

COMMENT 4-7: Draft Volume I page 1-51 and elsewhere in the Document: under Long Range Transportation Plan and under Regional Transportation Plan please add a statement to specifically state that the enhanced BRT system alternative and the new LRT alternative are not in these plans and that not being in the plans is a significant adverse impact under CEQA.

COMMENT 4-8: The format and narrative summary style of the DEIR/EIS are not easily understood and do not convey the robustness of the analyses actually performed as portrayed in the various studies and technical reports included in named appendices and identified as a part of

the Draft EIR/EIS. We could not, for example, find one chart that simply listed the significant environmental impacts that cannot be mitigated for each alternative.

We note the Technical Advisory Group (TAC) was promised on numerous occasions that a graphic based approach was to be used in the Draft EIR/EIS, similar to the many presentations of key findings that were presented to the Group. Thus we suggest the Final EIR/EIS include more graphics, charts and matrices that can be easily understood by a reader and future decision makers in lieu of the cumbersome comparative narratives.

COMMENT 4-9: Somewhere in the two volumes that constitute “the EIR/EIS” that is the primary source document for most readers, we request that there be charts or tables showing how each of the alternatives fares on each level of analyses; complete with a recognized level of environmental significance for each area. This should be done in a matrix format by community. We feel this information should be readily available in the main volumes of the EIR/EIS, at a minimum, for air quality, health risk and congestion/ traffic impacts.

COMMENT 4-10: Somewhere in the two volumes that constitute “the EIR/EIS” that is the primary source document for most readers, we request environmental thresholds and significant levels of impact measurements be clarified and referred to in the discussions leading to conclusion of impact. For example, the Health Risk Assessment maps are confusing in their color composition and the recognized standard cancer risk used by air quality experts such as the AQMD (above or below 10 in a million) is missing as a level of measurement. A matrix by community in the study area using this accepted level of measurement could show, at a glance, which alternatives impact which community’s cancer risks by levels of decrease or increase and whether or not the change is significant.

COMMENT 4-11: Please indicate in the DEIR/EIS Executive Summary description and discussion of the various tunnel scenarios that the dual bore tolled tunnel analysis with unrestricted truck access is a maximum impact analysis. Please further identify the potential truck restrictions (e.g. truck weight or hours of use) that could provide additional tunnel benefits as possible mitigation.

In our 2011 Scoping Letter on page 5 we had requested the DEIR/EIS examine the benefits of potential truck restrictions (e.g. peak period prohibitions or weight/diesel restrictions, etc.) as mitigation for the dual bored tolled Tunnel alternative, partly to provide operational options to address community concerns about trucks and south portal air quality concerns stated in scoping sessions. (These impacts have since been found to be minimal because of scrubbing technology but we expect operational options will be important in the final decisions about the tunnel). Instead, the team chose to do varying tunnel scenarios with or without trucks.

A dual bored tolled tunnel analysis without trucks or with some level of truck restrictions would provide important data and information to decision makers. However, with the help of experts, decision makers will be able to extrapolate the benefits of potential operational options from the analyses provided in the DEIR/EIS provided the DEIR/EIS indicates that the dual bore tolled tunnel with trucks is a maximum impact (i.e. “worst case”) analysis and that operational mitigation can enhance the dual bored tolled tunnel alternative over other tunnel scenarios and EIR/EIS alternatives.

COMMENT 4-12: Executive Summary pg. 10 & Project Alternatives descriptions page 2-88 and elsewhere in the documents: The 3 multi storied, large scale parking structures and the large surface parking lot that are an integral part of the LRT alternative are missing in the LRT description here and further on into the documents whenever the LRT is under analysis.

The proposed locations and size of the parking facilities are the basis for many of the findings of no significant impacts later in the document. (re: unnumbered appendix entitled “710N Parking Study”) and are also a main reason the LRT alternative requires the most eminent domain takings (69 properties) of any alternative. The total number of new spaces to be built in three multi storied parking facilities and one surface lot in 3 communities is 1,535.

COMMENT 4-13: The 710N Parking Study has little analysis in the way of changes to local community traffic flows in and around LRT stations and large parking facilities. For example, South Pasadena would have 2 such facilities totaling 738 new spaces that could create new traffic patterns. In Alhambra, the parking and resultant traffic pattern impact would be even greater because of the route of the LRT, the station locations and the station approach routes. Fremont would be used as the main access to and from the LRT.

Please continue to next page

COMMENT 4-14: The FEIR/EIS should highlight the data and analysis that show the final choice of alternatives (including no-build) makes little difference to projected future transit mode share, transit accessibility, and north-south transit throughput. The table below is an example of how this analysis could be shown in a table format. (Attachment B Table 3 & Attachment C page 7)

Comparison of Traffic and Transit Measures, SR-710 Alternatives (2035 Horizon Year, Permanent Impacts)

| METRIC | EXISTING (2012) | NO BUILD | TSM/TDM | BRT | LRT | 1-BORE TUNNEL (range of variations) | 2-BORE TUNNEL (range of variations) |
|--|-----------------|----------|---------|-------|-------|-------------------------------------|-------------------------------------|
| Diversion to Local Arterials (daily arterial VMT, in 000's) | 7,645 | 8,180 | 8,180 | 8,170 | 8,220 | 7,890-7,900 | 7,600-7,655 |
| Use of Arterials For Long Trips (% trips w/ O-D outside study area) | 12.4% | 13.7 | 14.3 | 14.2 | 14.0 | 10.3-10.6 | 7.3-7.8 |
| N-S Transit Throughput (daily person trips across E-W screenline, in 000's) | 150 | 209 | 211 | 215 | 214 | 211-213 | 211-212 |
| Transit Accessibility (% of population & employment w/in ¼ mi of high-frequency transit) | 80.8% | 80.6 | 80.6 | 80.6 | 80.7 | 80.6 (all) | 80.6 (all) |

COMMENT

4-15: The table illustrates the LRT is not a viable or feasible alternative in that the increase in projected transit ridership is going to happen anyway.

COMMENT 4-16: The projected future transit ridership increases of almost 40% by 2035 appear exceedingly optimistic, especially given the low land use densities along the LRT route. The Growth section of the DEIR/EIS discusses the study area as a well-established built-out environment with little or no growth planned or expected. Please provide documentation for these projections.

Part 5 Regional Comments

COMMENT 5-1: RE: Draft EIR/EIS Chapter 1 Figure 1-2 It is unclear what criteria has been used to select the 2035 Programmed Projects assumed to be constructed and operational in the No Build Alternative. The regional planning agency’s use of financially constrained and unconstrained project lists as a criteria for future planning does not appear to be evident. An overstatement of the reasonably expected future existence of planned infrastructure would have the effect of overstating the benefits of such alternatives as LRT, BRT and TDM/TSM and understating the benefits of the tunnel alternative. (Attachment A page 11)

COMMENT 5-2: In our scoping letter, on page 5 we had requested the I-710S, the I- 210 and the future High Desert Corridor be discussed in the context of the 710N Tunnel and its relationship to the future southern California regional freeway network. Of particular note is the fact that the I-210 north of the SR 710 Tunnel connection is one of the best performing freeways in the network, in part, because its design capacity anticipated the Gap Closure freeway connection. The DEIR/EIS does not discuss these relationships in the depth requested.

COMMENT 5-3: The southern California regional, system wide freeway network relationship between the SR 710N Gap Closure and the I-710 South Improvements is not adequately recognized or discussed in the SR 710N Draft EIR/EIS.

COMMENT 5-4: The SR710N Tunnel plays an important role for the I-710S project, NOT for accommodating trucks, but rather because of the additional truck capacity created on the I-710S, the I-5, the SR 60, the I-10 and the I-605 when vehicles currently using these freeways start using the Tunnel. These interrelationships and the fact that they are both Measure “R” projects are important and need to be discussed in the SR 710N Draft.

COMMENT 5-5: The upcoming Revised Draft Environmental Impact Report / Supplemental Environmental Impact Statement (RDEIR/SDEIS)” for the I-710S improvements includes an assumption that the SR 710N project will be a dual bore Tunnel with tolls. Reference: technical memorandum available at http://media.metro.net/projects_studies/I710/images/i710_person_travel_tech_memo.pdf
This memorandum states in part:

Future Transportation Projects

.....Extending SR-710, by constructing four general purpose lanes with tolls in each direction, in a tunnel, from Valley Boulevard to California Boulevard is included in the I-710 RDEIR/SDEIS.....

COMMENT 5-6: All non-tunnel alternatives have significant adverse land use and air quality environmental impacts because they are not included as projects in the RTP and the AQMD Plan. These adverse impacts must be documented as such per CEQA’s thresholds of significance as identified under X. Land Use and Planning, subsection b. in the Initial Study. Simple Statements of “consistency” and “non consistency” do not meet this important requirement. Simple statements of plans needing to be amended is not sufficient.

COMMENT 5-7: The Dual Bore Tunnel with Toll is the ONLY alternative consistent with the Air Quality Management District’s (AQMD) Plan and the ONLY alternative that helps the

attainment of regional air quality conformity because of its inclusion in the currently adopted 2012 Regional Transportation Plan / Sustainable Communities Strategies (2012 RTP/SCS). These plans identify a dual bore tolled Tunnel as one of the important regional freeway “gap closure projects” in Los Angeles County (2012 RTP/SCS page 43) and assume completion of the gap in future years in their modelling and policies.

Thus the Draft EIR/EIS should recognize and explain that selection of an alternative other than a dual bored tunnel has the potential to impact the region’s ability to attain regional air quality conformity. A “consistency” tabulation does not convey the importance of long range plans mandated by the state and federal governments nor does a procedural notation regarding the regional advisory Transportation Conformity Working Group suffice for this impact area.

COMMENT 5-8: BRT, LRT and TSM/TDM alternatives are not true stand alone alternatives in the context of long range, advance transportation planning, programming and budgeting required by state and federal law. None are included or anticipated in the adopted Metro Long Range Transportation Plan (LRTP), SCAG’s RTP or are included in any state or federal programming and budget documents. This context is not clear in the Draft.

COMMENT 5-9: The regional significance of the dual bored freeway Tunnel being in long standing regional plans and the concurrent actions taken over the past decades on many levels by public agencies and property owners does not come through in the Draft EIR/EIS. Analysis should be included to show the significance of regional long term planning and the potential environmental impacts that occur when long anticipated, planned projects are not fulfilled.

For example, many local General Plans in the region use the RTP projections and closure of the Gap via a tunnel freeway in their planning periods, all county Transportation Commissions use these assumptions (e.g. Congestion Pricing Studies, HOT Lane Studies, Truck Studies, etc.). Large scale public and private development project EIR/EIS’s use the SCAG and AQMP modelling and planning assumptions. We previously asked for these regional discussions in our scoping letter on pages 3 and 4.

Part 6 Comments Specific to Environmental Impacts within the City of Alhambra

COMMENT 6-1: 3.3 Community Impacts Parcel Acquisition Tables: Please identify the property at 2500 W. Commonwealth as city owned and that it produces general fund tax revenue to Alhambra.

COMMENT: There are three schools within the Alhambra city limits within a quarter mile of all north/south and east/west arterials in the city and one immediately adjacent and along the I-10 Freeway. These are: Fremont School, south of Valley Blvd, Northrup School on Atlantic Blvd., Garfield School on Garfield Avenue and Mark Keppel High School. Please confirm these schools were receptor locations used in the air quality assessment and health risk assessment.

COMMENT 6-2: Many benefits and advantages of the dual bored tolled tunnel are not enumerated in the DEIR/EIS because of the premature removal in the DEIR/EIS screening process of any surface or partial surface route freeway to close the gap. While we concur such an alternative has not proved to be politically acceptable, the role the tunnel has played since the late 1980’s and early 1990’s as a feasible mitigation to a surface route is lost as is all mention of public support or neutrality for a tunnel if only the surface route was completely off the table. Some of today’s tunnel opponents were

the very people working to change the gap closure to a tunnel in regional plans. This history and context should have a place in the DEIR/EIS.

COMMENT 6-3: The Draft makes it clear there are minimal environmental improvements to the local area wide traffic or existing and future congestion and air quality problems with the BRT, LRT, TDM/TSM alternatives and tunnel scenarios other than the dual bored tolled freeway tunnel even though the cost and extent of surface improvements are substantial (e.g. new connector roads, property takings for left turn lanes, etc.).

Not so clear is the fact that only the dual bore tolled tunnel, of all the alternatives, provides regional relief on the freeway system; a long term objective of completing the 710N gap closure. The Draft should make this point and refer to the quantitative analyses in the appendices that could help a reader understand that not all alternatives are equal.

COMMENT 6-4: The City of Alhambra supports only a dual bored tolled tunnel and would be willing to consider supporting truck operational restrictions in conjunction with the Tunnel.

COMMENT 6-5: The City of Alhambra supports the Gold Line and the Gold Line Extension rail projects as priority, planned light rail projects for the San Gabriel Valley. The LRT in the Gap Closure EIR/EIS should not be permitted to be hastily added to the light rail plans, programs and budgets developed over many years in a collaborative process with SCAG, SGVCOG and Metro.

COMMENT 6-6: The City of Alhambra vehemently opposes any alternative that proposes any new local roadway (T-1 Connector Road in TSM/TDM, BRT or LRT) or roadway widenings (for BRT) or an aerial track and tunnel (LRT) never before contemplated or any other Alhambra surface or subsurface street improvements proposed as a partial gap closure solution. The Draft clearly illustrates only the dual bored tolled freeway tunnel meets the purpose and needs of this long awaited gap closure and Alhambra has long borne the severe impacts of the freeway gap not being closed.

COMMENT 6-7: The excessive property condemnations, the huge new parking facilities, the miles and miles of utility relocations and the impacts to the UPRR and SCRRA in Alhambra and elsewhere can all be avoided with the dual bored tolled tunnel.

COMMENT 6-8: It is particularly onerous, after 40 years of our city accommodating the local, area wide and freeway traffic on our arterials, to see that the alternatives to the dual bored tolled freeway tunnel now being proposed all rely on land and property, publically and privately owned, within the Alhambra city limits. Connector Road T-1 is included in these alternatives as a way to increase the carrying capacity of Fremont in the future as the primary arterial carrying traffic from the I-10 freeway to the I-210 freeway if the tunnel is not constructed.

This is unacceptable. To not utilize the existing Caltrans owned right of way obtained for the express purpose of closing the 710N Gap in designing alternatives is a travesty and significant waste of public resources.

COMMENT 6-9: The Health Risk Assessment dramatically shows the highest levels of cancer risk, both existing and in the future (if a Tunnel is not built), to be in Alhambra and the southern communities. The existing cancer risk levels are a result of Alhambra's historical role in

accommodating regional traffic that cuts through our streets. The DEIR/EIS does not show the impacts this situation has had historically on Alhambra's quality of life.

COMMENT 6-10: The LRT Tunnel portion of the system has not been explored at each proposed depth in any detail that would allow a conclusion in the Draft that such a tunnel is even feasible. The dual bored tolled freeway Tunnel has been studied at least 3 times in multi-million dollar federal, state and Metro/Caltrans studies. These studies contain the necessary technical analysis (e.g. soil composition, geology, water tables, seismicity, etc.) and preliminary engineering to support a finding of construction feasibility.

COMMENT 6-11: The impacts of a No Build alternative are understated in the Draft. The Draft assumes everything will carry on as it has up to now with Alhambra accepting its role as the regional cut through (with the inherent health and safety impacts on our population) while other communities can enjoy the benefits of freeways already completed serving in their areas.

We have noted neighboring communities have instituted traffic calming techniques that are also available to the City of Alhambra. At a minimum, the DEIR/EIS should acknowledge the impacts to the I-10, in both directions at the Fremont exit, should we choose to make changes to existing street configurations in a reevaluation of our role in accommodating current freeway traffic.

COMMENT 6-12: Alhambra would support future multi modal transportation modes towards the goal of having improved transit ridership; regardless of the type of conveyance. However, the most heavily used system that moves the most vehicles and the most people by a wide majority (i.e. the freeway system) must be given priority in planning for the future now. Other transportation modes and linkages must be planned in conjunction with the overall southern California plans for such modes much like the freeway system has been planned over 40 years. These other modes do not serve the city, the area, the subregion, the region or the state as a viable alternative to completing the freeway system. Other transportation modes should be designed where appropriate with their plans for a complete system; not as a substitute for an existing system.

Part 7 Comments Evaluating the Draft EIR/EIS Transportation Analyses (in conjunction with Attachment A)

COMMENT 7-1: The DEIR underestimates the Positive Effects of the Tunnel Alternative (Attachment A pages 3-8)

While the DEIR provides a comprehensive analysis of the 710 North Study, the presentation of those results may have unintentionally deemphasized the potential benefits of the Tunnel Alternative. This evaluation examines the statistical performance of the project, as documented in the DEIR, along with visual representations of those comparisons.

The following technical areas show the vast differences between the Dual Bore Tunnel with Tolls and the other alternatives:

- A. System Performance
- B. Highway Performance
- C. Transit Performance
- D. On-Street Parking Loss

COMMENT 7-2: The DEIR did not do a thorough job of presenting the overall effects of traffic shifts as a result of the alternatives (Attachment A page 8)

Although the DEIR provided a comprehensive analysis of the performance measures of each alternative, those analyses primarily focused on north-south movement through the Study Area. Little discussion was given relative to east-west movement through the Study Area, possibly understating the potential effects of each alternative.

COMMENT 7-3: The DEIR overstates the positive effects of the TSM/TDM alternative and the BRT alternative (Attachment A page 11)

These two alternatives depend on significant on-street parking prohibitions (either permanently or during the peak hours) through the heart of the business districts in Pasadena and South Pasadena in order to implement the reversible lanes and the exclusive bus lane strategies. In our experience, these parking prohibitions are very difficult to get implemented.

COMMENT 7-4: The DEIR overstates the effects of the No Build alternative (Attachment A page 10)

The No Build includes projects and planned improvements through 2035, including those contained in the FTIP, the 2012 SCAG RTP/SCS, Measure R, the funded portions of Metro's 2009 LRTP, as well as the California High Speed Rail project.

It is highly unlikely that ALL of the planned and programmed improvements in the SCAG RTP/SCS and the FTIP will actually be implemented by 2035. This is not a criticism of the DEIR, but it should be pointed out in the DEIR that the travel performance of the transportation system under the No Project is extremely optimistic and unlikely to be achieved. Thus the performance of the alternatives is likely to be better than shown in the DEIR

COMMENT 7-5: Dual bore tunnel with tolls and no trucks and/or truck restrictions was not modelled nor is it one of the alternatives studied even though we asked for this in scoping. Thus we have a "worst case" analysis of the dual bore tunnel alternative. We request mitigation such as truck weight restrictions or hours of use restriction mitigation be identified to show how operational improvements regarding trucks can reduce impacts at portals.

COMMENT 7-6: Most of the tunnel alternatives studied are unrealistic and could never be built (Attachment A page 11)

The DEIR analyzes a number of Tunnel alternatives even though most of the variations are unfeasible. Without a Public Private Partnership (PPP) and without tolls for travel through the tunnel, the tunnel cannot be financed. Therefore the analysis of alternatives the do not include tolls presents an illusionary condition that will never be realized. It unnecessarily complicates the DEIR.

COMMENT 7-7: The benefits of the tunnel alternative are not studied for much of East Los Angeles (Attachment A page 11)

The boundaries of the Study Area are drawn such that much of East Los Angeles is outside of the Study Area. Therefore the trip-reduction effects of the Tunnel alternative on the streets in East Los Angeles are not specified and instead are grouped into the "Regional Effects" category. This makes

it difficult for the community of East Los Angeles, which is home to extensive minority populations, to evaluate the positive effects of the Tunnel on its streets.

COMMENT 7-8: The dual bore tunnel with tolls is the alternative that best meets the project's statement of purpose and needs (Attachment A page 12-13)

The matrix provided in Attachment A distills the results of these multiple transportation analyses into an evaluation against the stated Purpose and Needs of the 710 North Study. The values represent the magnitude of change of each alternative, as compared to the No Build Alternative.

COMMENT 7-9: Based on this evaluation of data presented in the DEIR, the results support the City of Alhambra's position that the Dual Bored Trolled Tunnel Alternative would be the most effective solution to closing the existing SR 710 gap, improving regional mobility and supporting the goal of congestion relief.

Part 8 Comments Evaluating the DEIR/EIS Air Quality Analysis and Health Risk Assessment (HRA) (in conjunction with Attachment B)

COMMENT 8-1: The FEIR should emphasize the long-standing and current health risk disparity (greater risk in Alhambra and nearby communities compared to areas to the north of the SR710 gap, where risk levels are 20 to 50% lower) exists, in part, because of the SR710 gap and that only a Tunnel alternative further reduces (although it does not eliminate) that disparity while risks in areas around and north of the SR710 Gap still decrease in the future. (Attachment B page 2)

COMMENT 8-2: All Cities in the Study Area will have lower air pollution levels and air-related cancer risk in 2020 and beyond: (Attachment B page 4)

COMMENT 8-3: Only the Freeway Tunnel provides large-scale decreases in cancer risk in heavily impacted cities when compared to the No-Build, BRT and LRT alternatives. (Attachment B page 4)

COMMENT 8-4: The FEIR should note that only a Tunnel alternative reduces criteria and air toxic emissions on historically impacted arterials, including those in the greater Alhambra/San Gabriel communities, by reducing arterial vehicle miles travelled (VMT) by trucks and cars, and improving mobility (i.e., less stop-and-go traffic). (Attachment B page 5)

COMMENT 8-5: The Freeway Tunnel offers more local air quality benefits (compared to the No Build) than the BRT and LRT (Attachment B page 4)

COMMENT 8-6: The FEIR should note that only a Tunnel alternative can reduce emissions by reducing vehicle miles travelled and increasing mobility on several freeways (SR2, I5, and SR110) and reduce SR710 traffic emissions up to 80% or more because of the filtered/scrubbed tunnel ventilation system.
The Freeway Tunnel is a unique opportunity for cleaner air (Attachment B page 5)

COMMENT 8-7: A Freeway Tunnel with the proposed control technologies (i.e. electrostatic precipitators, scrubbers), can reduce roadway emissions now, on vehicles of all model years. All particulate matter, not just tailpipe emissions, can be reduced 80% or more. No other alternative offers this opportunity (Attachment B page 7)

COMMENT 8-8: The DEIR does not provide enough information to assess impacts of Tunnel alternatives in the western and southern parts of East Los Angeles because it only provides information about increased traffic on the SR710 freeway in northern East Los Angeles and does not provide information to assess expected emission reductions from reduced pass-through traffic currently going to the I-5 and I-60. (Attachment B page 8)

COMMENT 8-9: The DEIR Response to Comments should explicitly describe that a Tunnel Alternative is the only Alternative that further reduces air emissions and health risks (e.g., cancer risks) in areas that have had the worst air quality and health risk impacts for years because of the SR710 Gap. (Attachment B page 9)

**Part 9 Comments Evaluating the DEIR/EIS Environmental Justice Analysis
(in conjunction with Attachment C)**

COMMENT 9-1: RE: DEIR/EIS HRA Figures 3-14 through 3-19; Community Impact Assessment, Chapter 7, Figure 7.1-1, Sheet 4 of 4.

Less traffic on arterials means less health risk from traffic emissions. When compared to the no-build alternative, the freeway tunnel alternatives could reduce cancer risk by up to 50 in a million along Garfield and Fremont – which are areas with environmental justice populations. Even with these rates of decrease, the southern areas do not reach the low levels of cancer risk low levels in and around the La Canada area.

This is relative to a current estimated cancer risk level of 400-800 in a million (South Coast Air Quality Management District, Multiple Air Toxics Exposure Study [MATES] IV, Draft Final Report, April 2015). (Because all vehicles will run cleaner in the future, all the alternatives would reduce cancer risk in the future by as much as 360 in a million below today's levels of 400-800 in a million in the Alhambra area.) (HRA, Figures 3-1 through 3-10)

COMMENT 9-2: The environmental justice analysis itself is non-quantitative: it does not break down the modeled or predicted impacts of various project alternatives by income or ethnic/racial group. (Attachment C page 1)

COMMENT 9-3: The environmental justice analysis does not explicitly consider the impacts on all racial or ethnic minority groups. The data presented in the analysis include low-income, non-white, and Latino/Hispanic populations, but do not consider any other minority (non-white) groups. Given the substantial Asian populations in the study area, this is a surprising omission that should be corrected, and African-American populations in the study area should also at least be identified. (Attachment C pgs 1-2)

COMMENT 9-4: The Draft EIR/EIS does not include a separate map showing sensitive receptors. The list of sensitive receptors has no addresses. We requested, in the 2011 Scoping Letter, specific receptor data be collected in our community, particularly in the schools along Fremont and the I-10 freeway. (Attachment C page 4)

COMMENT 9-5: We have expressed our concerns about longstanding disproportionate impacts to residents along arterials that are used in lieu of a through freeway connection on I-710. (Re: Alhambra 2011 Scoping Letter). The Draft EIR/EIS does not contain a direct, clear comparison of build and no-build alternatives that would enable a better understanding of how these impacts might be alleviated by any version of the project. (Attachment C pages 2-3)

COMMENT 9-6: The discussions of transportation system efficiency are focused on the drivers or travelers, rather than on the residents who would have to suffer the consequences of those drivers' choices. What is unsaid is how the choice between tolled and toll-free options would affect local residents along these alternative routes. (Attachment C page 2)

COMMENT: The environmental justice analysis contains a statement regarding each build alternative to the effect that because the alternative's long-term effects can be "substantially reduced," there will be no greater adverse effect on environmental justice populations than on non-environmental justice populations. We do not follow the logic of this statement, nor do we see how it is supported by the analysis that precedes it, nor do we find the conclusion supported by other sections of the Draft. (Attachment C page 3-4)

COMMENT 9-7: The Draft EIR/EIS could be improved if the approach was to evaluate the impacts of the alternatives on minority and low-income populations in the study area in a more quantitative fashion (e.g., via direct comparison of the impacts or performance of the alternatives). The analysis could include a summary of each area of impact (e.g., traffic, air pollution, health risk, visual impact, and noise) and an alternative-by-alternative comparison of the impacts on each population of concern in the study area. (Attachment C page 2)

COMMENT 9-8: RE: DEIR/EIS Community Impact Analysis, Chapter 7, Figures 7.1-1 through 7.1-4 The environmental justice maps are incomplete in several respects. For example, their geographic extent does not match, and in fact is smaller than, the geographic extent of other key analyses. The most prominent example of this mismatch is in the health risk assessment. (Attachment C page 3-4)

COMMENT 9-9: The environmental justice maps in the DEIR/EIS make it hard to compare impacts to East Los Angeles with those to La Cañada-Flintridge. (Attachment C pages 3-4)

COMMENT 9-10: The environmental justice maps do not include roadways other than freeways; they show only census tract boundaries. This makes it very difficult to say whether a point of particular impact is or is not located in a tract containing environmental justice populations. (Attachment C pgs 3-4)

COMMENT 9-11: The LRT alternative could have disproportionate visual and safety impacts in areas with environmental justice populations, once the analysis is expanded to include other non-white minority groups. (Attachment C page 11)

FINAL COMMENT: Last minute efforts to create “new” or quasi new alternatives to close the gap are thinly disguised attempts to create more delay in the environmental process. The thorough job performed with Scoping, Alternatives identification and the Alternatives screening process from over 100 suggested alternatives to the final alternatives reviewed in the DEIR/EIS was more than adequate and demonstrated Caltrans and Metro’s dedication to creating a complete and adequate document. The entire alternatives review, screening and selection process was conducted with protracted public participation and had ample opportunity to suggest new or quasi new alternatives at each step in the process.

The City of Alhambra asks that Caltrans and Metro ensure there is NO MORE DELAY from any source, in moving forward with the SR710N Gap Closure tunnel. Overall, we find the Draft EIR/EIS to be an exhaustive, complete and adequate document for purposes of selecting the dual bore tolled tunnel as the preferred, environmentally superior alternative and for final tunnel project selection, funding and construction.

We thank Caltrans and Metro for fulfilling their public promises at the start of this endeavor. We now need to move forward with the dual bore tolled tunnel and fulfill the voters’ 2008 mandate without any more delay.

Respectfully Submitted,



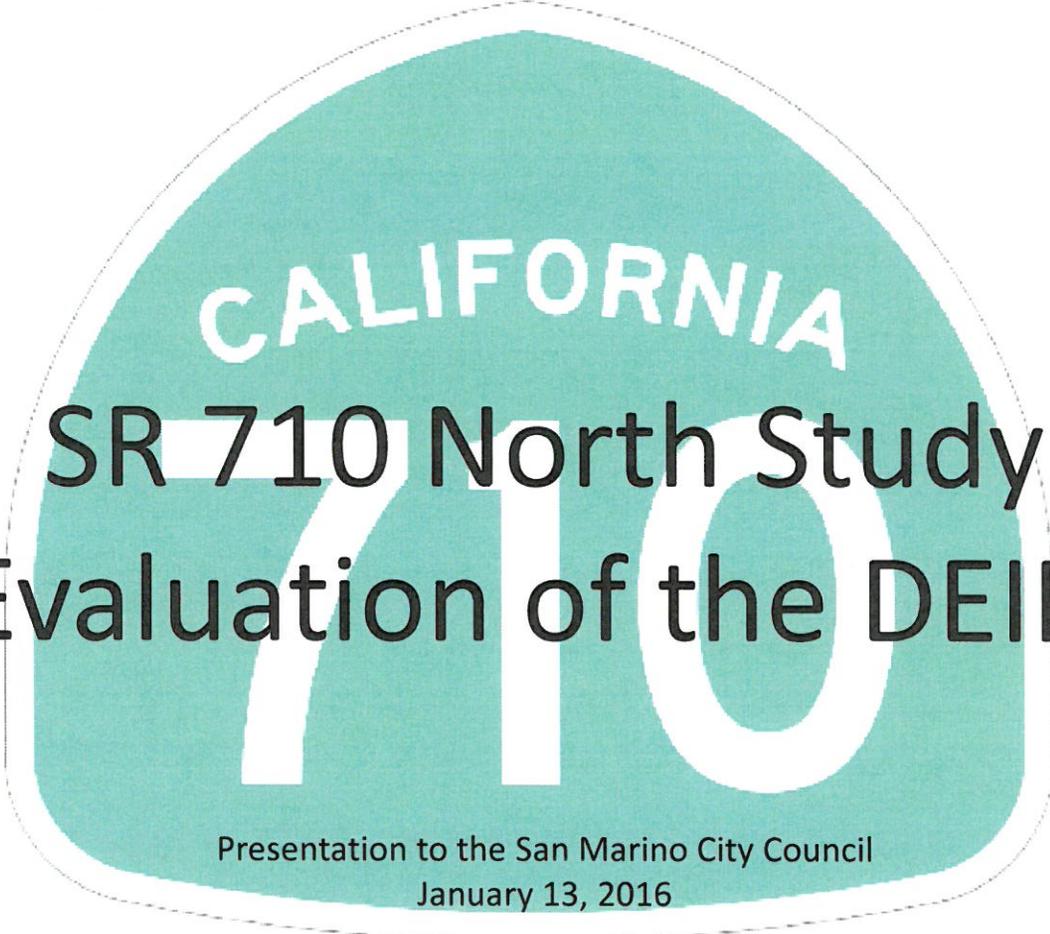
Leland C. Dolley,

Special Counselor for the City of Alhambra
(310) 977-7704 / leedolley@verzon.net

CC: Alhambra Mayor Luis Ayala and the Alhambra City Council
Mary Swink, Alhambra City Manager
Joe Montez, City Attorney

ATTACHMENTS

- A. Technical Memorandum: Transportation
- B. Technical memorandum: Air Quality and Health Risk Assessment
- C. Technical Memorandum: Environmental Justice

The logo is a green shield-shaped emblem with a white border. At the top, the word "CALIFORNIA" is written in white, uppercase letters. Below it, the number "710" is written in large, white, bold digits. The text "SR 710 North Study" and "An Evaluation of the DEIR/EIS" is overlaid on the shield in black, bold font.

SR 710 North Study

An Evaluation of the DEIR/EIS

Presentation to the San Marino City Council
January 13, 2016

Leland C Dolley,
Special Counselor to the City of Alhambra, SR710N Gap Closure
Leedolley1@verizon.net
310-977-7704

City of
Alhambra



Data Source of Transportation Review

- All information in the slides is based on the data and references in the DEIR/EIS documents.

Study Area & Alternatives

DEIR/EIS Study Area boundaries:

- I-210 to the north
- I-10 / SR 60 to the south
- I-5 / SR 2 to the west
- I-605 to the east

DEIR/EIS prepared a No Build Alternative, which serves as a baseline for comparison of the following Build Alternatives:

- **TSM/TDM:** Transportation System Management/Transportation Demand Management
- **BRT:** Bus Rapid Transit
- **LRT:** Light Rail Transit
- **Tunnel:** Dual Bore Tunnel with Tolls

How do the alternatives compare?

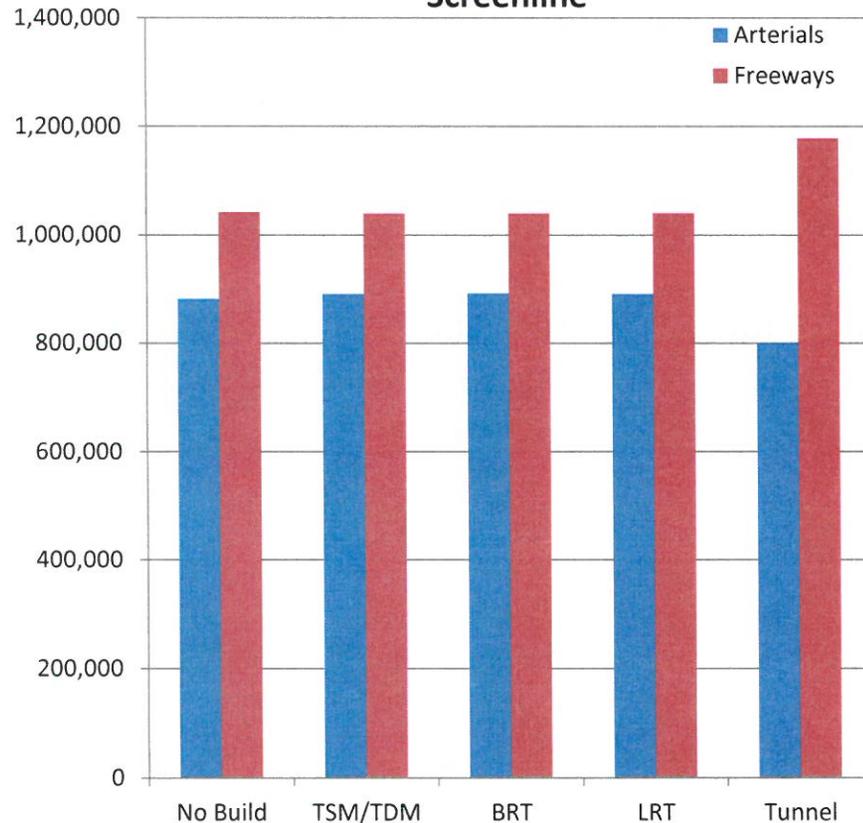
| PURPOSE AND NEEDS | No Build | Tunnel | TSM/TDM | BRT | LRT |
|--|---|------------------------------------|------------------------------|--------------------------------------|---|
| 1. <i>Improve the efficiency of the existing regional freeway and arterial systems (i.e., How much is the time spent on the road reduced?)</i> | 12,107,000 Vehicle Hours Traveled | 6.78 M Hours Saved Annually | 261,000 Hours Saved Annually | 1.04 M Hours Saved Annually | 2.87 M More Hours Annually |
| 2. <i>Increase in regional transit ridership (i.e., Are people more likely to use public transit in the region?)</i> | New Transit Trips | | | | +1,800 to +5,000 over other alternatives |
| 3. <i>Increase in study area transit ridership (i.e., Are people more likely to use public transit in the study area?)</i> | 4.2% Transit Mode Share | | | +0.1% over other alternatives | +0.1% over other alternatives |
| 4. <i>Reduce congestion on local arterials adversely affected due to accommodating regional traffic volumes (i.e., Is there less cut-through traffic?)</i> | 13.7% PM Arterial Cut Through Traffic | 57,600 vpd off arterials | 6,500 more vpd on arterials | 5,800 more vpd on arterials | 3,900 more vpd on arterials |
| 5. <i>Increase capacity; Increase north-south mobility (i.e., Does this move more people?)</i> | 3,210,000 Daily Person Trips Across Screenline | 22.97 M Annual Person Trips | 2.09 M Annual Person Trips | 3.92 M Annual Person Trips | 3.39 M Annual Person Trips |
| 6. <i>Reduce regional congestion (i.e., Will this reduce peak hour trips by at least 2.5 minutes?)</i> | % Peak Hour Trips \geq 2.5 minutes faster than No Build | 234,000 vpd w time savings | | | 70,400 vpd w time savings |

Derived from data in SR710 North Study, Transportation Technical Report (Caltrans & Metro, November 2014)

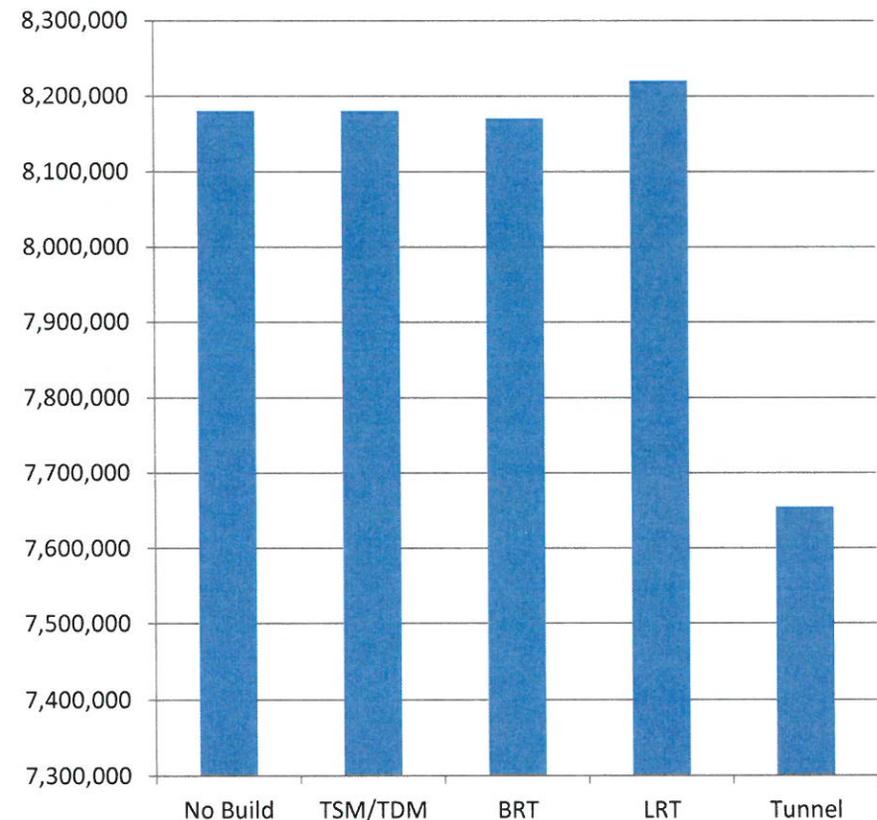
- The Tunnel appears to provide the *greatest magnitude of positive improvement* to regional mobility and congestion relief.

What happens on the arterials?

Daily Traffic Volume Across the Study Area
Screenline

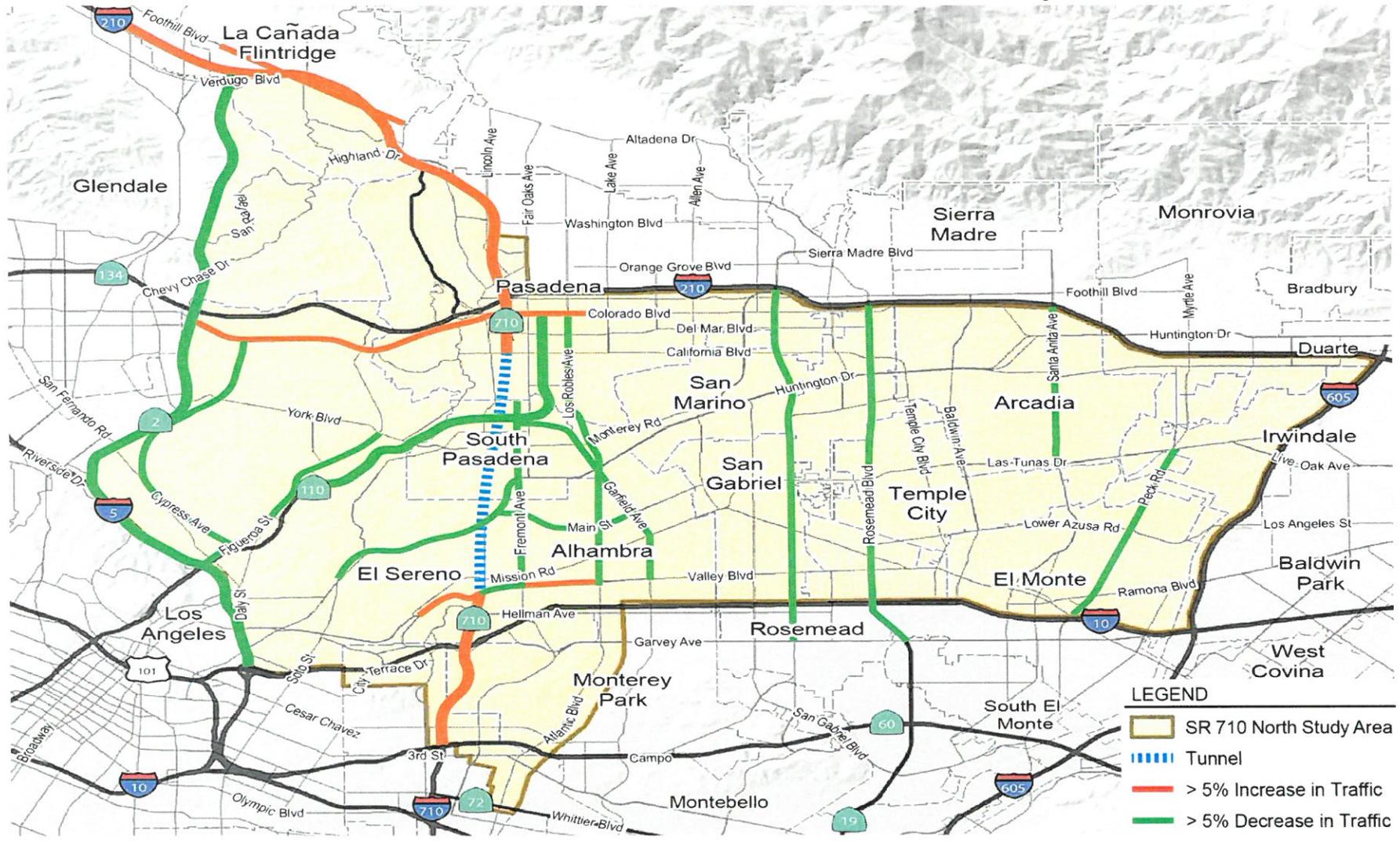


Vehicle Miles Traveled on Local Arterials



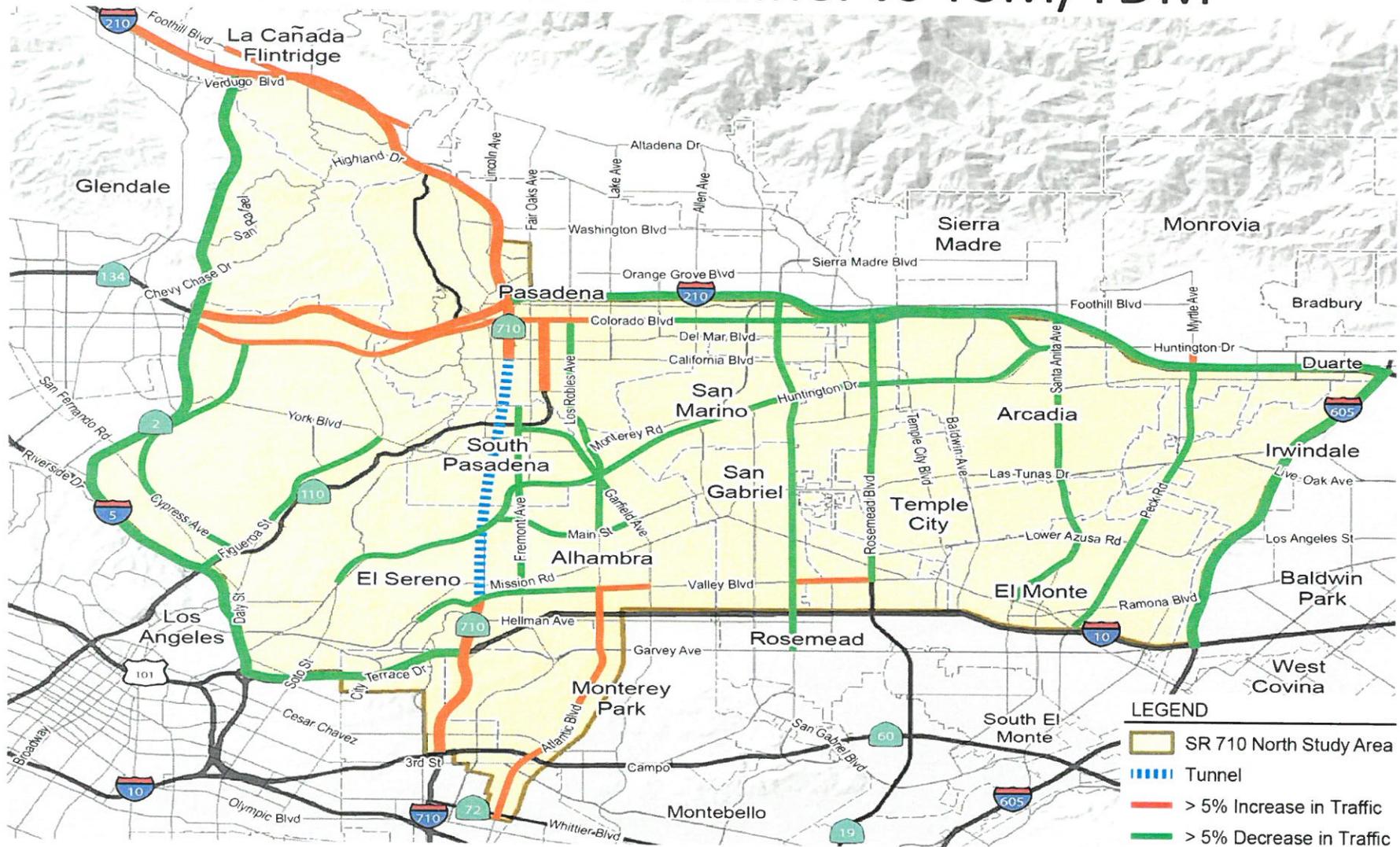
- Only the Tunnel moves more arterial traffic to the freeway.
- The arterial streets aren't pretending to be freeways.
- Commuters are less likely to cut-through through the community.

2035 Auto ADT – Tunnel vs TSM/TDM



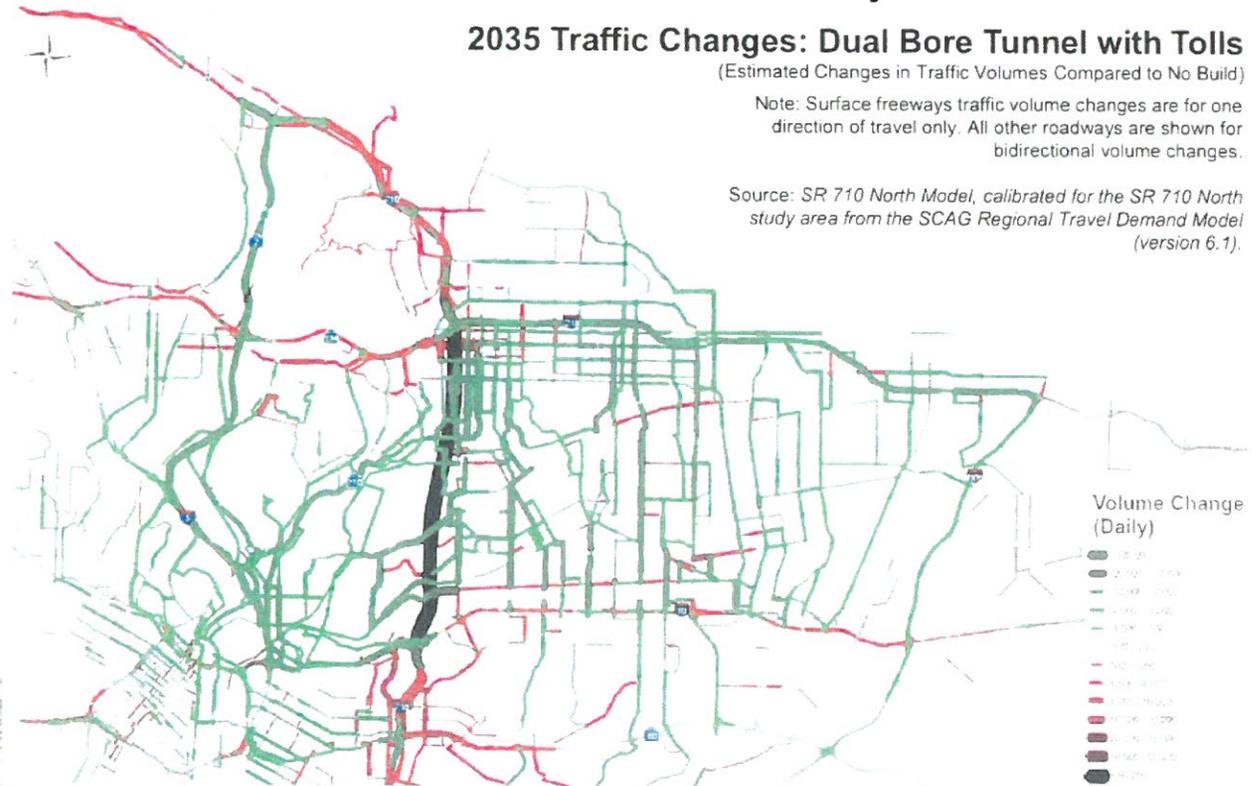
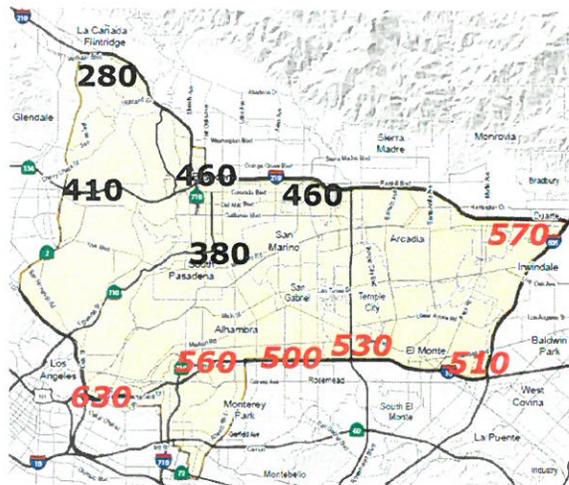
Based on data from SR710 North Study, Air Quality Assessment Report (Caltrans & Metro, January 2015)

2035 Truck ADT – Tunnel vs TSM/TDM



Air Quality / Health Risk Summary

- **Only the Freeway Tunnel** further reduces *local street emissions* (by reducing vehicle miles and hours travelled, in green)
- **Only the Freeway Tunnel** further reduces *local street truck emissions* (including air toxic DPM) in heavily impacted Alhambra (-17%) and San Gabriel Valley



2035 Traffic Changes: Dual Bore Tunnel with Tolls
(Estimated Changes in Traffic Volumes Compared to No Build)

Note: Surface freeways traffic volume changes are for one direction of travel only. All other roadways are shown for bidirectional volume changes.

Source: SR 710 North Model, calibrated for the SR 710 North study area from the SCAG Regional Travel Demand Model (version 6.1).

Metro, Stakeholder meeting #16

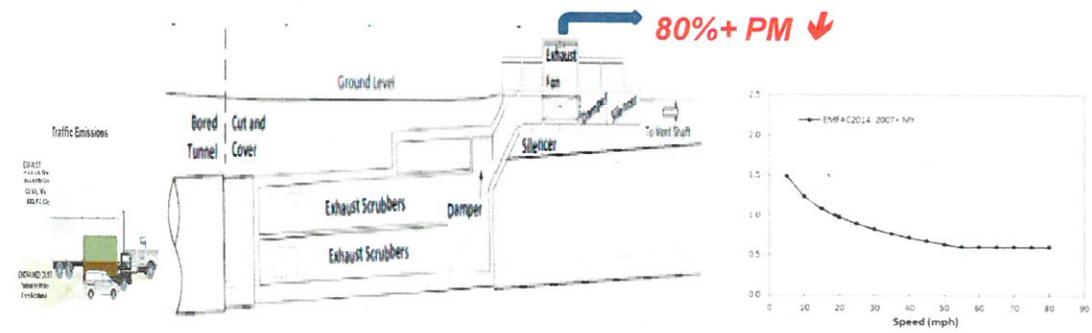


Figure 17: Longitudinal Section of the North Portal OMC Building

Percentage reductions based only on reduced vehicle miles travelled; greater reductions expected from mobility improvements

Data Source of Air Quality Review

- All information in the slides is based on the data and references in the DEIR/EIS documents.

Summary

- The Tunnel results in the greatest magnitude of positive change to congestion relief and regional mobility over the other alternatives:
 - 6.78 Million hours of travel time saved annually
 - A 10% reduction in daily travel time of at least 2.5 minutes (234,000 vpd)
 - A 43% reduction in daily arterial cut through traffic (57,000 vpd)
 - 22.97 Million annual person trips
- The Tunnel moves regional arterial traffic back onto the freeways, where it was originally designed to go
 - Arterials throughout the study area benefit.
- Only the Tunnel reduces emissions in historically impacted “SR710 Health Gap” areas
 - Local street emissions ↓: example, 7% to 14% or more lower from Pasadena through Alhambra
 - Freeway emissions ↓: in Tunnel (controlled) and open roadway (fewer trip miles / greater mobility)
 - Heath risk ↓ everywhere: Cleaner cars/trucks AND an additional 10 to 50 in a million cancer risk reduction for SR 710 terminus communities

City of
Alhambra



ATTACHMENT A

to

City of Alhambra Comment Letter 8-5-15

Evaluation of Transportation Elements of the SR 710 North Study Draft Environmental Impact Report, Environmental Impact Statement prepared by Gibson Transportation Consulting, Inc.



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Patrick A. Gibson, P.E., PTOE
president



Pat Gibson has over 45 years of experience in preparing traffic and parking analyses for both public and private sector projects. He has directed the transportation sections for Environmental Impact Reports and Environmental Impact Statements for numerous large development projects, including:

- Aquarium of the Pacific
- Arizona Cardinals NFL Stadium
- Arrowhead Pond of Anaheim
- Bakersfield Commons
- Century City Center
- Disneyland Resort
- Dodger Stadium
- Downtown Disney, Disney World
- Dubailand Theme Parks, United Arab Emirates
- Hollywood & Highland
- Honda Center
- The Huntington Library Education & Visitors Center
- LAX Northside Plan Update
- LEGOLAND
- Long Beach Convention Center
- Los Angeles Convention Center
- NBC/Universal Studios
- Paramount Pictures Studios
- PETCO Park
- Phoenix Coyotes NHL Arena
- Playa Vista
- The Queen Mary
- Rose Bowl
- STAPLES Center
- The Village at Westfield Topanga
- University of Southern California
- Wilshire Grand

Pat has directed over 50 downtown parking studies and has conducted hundreds of parking needs, feasibility, and functional design studies, as well as shared parking and parking financial analyses, for developments throughout Southern California and the United States. He has prepared traffic and parking studies for stadia and event centers, new and expanded regional shopping centers, and retail/entertainment centers throughout the United States. He spearheaded traffic, parking, access/circulation, and safety studies for over 50 schools and universities, and has spoken internationally on the topic.

Pat co-authored both editions of Shared Parking for the Urban Land Institute as well as *Parking Requirements for Shopping Centers*, 2nd Edition for the Urban Land Institute and International Council of Shopping Centers.

He teaches the transportation planning and traffic engineering courses at the University of California, Los Angeles and East Los Angeles College.

experience

45 years

education

Master of Science,



Pat Gibson
President



Sean Mohn
Principal



Helen Schorr
Principal,
Director of Operations



Sarah M. Drobis
Principal Associate



Jonathan Chambers
Senior Associate



Brian Hartshorn
Senior Associate



Hassan Ahmed
Associate



Rebecca Brady
Associate



Jaclyn Evans
Associate/
Graphics Director



Richard Gibson
Associate



Eugene Tang
Associate



Emily Wong
Associate

Transportation Engineering,
Northwestern University

Bachelor of Science,
Engineering Science,
Oakland University

certifications

Civil Engineer, States of California, Arizona, Illinois, and Nevada

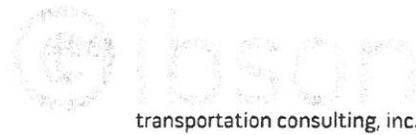
Professional Traffic Operations Engineer, National Registration

affiliations

Institute of Transportation Engineers, Fellow, Life Member

Committee Member on Design of Regional Shopping Centers

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MEMORANDUM

TO: Leland Dolley, Leland C. Dolley A Law Corporation

FROM: Patrick A. Gibson, P.E., PTOE, and Eugene Tang, AICP

DATE: July 9, 2015

RE: Evaluation of Transportation Elements of the
SR 710 North Study Draft Environmental Impact Report/
Environmental Impact Statement

Ref: 1370

Gibson Transportation Consulting (GTC), on behalf of the City of Alhambra, has prepared an evaluation of the transportation analyses related to the State Route (SR) 710 North Study. GTC reviewed the documents identified below and compared the impacts of the alternatives.

The following documents and presentations were utilized in this evaluation:

- *SR 710 North Study, Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings* (California Department of Transportation [Caltrans] and Los Angeles County Metropolitan Transportation Authority [Metro], March 2015) (the DEIR)
- *SR 710 North Study Transportation Technical Report* (Caltrans and Metro, November 2014) (the Transportation Report)
- *SR 710 North Study Air Quality Assessment Report* (Caltrans and Metro, January 2015) (the AQ Report)
- 710 North Public Hearings (Public Hearings)
 - May 6, 2015, La Cañada High School Auditorium, La Cañada
 - May 7, 2015, Los Angeles Christian Presbyterian Church, El Sereno

DEIR

The Statement of Purpose and Needs, as provided in all documents of the DEIR, is:

“The 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, including the following considerations:

- Improve efficiency of the existing regional freeway and transit networks.

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 July 9, 2015
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- Reduce congestion on local arterials adversely affected due to accommodating regional traffic volumes.
- Minimize environmental impacts related to mobile sources.

“The lack of continuous north-south transportation facilities in the study area has the following consequences, which have been identified as the elements of need for the project:

- Degradation of the overall efficiency of the larger regional transportation system
- Congestion on freeways in the study area
- Congestion on the local streets in the study area
- Poor transit operations within the study area”

The Study Area for the SR 710 North Project is generally referenced as the western San Gabriel Valley and east/northeast Los Angeles. The Study Area boundaries include Interstate 210 (I-210) to the north, Interstate 605 (I-605) to the east, Interstate 10 (I-10) to the south, and Interstate 5 (I-5) and State Route 2 (SR 2) to the west.

Project Alternatives

Caltrans, in cooperation with Metro, proposed transportation improvements to improve mobility and relieve congestion in the Study Area, while minimizing the ensuing environmental impacts. In order to meet these objectives, the following Project alternatives were developed for the SR 710 North Study:

- No Build Alternative: The California Environmental Quality Act Guidelines requires that a “No Project” alternative be evaluated to provide a baseline for the comparison of impacts for the other alternatives. The No Build includes projects and planned improvements through 2035, including those contained in *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future* (Southern California Association of Governments [SCAG], April 2012), the Federal Transportation Improvement Program (FTIP), Measure R, the funded portions of Metro’s 2009 Long Range Transportation Plan (LRTP), as well as the California High Speed Rail (HSR) project.
- Transportation System Management/Transportation Demand Management (TSM/TDM) Alternative: Federal Regulations require that a TSM/TDM Alternative be considered on all proposed major highway projects in urban areas. TSM/TDM is predicated on a series of surface street and operational improvements, along with active transportation and transit enhancements/refinements.
- Bus Rapid Transit (BRT) Alternative: The BRT Alternative was considered to provide high-speed, high- frequency bus service through a combination of new, dedicated bus lanes and mixed-flow traffic lanes to key destinations between East Los Angeles and Pasadena. BRT builds upon TSM/TDM and adds specific transit enhancements/refinements.

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- Light Rail Transit (LRT) Alternative: The LRT Alternative includes a passenger rail line, along a dedicated route, which would serve key destinations between East Los Angeles and Pasadena. LRT similarly builds upon TSM/TDM with modifications to accommodate a light rail solution.
- Freeway Tunnel Alternative: The Tunnel Alternative would introduce a tunnel connection between Pasadena and Alhambra; this builds upon TSM/TDM with modifications to provide connectivity between the north and south stubs of the 710.

The City of Alhambra has previously expressed interest and support for a Tunnel Alternative for the SR 710 North Study. While the DEIR studied a number of tunnel variations, for the purposes of this evaluation, the Dual Bore Tunnel with Toll variation was selected due to the available roadway capacity and potential for providing a cost effective solution. Therefore, all references to the Tunnel Alternative in this evaluation are to the Dual-Bore Tunnel with Toll variation.

The Transportation Report evaluated the performance and potential impacts of each of the above alternatives for various statistical performance measures. The Transportation Report utilized the SCAG Travel Demand Model to prepare analyses for the 2035 horizon year; the model forecasts travel behavior and demand, based on a series of inputs and assumptions derived from actual data. The Transportation Report evaluated each alternative relative to overall transportation system and highway performance measures, transit performance measures and traffic operations/volumes.

COMMENTS

Based on our review of the documentation, GTC submits the following comments:

COMMENT 1: ADEQUACY OF THE ANALYSIS

GTC finds the methodology and analysis of the Transportation Report to be consistent with the state of the practice for the analysis of large-scale transportation alternatives.

COMMENT 2: DEIR UNDERESTIMATES THE BENEFITS OF THE TUNNEL ALTERNATIVE

While the DEIR provides a comprehensive analysis of the SR 710 North Study, the presentation of those results may have unintentionally deemphasized the potential benefits of the Tunnel Alternative.

GTC examined the statistical performance of the project, as documented in the DEIR, and prepared visual representations comparing the alternatives.

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System Performance

The system performance measures used in this evaluation are defined below.

- Vehicular Travel Distance identifies the changes in total vehicle miles traveled (VMT) of each alternative, for both automobiles and trucks.
- Vehicular Travel Time identifies the changes in total vehicle hours traveled (VHT) by each alternative, for both automobiles and trucks.
- The Daily Person Throughput identifies the total number of person trips crossing an east-west screenline by each alternative, for both vehicular and transit trips.

Both the VMT and VHT have been calculated specific to the Study Area as well as the SCAG modeling region; in addition, these measures are provided in a daily and combined AM and PM peak period value. Much of the data presented in the DEIR is presented in terms of the number of vehicles or persons crossing a screenline drawn across the center of the Study Area. Figure 1 illustrates the east-west screenline.

Travel behavior will be affected by transportation improvements made throughout the system. Depending on the alternative, the amount of travel may increase (travelers may take longer trips to different destinations due to increased mobility) or decrease (shift from autos to transit)¹. The increase in travel distance may not necessarily translate to an increase in travel time (more capacity may increase travel distance and decrease travel time for all travelers).

Figures 2A and 2B, respectively, illustrate the daily VMT and VHT across the SCAG region for each alternative. Figures 3A and 3B, respectively, illustrate the daily VMT and VHT within the localized Study Area. Figure 4 depicts the daily person throughput across the Study Area screenline. Table 1 provides additional detail on the comparison of the system performance measures by alternative.

Regional Analysis. The Tunnel Alternative projects a daily VMT change of +0.08%, while the VMT change of other alternatives ranges from -0.02% to +0.01%. The change in VHT is projected at -0.21% with the Tunnel Alternative, as compared to a range of -0.03% to +0.09% with the other alternatives. These patterns hold when examining the VMT and VHT of the combined AM and PM peak period; the Tunnel Alternative results in the largest percentage of change from the No Build Alternative, when compared to the other alternatives.

Study Area Analysis. Similar to the regional comparison, the Tunnel Alternative also projects the greatest percentage of change from the No Build Alternative within the Study Area. The daily VMT projects change of +1.63%, whereas the other alternatives project change ranging from +0.16% to +0.28%. Relative to VHT, a change of -3.12% is projected with the Tunnel Alternative; this compares to -0.57% to 0.0% with the other alternatives. A similar pattern exists with the combined AM and PM peak period measures. The daily person throughput across the Study Area screenline projects the greatest increase of +2.74% with the Tunnel Alternative, whereas the other alternatives range from +0.25% to +0.47%.

¹ Transportation Report, Section 4.1.1

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Summary. Relative to System Performance, the Tunnel Alternative is projected to result in increases to VMT and person throughput along with a decrease in VHT. This implies that the Tunnel Alternative is able to move more persons through the system, as demonstrated by the daily person throughput, to greater distances and in less time than the other alternatives.

The Tunnel Alternative has the potential to annually save over 6.7 million hours of travel within the region when compared to the No Build Alternative. The vast majority of that travel time savings will be felt locally. Within the Study Area, the Tunnel Alternative potentially results in over 5.7 million hours of travel time saved while serving 22.9 million more person trips annually than the No Build Alternative. No other alternative comes close to this level of travel time savings or increased person throughput.

Highway Performance

The highway performance measures used in the analysis are defined below:

- Traffic Volume Served is expressed as regional north-south vehicular travel crossing the east-west screenline on both the freeway and arterial systems. The freeway and arterial measurements provide an indication of how well the road system is working for regional and local trips.
- Traffic Diversion to Local Arterials shows the volume of traffic that uses the arterial street network instead of the freeway facilities, due to congestion or lack of freeway connectivity. This measure is applied to arterial system in the Study Area only and is expressed in VMT.
- Use of Local Arterials for Long Trips is a performance measure that provides the percentage of vehicle trips on the arterial system that cut through the Study Area (i.e., trips that do not have an origin or destination inside the Study Area).
- Travel Time Improvement is the number of regional trips in the No Build Alternative that would experience a reduction in travel time in comparison to the Build Alternatives. These trips would not have to use the improvements provided in the Build alternatives but would benefit from them.

Figure 5 illustrates the arterial and freeway traffic volumes served across the screenline for each alternative, while Figure 6 illustrates the traffic diversion to local arterials. Table 2 also details the traffic volume and VMT comparisons for the Highway Performance Measures by alternative.

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An operational comparison of the alternatives is shown below:

HORIZON YEAR (2035) OPERATIONAL PERFORMANCE MEASURES BY ALTERNATIVE

| Performance Measure | No Build | TSM/TDM | BRT | LRT | Tunnel |
|---|----------|---------|-------|-------|--------|
| Use of Local Arterials for Long Trips | | | | | |
| PM Peak Period Percent Cut-Through | 13.7% | 14.3% | 14.2% | 14.0% | 7.8% |
| Travel Time Improvement | | | | | |
| Percent of AM and PM Peak Period Trips More Than 2.5 Minutes Faster Than No Build | 0% | 0% | 0% | 3% | 10% |

Traffic Volume Served. Within the Study Area, the Tunnel Alternative is projected to result in a change of -9.19% in arterial traffic volume, whereas the other alternatives range from +1.02% to +1.14%. Thus, the Tunnel Alternative is the only Build Alternative that has the potential to reduce traffic on the arterial streets within the Study Area. Conversely, freeway volume is projected to change by +13.05% with the Tunnel Alternative, compared to -0.29% to -0.19% for the other alternatives. Again, the Tunnel Alternative is the only alternative that removes vehicular traffic from the local arterial streets and puts it back on the freeway system.

Traffic Diversion to Local Arterials. Compared to the No Build Alternative, the Tunnel Alternative is projected to result in a change in arterial VMT of -6.42% within the Study Area. The other alternatives project an arterial VMT change ranging from -0.12% to +0.49%.

Use of Local Arterials for Long Trips. Compared to the No Build Alternative, the Tunnel Alternative projects that 7.8% of PM peak hour traffic cuts through the Study Area arterials. By comparison, the other alternatives project a level of cut-through traffic of 13.7% to 14.3% on Study Area arterials. The three other Build Alternatives actually increase the use of local arterial streets for long trips as compared to the No Build Alternative.

Travel Time Improvement. During the AM and PM periods, the Tunnel Alternative projects that 10% of trips could experience a travel time reduction greater than 2.5 minutes. By comparison, the LRT Alternative projects that 3% of those AM and PM peak hour trips could experience a similar travel time improvement, while the TSM/TDM and BRT Alternatives offer no such travel time improvement.

Relative to Highway Performance, the Tunnel Alternative indicates a projected reduction in arterial street traffic and an increase in freeway volume; corresponding decreases in arterial cut-through traffic and travel time (by at least 2.5 minutes) are also projected. This suggests that the Tunnel Alternative benefits arterial streets by shifting regional traffic to the freeways and decreasing travel time.

Transit Performance

The transit performance measures used in this analysis are defined below:

- **New Transit Trips** identifies the number of new transit taken by people who choose to use transit services and who would have otherwise used a different mode for travel.
- **Transit Mode Share** represents the percentage of total daily person trips utilizing transit; this was calculated based on daily trips in the study area.
- **North-South Transit Throughput** represents the total daily person trips, using transit services, which traverse the study area screenline.
- **Transit Accessibility** is the percentage of the Study Area population located within 0.25 mile of a transit stop with high frequency service (peak headways less than 15 minutes).

Table 3 details the comparison of the transit performance measures.

New Transit Trips. As indicated in Table 3, the Tunnel Alternative is projected to experience an increase of 10,300 new transit trips, compared to 11,250-15,350 new transit trips for the other alternatives. Thus, all of the Build Alternatives are essentially transit neutral when it comes to the number of net new transit trips supported by the Build Alternatives. The total difference in transit patronage among all of the Build Alternatives is only 4,950 daily transit trips out of over 3 million daily person trips in the Study Area.

Transit Mode Share. During the 2035 Horizon Year, the transit mode share for each alternative is nearly identical; the largest increase would be 0.1% in the BRT and LRT Alternatives. Again, the Build Alternatives are essentially transit neutral.

North-South Transit Throughput. The number of daily person trips by transit crossing the screenline in the Tunnel Alternative is projected at 212,000 person trips. This compares to 209,000 person trips in the No Build Alternative and 211,000-215,000 person trips in the TSM/TDM, BRT, and LRT Alternatives.

Transit Accessibility. During the 2035 Horizon Year, the percentage of transit accessibility for each alternative is nearly identical; the largest increase would be 0.1% in the BRT and LRT Alternatives.

Relative to Transit Performance, the Tunnel Alternative is projected to increase transit trips and person throughput when compared to the No Build Alternative. The TSM/TDM, BRT, and LRT Alternatives would provide greater increases than the Tunnel Alternative because they are more transit intensive. These increases, however, should also be considered relative to the projected percentages of transit mode share and transit accessibility. With the exception of the minor increase in the BRT and LRT Alternatives, the transit mode share and transit accessibility measures are nearly identical across the Build Alternatives.

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On-Street Parking Loss

The DEIR included a parking assessment that identified potential impacts to existing on-street parking spaces associated with each Build Alternative. The parking losses are characterized as either temporary or permanent. Temporary parking loss is associated with peak hour parking restrictions, while permanent parking loss is associated with those improvements that would not replace the lost parking. Table 4 details the parking losses across the alternatives.

As shown in Table 4, the TSM/TDM Alternative would result in 26 spaces temporarily lost during the weekday AM and PM peak periods, all in Alhambra, and 220 spaces permanently lost, the majority of which is concentrated in Alhambra and Los Angeles, with losses in San Gabriel, San Marino, and South Pasadena as well.

The BRT Alternative would result in the temporary loss of 1,047 spaces during the weekday AM and PM peak periods. A substantial portion (77%) of this temporary parking loss would occur in Monterey Park and South Pasadena; the remainder would occur in Alhambra, Los Angeles, and Pasadena. A total of 96 spaces in Alhambra, Los Angeles, Monterey Park, Pasadena, and South Pasadena would be permanently lost during all hours of the day.

The LRT Alternative would not cause the loss of AM or PM peak hour on-street parking; a total of four spaces would be permanently lost in South Pasadena.

The Tunnel Alternative would not cause the loss AM or PM peak hour on-street parking, nor would any parking spaces be permanently lost.

COMMENT 3: THE DEIR DID NOT DO A THOROUGH JOB OF PRESENTING THE OVERALL EFFECTS OF TRAFFIC SHIFTS AS A RESULT OF THE ALTERNATIVES

Although the DEIR provided a comprehensive analysis of the performance measures of each alternative, those analyses primarily focused on north-south movement through the Study Area. Little discussion was given relative to east-west movement through the Study Area, possibly understating the potential effects of each alternative.

Traffic volumes across the arterial and freeway system are the fundamental data used to calculate several of the performance measures discussed above. While the traffic volume data was provided in the DEIR, the traffic volumes themselves were not explicitly discussed.

GTC prepared a comparison of traffic volumes for select alternatives and for all directions of travel, utilizing the traffic volumes for select alternatives from Appendix D of the AQ Report, which in turn utilized the Transportation Report volumes prepared using the SCAG Travel Demand Model.

GTC compared the traffic volumes presented for the 2035 Horizon Year analyses of the TSM/TDM and Tunnel Alternatives along with the Freeway Level of Service (LOS) exhibits for the Tunnel Alternative. The Tunnel Alternative was calculated as a percentage change from TSM/TDM. A threshold of +/-5% was utilized, which represents a change of one-half LOS. The traffic volumes are presented as Average Daily Traffic (ADT) for passenger vehicles and trucks, respectively expressed as ADT and Truck ADT. This comparison illustrates the potential traffic

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shifts in both the north-south and east-west directions, highlighting the potential benefits and impacts of the selected alternatives.

Tables 5A and 5B detail the arterial and freeway segments selected for this comparison along with the traffic volumes provided in the Transportation Report. Of the freeway segments identified, those labeled between points of an interchange were not included. Figures 7A and 7B illustrate the traffic volume differences across the Study Area and Figures 8A and 8B illustrate the differences in the immediate vicinity of Alhambra. The color coding represents an increase (red) or decrease (green) in the Tunnel Alternative traffic volume, relative to the TSM/TDM Alternative.

ADT

As illustrated, the effect of the Tunnel Alternative on the arterial and freeway system is consistent with the evaluation of Highway Performance discussed above; traffic volume is drawn to the freeways, relieving arterials across the Study Area. This effect is pronounced in the immediate vicinity of the north and south portals and through Alhambra. ADT volumes are projected to increase on SR 710 and I-210 with decreases projected along Huntington Drive, Main Street, and Fremont Avenue. This effect is not isolated to the immediate vicinity; ADT increases are projected on Colorado Boulevard and Foothill Boulevard. The arterial ADT reduction pattern extends to Eagle Rock Boulevard/Cypress Avenue, and Figueroa Street to the west and San Gabriel Boulevard, Rosemead Boulevard, Santa Anita Avenue, and Peck Road to the east. Also notable are segments of SR 2, I-5, and SR 110 with a projected decrease in ADT. As shown, reductions in ADT volume are apparent in the north-south direction, along with some improvements in the east-west direction.

Truck ADT

The pattern of Truck ADT is consistent with passenger ADT, where truck volume is generally drawn toward the freeways from the arterials. Again, the effect is pronounced near the portals and in Alhambra. Increased Truck ADT is projected along SR 134, I-210, and SR 710; a decrease in arterial Truck ADT is projected along Huntington Drive, Main Street, Valley Boulevard, and Fremont Avenue. The wider ranging impact of Truck ADT redistributing to the Tunnel is clear through the Study Area. Continuous segments along SR 2, I-5, I-10, I-605, and I-210 are projected to experience a decrease in Truck ADT. Similarly, continuous segments of arterials (i.e., Eagle Rock Boulevard/Cypress Avenue, Figueroa Street, Huntington Drive, San Gabriel Boulevard, Rosemead Boulevard, Santa Anita Avenue, and Peck Road) also project decreases of at least 5% in Truck ADT. Even more dramatically than the ADT volumes above, the comparison of Truck ADT indicates clear improvements to east-west movement through the Study Area, in addition to the north-south direction.

The LOS along the freeway segments should be considered in conjunction with the projected changes in ADT and Truck ADT. As provided in the Transportation Report, Figures 9A and 9B illustrate the freeway LOS respectively projected for the Study Area during the AM and PM peak periods.

LOS with ADT/Truck ADT Increase

- An increase in Truck ADT is projected for SR 134 between SR 2 and I-210. This segment is projected to operate between LOS C and D during the AM peak period and between LOS C and E during the PM peak period.
- An increase in ADT and Truck ADT is projected for I-210 north of SR 134. This segment is projected to generally operate at LOS A/B in the northbound direction and LOS D in the southbound direction in the AM peak period. Short segments of LOS E and F operation would be experienced southbound in the AM peak period. In the PM peak period, LOS D northbound and LOS C southbound would predominate. In other words, despite the increase in vehicular traffic on this section of I-210, this freeway would continue to operate at a better LOS than any other freeway in the region.
- An increase in ADT and Truck ADT is projected for SR 710 at the north and south portals. These segments are projected to operate generally at LOS C.

LOS with ADT/Truck ADT Decrease

- A decrease in ADT and Truck ADT is projected for SR 2 between I-5 and I-210. This segment is projected to generally operate between LOS A/B and C during the AM and PM peak periods.
- A decrease in ADT and Truck ADT is projected for I-5 between SR 2 and I-10. This segment is projected to primarily operate at LOS D to F.
- A decrease in Truck ADT is projected for I-10 between I-5 and SR 710. The projected operation through this segment is LOS A/B and C with short segments of LOS E.
- A decrease in Truck ADT is projected for I-210 between SR 710 and I-605. The projected operation through this segment is LOS C to F.
- A decrease in Truck ADT is projected for I-605 between I-210 and I-10. This segment is projected to primarily operate at LOS C and D with shorter segments at LOS E/F.

The volume comparison clearly illustrates the potential shifts of ADT/Truck ADT in the Study Area as a result of the Tunnel Alternative. While an increase in ADT/Truck ADT results along I-210 (north of the tunnel), that segment of freeway is projected to primarily operate at LOS D or better during the AM and PM peak hours, which is generally considered as acceptable operation within an urbanized environment. This focused increase in ADT/Truck ADT is tempered by the corresponding decreases in arterial ADT/Truck ADT that extend throughout the Study Area.

By connecting the SR 710 gap with the Tunnel, the benefits to the arterial street network increase for all directions of travel.

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COMMENT 4: PARKING PROHIBITIONS NEEDED FOR THE TSM/TDM AND BRT ALTERNATIVES MAY BE DIFFICULT TO IMPLEMENT

Adjacent cities have expressed support for the TSM/TDM and BRT Alternatives. However, these two alternatives depend on significant on-street parking prohibitions (either permanently or during the peak hours) in order to implement the reversible lanes and the exclusive bus lane strategies.

The parking prohibitions are needed through the heart of the business districts in Pasadena and South Pasadena and, in our experience, these parking prohibitions are very difficult to get implemented.

If the cities' support for these alternatives does not include a commitment to prohibit peak hour parking through their business districts, the beneficial effects of the TSM/TDM and the BRT Alternatives will not be realized.

COMMENT 5: THE DEIR OVERSTATES THE EFFECTS OF THE NO BUILD ALTERNATIVE

As mentioned earlier in this memo, the No Build Alternative includes projects and planned improvements through 2035, including those contained in the SCAG RTP/SCS, FTIP, Measure R, LRTP, and HSR projects.

It is highly unlikely that ALL of the planned and programmed improvements in the SCAG RTP/SCS and the FTIP will actually be implemented by 2035. This is not a criticism of the DEIR, but it should be pointed out in the DEIR that the travel performance of the transportation system under the No Project Alternative is extremely optimistic and unlikely to be achieved. Thus, the performance of the alternatives is likely to be better than shown in the DEIR.

COMMENT 6: MOST OF THE TUNNEL ALTERNATIVES STUDIES ARE UNREALISTIC

The DEIR analyzes a number of tunnel variations even though most of the variations are unfeasible. Without a Public Private Partnership (PPP) and without tolls for travel through the tunnel, the tunnel most likely cannot be financed. Therefore, the analysis of variations that do not include tolls presents an illusionary condition that will probably never be realized and unnecessarily complicates the DEIR.

COMMENT 7: THE BENEFITS OF THE TUNNEL ALTERNATIVE ARE NOT STUDIED FOR MUCH OF EAST LOS ANGELES

The boundaries of the Study Area are drawn such that much of East Los Angeles is outside of the Study Area. Therefore, the trip-reduction effects of the Tunnel Alternative on the streets in East Los Angeles are not specified and instead are grouped into the "Regional Effects" category. This makes it difficult for the community of East Los Angeles to evaluate the positive effects of the Tunnel Alternative on its streets.

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determined through evaluation of the VMT, VHT, and daily person throughput measures. The Tunnel results in increases of up to 1.6% VMT across the region and within the Study Area. Conversely, the VHT and daily person throughput are projected to improve by approximately 3% across the region and within the Study Area. The other alternatives also result in changes to these performance measures; however, the findings indicate that the Tunnel Alternative promotes a greater magnitude of positive improvements to regional mobility, accessibility and congestion reduction.

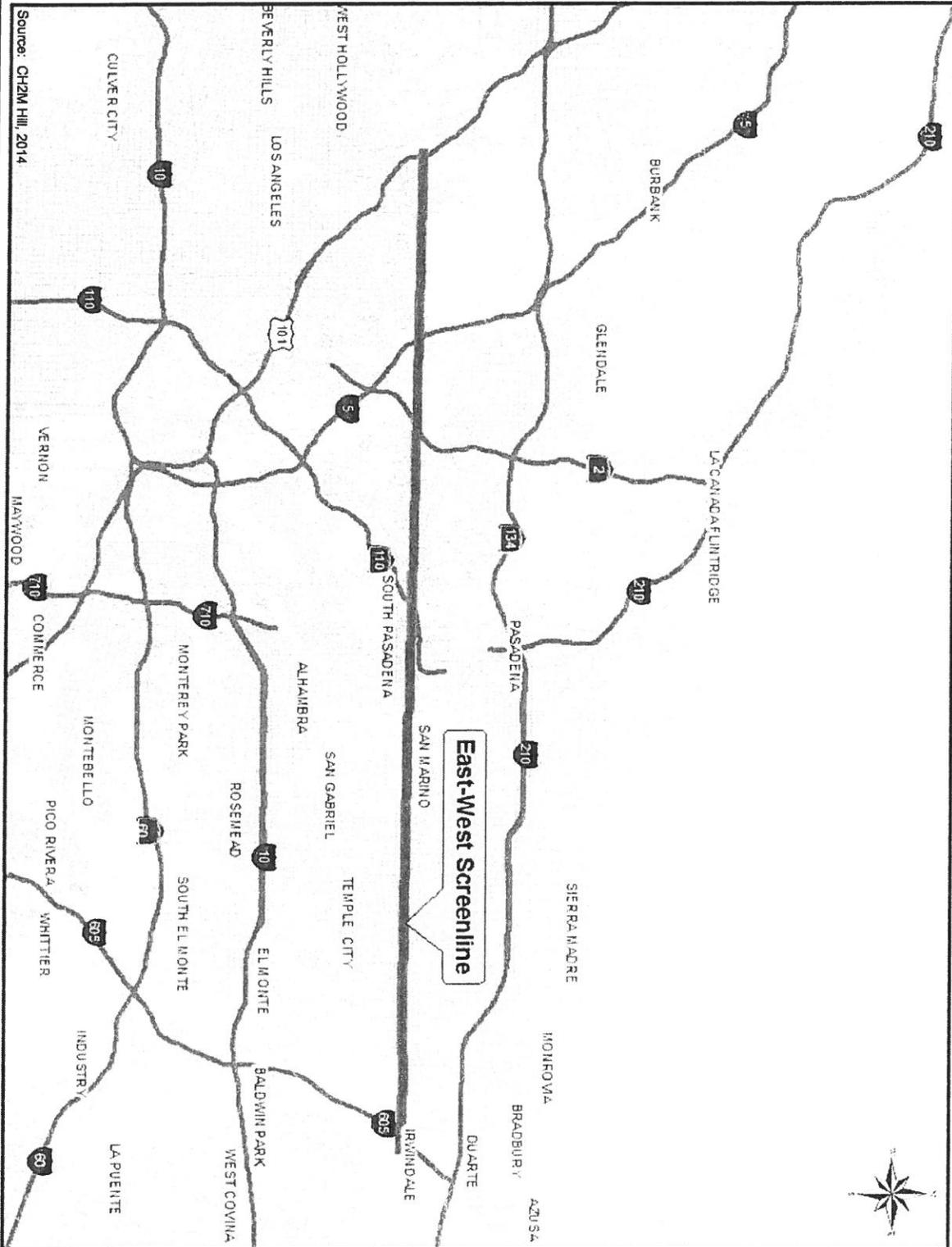
The evaluation of Highway Performance measured characteristics of traffic through the Study Area including screenline traffic volume, arterial VMT, cut-through traffic, and travel time. The Tunnel Alternative was found to reduce the arterial volume by over 9% while increasing the freeway volume by 13%, relative to overall Study Area traffic. These findings correspond to the approximately 6% reduction in arterial VMT and the approximately 40% decrease to the percentage of cut through traffic in the Study Area. The percentage of AM and PM peak hour trips with travel time savings increases by 10%. The other alternatives result in nominal changes to these performance measures. The findings continue to indicate that the Tunnel Alternative offers positive improvements to regional mobility and congestion reduction.

Transit Performance was evaluated by the number of new transit trips, mode share, Study Area person throughput, and transit accessibility. Although the Tunnel Alternative results in an improvement of over 10,000 new transit trips and an increased daily throughput of 3,000 person trips compared to the No Build Alternative, this level of change is less than those of the other alternatives. Interestingly, the levels of transit mode share and transit accessibility are effectively unchanged and the same across the alternatives. The findings indicate that the Tunnel Alternative would offer some transit performance improvements over the No Build Alternative, but suggest that the other alternatives may not offer an improvement as significant as anticipated.

A parking loss evaluation across the alternatives indicates that the Tunnel Alternative would not result in the temporary or permanent loss of any on-street parking. However, the TSM/TDM and BRT Alternatives would result in substantial loss of on-street parking spaces. In TSM/TDM, the majority of parking loss would be permanent; conversely, BRT would result in primarily peak period parking losses. The LRT Alternative would result in the permanent loss of four spaces.

A traffic volume comparison was performed, plotting the difference in traffic volume from the Tunnel Alternative relative to the TSM/TDM Alternative. This comparison utilized the ADT and Truck ADT data provided in the DEIR. Relative to ADT, the increase and decrease in traffic volume occurs in the anticipated locations, i.e., in the vicinity of each end of the tunnel and within Alhambra. The projected decreases in traffic, however, are not limited to areas within Alhambra; rather, ADT decreases are projected throughout the Study Area. This pattern is more pronounced when examining Truck ADT; the pattern of Truck ADT reduction extends from the freeways (SR 2, I-5, I-10, I-210, I-605) to continuous segments of the arterials (Eagle Rock Boulevard/Cypress Avenue, Huntington Drive, Fremont Avenue, San Gabriel Boulevard, Rosemead Boulevard, Santa Anita Avenue, Peck Road). This comparison corresponds to the results of the System Performance and Highway Performance evaluations, where the Tunnel Alternative offers improvements to regional mobility and congestion reduction.

Based on the analysis detailed above, the Dual Bore Tunnel with Tolls Alternative best meets the Project's Statement of Purpose and Needs.



EAST-WEST SCREENLINE

FIGURE 1

FIGURE 2A
DAILY VHT - REGIONAL

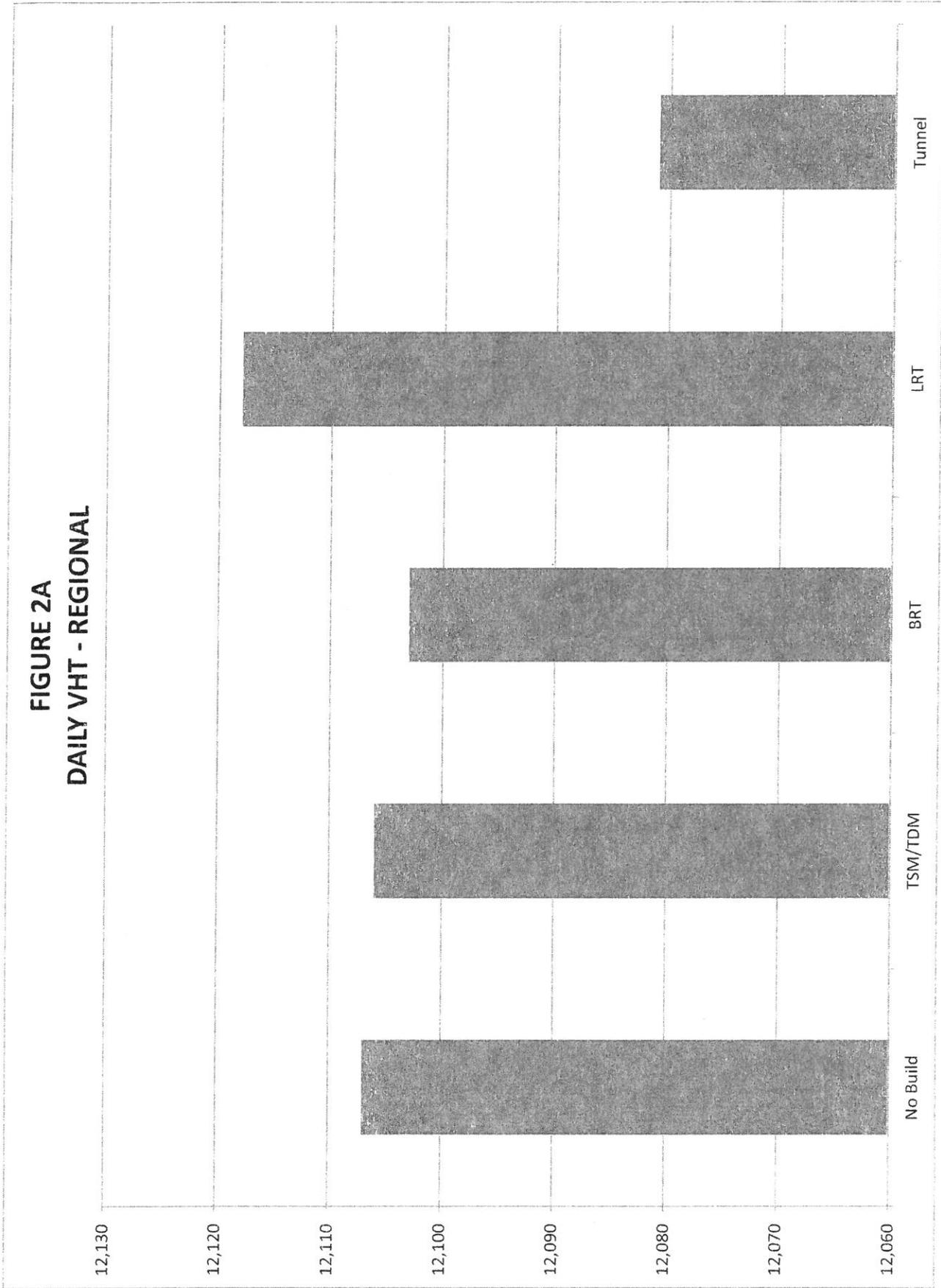


FIGURE 2B
DAILY VMT - REGIONAL

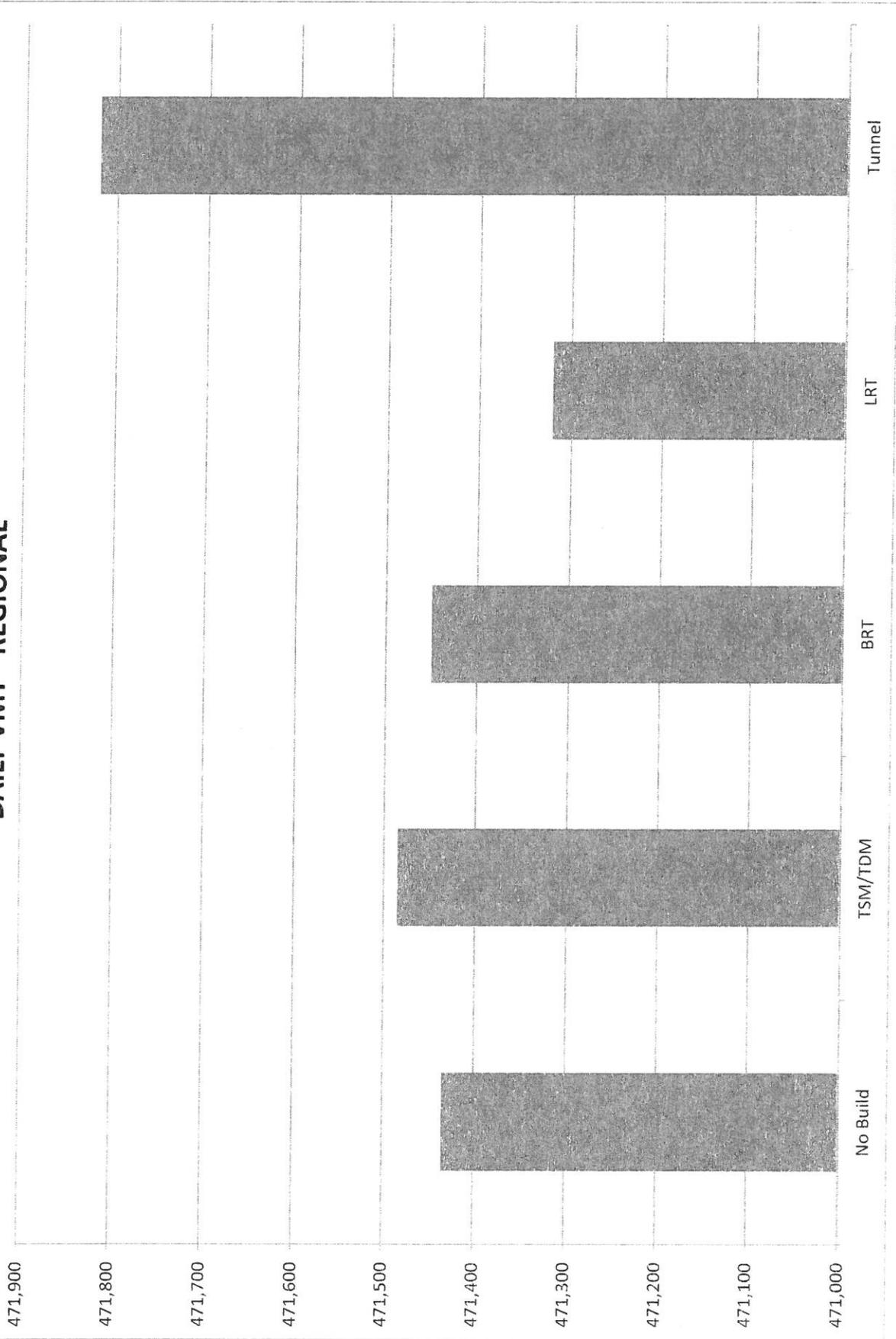


FIGURE 3A
DAILY VHT - STUDY AREA

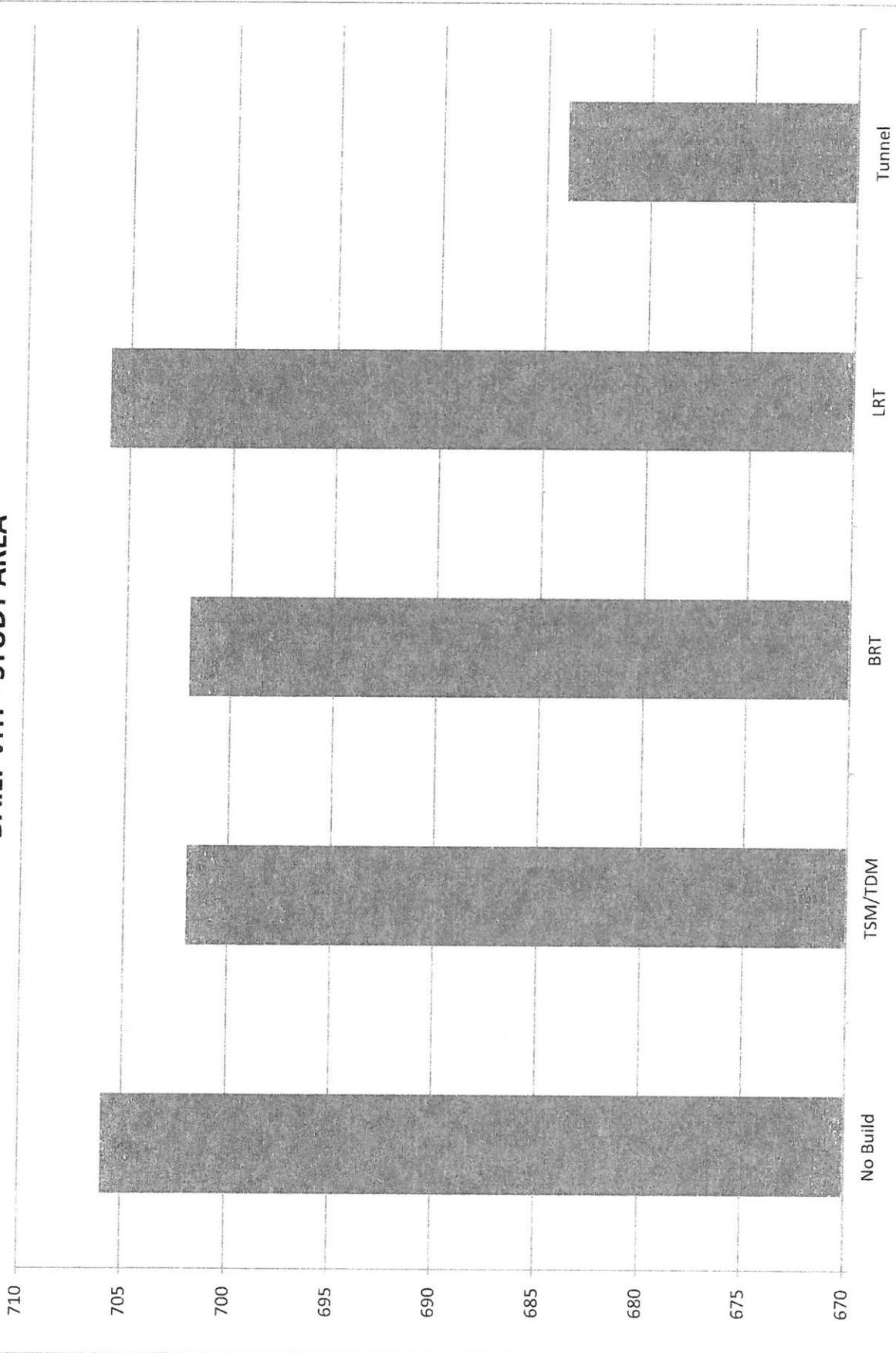


FIGURE 3B
DAILY VMT - STUDY AREA

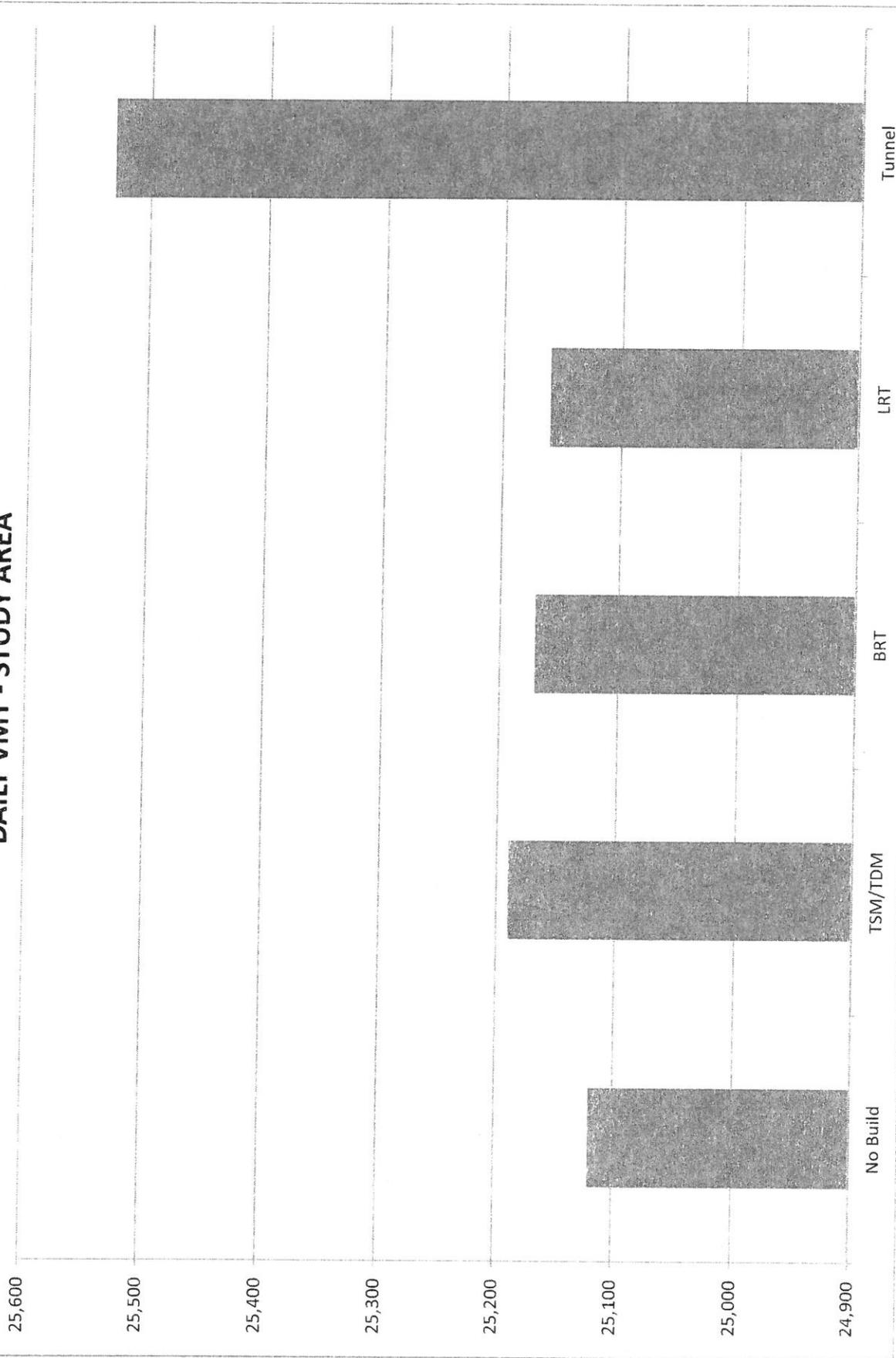


FIGURE 4
DAILY PERSON THROUGHPUT - STUDY AREA

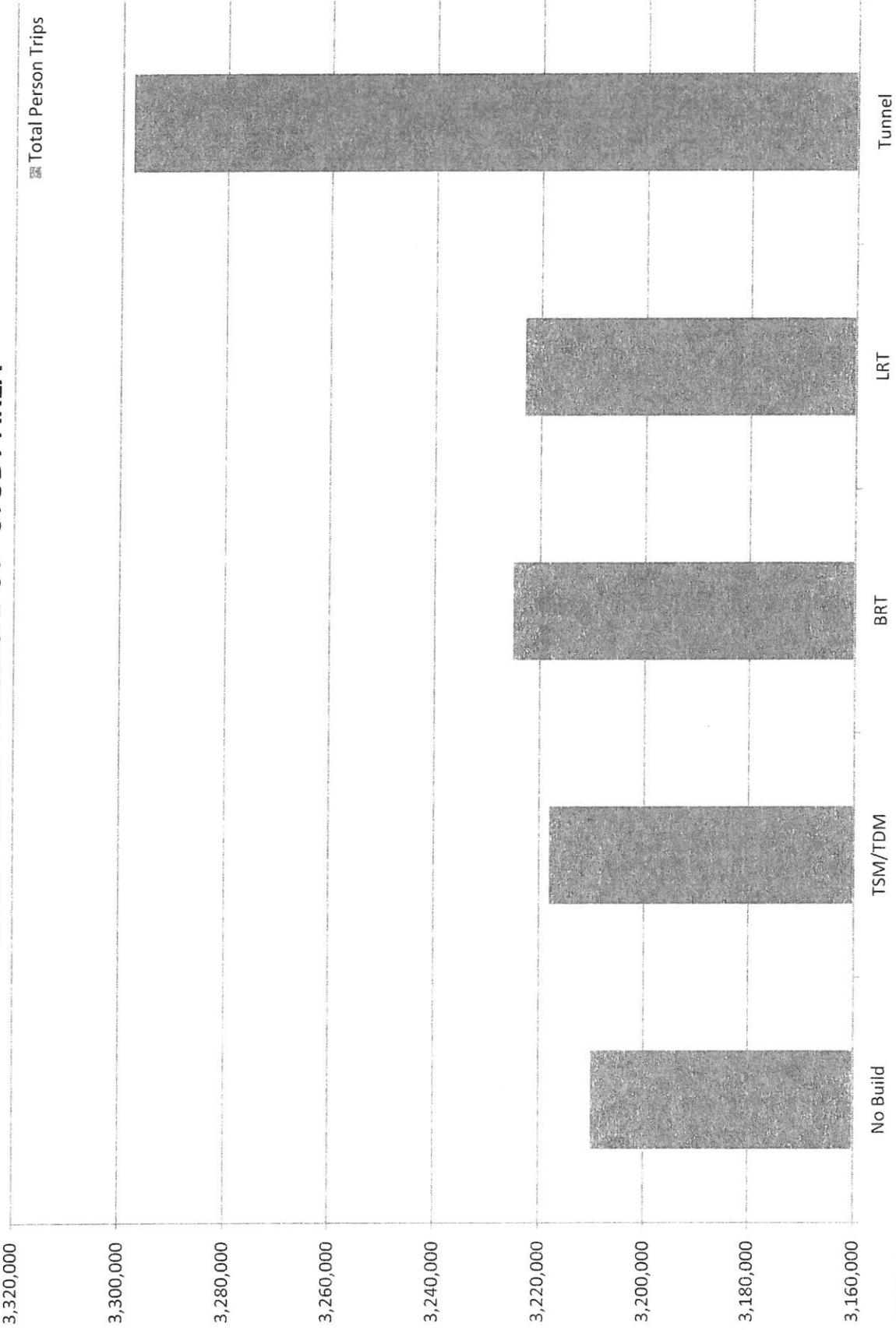


FIGURE 5
DAILY TRAFFIC VOLUME ACROSS SCREENLINE

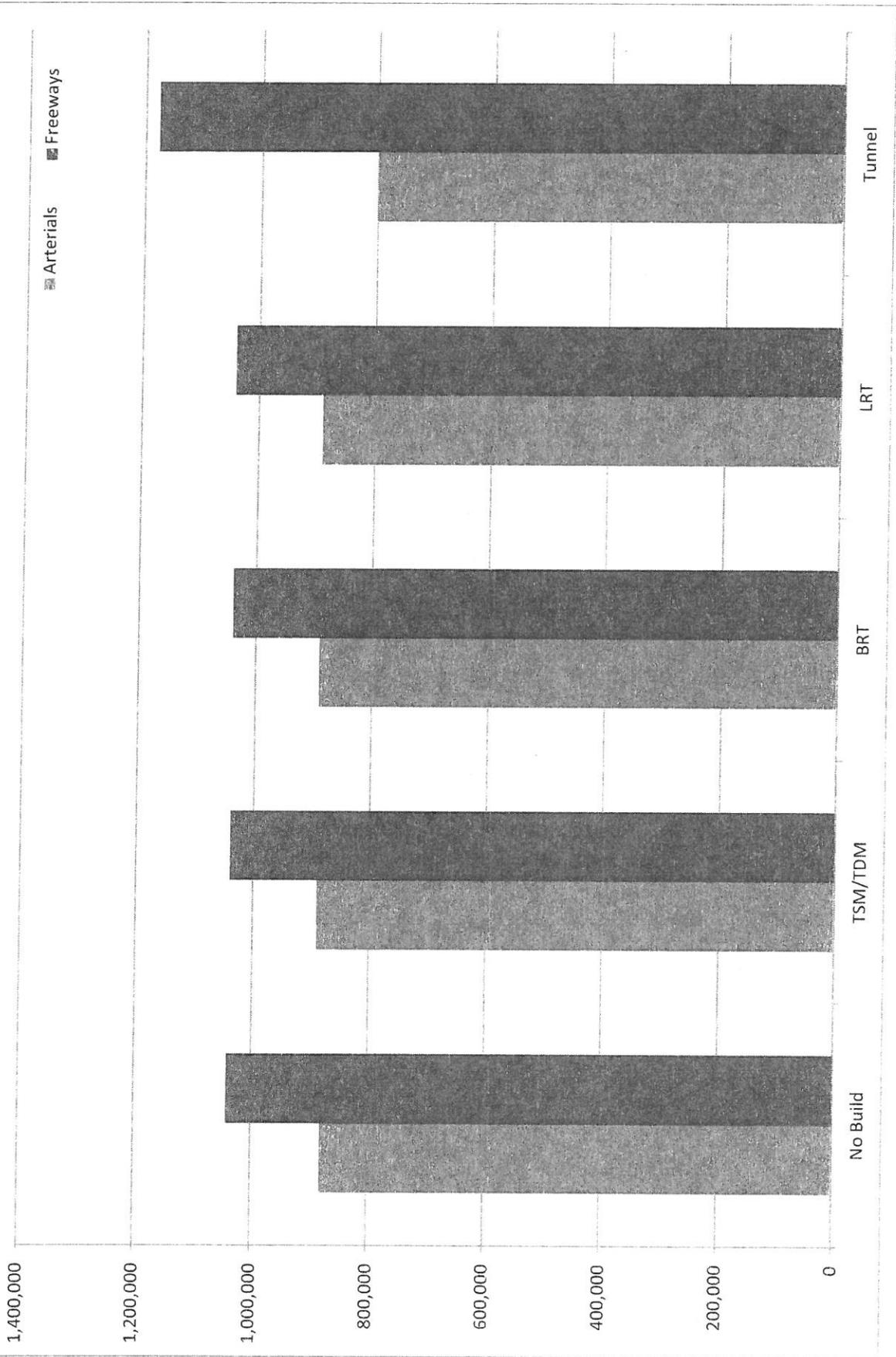
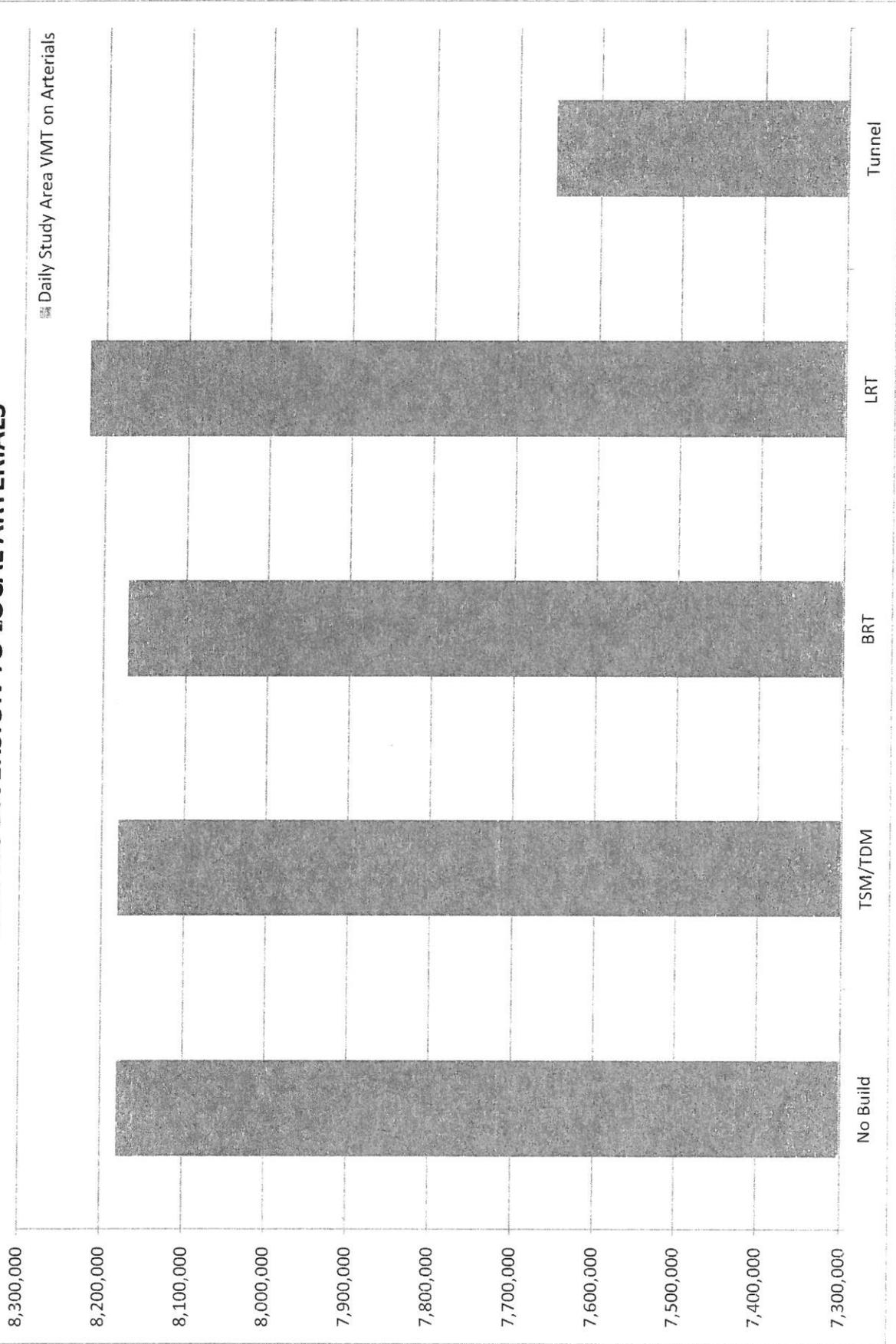


FIGURE 6
TRAFFIC DIVERSION TO LOCAL ARTERIALS



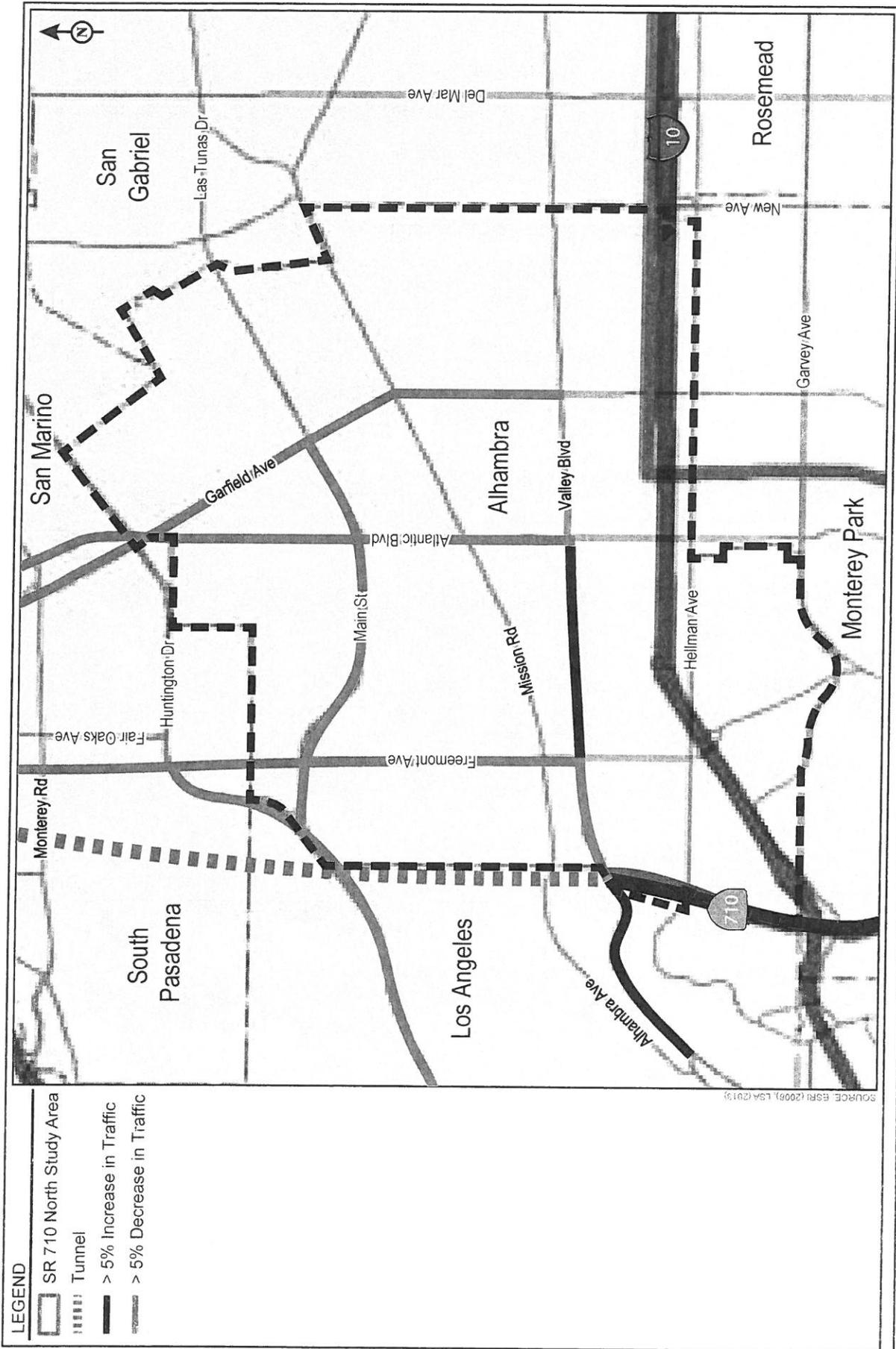
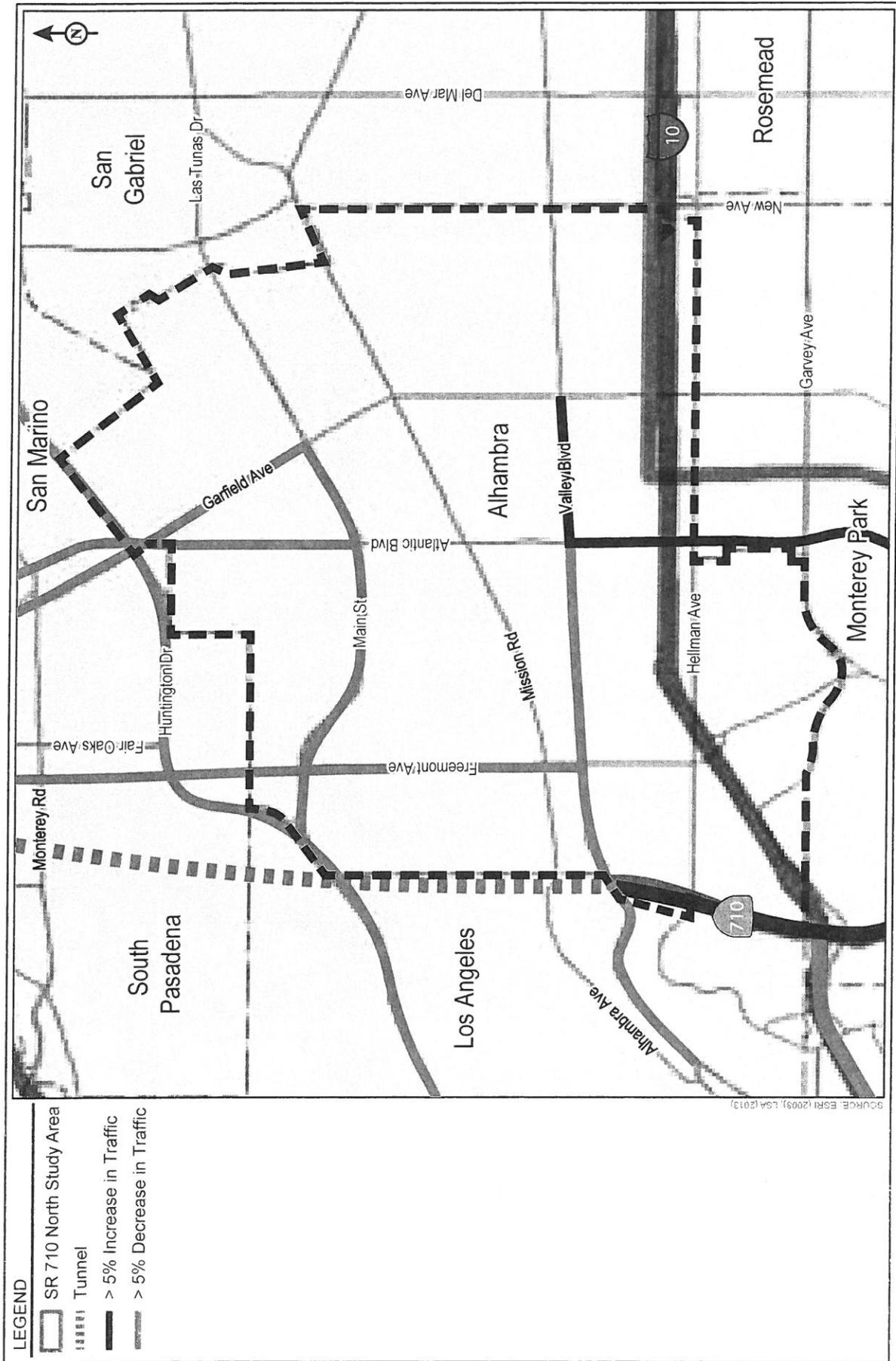


FIGURE
7A

2035 AVERAGE DAILY TRAFFIC
TUNNEL VS TSM/TDM

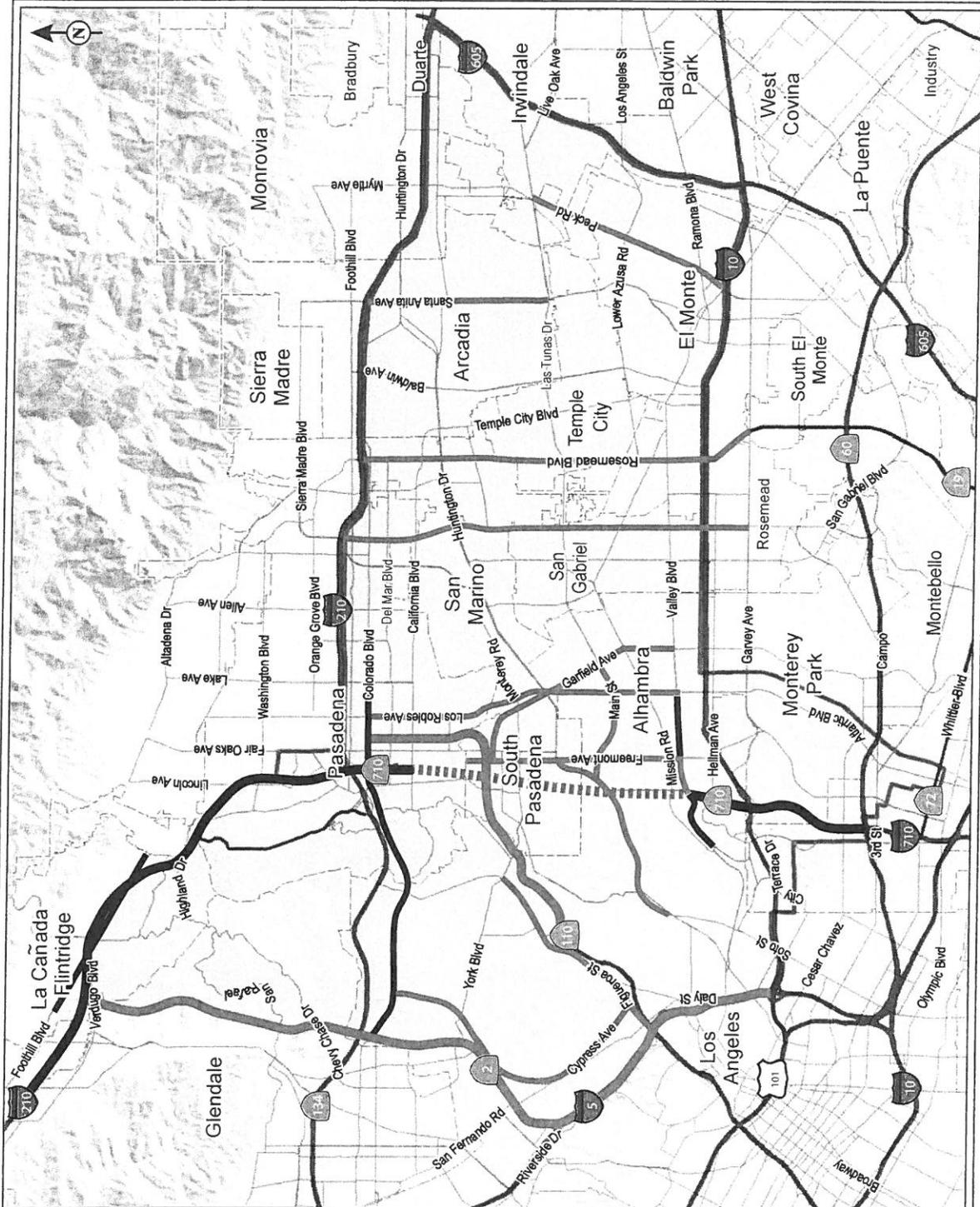


2035 TRUCK TRAFFIC TUNNEL VS TSM/TDM

FIGURE 7B

9SOURCE: ESRI (2009), USA (2013)

- LEGEND**
- SR 710 North Study Area
 - Tunnel
 - > 5% Increase in Traffic
 - > 5% Decrease in Traffic

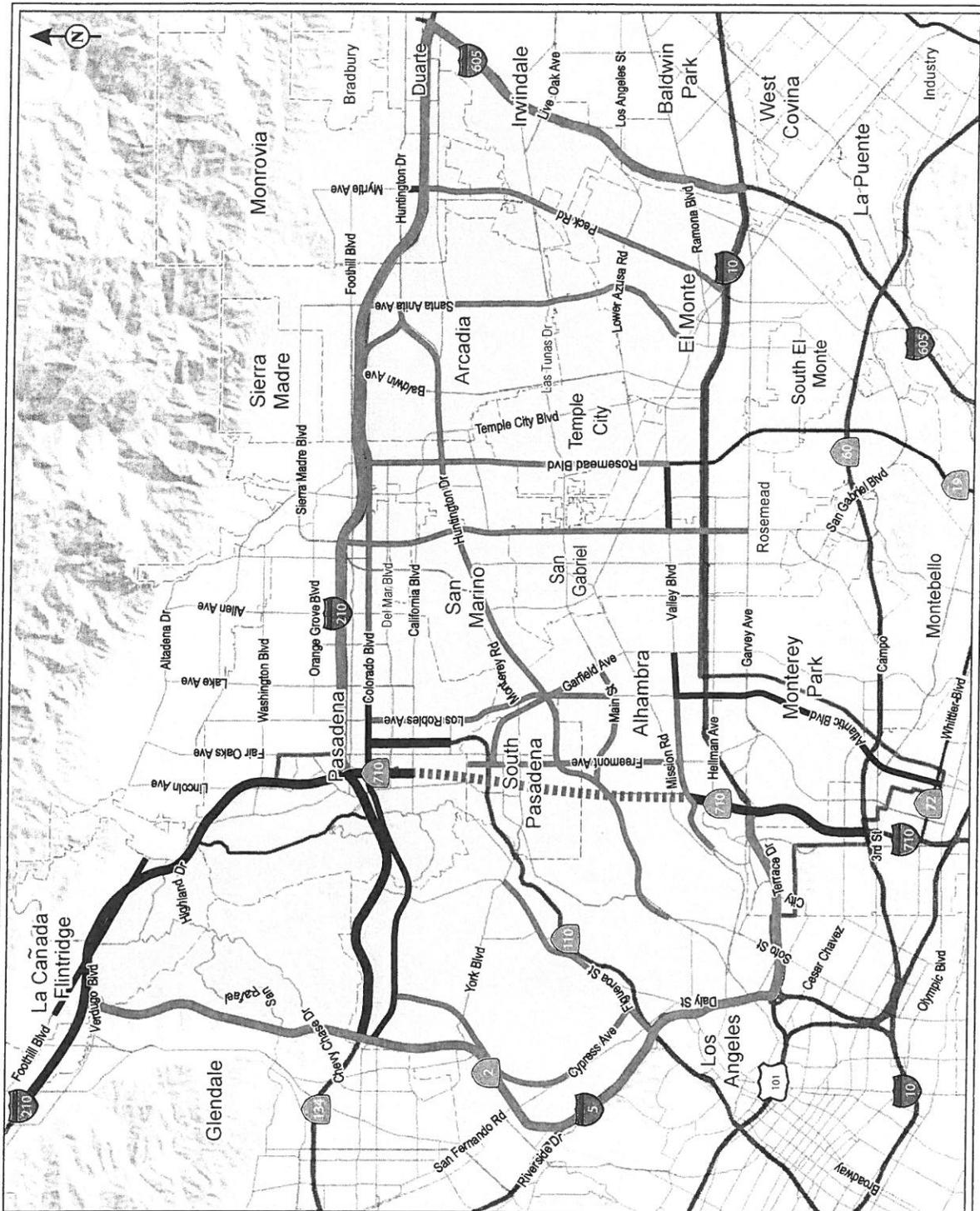


SOURCE: ESRI (2009), LSC (2013)

2035 AVERAGE DAILY TRAFFIC TUNNEL VS TSM/TDM

FIGURE 8A

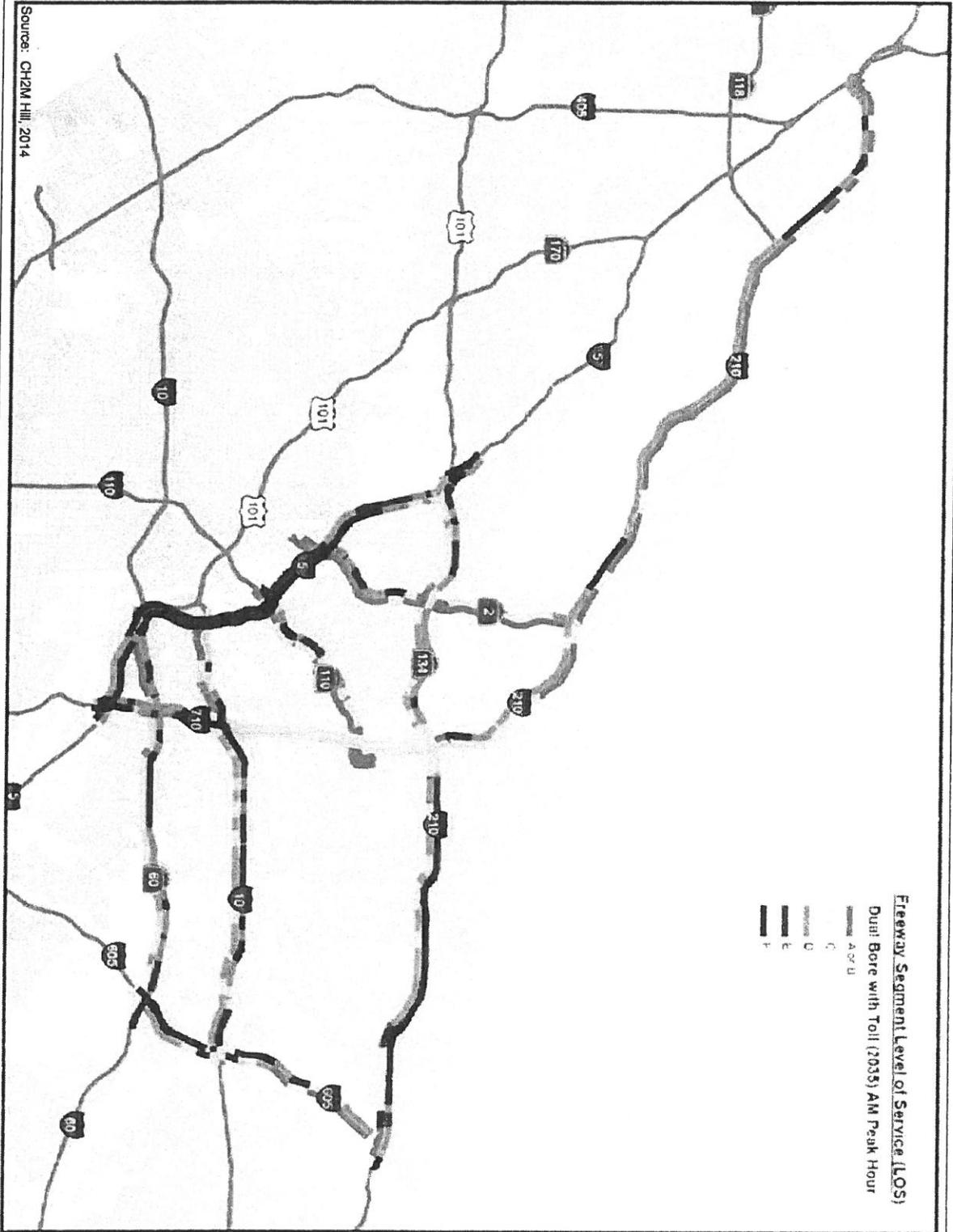
- LEGEND**
- SR 710 North Study Area
 - Tunnel
 - > 5% Increase in Traffic
 - > 5% Decrease in Traffic



SOURCE: ESRI (2009), LSA (2013)

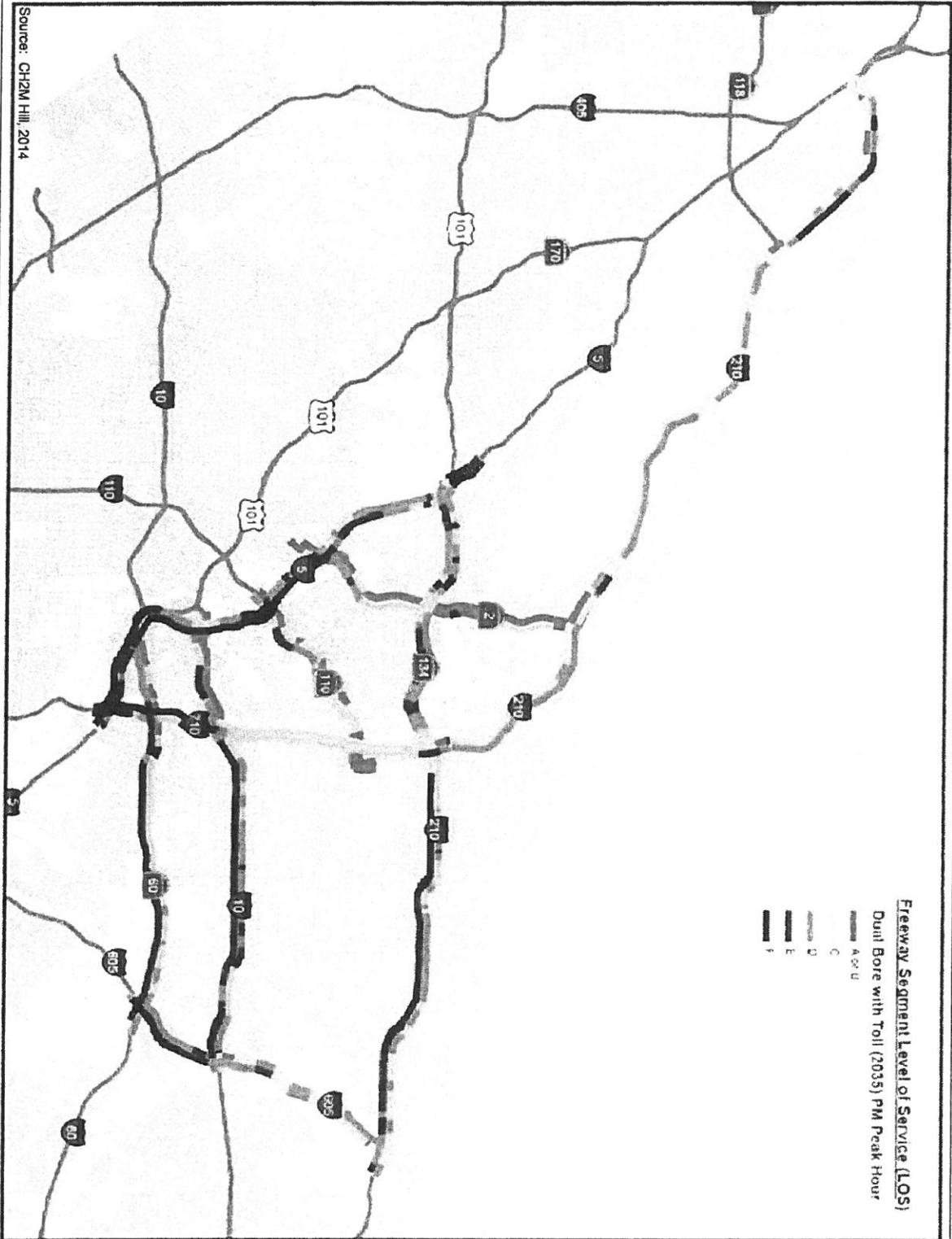
2035 TRUCK TRAFFIC
TUNNEL VS TSM/TDM

FIGURE
8B



2035 FREEWAY LOS -- AM PEAK HOUR -- TUNNEL

FIGURE
9A



2035 FREEWAY LOS -- PM PEAK HOUR -- TUNNEL

FIGURE
9B

TABLE 1
HORIZON YEAR (2035) SYSTEM AND ROADWAY PERFORMANCE MEASURES BY ALTERNATIVE

| Performance Measure | No Build | | TSM/TDM | | BRT | | LRT | | Tunnel | | |
|------------------------------------|-----------|---|-----------|-------|--------|-----------|--------|--------|-----------|--------|--------|
| | Value | % | Value | + / - | Value | + / - | Value | + / - | Value | + / - | |
| Regional VMT/VHT [a] | | | | | | | | | | | |
| Daily VMT | 471,435 | | 471,485 | 50 | 0.01% | 471,450 | 15 | 0.00% | 471,320 | -115 | -0.02% |
| Daily VHT | 12,107 | | 12,106 | -1 | -0.01% | 12,103 | -4 | -0.03% | 12,118 | 11 | 0.09% |
| Combined AM and PM Peak Period VMT | 190,110 | | 190,140 | 30 | 0.02% | 190,120 | 10 | 0.01% | 190,175 | 65 | 0.03% |
| Combined AM and PM Peak Period VHT | 4,985 | | 4,985 | 0 | 0.00% | 4,984 | -1 | -0.02% | 4,999 | 14 | 0.28% |
| Study Area VMT/VHT [a] | | | | | | | | | | | |
| Daily VMT | 25,120 | | 25,190 | 70 | 0.28% | 25,170 | 50 | 0.20% | 25,160 | 40 | 0.16% |
| Daily VHT | 706 | | 702 | -4 | -0.57% | 702 | -4 | -0.57% | 706 | 0 | 0.00% |
| Combined AM and PM Peak Period VMT | 10,320 | | 10,350 | 30 | 0.29% | 10,340 | 20 | 0.19% | 10,345 | 25 | 0.24% |
| Combined AM and PM Peak Period VHT | 291 | | 290 | -1 | -0.34% | 290 | -1 | -0.34% | 292 | 1 | 0.34% |
| Daily Person Throughput [b] | | | | | | | | | | | |
| Total Person Trips | 3,210,000 | | 3,218,000 | 8,000 | 0.25% | 3,225,000 | 15,000 | 0.47% | 3,223,000 | 13,000 | 0.40% |
| | | | | | | | | | 3,298,000 | 88,000 | 2.74% |

Notes:

Source: Table 3.5.11 from SR 710 North Study EIR/EIS, California Department of Transportation and Los Angeles County Metropolitan Transportation Authority, March 2014.
Change in value / % change calculated from No Build alternative.

[a] Vehicle Miles Travelled (VMT)/ Vehicle Hours Travelled (VHT) values are expressed as 1,000's.

[b] Daily Person Throughput are daily person trips on East-West Screenline for Autos and Transit.

[c] Daily Traffic Volumes are vehicles crossing the East-West screenline in the Study Area.

TABLE 2
HORIZON YEAR (2035) SYSTEM AND ROADWAY PERFORMANCE MEASURES BY ALTERNATIVE

| Performance Measure | No Build | | TSM/TDM | | BRT | | LRT | | Tunnel | |
|---|-----------|--------|-----------|--------|---------|--------|-----------|--------|-----------|--------|
| | Value | % | Value | % | Value | % | Value | % | Value | % |
| Daily Traffic Volumes | | | | | | | | | | |
| Arterials Crossing East-West Screenlines | 881,000 | 1.02% | 890,000 | 1.02% | 10,000 | 1.14% | 890,000 | 1.02% | 800,000 | -9.19% |
| Freeways Crossing East-West Screenlines | 1,042,000 | -0.29% | 1,039,000 | -0.29% | -3,000 | -0.29% | 1,040,000 | -0.19% | 1,178,000 | 13.05% |
| Traffic Diversion to Local Arterials | | | | | | | | | | |
| Daily Study Area VMT on Arterials | 1,923,000 | 0.31% | 1,929,000 | 0.31% | 7,000 | 0.36% | 1,930,000 | 0.36% | 1,978,000 | 2.86% |
| | 8,180,000 | 0.00% | 8,180,000 | 0.00% | -10,000 | -0.12% | 8,220,000 | 0.49% | 7,655,000 | -6.42% |

Notes:

Source: Table 4.5 from SR 710 North Study EIR/EIS, California Department of Transportation and Los Angeles County Metropolitan Transportation Authority, March 2014.

TABLE 3
HORIZON YEAR (2035) TRANSIT PERFORMANCE BY ALTERNATIVE

| Performance Measure | No Build | TSM/TDM | BRT | LRT | Tunnel |
|--|----------|---------|---------|---------|---------|
| New Transit Trips Change in Total Daily Linked Transit Trips in the SCAG Region | -- | 11,250 | 13,500 | 15,350 | 10,300 |
| Transit Mode Share Study Area Mode Share | 4.20% | 4.20% | 4.30% | 4.30% | 4.20% |
| North-South Transit Throughput Daily Person Trips by Transit Crossing East-West Screenline | 209,000 | 211,000 | 215,000 | 214,000 | 212,000 |
| Transit Accessibility Percent of Study Area Population and Employment within 0.25 Mile of High Frequency Service | 80.60% | 80.60% | 80.60% | 80.70% | 80.60% |

Notes:

Source: Table 4-10 from SR 710 North Study EIR/EIS, California Department of Transportation and Los Angeles County Metropolitan Transportation Authority, March 2014.

TABLE 4
PARKING LOSS SUMMARY

| City | Weekday AM/PM Peak Period Parking Loss [a] | | | | Permanent Parking Loss [b] | | | |
|----------------------|--|-------|-----|------------------|----------------------------|-----|-----|------------------|
| | TSM/TDM | BRT | LRT | Dual Bore w/Toil | TSM/TDM | BRT | LRT | Dual Bore w/Toil |
| Los Angeles/Alhambra | 0 | - | 0 | 0 | 135 | - | 0 | 0 |
| Los Angeles | 0 | 118 | 0 | 0 | 0 | 4 | 0 | 0 |
| San Gabriel | 0 | 0 | 0 | 0 | 18 | 0 | 0 | 0 |
| San Marino | 0 | 0 | 0 | 0 | 40 | 0 | 0 | 0 |
| Monterey Park | 0 | 417 | 0 | 0 | 0 | 23 | 0 | 0 |
| Alhambra | 26 | 28 | 0 | 0 | 2 | 16 | 0 | 0 |
| South Pasadena | 0 | 394 | 0 | 0 | 25 | 27 | 4 | 0 |
| Pasadena | 0 | 90 | 0 | 0 | 0 | 26 | 0 | 0 |
| Total | 26 | 1,047 | 0 | 0 | 220 | 96 | 4 | 0 |

Notes:

Source: Tables 6-2, 6-5, and 6-7 in SR 710 North Study EIR/EIS Transportation Technical Report, California Department of Transportation and Los Angeles County Metropolitan Transportation Authority, November 2014.

[a] Permanent parking loss during weekday AM and PM peak periods (estimated to be 7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM). Parking will be available off-peak hours.

[b] Permanent parking loss due to final implementation of project. It has been assumed that this loss will not be restored after completion of project.

| Selected Facility | Start | End | No Build (2035) | | TSM/TDM (2035) | | LRT (2035) | | BRT (2035) | | Dual Bore w/Toll (2035) | |
|-------------------|----------------------------|---------------------------|-----------------|-----------|----------------|-----------|------------|-----------|------------|-----------|-------------------------|-----------|
| | | | ADT | Truck ADT | ADT | Truck ADT | ADT | Truck ADT | ADT | Truck ADT | ADT | Truck ADT |
| Freeways | | | | | | | | | | | | |
| I-210 | I-210/1605 IC West | Rosemead Bl | 295,814 | 38,555 | 294,679 | 38,502 | 296,000 | 38,299 | 294,664 | 38,461 | 288,219 | 36,100 |
| | Rosemead Bl | San Gabriel Bl | 335,022 | 39,350 | 334,241 | 39,290 | 335,339 | 39,068 | 334,030 | 39,252 | 325,990 | 36,807 |
| | San Gabriel Bl | I-210/I-710 IC East | 361,358 | 39,629 | 360,719 | 39,599 | 361,593 | 39,266 | 360,632 | 39,568 | 355,734 | 37,220 |
| | I-210/I-710 IC East | I-210/I-710 IC Mid | 263,492 | 22,591 | 263,374 | 22,587 | 264,836 | 22,408 | 263,531 | 22,552 | 268,834 | 21,791 |
| | I-210/I-710 IC Mid | I-210/I-710 IC North | 50,507 | 941 | 52,553 | 1,102 | 51,594 | 1,024 | 52,695 | 1,119 | 101,808 | 9,233 |
| | I-210/I-710 IC North | Lincoln Av | 170,808 | 20,388 | 172,426 | 20,531 | 171,474 | 20,377 | 172,266 | 20,505 | 205,905 | 26,318 |
| | Lincoln Av | SR 2 | 162,521 | 20,231 | 163,400 | 20,299 | 163,078 | 20,183 | 163,295 | 20,277 | 189,675 | 25,939 |
| | SR 2 | La Crescenta Bl | 162,495 | 21,605 | 162,457 | 21,599 | 162,763 | 21,362 | 162,375 | 21,624 | 180,065 | 25,971 |
| SR 2 | I-210/SR 2 | SR 2/SR 134 IC North | 99,364 | 7,598 | 97,908 | 7,433 | 98,871 | 7,123 | 97,909 | 7,543 | 81,144 | 4,373 |
| | SR 2/SR 134 IC South | SR 2/I-5 IC North | 190,492 | 13,717 | 189,176 | 13,589 | 190,027 | 13,043 | 188,962 | 13,694 | 168,397 | 8,932 |
| I-5 | I-5/SR-2 IC South | I-5/SR 110 IC North | 291,456 | 31,923 | 290,952 | 31,746 | 291,013 | 32,248 | 290,892 | 31,544 | 285,228 | 27,509 |
| | I-5/SR 110 IC South | I-5/I-10 IC North | 306,629 | 34,394 | 306,060 | 34,444 | 306,452 | 34,831 | 306,030 | 34,116 | 293,340 | 29,549 |
| | I-5/I-10 IC South | E Cesar Chavez Av | 290,538 | 27,172 | 289,925 | 28,562 | 290,731 | 28,165 | 290,789 | 27,542 | 289,392 | 29,604 |
| SR 134 | SR 134/I-210/SR 710 IC | N Figueroa St | 285,947 | 21,157 | 286,554 | 21,174 | 287,992 | 20,954 | 285,768 | 21,094 | 291,750 | 22,672 |
| | N Figueroa St | SR 134/SR 2 IC East | 288,237 | 21,138 | 287,968 | 21,130 | 289,538 | 20,911 | 288,055 | 21,047 | 293,331 | 22,765 |
| SR 710 | SR 710/I-210 IC Mid | SR 710/I-210 IC South | 50,507 | 941 | 52,553 | 1,102 | 51,594 | 1,024 | 52,695 | 1,119 | 101,808 | 9,233 |
| | SR 710 North Portal | SR 710 South Portal | - | - | - | - | - | - | - | - | 169,501 | 13,206 |
| | SR 710 South Portal | SR 710/I-10 IC North | 61,191 | 2,215 | 100,798 | 3,473 | 64,233 | 2,366 | 69,240 | 3,486 | 194,140 | 14,249 |
| | SR 710/I-10 IC South | SR 710/SR 60 IC | 166,381 | 13,775 | 174,491 | 12,314 | 167,906 | 12,894 | 173,758 | 13,496 | 195,251 | 14,768 |
| I-10 | I-10/I-5 IC East | I-10/I-710 IC West | 311,759 | 22,203 | 313,585 | 20,659 | 309,157 | 21,292 | 312,800 | 21,401 | 306,747 | 15,518 |
| | I-10/I-710 IC West | I-10/I-710 IC East | 240,281 | 13,376 | 238,612 | 13,002 | 236,459 | 13,116 | 238,114 | 13,267 | 235,516 | 12,690 |
| | I-10/I-710 IC East | Rosemead Bl | 302,894 | 15,822 | 300,865 | 15,874 | 298,867 | 15,861 | 300,818 | 15,865 | 305,459 | 15,903 |
| | Rosemead Bl | I-10/I-605 IC West | 256,382 | 14,872 | 257,092 | 14,966 | 250,355 | 14,855 | 257,067 | 14,926 | 260,709 | 14,903 |
| I-605 | I-605/I-210 IC South | Los Angeles St | 153,766 | 24,114 | 152,799 | 24,170 | 153,824 | 23,870 | 153,270 | 24,221 | 148,675 | 22,552 |
| | Los Angeles St | I-605/I-10 IC North | 185,228 | 26,252 | 184,323 | 26,343 | 185,460 | 26,033 | 184,840 | 26,395 | 180,360 | 24,757 |
| SR 110 | Glenarm St | S Avenue 52 | 101,431 | 0 | 100,861 | 0 | 101,470 | 0 | 100,711 | 0 | 94,806 | 0 |
| | S Avenue 52 | SR 110/I-5 IC North | 154,974 | 0 | 153,427 | 0 | 155,187 | 0 | 153,539 | 0 | 147,050 | 0 |
| Arterials | | | | | | | | | | | | |
| Colorado Bl | Verdugo Rd | N Figueroa St | 26,094 | 269 | 26,263 | 270 | 26,486 | 283 | 26,246 | 282 | 28,955 | 335 |
| | N Figueroa St | N Lake Av | 10,345 | 156 | 10,349 | 151 | 10,539 | 154 | 10,373 | 148 | 12,395 | 186 |
| | N Lake Av | N Hill Av | 8,782 | 0 | 8,692 | 0 | 9,012 | 0 | 9,036 | 0 | 6,683 | 0 |
| | N Hill Av | San Gabriel Bl | 10,766 | 76 | 10,645 | 64 | 10,913 | 73 | 10,707 | 66 | 8,060 | 46 |
| | San Gabriel Bl | Rosemead Bl | 9,627 | 64 | 9,355 | 65 | 9,686 | 79 | 9,364 | 68 | 6,330 | 46 |
| | Rosemead Bl | Huntington Dr | 16,281 | 183 | 15,850 | 177 | 16,353 | 195 | 15,764 | 177 | 12,863 | 112 |
| Huntington Dr | Crestfield Dr | Santa Anita Av | 21,660 | 391 | 21,531 | 387 | 21,864 | 397 | 21,544 | 385 | 20,749 | 379 |
| | Santa Anita Av | Rosemead Bl | 40,766 | 823 | 41,677 | 813 | 41,856 | 854 | 41,675 | 813 | 41,316 | 705 |
| | Rosemead Bl | San Gabriel Bl | 50,394 | 1,174 | 52,820 | 1,214 | 52,557 | 1,285 | 52,792 | 1,230 | 53,818 | 1,128 |
| | San Gabriel Bl | Garfield Av | 55,824 | 740 | 59,541 | 766 | 58,894 | 780 | 59,661 | 783 | 56,224 | 691 |
| | Garfield Av | Fremont Av | 49,744 | 866 | 48,400 | 891 | 49,266 | 910 | 48,603 | 899 | 46,139 | 793 |
| | Fremont Av | Eastern Av | 59,511 | 1,128 | 59,929 | 1,208 | 58,870 | 1,197 | 59,954 | 1,203 | 47,418 | 838 |
| | Eastern Av | N Mission Rd | 42,645 | 737 | 41,844 | 724 | 42,394 | 750 | 42,087 | 693 | 37,850 | 685 |
| N Broadway | Huntington Dr/N Mission Rd | Avenue 20 San Fernando Rd | 40,930 | 449 | 39,379 | 444 | 40,601 | 467 | 39,546 | 427 | 38,684 | 425 |
| E Live Oak Av | Commerce Dr | Peck Rd | 36,971 | 1,107 | 36,710 | 1,061 | 36,977 | 1,079 | 36,676 | 1,100 | 36,216 | 1,078 |
| | Peck Rd | Santa Anita Av | 24,229 | 401 | 23,913 | 363 | 24,388 | 399 | 23,915 | 361 | 23,556 | 360 |
| Las Tunas Dr | Santa Anita Av | Rosemead Bl | 18,918 | 272 | 18,502 | 237 | 18,855 | 273 | 18,512 | 233 | 18,611 | 226 |
| | Rosemead Bl | Garfield Av | 24,440 | 271 | 23,945 | 243 | 24,081 | 271 | 23,977 | 241 | 23,628 | 239 |
| | Garfield Av | Palm Av | 21,591 | 222 | 21,704 | 237 | 21,656 | 223 | 21,565 | 253 | 18,126 | 171 |
| | Palm Av | Huntington Dr | 23,941 | 414 | 24,269 | 499 | 23,274 | 443 | 24,352 | 499 | 17,285 | 267 |
| Valley Bl | I-605 | Santa Anita Av | 40,306 | 622 | 40,156 | 625 | 40,671 | 619 | 40,131 | 617 | 39,976 | 617 |
| | Santa Anita Av | Rosemead Bl | 32,294 | 406 | 30,252 | 391 | 30,723 | 396 | 30,277 | 390 | 29,830 | 379 |
| | Rosemead Bl | San Gabriel Bl | 27,019 | 210 | 27,750 | 249 | 28,299 | 255 | 27,766 | 250 | 27,903 | 280 |
| | San Gabriel Bl | Garfield Av | 20,725 | 133 | 20,717 | 137 | 20,595 | 133 | 20,684 | 139 | 21,418 | 136 |
| | Garfield Av | Atlantic Bl | 11,373 | 80 | 11,328 | 82 | 11,396 | 82 | 11,330 | 81 | 13,559 | 109 |
| | Atlantic Bl | Fremont Av | 13,685 | 179 | 12,473 | 124 | 13,339 | 171 | 12,592 | 132 | 15,935 | 115 |
| | Fremont Av | SR 710 Ramps | 52,842 | 1,677 | 50,788 | 1,487 | 56,695 | 1,877 | 50,958 | 1,606 | 31,931 | 988 |
| | SR 710 Ramps | N Mission Rd | 16,497 | 559 | 8,317 | 293 | 16,191 | 534 | 8,503 | 299 | 9,097 | 114 |
| Myrtle Av | Colorado Bl | I-210 | 15,869 | 264 | 15,736 | 263 | 15,645 | 258 | 15,799 | 263 | 15,358 | 286 |
| | I-210 | Live Oak Av | 32,664 | 737 | 32,395 | 742 | 32,368 | 736 | 32,363 | 735 | 30,888 | 689 |
| | Live Oak Av | Valley Bl | 28,328 | 505 | 27,729 | 504 | 27,783 | 501 | 27,727 | 507 | 25,737 | 436 |
| | Valley Bl | Garvey Av | 41,349 | 485 | 41,080 | 477 | 41,340 | 489 | 41,062 | 478 | 41,166 | 495 |
| Santa Anita Av | Colorado Bl | Las Tunas Dr | 26,373 | 461 | 26,133 | 450 | 26,436 | 443 | 26,164 | 436 | 24,362 | 350 |
| | Las Tunas Dr | Valley Bl | 29,317 | 506 | 28,952 | 491 | 29,108 | 491 | 28,933 | 480 | 27,889 | 473 |
| | Valley Bl | Garvey Av | 42,010 | 1,415 | 40,795 | 1,377 | 40,271 | 1,370 | 40,827 | 1,381 | 39,030 | 1,360 |
| Rosemead Bl | Orange Grove Bl | Huntington Dr | 34,413 | 514 | 34,592 | 519 | 34,698 | 504 | 34,601 | 513 | 31,506 | 454 |
| | Huntington Dr | Las Tunas Dr | 35,803 | 730 | 36,344 | 744 | 36,592 | 758 | 36,382 | 761 | 31,568 | 616 |
| | Las Tunas Dr | Valley Bl | 45,415 | 839 | 45,136 | 843 | 45,107 | 835 | 45,103 | 835 | 46,681 | 848 |
| | Valley Bl | Garvey Av | 66,999 | 1,422 | 72,378 | 1,508 | 72,728 | 1,552 | 72,449 | 1,512 | 68,135 | 1,513 |
| San Gabriel Bl | I-210 | Huntington Dr | 32,612 | 876 | 32,472 | 863 | 32,437 | 879 | 32,487 | 894 | 27,824 | 650 |
| | Huntington Dr | Las Tunas Dr | 45,013 | 731 | 44,245 | 736 | 44,507 | 752 | 44,246 | 763 | 40,186 | 602 |
| | Las Tunas Dr | Valley Bl | 41,367 | 614 | 39,636 | 603 | 40,364 | 638 | 39,664 | 635 | 36,422 | 475 |
| | Valley Bl | Garvey Av | 39,943 | 638 | 38,451 | 601 | 38,918 | 623 | 38,549 | 633 | 36,383 | 557 |
| Fremont Av | Valley Bl | Huntington Dr | 50,265 | 1,431 | 53,047 | 1,515 | 52,908 | 1,580 | 52,988 | 1,589 | 37,958 | 1,251 |
| | Huntington Dr | Garfield Av | 25,638 | 555 | 29,985 | 650 | 29,435 | 682 | 29,904 | 661 | 23,619 | 403 |
| | Garfield Av | Columbia St | 24,052 | 608 | 25,325 | 630 | 24,947 | 647 | 25,271 | 652 | 18,161 | 343 |
| | Columbia St | Huntington Dr | 12,429 | 37 | 13,246 | 34 | 12,212 | 30 | 13,423 | 33 | 12,491 | 18 |
| Garfield Av | Fremont Av | Huntington Dr | 47,543 | 437 | 47,716 | 444 | 47,824 | 453 | 47,742 | 473 | 42,950 | 372 |
| | Huntington Dr | W Main St | 43,893 | 441 | 43,319 | 407 | 44,206 | 461 | 43,234 | 445 | 39,830 | 408 |
| | W Main St | Valley Bl | 43,893 | 441 | 43,319 | 407 | 44,206 | 461 | 43,234 | 445 | 39,830 | 408 |
| N Atlantic Bl | Huntington Dr | Main St | 45,634 | 654 | 47,236 | 688 | 46,475 | 720 | 47,633 | 740 | 36,948 | 522 |
| | Main St | Valley Bl | 53,439 | 917 | 51,976 | 819 | 53,256 | 965 | 52,469 | 869 | 47,918 | 812 |
| | Valley Bl | I-10 | 50,915 | 859 | 50,169 | 810 | 52,977 | 923 | 50,549 | 858 | 50,726 | 895 |
| | I-10 | SR 60 | 40,267 | 548 | 39,862 | 539 | 40,211 | 556 | 38,751 | 551 | 40,368 | 633 |
| | SR 60 | Whittier Bl | 41,565 | 809 | 41,128 | 818 | 41,600 | 805 | 41,460 | 833 | 42,124 | 869 |
| S Arroyo Pkwy | Colorado Bl | Glenarm St | 55,371 | 322 | 55,050 | 319 | 54,418 | 317 | 54,333 | | | |

ATTACHMENT B

to

City of Alhambra Comment Letter 8-5-15

State Route 710 (SR 710) Draft Environmental Impact Report and Draft Environmental Impact Statement (DEIR/EIS) Air Quality and Health Risks Impacts Review prepared by Ramboll Environ

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Dr. Julia Lester has over 21 years of experience in environmental services. She joined ENVIRON in August 2004, after over 14 years at the South Coast Air Quality Management District (SCAQMD). She has substantial expertise in air quality planning and analysis, including emission inventory assessment, air quality modeling, health risk analysis and control strategy development, assessment and implementation. Her experience has given her a broad understanding of air regulatory issues for ports; transportation goods movement project proponents; sanitation and wastewater utilities; biomass conversion and waste-to-energy facilities; crop and animal agriculture; fugitive dust planning agencies; and agencies/industries with specialized air regulatory challenges. She has provided permitting and compliance assistance to numerous facilities subject to air agency regulations, including Title V facilities. She is a SCAQMD-certified permitting professional and a San Joaquin Valley Air Pollution Control District-certified air permitting professional. Julia has conducted regulatory negotiations with many air agencies, and has supported clients in litigation, before city councils and in other public forums. She has a PhD and an MS in chemical engineering from the California Institute of Technology, and a BS in chemical engineering from Purdue University.

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MEMO

Date **July 10, 2015**
 To **Leland Dolley**
 From **Julia Lester, Ramboll Environ**
 Subject **State Route 710 (SR710) Draft Environmental Impact Report and Draft Environmental Impact Statement (DEIR/DEIS) Air Quality and Health Risk Impacts Review**

Per your request, Ramboll Environ has reviewed the Air Quality and Health Risk sections of the SR710 DEIR/DEIS.¹ Ramboll Environ's key comments are included below in this cover Memorandum.

Only the Dual-Bore Freeway Tunnel Alternatives, compared to the other alternatives or doing nothing, will enhance expected future air quality and health risk benefits to the traditionally impacted cities in the southern part the SR710 Gap (Alhambra, El Sereno, and Monterey Park). Areas north of the SR710 Gap, which have lower current cancer risk from air pollution, will have lower future cancer risk even with the Dual-Bore Tunnel Alternative. The Dual-Bore Freeway Tunnel Alternative also reduces emission-related travel miles on the SR2, I5, and SR110 and on local arterials in Pasadena, South Pasadena, Alhambra, and other communities in the San Gabriel Valley. Other alternatives, particularly the Bus Rapid Transit and Light-Rail Transit Alternatives (BRT and LRT Alternatives, respectively), generally have no effect or retard air quality and health risk improvements in the heavily-impacted greater Alhambra / San Gabriel area. In addition, only the Tolled, Dual-bore Freeway Tunnel Alternative is in the adopted 2012 Regional Transportation Plan / Sustainable Communities Strategies (2012 RTP/SCS) and thus, meets regional transportation air quality conformity requirements.

Date July 10, 2015

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¹ http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/

KEY COMMENTS

A. *The Air Quality and Health Risk Assessment meets or exceeds Caltrans standard environmental requirements and the current state-of-the-practice for large-scale transportation projects.*

Ramboll Environ reviewed several DEIR/DEIS, with a more detailed review of the following DEIR/DEIS documents:

- DEIR/DEIS Volume 1, Section 3.2
- Air Quality Assessment Report (January 2015)^{2,3}
- Health Risk Assessment (November 2014)^{4,5}

Chapter 11 of the Caltrans Standard Environmental Reference (SER)⁶ describes “the regulatory framework and recommended procedures for performing an air quality analysis for both Caltrans and local agency transportation projects.”⁷ The DEIR/DEIS includes the standard assessments required the SER, consistent with the recommended procedures. In addition, the DEIR/DEIS includes a Health Risk Assessment that goes beyond the SER requirements. The analyses in the Health Risk Assessment is consistent with the current state-of-the-practice for large-scale transportation projects, such as terminal projects at the San Pedro Bay ports and the I710 Corridor Project. As noted in the DEIR/DEIS (page 3.13-14), only the Tolled, Dual-bore Freeway Tunnel Alternative is in the adopted 2012 Regional Transportation Plan / Sustainable Communities Strategies (2012 RTP/SCS) and thus, meets regional transportation air quality conformity requirements.

B. *The FEIR should emphasize the long-standing and current health risk disparity (greater risk in Alhambra and nearby communities compared to areas to the north of the SR710 gap, where risk levels are 20 to 50% lower) exists, in part, because of the SR710 gap and that only a Tunnel alternative further reduces (although it does not eliminate) that disparity while risks in areas around and north of the SR710 Gap still decrease in the future.*

² SR710 DEIR/DEIS. Air Quality Assessment Report. Volume 1. January 2015.
http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Air%20Quality%20Analysis/SR%20710%20Air%20Quality%20Analysis%20Vol%20I.pdf

³ SR710 DEIR/DEIS. Air Quality Assessment Report. Volume 2. January 2015.
http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Air%20Quality%20Analysis/SR%20710%20Air%20Quality%20Analysis%20Vol%202.pdf

⁴ SR710 DEIR/DEIS. Health Risk Assessment. Volume 1. November 2014.
http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Health%20Risk%20Assessment/SR%20710%20Health%20Risk%20Assessment%20Vol%20I.pdf

⁵ SR710 DEIR/DEIS Health Risk Assessment. Volume 1. November 2014.
http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Health%20Risk%20Assessment/SR%20710%20Health%20Risk%20Assessment%20Vol%202.pdf

⁶ <http://www.dot.ca.gov/ser/vol1/sec3/physical/ch11air/chap11.htm>

⁷ Ibid

The Final EIR/EIS should describe:

- The higher cancer risk now in the southern end of the SR710 Gap compared to areas north of the SR710 Gap
- Fleet turnover for cars and trucks will reduce cancer risk for **ALL** alternatives and **ALL** areas in the Study Area, including the Tunnel Alternative for the northern cities (e.g., Pasadena, La Canada/Flintridge)
- That only Tunnel alternatives reduce the relative risk differential due, in part, to the SR710 Gap and that the Transportation System Management / Transportation Demand Management (TSM/TDM), bus (BRT), and light rail (LRT) alternatives do not address this higher relative risk at all
- The latest Office of the Environmental Health Hazard Assessment (OEHA) exacerbates the risk differential, accentuating the need for the Tunnel Alternative to reduce that decades-old risk differential

South SR710 Gap communities have the greatest existing cancer risk: The Multiple Air Toxics Exposure Study (MATES) IV recently completed by the South Coast Air Quality Management District (AQMD) has shown that cities near the southern SR710 stub (Alhambra, El Sereno, Monterey Park and East Los Angeles) have greater levels of air pollution cancer risk compared to other Study Area cities.⁸ The following table shows that the southern SR710 stub cities have 2012 cancer risks that range from 50 to 290 in a million greater than the cities in and north of the gap.

| Locations in Study Area | Cancer Risk (in a Million) | Compared to Alhambra | % Difference |
|--------------------------------------|----------------------------|----------------------|--------------|
| La Canada/Flintridge | 280 | -280 | -50% |
| Pasadena (Northern Termini) | 460 | -100 | -18% |
| South Pasadena | 380 | -180 | -32% |
| Alhambra (Southern Termini / Valley) | 560 | 0 | 0% |
| El Sereno | 510 | -50 | -9% |
| Monterey Park | 520 | -40 | -7% |
| East LA | 570 | 10 | 2% |

Note: Figure 1 of this Memorandum is the MATES IV interactive map and 2012/2013 cancer risk values for selected locations in the general Study Area.

⁸ Values taken from the MATES IV interactive map at <http://www3.aqmd.gov/webappl/OI.Web/OI.aspx?jurisdictionID=AQMD.gov&shareID=73f55d6b-82cc-4c41-b779-4c48c9a8b15b>

All Cities in the Study Area will have lower air pollution levels and air-related cancer risk in 2020 and beyond: The DEIR Air Quality Assessment Report (AQAR) shows that criteria pollutant emissions will decrease from the 2012 base year to 2020 and 2025 (AQAR Table 5-11). Based on Figures 3-1 through 3-10 in the SR710 DEIR Health Risk Assessment (HRA) Report, cancer risk in all cities in the Study Area will decrease 50 to 350 in a million, with the greatest decreases along freeways with the most truck traffic (i.e., I5 from the I10 to SR2; I210 from the I605 through Pasadena to SR2; I10; and I605). Even in the worst case (dual-bore tunnel with toll and trucks), cancer risk is reduced from current 2012 levels everywhere in the Study Area (HRA Figure 3-8). Even by the North Portal in Pasadena, cancer risk is 10 to over 300 in a million lower than current levels even with the dual-bore tunnel with toll and trucks alternative (see Figure 2 of this Memorandum).

Only the Freeway Tunnel provides large-scale decreases in cancer risk in heavily impacted cities when compared to the No-Build, BRT and LRT alternatives: Based on Figures 3-11 through 3-19 of the Health Risk Assessment, the Freeway Tunnel alternatives significantly reduce cancer risk (e.g., more than 10 in a million and in places more than 50 in a million) in the greater Alhambra / El Sereno / San Gabriel area compared to doing nothing or implementing the BRT or LRT alternatives (see Figure 3 of this Memorandum).⁹ Note that even with a Tunnel alternative that there will still be higher risk levels in communities south of the SR710 compared to those north of the SR710 (current 2012 disparity: 100 to 280 in a million; greatest benefit (dual-bored tunnel alternative) in greater Alhambra / San Gabriel area compared to No-Build: ~50 in a million).

The relative risk in the greater Alhambra areas is even greater if the latest OEHHA health risk method is used: In May 2015, OEHHA adopted a revised methodology to calculate health risks (and in particular cancer risk).¹⁰ As a rule of thumb, cancer risk due to airborne gaseous toxics and diesel particulate matter (DPM) will be estimated to be about 2.7 times greater than previous estimates.¹¹ The actual risk has not changed, but the estimates will be greater because the new method accounts for the enhanced effects during the 3rd trimester of pregnancy and young children from ages 0 to 2 years old.

⁹ http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Health%20Risk%20Assessment/SR%20710%20Health%20Risk%20Assessment%20Vol%20I.pdf

¹⁰ http://oehha.ca.gov/air/hot_spots/hotspots2015.html

¹¹ Increased cancer risk estimate projections of 2.4 to 3 times have been cited in air agency presentations and reports. 2.7 was chosen as a mid-range estimate. More information on SCAQMD's incorporation of the 2015 OEHHA methodology can be found at <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2015/2015-jun1-028.pdf?sfvrsn=9>

| Locations in Study Area | Estimated Cancer Risk based on new OEHHA method (in a Million) | Compared to Alhambra |
|--------------------------------------|--|----------------------|
| La Canada/Flintridge | 756 | -756 |
| Pasadena (Northern Termini) | 1242 | -270 |
| South Pasadena | 1026 | -486 |
| Alhambra (Southern Termini / Valley) | 1512 | 0 |
| El Sereno | 1377 | -135 |
| Monterey Park | 1404 | -108 |
| East LA | 1539 | 27 |

- C. ***The FEIR should note that only a Tunnel alternative reduces criteria and air toxic emissions on historically impacted arterials, including those in the greater Alhambra/San Gabriel communities, by reducing arterial vehicle miles travelled (VMT) by trucks and cars, and improving mobility (i.e., less stop-and-go traffic).***

The Freeway Tunnel offers more local air quality benefits (compared to the No-Build) than the BRT and LRT alternatives: Vehicles travel on freeways and local roadways. Air emissions and related impacts are generally a function of the vehicle miles travelled (VMT), with adjustments for vehicle speed, etc. Based on the average daily trip (ADT) information for freeways and local arterials in the SR710 DEIR Air Quality Assessment Report¹² and segment length information from geographic information system (GIS) databases, the VMT was calculated for certain Study Area cities (arterials, open freeways and freeway tunnel) and freeways (open and in a tunnel). Air emissions impact on local arterials and freeways, by city, can be compared for the different build alternatives (relative to the No-Build Alternative) using this VMT information.

NOTE: Overall cancer risk and most air pollution decreases in future years for all areas¹³ (see Comment A). This analysis indicates whether those decreases are retarded by the alternatives (increases compared to the future No-Build Alternative) or enhanced by the alternatives. Also, travel through the freeway tunnel must be considered separately when assessing air quality impacts because emissions from those trips will be substantially reduced by the scrubbers/filters in the ventilation systems.

¹² http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Air%20Quality%20Analysis/SR%20710%20Air%20Quality%20Analysis%20Vol%20I.pdf

¹³ DEIR Air Quality Assessment Report, Table 5-11. Note the comparisons to the existing 2012 conditions.

Local Arterials: Average Daily Trip (ADT) information for truck and total traffic on arterial road segments are presented in the AQAR Appendix D (PM Hot-Spot Analysis), including for the BRT Alternative (AQAR Appendix D Table 8), LRT Alternative (AQAR Appendix D Table 9), and Dual-Bore Tunnel with Tolls (AQAR Appendix D Table 17). VMT can be calculated by multiplying the ADT by the number of miles in the road segment.

Arterial Truck Traffic: Based on the VMT comparisons to the No-Build Alternative,¹⁴ the BRT and LRT Alternative have no appreciable impact on VMT in La Canada / Flintridge, Pasadena, South Pasadena, Alhambra, San Gabriel, and Monterey Park. The Dual-Bore Freeway Tunnel Alternative *decreases* the average arterial truck VMT in Alhambra by 17%. This would result in a proportionate reduction in the major air toxic carcinogen diesel particulate matter (DPM) in this heavily impacted (currently and in the future) community.

All Arterial Traffic: Based on the VMT comparisons to the No-Build Alternative,¹⁵ the BRT Alternative *increases* total VMT five percent on arterials through South Pasadena and San Marino. There are no appreciable changes in arterial total VMT for the LRT Alternative. For the Tolled, Dual-Bore Freeway Tunnel with Tolls Alternative, arterial VMT *decreased* for the cities of South Pasadena, Pasadena, San Gabriel, and Alhambra (-12%, -9%, -7%, and -14%, respectively) compared to the No-Build. VMT *increases* on La Canada/Flintridge arterials by 9% compared to the No-Build; note that La Canada/Flintridge has much lower levels of arterial traffic (~120,000 VMT per day compared to 457,000 in Alhambra) and is an area with lower air quality and health risk than the southern SR710 Gap cities. The following table summarizes the percentage change in all traffic VMT compared to the No-Build Alternative in select cities.

| | BRT | LRT | Dual-Bore Tunnel with Tolls |
|-------------------------------|------------|------------|--|
| La Canada / Flintridge | 0% | - | +9% |
| Pasadena | 0% | - | -9% |
| South Pasadena | +5% | +3% | -12% |
| San Gabriel | -2% | -2% | -7% |
| Alhambra | 0% | | -14% |

VMT decreases on arterials are directly related to emission reductions. If there is increased mobility on the arterials (i.e., faster average speeds), then there will be an additional emissions reduction effect (see Figure 4 of this Memorandum for example emission-speed graphs for trucks and cars). Gibson Transportation Consulting, Inc. has determined that only the Tunnel alternatives reduce traffic throughout the San Gabriel

¹⁴ VMT comparisons were made by determining the ADT for the Build and No-Build Alternatives for each segment and then multiplying by the number of miles in each segment. Percent changes in VMT were calculated, unless actual VMT was relatively small, i.e., the actual difference in VMT was less than 10,000 for all vehicles or 1,000 for trucks).

¹⁵ VMT comparisons were made by determining the ADT for the Build and No-Build Alternatives for each segment and then multiplying by the number of miles in each segment. Percent changes in VMT were calculated, unless actual VMT was relatively small, i.e., the actual difference in VMT was less than 10,000 for all vehicles or 1,000 for trucks).

Valley; thus, we would expect higher average speeds on these less congested arterials. This should enhance the emission reductions on San Gabriel Valley arterials resulting from the VMT reductions for the Dual-Bore Tunnel with Tunnel Alternative discussed above.

Arterial Summary: Only the Freeway Tunnel alternatives meaningfully enhance the overall improvements in air quality and public health that historically impacted southern SR710 Gap communities will experience. This is also true of Pasadena, South Pasadena, and San Gabriel. Reductions of emissions in La Canada/Flintridge arterials will be retarded, although the area will continue to have relatively better air quality. The BRT Alternative increases VMT on arterials in San Marino and South Pasadena, retarding future improvements in those areas.

- D. *The FEIR should note that only a Tunnel alternative can reduce emissions by reducing vehicle miles travelled and increasing mobility on several freeways (SR2, I5, and SR110) and reduce SR710 traffic emissions up to 80% or more because of the filtered/scrubbed tunnel ventilation system.***

The Freeway Tunnel is a unique opportunity for cleaner air: Mobile source emissions have historically been controlled at the tailpipe. California has the most stringent car and truck tailpipe emissions standards in the nation. Cancer risk reductions from 2012 discussed above in Comment B are a direct result of new cars and trucks replacing older and far more emitting vehicles on the road. Particulate matter, which is associated with premature mortality and morbidity impacts, comes from vehicle brake, tire wear, and road dust that cannot be reduced by tailpipe emission controls. It is for this reason that incremental increases in VMT alone CANNOT be used to imply that the Freeway Tunnel Alternatives will result in increased air quality and/or health risk impacts.

A Freeway Tunnel with the proposed control technologies (i.e., electrostatic precipitators, scrubbers), can reduce roadway emissions now, on vehicles of all model years. All particulate matter, not just tailpipe emissions, can be reduced 80% or more.¹⁶ No other alternative offers this opportunity.

Freeways in the Study Area: Based on the VMT data comparisons to the No-Build Alternative, the BRT Alternative and the LRT Alternative do not have an appreciable effect on VMT levels with the exception of an 8% increase in VMT on the freeways running through Monterey Park. For the Freeway Tunnel Alternative, it is very important to differentiate between open freeways and freeways running in an underground tunnel with ventilation systems equipped with air scrubbers / filters. Although emissions are generally a function of VMT, they are directly a function of the level of control. For example, a freeway tunnel with the minimum 80% control efficiency for particulates would have the

¹⁶ http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Tunnel%20Systems%20Report/SR710%20Tunnel%20Systems%20Report.pdf Section 5.5 and http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Health%20Risk%20Assessment/SR%20710%20Health%20Risk%20Assessment%20Vol%20I.pdf Section 2.2.2.1

same emissions as an open freeway with one-fifth of the VMT. Said another way, freeway tunnels emit over 5x less particulate emissions than a surface freeway for the same number of cars and trucks. The Dual-Bore Tunnel with Tolls has 68,000 truck VMT where the air is scrubbed/filtered and reduces open freeway truck VMT by 42,300 VMT. This would be expected to be a net air quality and public health benefit for the region. The largest truck VMT decreases in the Study Area (compared to No-Build) would on SR2 (-31,000), I5 (-15,000); even SR-134 truck VMT decreases appreciably (-7,000). Freeway truck VMT on the I210 would increase 15,500 in the Study Area. Changes in freeway truck VMT on the current I710 and I10 essentially offset each other. All SR2 VMT (cars and trucks) decreases substantially (-159,000 VMT or -15% from No-Build), with VMT on the I5 and SR110 also decreasing 35,000 to 40,000 VMT (~3% to 5%). Emissions from cars as well as trucks will be reduced because of the freeway tunnel ventilation / scrubber / filter systems. The following table presents the percentage change in VMT on existing freeways for the Dual-Bore Tunnel with Tolls Alternative compared to the No-Build Alternative.

| | VMT % change Trucks | VMT % Change All Traffic |
|--------------|------------------------|-----------------------------|
| I210 | +3% | +3% |
| SR2 | -39% | -15% |
| I5 | -10% | -3% |
| SR134 | -6% | +2% |
| I10 | -6% | +1% |
| I605 | -6% | -3% |
| SR110 | NA | -5% |

Freeway Summary: Only the Freeway Tunnel Alternative appreciably reduces open (non-tunnel) freeway truck VMT in the Study Area, particularly on the SR2 and I5. Total VMT on some major freeways (SR2, I5) would be reduced, although there would be slightly higher percentage of VMT on the I210. The fully completed SR710 would have higher VMT compared to the No-Build, but the majority of that VMT will be in the freeway tunnel; any emissions related to VMT in the tunnel would be significantly reduced because of the tunnel's ventilation/scrubber/filter systems.

- E. *The DEIR does not provide enough information to assess impacts of Tunnel alternatives in the western and southern parts of East Los Angeles because it only provides information about increased traffic on the SR710 freeway in northern East Los Angeles and does not provide information to assess expected emission reductions from reduced pass-through traffic currently going to the I5 and I-60.***

Most of East Los Angeles is not in the SR710 Study Area or the slightly larger dispersion modeling domain (see Memorandum Figures 5 and 6, respectively). Similarly, the I710 - SR60 - I5 "triangle" is not included as a source of traffic emissions or the

dispersion modeling of impacts. Most of the arterial streets in East Los Angeles are not included in the emission calculations or dispersion modeling of impacts. However, the portion of SR710 from SR60 to the I10 is included in the SR710 Study Area and its emissions are included in the dispersion modeling.

Tunnel alternatives do increase VMT along the portion of SR710 from SR60 to the I10, but it is unknown where and to what degree traffic reductions are likely occurring in the I710-SR60-I5 triangle of freeways and arterials or arterials to the east of the I710. This is important, because if better mobility along the SR710 is reducing traffic along the heavily congested I5 and the arterials in East Los Angeles, one would expect concomitant emission and risk reductions in those areas. However, the actual impact in East Los Angeles cannot be determined with the information in the DEIR/DEIS.

F. *The DEIR Response to Comments should explicitly describe that a Tunnel Alternative is the only Alternative that further reduces air emissions and health risks (e.g., cancer risks) in areas that have had the worst air quality and health risk impacts for years because of the SR710 Gap.*

The existing setting for air quality clearly shows that areas near where the I710 ends in Alhambra and further south in Monterey Park and East Los Angeles have significantly greater cancer risks than areas to the north, including Pasadena and La Canada / Flintridge. This is due, in part, to the SR710 Gap causing additional emissions related to increased congestion, slower traffic, and longer diversions to slower arterial roadways.

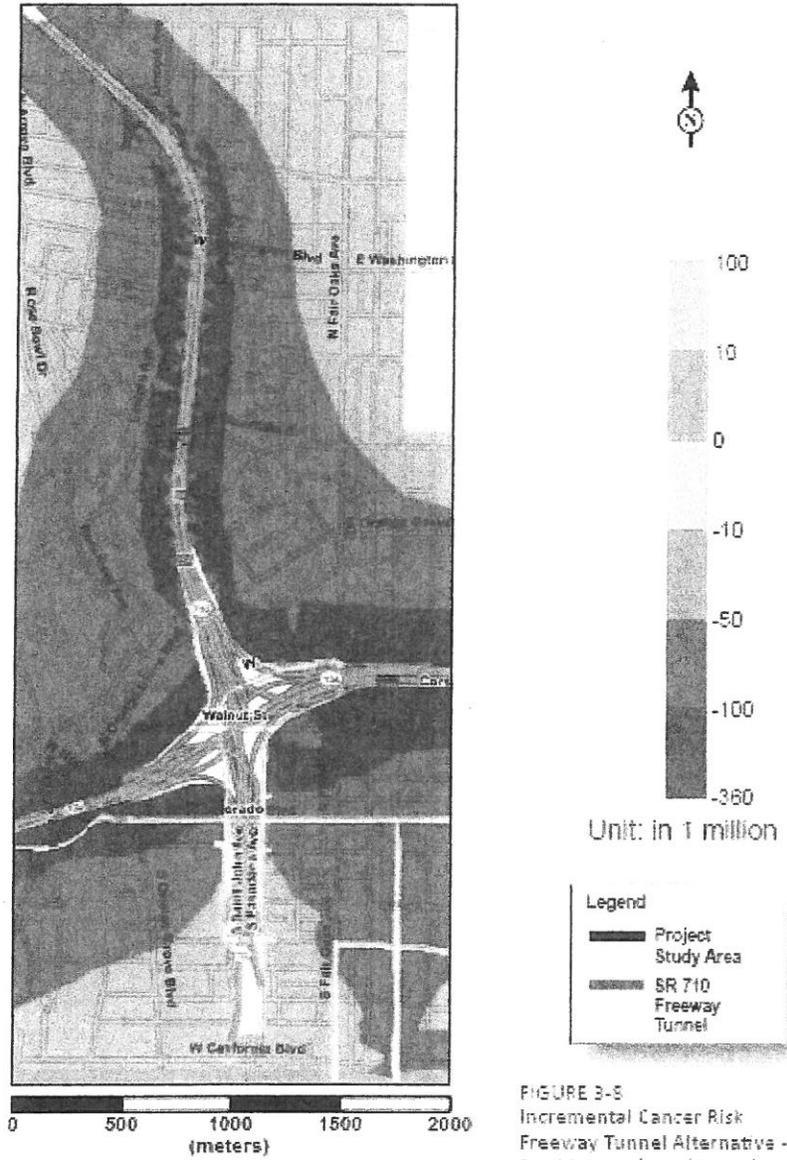
The current Health Risk Assessment maps are confusing in their color composition, implying the Tunnel would increase risk in the greater Alhambra / San Gabriel area (darker colors), when the Tunnel alternatives are the ONLY alternatives that further reduce risk in those areas compared to the No-Build Alternative (see HRA Figures 3-11 through 3-19 and Memorandum Figure 3). We suggest that decreases in risk be noted using green variations (not the dark gray, which implies a dis-benefit) and increases in risk be noted using gray or orange variations (not the green/yellow used in the current maps, which imply benefits or lower risk impacts). The colors and legend should have consistent intervals for increases and decreases in risk (e.g., 10, 50, 100, 300). Although Caltrans and/or FHWA have not established health risk thresholds, it should be noted in the text that the South Coast Air Quality Management District has promulgated a significance threshold of 10 in a million cancer risk for CEQA analyses and that none of the Build alternatives, including the dual-bore Tunnel Alternative with trucks, result in any increase in cancer risk compared to the 2012 baseline. The revised color scheme and more proportionate risk intervals will clearly show that only a Tunnel alternative (and the dual-bore tunnel in particular) reduces risk in areas with the greatest risk in the existing setting.

JCL:ee

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FIGURES

Figure 2: Cancer Risk for the Dual-Bore Tunnel with Tolls and Trucks Alternative (Worst-Case) is 10 to 300+ in a Million Lower Than in 2012 Base Year



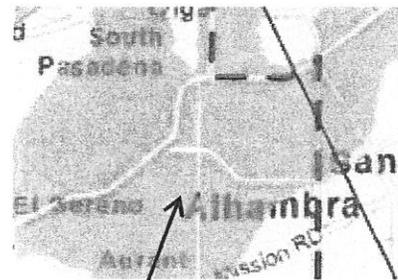
North Portal Area

FIGURE B-8
Incremental Cancer Risk
Freeway Tunnel Alternative -
Dual Bore w/ Toll (T2_V2) vs.
2012 Existing Condition
Health Risk Assessment
SR 710 North Study

Figure 3: Dual-Bore Tunnel with Tolls and Trucks Reduces Cancer Risk in greater El Sereno / Alhambra / San Gabriel Area Compared to the No-Build Alternative (BRT and LRT Increase Cancer Risk for This Historically Impacted Area Compared to the No-Build Alternative)

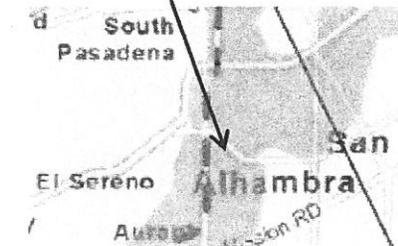
NOTE: Green is *increase* in cancer risk between 0 and 10 in a million
 Light grey is *decrease* in cancer risk between 0 and 10 in a million
 Darker grey is a *decrease* in cancer risk between 10 and 50 in a million
 Darkest grey is a *decrease* in cancer risk between 50 and 100 in a million

Bus Rapid Transit (BRT) Alternative:

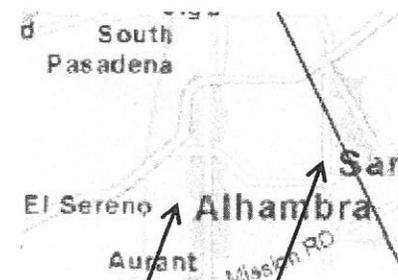


Cancer Risk Increases

Light-Rail Transit (LRT) Alternative:



Dual-Bore Tunnel with Tolls and Trucks:

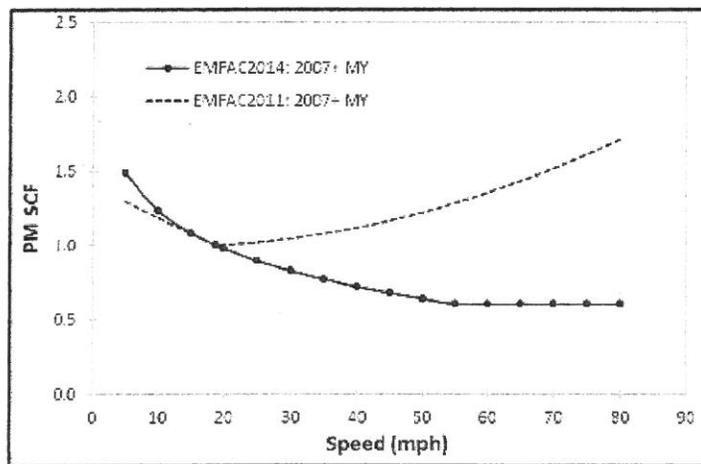
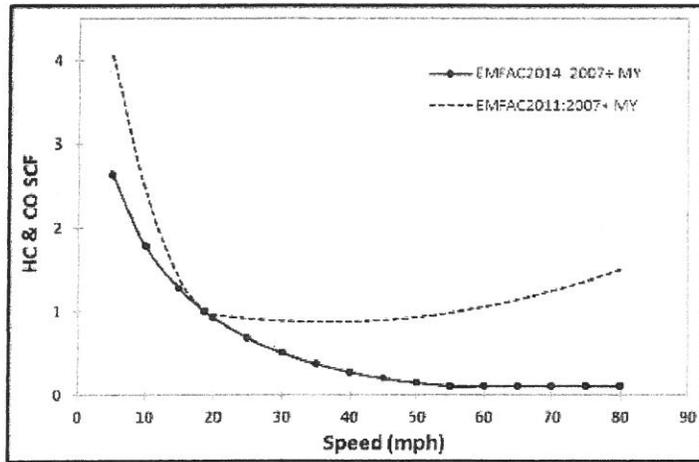


Cancer Risk Reductions

(BRT: HRA Figure 3-12; LRT: HRA Figure 3-13; Dual-Bore Tunnel: HRA Figure 3-17)

Figure 4: Emission-Speed Graphs (examples)

From CARB EMFAC2014-vol3-technical-documentation-052015,¹⁷ Figure 6.2-1:
 NOx Emission Speed Correction Factor (or SCF) vs. Speed Curve
 for Heavy-Heavy Duty Trucks (EMFAC = EMISSION FACTOR)



¹⁷ EMFAC2014 Technical Documentation, Volume 3. California Air Resources Board. May 2015.
<http://www.arb.ca.gov/msei/downloads/emfac2014/emfac2014-vol3-technical-documentation-052015.pdf>

Figure 5: SR710 Study Area (from HRA Figure 1-1)
[Crimson lines are approximate outline of East Los Angeles]

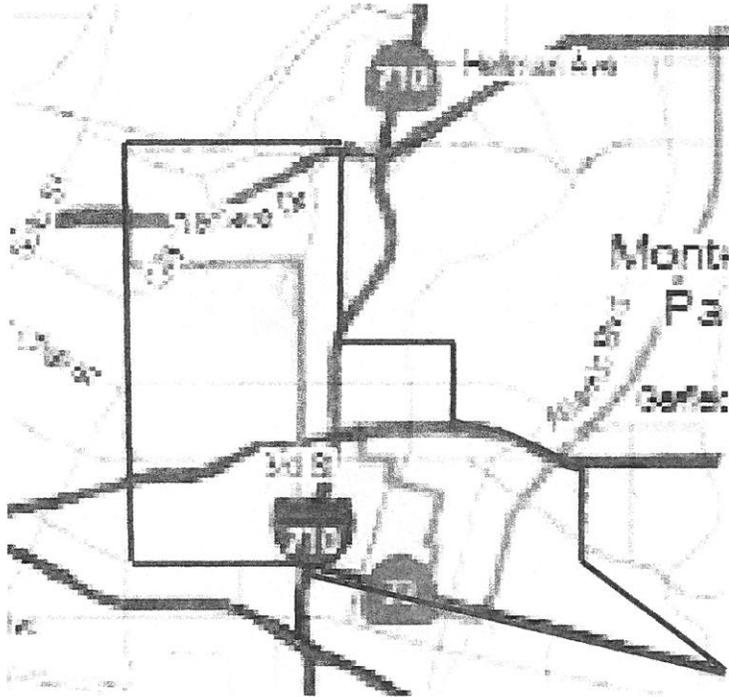
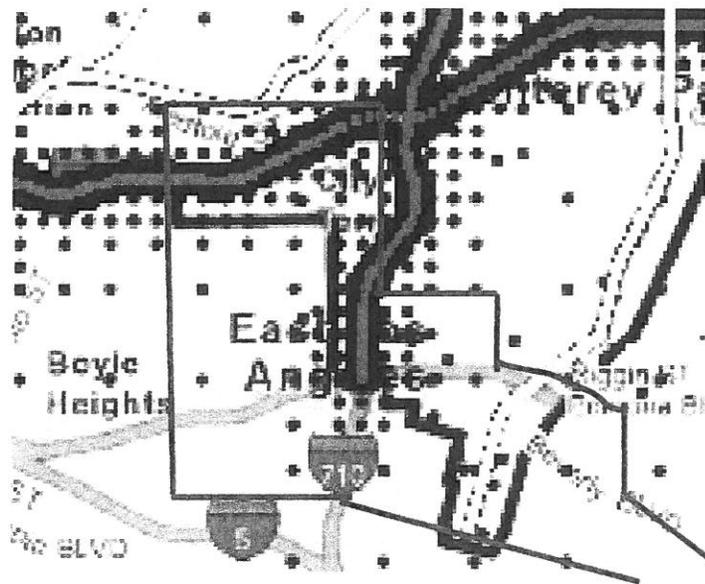


Figure 6: SR710 Modeling Sources and Receptors (from HRA Figure 2-1)



ATTACHMENT C

to

City of Alhambra Comment Letter 8-5-15

Staff Prepared Technical Memorandum on Environmental Justice for the SR 710 DEIR/EIS

TECHNICAL MEMORANDUM ON ENVIRONMENTAL JUSTICE FOR THE SR 710
DEIR/EIS

As expressed in our scoping letter of April 14, 2011, we believe the existing situation imposes environmental justice impacts. Specifically, we are concerned that the lack of a freeway connection on I-710 drives motorists to local arterial streets, and that residents along these streets suffer a disproportionate impact from the extra traffic and associated emissions. Valley Boulevard and Fremont Avenue through Alhambra are examples of arterials that have experienced these impacts for decades. As shown in the Draft EIR/EIS environmental justice analysis, residents along these arterials have higher percentages of minority populations than in the County as a whole (Community Impact Assessment, Chapter 7 [Environmental Justice], Figure 7.1-1, Sheet 4 of 4). Thus, the Draft EIR/EIS demonstrates a disproportionate impact on minority communities: a clear environmental justice concern.

- The Draft EIR/EIS does not provide a clear comparison of the impacts of alternatives on environmental justice populations.

Given our concerns, we hoped to see in the SR-710 North Study environmental documents, a discussion of the existing environmental justice impacts, as well as a comparison of how the various alternatives would address this problem. However, the Draft EIR/EIS does not contain a direct, clear comparison of build and no-build alternatives that would enable a better understanding of how these impacts might be alleviated by any version of the project.

- The environmental justice analysis does not explicitly consider the impacts on all racial or ethnic minority groups.

The analysis does identify “EJ populations” by census tract, using criteria based on where minority or low-income percentages exceed those in LA County as a whole by certain thresholds. The data presented in the analysis include low-income, non-white, and Latino/Hispanic populations, but do not consider any other minority (non-white) groups. Given the substantial Asian populations in the study area, this is a surprising omission that should be corrected, and African-American populations

in the study area should also at least be identified. The environmental justice data used in the analysis are included in Attachment 1.

The discussions of the impacts of the alternatives focus mainly on proximity – i.e., the location of project elements relative to the locations of the populations analyzed – and, in some cases, on the general effects of the project elements on transportation system efficiency in the study area. To some extent, a location-focused approach makes sense. Proximity to transit lines means access to those lines and their benefits. Proximity to a tunnel portal means proximity to the concentrated emissions at the portal locations (which would come from arriving/departing traffic and tunnel ventilation systems).

But the discussions of transportation system efficiency are focused on the drivers or travelers, rather than on the residents who would have to suffer the consequences of those drivers' choices. An example is the superficial discussion of tolling in the environmental justice section of the Community Impact Assessment, which observes that motorists avoiding a tunnel toll would still have north-south travel alternatives (CIA, Chapter 7, Section 7.3.3.5, p. 7-12). What is unsaid is how the choice between tolled and toll-free options would affect local residents along these alternative routes.

- Because the environmental justice analysis is non-quantitative, it does not support the conclusions drawn about environmental justice impacts.

The only statement in the environmental justice analysis that addresses our concerns is this one under a discussion of the freeway tunnel alternative: "Environmental justice and other populations would indirectly benefit as a result of reduced traffic on local streets in the study area" (CIA, Chapter 7, Section 7.3.3.5, p. 7-11).

The environmental justice analysis does not break down the modeled or predicted impacts of various project alternatives by income or ethnic/racial group. The analysis contains a statement regarding each build alternative to the effect that because the alternative's long-term effects can be "substantially reduced," there will be no greater adverse effect on environmental justice populations than on non-environmental justice populations. We do not follow the logic of this statement, nor do we see how it is supported by the analysis that precedes it in each case.

These conclusions could possibly be better supported if the Draft EIR/EIS evaluated the impacts of the alternatives on minority and low-income populations in the study area in a more quantitative fashion (e.g., via direct comparison of the impacts or performance of the alternatives). The analysis could include a summary of each area of impact (e.g., traffic, air pollution, health risk, visual impact, noise) and an alternative-by-alternative comparison of the impacts on each population of concern in the study area. Such a comparison would allow decision makers to understand which populations would be better off and which worse off under any of the alternatives, and thus enable them to make a better-informed evaluation of their choices.

Another approach that would help inform decision makers would be to map not only the physical elements of each alternative in conjunction with the identified environmental populations (as in the Community Impact Analysis, Chapter 7, Figures 7.1-1 through 7.1-4), but to do likewise with the projected impacts of the alternatives. For example, the outcomes of the health risk assessment could be overlaid on a map of minority or low-income populations to show how the various alternatives would affect these populations.

- The environmental justice maps are incomplete in several respects.

An additional concern specifically related to the environmental justice maps (Community Impact Analysis, Chapter 7, Figures 7.1-1 through 7.1-4) is that their geographic extent does not match, and in fact is smaller than, the geographic extent of other key analyses. The most prominent example of this mismatch is in the health risk assessment. The maps of changes in health risk for the various alternatives (HRA, Figures 3-1 through 3-19) extend as far south as the I-710/SR-60 interchange, while the environmental justice map stops just below the I-710/I-10 interchange. The environmental justice maps stop short on the north end, too, making it hard to compare, for example, impacts to East Los Angeles with those to La Cañada-Flintridge.

Moreover, the environmental justice maps do not include roadways other than freeways; they show only census tract boundaries. This makes it very difficult to say whether a point of particular impact is or is not located in a tract containing environmental justice populations.

- The Draft EIR/EIS does not include a map showing sensitive receptors.

While a map of model receptors is included in the Health Risk Assessment (Figure 2-1 of the Health Risk Assessment report), no map is provided showing the locations of sensitive receptors. Many of these may fall within or represent locations of concern from an environmental justice perspective. Without such a map, it is difficult to determine whether specific impacted receptors might lie within areas containing environmental justice populations.

The remaining sections below detail findings with regard to our review of the Draft EIR/EIS analyses of:

- Traffic and transportation impacts
- Health risk impacts, and
- Visual impacts¹.

Traffic and Transportation Impacts

The following discussions are based on the impacts of the alternatives in the horizon year of 2035, and do not consider temporary or construction-related impacts, only so-called “permanent” impacts. Our analysis of traffic and transportation impacts focused on the following four metrics presented in the Draft EIR/EIS:

- Traffic diversion to local arterials: analyzes the vehicle miles traveled (VMT) on arterials in the study area (which would include Valley Blvd. and Fremont Ave.) under different project alternatives
- Use of local arterials for long trips: defined as the percentage of arterial trips with origin and destination outside the study area – another measure of impact to arterials such as Valley Blvd. and Fremont Ave., which likely carry a large proportion of these trips

¹ These comments are based on horizon-year, permanent project impacts, except in the case of the health risk assessment (HRA), which was performed for opening-year impacts. Temporary and construction-related impacts are not addressed in our discussion of environmental justice.

- North-south transit throughput: addresses the statement in the Purpose and Need that current transit quality suffers because of arterial congestion; also, transit is an important option for low-income residents
- Transit accessibility: addresses transit service quality and the point that transit is an important option for low-income residents.

Our findings are as follows. Table 1, below, summarizes our comparison of traffic- and transit-related performance measures.

- Traffic Diversion to Local Arterials: Today, there are 7,645,000 daily VMT in the study area on arterials (Transportation Technical Report, Table 4-2, p. 4-6). Without action, under no-build, there would be 8,180,000 daily VMT on arterials – the problem gets substantially worse (Draft EIR/EIS, Table 3.5-11, p. 3.5-37). This is likely due to the underlying growth trends in the region, since these are horizon year projections (2035). With any of the transit/TDM alternatives, the problem is barely alleviated, or gets even worse (8,220,000 for the LRT alternative, for example). With the freeway tunnel options, the range of results is from 7,600,000 (2-bore, no toll) to 7,895,000 (1-bore, toll, express bus).

In other words, the freeway tunnel alternatives perform better on this critical measure, which relates to the longstanding disproportionate impact to arterials including Valley Blvd. and Fremont Ave. In general, the 2-bore tunnel alternatives keep the problem from getting worse than it is today. The 2-bore tunnel alternative with toll is projected to result in 7,655,000 VMT on arterials in 2035 – a tiny 0.1% increase over the current 7,645,000 VMT (Draft EIR/EIS, Table 3.5-11, p. 3.5-37).

Conclusion: Compared to the no-build alternative, the freeway tunnel alternatives would do a better job of alleviating traffic on local arterials than the transit and TDM/TSM alternatives.

- Use of Local Arterials for Long Trips: Today, 12.4 percent of arterial trips have origin and destination outside the study area (Transportation Technical Report, Table 4-2, p. 4-6). The no-build alternative would let this rise to 13.7%. The transit/TDM alternatives are all at 14% or more. Freeway tunnel alternatives all

improve the problem: the highest of them is 10.6% (1-bore, toll, no trucks) and the lowest (best) is 7.3% (2-bore, no toll) (Draft EIR/EIS, Table 3.5-11, p. 3.5-37). The 1-bore tunnel alternatives are all 10.x% and the 2-bore tunnel alternatives are all 7.x% - a clear improvement over current conditions and clearly preferable performance to the transit/TDM alternatives in alleviating the disproportionate impact to arterials resulting from the lack of a through freeway connection.

Conclusion: Compared to current (2012) levels, cut-through trips on arterials would increase with LRT and BRT alternatives, but would decrease with tunnel alternatives (as a percentage of all trips).

- Transit Quality and Accessibility: The Draft EIR/EIS shows that transit mode share, transit accessibility, and north-south transit throughput will all increase by 2035 regardless of what happens with this project (including no-build) (Draft EIR/EIS, Table 3.5-11, p. 3.5-38). There are projected to be minor differences between the alternatives in terms of north-south transit throughput in the horizon year. This would seem to be the most direct measure of whether arterial congestion is alleviated by any of the alternatives.

The analysis projects 209,000 daily person trips across the East-West screenline under no-build; 211,000-214,000 under the transit/TDM alternatives; and 211,000-213,000 under the freeway tunnel alternatives. The current number is 150,000 (Transportation Technical Report, Table 4-3, p. 4-6) – so the growth is likely due to the projected growth in transit mode share, from 3.5% today to about 4.2% for all alternatives, except 4.3% for BRT or LRT. Again this appears to be an underlying trend having little to do with the SR-710 North project.

Transit accessibility – defined as the percentage of population and employment within ¼ mile of high-frequency transit service – is 80.8% today, and in 2035 it is predicted to be 80.6% for all alternatives, build or no-build, except LRT for which it is predicted to be 80.7%. In other words, there is little difference among the alternatives when considering future transit accessibility (Transportation Technical Report, Table 4-3, p. 4-6; Draft EIR/EIS, Table 3.5-11, p. 3.5-38).

Conclusion: The choice of alternatives (including no-build) makes little difference to projected future transit mode share, transit accessibility, and north-south transit throughput.

Table 1. Comparison of Traffic and Transit Measures, SR-710 Alternatives (2035 Horizon Year, Permanent Impacts)

| METRIC | EXISTING (2012) | NO BUILD | TSM/TDM | BRT | LRT | 1-BORE TUNNEL (range of variations) | 2-BORE TUNNEL (range of variations) |
|---|-----------------|----------|---------|-------|-------|-------------------------------------|-------------------------------------|
| Diversion to Local Arterials (daily arterial VMT, in 000's) | 7,645 | 8,180 | 8,180 | 8,170 | 8,220 | 7,890-7,900 | 7,600-7,655 |
| Use of Arterials For Long Trips (% trips w/ O-D outside study area) | 12.4% | 13.7 | 14.3 | 14.2 | 14.0 | 10.3-10.6 | 7.3-7.8 |
| N-S Transit Throughput (daily person trips across E-W screenline, in 000's) | 150 | 209 | 211 | 215 | 214 | 211-213 | 211-212 |
| Transit Accessibility (% of population & employment w/in ¼ mi of high-frequency transit) | 80.8% | 80.6 | 80.6 | 80.6 | 80.7 | 80.6 (all) | 80.6 (all) |

Health Risk Impacts

The results of the Health Risk Assessment (HRA) offer another view of the effects of the various alternatives on the disproportionate impact experienced by residents along arterials such as Valley Blvd. and Fremont Ave. due to the lack of a through freeway connection. The maps of the HRA results are particularly effective in highlighting the performance of the alternatives and the differences between them. The HRA estimated opening-year rather than horizon-year impacts: 2025 for TSM/TDM and transit alternatives, 2035 for freeway tunnel alternatives (HRA, Section 3.2, p. 3-5).

- Existing Conditions: According to the South Coast Air Quality Management District's (AQMD) Multiple Air Toxics Exposure Study (MATES) IV (Draft Final Report, April 2015), cancer risk levels related to air pollution in the general Alhambra area are between 400 and 800 in a million. This figure can be understood as an "excess" environmental risk of cancer, which is added to a basic lifetime cancer risk of about 1 in 3 or 1 in 4. Thus, the risk increases and decreases discussed below relate to a current air pollution risk of 400-800 in a million. The South Coast AQMD uses a health risk threshold of 10 in a million; Caltrans has not adopted a threshold for health risk.
- Comparison of Future Conditions to Existing Conditions: According to the HRA, "In summary, compared to the 2012 existing condition, the project would result in net health benefits to the entire study area for all the alternatives including all freeway tunnel variations" (HRA, Section 3.1.1.1, p. 3-3). This is because the entire vehicle fleet will have much lower emissions in the future than it does today. Thus all alternatives, including no-build, would result in lower cancer risk at the points of maximum impact (overall, residential, worker, sensitive receptor, and student) than under existing conditions (2012) in the respective opening years of the facilities. The decreases at the point of maximum impact are similar for all alternatives, including No-Build, and range from a low of 14.7 in a million decrease to 16.0 in a million decrease (HRA, Table 3-1, p. 3-6; HRA, Figures 3-1 through 3-10).
- Comparison of Build Alternatives to No-Build - Non-Freeway Alternatives: According to a table summarizing the points of maximum impact, when compared to no-build, the transit and TDM alternatives would result in increases in cancer risk ranging up to 11 in a million. This maximum increase is projected to occur at the intersection of Valley Blvd. and Fremont Ave. (already a heavily impacted area for traffic and cancer risk, as well as a location of minority population concentration) (HRA, Table 3-4, p. 3-6; CIA Chapter 7, Figure 7.1-1, Sheets 3 and 4).

When compared to no-build using the maps presented in the HRA, the transit and TDM alternatives would result in small increases in cancer risk (less than 10

in a million increment) in much of Alhambra, and small decreases (less than 10 in a million decrement) in the remaining areas of the city (HRA, Figures 3-11, 3-12, 3-13).

- Comparison of Build Alternatives to No-Build - Freeway Tunnel Alternatives:
According to a table summarizing the points of maximum impact, when compared to no-build, the freeway tunnel alternatives would result in increases of cancer risk up to 170 in a million (2-bore/no toll variation). The maximum increases are projected to occur at a commercial/residential complex near the north portal, in an area that does not meet the EIR's criteria for environmental justice populations) (HRA, Table 3-4, p. 3-6; CIA Section 7, Figure 7.1-1, Sheets 3 and 4).

When compared to no-build using the maps presented in the HRA, the freeway tunnel alternatives would result in small decreases in cancer risk (less than 10 in a million decrement) throughout most of the area between the I-210 and I-10 freeways (HRA, Figures 3-14 through 3-19). Notably, the freeway alternatives would result in larger decreases in cancer risk (between 10 and 50 in a million decrement) along Fremont Avenue and Garfield Avenue in Alhambra and San Gabriel. These decreases likely reflect the fact that drivers now using these arterials for through trips due to the lack of a freeway connection would choose to use a freeway tunnel if it were available, alleviating the impact on nearby arterials.

When compared to no-build using the maps presented in the HRA, the freeway tunnel alternatives would increase cancer risk at the areas near the north and south tunnel portals (HRA, Figures 3-14 through 3-19). The variation without trucks² has the least such impact, showing very little risk increase at the south portal, a slightly larger area south of I-210 at the north portal, and nearly all less than 10 in a million increment (Figure 3-19).

² "Trucks" are assumed to refer to heavy-duty trucks, as indicated by the Transportation Technical Report, footnote to Table 4-7, p. 4-14.

According to the maps, the freeway tunnel alternatives that would allow trucks would result in larger areas of cancer risk increase at the north and south portal areas, including up the I-210 to La Cañada Flintridge (HRA, Figure 3-18). The magnitude of these increases would again mostly be less than 10 in a million, with areas of increase up to 100 in a million within approximately 500 meters of the 710 freeway as far south as the SR-60 interchange at the south portal, and within 500-1,000 meters of the 710 and 210 between California Blvd. and Howard Street near the north portal.

Based on a comparison of maps for two variations that are the same except for the permission or restriction of trucks (T2_V4 and T2_V5), allowing trucks to use the tunnel could result in small increases in cancer risk to areas south of Pasadena that are home to environmental justice populations and to areas north of Pasadena that presumably are not home to environmental justice populations (HRA, Figures 3-18 and 3-19). If trucks are not allowed to use the tunnel, risk increases of comparable magnitude would be seen instead along I-5 between I-10 and SR-2, an area that is home to environmental justice populations according to the portion shown on the environmental justice maps (Community Impact Assessment, Chapter 7, Figure 7.1-1, Sheets 3 and 4). Notably, the LRT alternative would also result in risk increases along I-5, over a slightly smaller area (HRA, Figure 3-13). Because the extent of the EJ maps (and presumably, the extent of the geographic range of the EJ analysis) is more limited than the extent of the risk maps, the data are not presented that would fully allow these comparisons to be made.

- Based on a comparison of maps for two variations that are the same except for the use of tolls or no tolls (T2_V2 and T2_V4), imposing a toll would appear to lessen the areas of greatest health risk increase (as much as 10 to 100 in a million increment) close to the north and south portals (HRA, Figures 3-17 and 3-18). This difference presumably would reflect motorists' choices to avoid the toll by taking other routes. The area around the south portal is home to EJ populations; the area around the north portal south of I-210 is not, but the area to the north of I-210 is, though again the EJ map does not extend as far as the map of health risk results. At the scale of these maps, it appears there is little difference in the

(positive) impacts that would be experienced on the study area arterials if a toll were imposed or not imposed.

Conclusion: Less traffic on arterials means less health risk from traffic emissions. When compared to the no-build alternative, the freeway tunnel alternatives could reduce cancer risk by up to 50 in a million along Garfield and Fremont – which are areas with environmental justice populations.

Conclusion: Compared to the no-build alternative, allowing trucks to use the freeway tunnels would increase risk slightly, and by about the same amount, in areas north and south of Pasadena and the portal locations.

Visual Impacts

Based on a review of the Draft EIR/EIS analysis of changes in visual quality (Table 3.6, p. 3.6-31), net visual impacts were compared for the different alternatives. The table compares impacts of BRT, LRT and freeway (tunnel) alternatives at 30 key view locations: two for BRT, 18 for LRT, and 10 for freeway. Based on the environmental justice map (Community Impact Assessment, Chapter 7, Figure 7.1-1, Sheet 4 of 4), we determined which of these key views were located in tracts with one or more populations meeting the environmental justice criteria. In some cases these locations were not on the environmental justice map, whose limited extent has been noted, or could not be definitively placed due to the lack of local roadways on the map. In these cases we made our best judgment as to whether these key views were or were not located in areas meeting environmental justice criteria.

We then summed the net changes in visual quality by alternative and by EJ or non-EJ location. The BRT alternative would not change visual quality from existing conditions at either key view location. The LRT alternative would result in a net negative change to visual quality from existing conditions totaling -4.7 units in EJ locations (over 13 key views), while in non-EJ locations the net change to visual quality would total +1.2 units (over five key views). The freeway alternatives would result in a net positive change to visual quality from existing conditions totaling +0.9 units in EJ locations (over six key views), while in non-EJ locations the net change to visual quality would total +1.7 units (over four key views).

These results substantiate community concerns that the LRT alternative, if built above-ground in the southern portion of the study area as proposed, would have a disproportionate negative visual impact in areas that are home to environmental justice populations. The freeway alternatives would have positive impacts in these areas, as well as in those that are not home to environmental justice populations.

Conclusion: The LRT alternative could have disproportionate visual and safety impacts in areas with environmental justice populations.

ATTACHMENT 1 – ENVIRONMENTAL JUSTICE DATA

Income and Race - Percent

| Tract | Income | White | Black | Asian | Am. In./Alaska Native | Pacific Islander | Hispanic | Other |
|--------|--|--------|--------|--------|-----------------------|------------------|----------|--------|
| 480302 | less than or equal to 30% of HAMFI | 12.18% | 0.00% | 52.70% | 0.00% | 2.70% | 32.43% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMFI | 29.65% | 0.00% | 42.71% | 0.00% | 0.00% | 27.64% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 15.02% | 10.73% | 36.05% | 0.00% | 0.00% | 36.48% | 1.72% |
| | greater than 80% but less than or equal to 100% of HAMFI | 30.77% | 0.00% | 38.46% | 0.00% | 0.00% | 30.77% | 0.00% |
| | greater than 100% of HAMFI | 32.62% | 0.00% | 29.79% | 0.00% | 0.00% | 37.59% | 0.00% |
| 480303 | less than or equal to 30% of HAMFI | 19.35% | 0.00% | 61.29% | 0.00% | 0.00% | 6.45% | 12.90% |
| | greater than 30% but less than or equal to 50% of HAMFI | 15.69% | 0.00% | 52.94% | 0.00% | 0.00% | 23.53% | 7.84% |
| | greater than 50% but less than or equal to 80% of HAMFI | 27.69% | 0.00% | 43.08% | 0.00% | 0.00% | 29.23% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMFI | 0.00% | 0.00% | 53.97% | 0.00% | 0.00% | 46.03% | 0.00% |
| | greater than 100% of HAMFI | 21.52% | 3.80% | 40.51% | 0.00% | 0.00% | 34.18% | 0.00% |
| 480304 | less than or equal to 30% of HAMFI | 4.21% | 0.00% | 73.68% | 3.16% | 0.00% | 18.95% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMFI | 9.48% | 0.00% | 73.44% | 0.00% | 0.00% | 17.19% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 3.51% | 0.00% | 45.61% | 0.00% | 0.00% | 50.88% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMFI | 7.14% | 0.00% | 64.29% | 0.00% | 0.00% | 28.57% | 0.00% |
| | greater than 100% of HAMFI | 19.75% | 11.11% | 41.98% | 0.00% | 0.00% | 27.16% | 0.00% |
| 480400 | less than or equal to 30% of HAMFI | 24.39% | 0.00% | 74.39% | 0.00% | 0.00% | 31.71% | 19.51% |
| | greater than 30% but less than or equal to 50% of HAMFI | 19.72% | 0.00% | 30.99% | 0.00% | 0.00% | 49.30% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 6.82% | 0.00% | 43.18% | 0.00% | 0.00% | 50.00% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMFI | 40.35% | 0.00% | 31.58% | 0.00% | 0.00% | 28.07% | 0.00% |
| | greater than 100% of HAMFI | 35.75% | 0.00% | 40.10% | 0.97% | 0.00% | 21.74% | 1.45% |
| 480500 | less than or equal to 30% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 100% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 480701 | less than or equal to 30% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 100% of HAMFI | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |

Income and Race - Percent

| Tract | Income | White | Black | Asian | Am. In./Alaska Native | Pacific Islander | Hispanic | Other |
|--------|---|--------|-------|--------|-----------------------|------------------|----------|-------|
| 480802 | less than or equal to 30% of HAMEI | 16.00% | 0.00% | 56.00% | 0.00% | 0.00% | 28.00% | 0.00% |
| | greater than 30%, but less than or equal to 50% of HAMEI | 23.53% | 0.00% | 17.65% | 0.00% | 0.00% | 58.82% | 0.00% |
| | greater than 50%, but less than or equal to 80% of HAMEI | 10.00% | 0.00% | 35.00% | 0.00% | 0.00% | 55.00% | 0.00% |
| | greater than 80%, but less than or equal to 100% of HAMEI | 10.64% | 0.00% | 42.55% | 4.26% | 0.00% | 42.55% | 0.00% |
| 480803 | greater than 100% of HAMEI | 20.33% | 3.49% | 32.56% | 0.00% | 0.00% | 43.02% | 0.00% |
| | less than or equal to 30% of HAMEI | 13.51% | 0.00% | 0.00% | 0.00% | 0.00% | 86.49% | 0.00% |
| | greater than 30%, but less than or equal to 50% of HAMEI | 29.59% | 0.00% | 2.37% | 0.00% | 0.00% | 62.13% | 5.92% |
| | greater than 50%, but less than or equal to 80% of HAMEI | 20.71% | 0.00% | 23.08% | 0.00% | 0.00% | 56.21% | 0.00% |
| 480804 | greater than 80%, but less than or equal to 100% of HAMEI | 20.74% | 0.00% | 44.64% | 0.00% | 0.00% | 35.12% | 0.00% |
| | greater than 100% of HAMEI | 26.36% | 0.00% | 22.48% | 0.00% | 0.00% | 51.16% | 0.00% |
| | less than or equal to 30% of HAMEI | 0.00% | 0.00% | 73.58% | 0.00% | 0.00% | 26.42% | 0.00% |
| | greater than 30%, but less than or equal to 50% of HAMEI | 4.06% | 0.00% | 38.07% | 0.00% | 0.00% | 57.87% | 0.00% |
| 480901 | greater than 50%, but less than or equal to 80% of HAMEI | 5.17% | 5.39% | 43.10% | 0.00% | 0.00% | 44.18% | 2.16% |
| | greater than 80%, but less than or equal to 100% of HAMEI | 9.49% | 3.95% | 49.41% | 0.00% | 0.00% | 37.15% | 0.00% |
| | greater than 100% of HAMEI | 19.15% | 0.00% | 49.65% | 0.00% | 0.00% | 31.21% | 0.00% |
| | less than or equal to 30% of HAMEI | 3.92% | 0.00% | 70.59% | 0.00% | 0.00% | 25.49% | 0.00% |
| 480902 | greater than 30%, but less than or equal to 50% of HAMEI | 6.78% | 2.71% | 48.51% | 0.00% | 0.00% | 42.01% | 0.00% |
| | greater than 50%, but less than or equal to 80% of HAMEI | 2.82% | 0.00% | 57.75% | 0.00% | 0.00% | 39.44% | 0.00% |
| | greater than 80%, but less than or equal to 100% of HAMEI | 0.00% | 0.00% | 64.10% | 0.00% | 0.00% | 35.90% | 0.00% |
| | greater than 100% of HAMEI | 3.75% | 0.00% | 71.25% | 0.00% | 0.00% | 25.00% | 0.00% |
| 480903 | less than or equal to 30% of HAMEI | 0.00% | 3.52% | 56.34% | 0.00% | 0.00% | 38.73% | 1.41% |
| | greater than 30%, but less than or equal to 50% of HAMEI | 0.00% | 0.00% | 63.16% | 0.00% | 0.00% | 36.84% | 0.00% |
| | greater than 50%, but less than or equal to 80% of HAMEI | 16.00% | 0.00% | 34.00% | 0.00% | 0.00% | 50.00% | 0.00% |
| | greater than 80%, but less than or equal to 100% of HAMEI | 0.00% | 0.00% | 59.26% | 0.00% | 0.00% | 40.74% | 0.00% |
| 480904 | greater than 100% of HAMEI | 6.94% | 2.78% | 59.72% | 0.00% | 0.00% | 30.56% | 0.00% |
| | less than or equal to 30% of HAMEI | 2.25% | 0.00% | 89.33% | 0.00% | 0.00% | 8.43% | 0.00% |
| | greater than 30%, but less than or equal to 50% of HAMEI | 7.14% | 0.00% | 45.24% | 0.00% | 0.00% | 47.62% | 0.00% |
| | greater than 50%, but less than or equal to 80% of HAMEI | 3.54% | 0.00% | 25.66% | 0.00% | 0.00% | 70.80% | 0.00% |
| 480905 | greater than 80%, but less than or equal to 100% of HAMEI | 21.88% | 0.00% | 78.13% | 0.00% | 0.00% | 0.00% | 0.00% |
| | greater than 100% of HAMEI | 10.38% | 4.72% | 48.35% | 0.00% | 0.00% | 36.56% | 0.00% |

Income and Race - Percent

| Tract | Income | White | Black | Asian | Am. In./Alaska Native | Pacific Islander | Hispanic | Other |
|--------|---|--------|--------|--------|-----------------------|------------------|----------|--------|
| 481001 | less than or equal to 30 % of HAMI | 14.47% | 2.63% | 63.16% | 0.00% | 0.00% | 19.74% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMI | 16.00% | 0.00% | 66.00% | 0.00% | 0.00% | 12.00% | 6.00% |
| | greater than 50% but less than or equal to 80% of HAMI | 11.58% | 0.00% | 32.43% | 0.00% | 0.00% | 55.98% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMI | 11.76% | 0.00% | 73.53% | 0.00% | 0.00% | 14.71% | 0.00% |
| | greater than 100% of HAMI | 18.22% | 0.00% | 51.40% | 0.00% | 0.00% | 25.70% | 4.67% |
| 481002 | less than or equal to 30 % of HAMI | 2.50% | 0.00% | 75.00% | 0.00% | 0.00% | 22.50% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMI | 8.20% | 11.45% | 47.54% | 0.00% | 3.28% | 24.59% | 4.92% |
| | greater than 50% but less than or equal to 80% of HAMI | 9.09% | 2.02% | 48.48% | 0.00% | 0.00% | 24.24% | 16.16% |
| | greater than 80% but less than or equal to 100% of HAMI | 8.93% | 0.00% | 28.57% | 0.00% | 0.00% | 62.50% | 0.00% |
| | greater than 100% of HAMI | 13.58% | 2.55% | 61.12% | 0.00% | 0.00% | 21.05% | 1.70% |
| 481500 | less than or equal to 30 % of HAMI | 9.09% | 0.00% | 68.16% | 0.00% | 0.00% | 22.73% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMI | 28.26% | 0.00% | 68.84% | 0.00% | 0.00% | 2.90% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMI | 18.75% | 0.00% | 73.75% | 0.00% | 0.00% | 7.50% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMI | 21.88% | 0.00% | 56.25% | 0.00% | 0.00% | 21.88% | 0.00% |
| | greater than 100% of HAMI | 13.33% | 0.00% | 59.05% | 0.00% | 0.00% | 27.62% | 0.00% |
| 481603 | less than or equal to 30 % of HAMI | 3.33% | 8.33% | 65.00% | 0.00% | 0.00% | 20.00% | 3.33% |
| | greater than 30% but less than or equal to 50% of HAMI | 0.00% | 0.00% | 66.96% | 0.00% | 0.00% | 33.04% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMI | 7.04% | 0.00% | 49.30% | 5.28% | 0.00% | 38.38% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMI | 0.00% | 0.00% | 72.73% | 0.00% | 0.00% | 27.27% | 0.00% |
| | greater than 100% of HAMI | 24.29% | 0.00% | 44.29% | 0.00% | 0.00% | 31.43% | 0.00% |
| 481604 | less than or equal to 30 % of HAMI | 4.76% | 0.00% | 85.71% | 0.00% | 0.00% | 9.52% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMI | 16.67% | 0.00% | 51.85% | 0.00% | 3.70% | 27.78% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMI | 12.86% | 10.00% | 58.57% | 0.00% | 0.00% | 18.57% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMI | 3.88% | 19.42% | 33.01% | 0.00% | 0.00% | 43.69% | 0.00% |
| | greater than 100% of HAMI | 20.38% | 3.13% | 47.02% | 0.00% | 0.00% | 26.33% | 3.13% |
| 481605 | less than or equal to 30 % of HAMI | 4.00% | 0.00% | 84.00% | 0.00% | 0.00% | 12.00% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMI | 0.00% | 0.00% | 64.52% | 0.00% | 0.00% | 35.48% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMI | 0.00% | 0.00% | 85.19% | 0.00% | 0.00% | 14.81% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMI | 18.99% | 0.00% | 61.45% | 0.00% | 0.00% | 19.55% | 0.00% |
| | greater than 100% of HAMI | 10.45% | 0.00% | 31.34% | 0.00% | 0.00% | 53.73% | 4.48% |

Income and Race - Percent

| Tract | Income | White | Black | Asian | Am. In./Alaska Native | Pacific Islander | Hispanic | Other |
|--------|--|--------|--------|--------|-----------------------|------------------|----------|-------|
| 481606 | less than or equal to 30% of HAMFI | 2.82% | 0.00% | 88.73% | 0.00% | 0.00% | 8.45% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMFI | 0.00% | 0.00% | 77.22% | 0.00% | 0.00% | 22.78% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 0.00% | 0.00% | 66.37% | 0.00% | 0.00% | 32.45% | 1.18% |
| | greater than 80% but less than or equal to 100% of HAMFI | 0.00% | 0.00% | 62.50% | 0.00% | 0.00% | 37.50% | 0.00% |
| | greater than 100% of HAMFI | 4.41% | 10.29% | 72.06% | 0.00% | 0.00% | 13.24% | 0.00% |
| 481800 | less than or equal to 30% of HAMFI | 17.54% | 0.00% | 60.53% | 0.00% | 0.00% | 21.93% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMFI | 29.27% | 0.00% | 60.98% | 0.00% | 0.00% | 9.76% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 10.26% | 0.00% | 69.23% | 0.00% | 0.00% | 20.51% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMFI | 40.32% | 0.00% | 51.61% | 0.00% | 0.00% | 8.06% | 0.00% |
| | greater than 100% of HAMFI | 26.58% | 0.00% | 59.49% | 0.00% | 0.00% | 13.92% | 0.00% |
| 481901 | less than or equal to 30% of HAMFI | 10.48% | 0.00% | 28.38% | 0.00% | 0.00% | 61.14% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMFI | 42.64% | 0.00% | 30.23% | 0.00% | 0.00% | 27.13% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 34.65% | 0.00% | 34.65% | 0.00% | 0.00% | 28.22% | 2.48% |
| | greater than 80% but less than or equal to 100% of HAMFI | 0.00% | 0.00% | 28.30% | 0.00% | 0.00% | 71.70% | 0.00% |
| | greater than 100% of HAMFI | 13.88% | 0.00% | 41.03% | 0.00% | 0.00% | 43.61% | 1.49% |
| 481902 | less than or equal to 30% of HAMFI | 12.20% | 0.00% | 79.27% | 0.00% | 0.00% | 8.54% | 0.00% |
| | greater than 30% but less than or equal to 50% of HAMFI | 9.87% | 0.00% | 28.29% | 0.00% | 0.00% | 61.84% | 0.00% |
| | greater than 50% but less than or equal to 80% of HAMFI | 6.94% | 0.00% | 50.00% | 2.78% | 0.00% | 40.28% | 0.00% |
| | greater than 80% but less than or equal to 100% of HAMFI | 0.00% | 27.78% | 61.11% | 0.00% | 0.00% | 11.11% | 0.00% |
| | greater than 100% of HAMFI | 12.08% | 0.00% | 37.20% | 0.00% | 0.00% | 50.72% | 0.00% |

Income and Race Totals

| Tract | Income | White | Black | Asian | Am. In./Alaska Native | Pacific Islander | Hispanic | Other |
|--------|--|-------|-------|-------|-----------------------|------------------|----------|-------|
| 480302 | less than or equal to 30 % of HAMFI | 45 | 0 | 195 | 0 | 10 | 120 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 59 | 0 | 85 | 0 | 0 | 55 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 35 | 25 | 84 | 0 | 0 | 85 | 4 |
| | greater than 80% but less than or equal to 100% of HAMFI | 40 | 0 | 50 | 0 | 0 | 40 | 0 |
| | greater than 100% of HAMFI | 230 | 0 | 210 | 0 | 0 | 265 | 0 |
| 480303 | less than or equal to 30 % of HAMFI | 30 | 0 | 95 | 0 | 0 | 10 | 20 |
| | greater than 30% but less than or equal to 50% of HAMFI | 40 | 0 | 135 | 0 | 0 | 60 | 20 |
| | greater than 50% but less than or equal to 80% of HAMFI | 90 | 0 | 140 | 0 | 0 | 95 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 0 | 170 | 0 | 0 | 145 | 0 |
| | greater than 100% of HAMFI | 85 | 15 | 160 | 0 | 0 | 135 | 0 |
| 480304 | less than or equal to 30 % of HAMFI | 20 | 0 | 350 | 15 | 0 | 90 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 30 | 0 | 235 | 0 | 0 | 55 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 10 | 0 | 130 | 0 | 0 | 145 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 10 | 0 | 90 | 0 | 0 | 40 | 0 |
| | greater than 100% of HAMFI | 80 | 45 | 170 | 0 | 0 | 110 | 0 |
| 480400 | less than or equal to 30 % of HAMFI | 50 | 0 | 50 | 0 | 0 | 65 | 40 |
| | greater than 30% but less than or equal to 50% of HAMFI | 70 | 0 | 110 | 0 | 0 | 175 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 15 | 0 | 95 | 0 | 0 | 110 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 115 | 0 | 90 | 0 | 0 | 80 | 0 |
| | greater than 100% of HAMFI | 370 | 0 | 415 | 10 | 0 | 225 | 15 |
| 480500 | less than or equal to 30 % of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | greater than 100% of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 480704 | less than or equal to 30 % of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | greater than 100% of HAMFI | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Income and Race - Totals

| Tract | Income | White | Black | Asian | Am. In./Alaska Native | Pacific Islander | Hispanic | Other |
|--------|--|-------|-------|-------|-----------------------|------------------|----------|-------|
| 480802 | less than or equal to 30 % of HAMFI | 20 | 0 | 70 | 0 | 0 | 35 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 40 | 0 | 30 | 0 | 0 | 100 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 20 | 0 | 70 | 0 | 0 | 110 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 10 | 0 | 40 | 4 | 0 | 40 | 0 |
| | greater than 100% of HAMFI | 90 | 15 | 140 | 0 | 0 | 185 | 0 |
| 480803 | less than or equal to 30 % of HAMFI | 10 | 0 | 0 | 0 | 0 | 64 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 50 | 0 | 4 | 0 | 0 | 105 | 10 |
| | greater than 50% but less than or equal to 80% of HAMFI | 35 | 0 | 39 | 0 | 0 | 95 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 34 | 0 | 75 | 0 | 0 | 59 | 0 |
| | greater than 100% of HAMFI | 170 | 0 | 145 | 0 | 0 | 330 | 0 |
| 480804 | less than or equal to 30 % of HAMFI | 0 | 0 | 195 | 0 | 0 | 70 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 8 | 0 | 75 | 0 | 0 | 114 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 24 | 25 | 200 | 0 | 0 | 205 | 10 |
| | greater than 80% but less than or equal to 100% of HAMFI | 24 | 10 | 125 | 0 | 0 | 94 | 0 |
| | greater than 100% of HAMFI | 135 | 0 | 350 | 0 | 0 | 220 | 0 |
| 480901 | less than or equal to 30 % of HAMFI | 10 | 0 | 180 | 0 | 0 | 65 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 25 | 10 | 179 | 0 | 0 | 155 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 10 | 0 | 205 | 0 | 0 | 140 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 0 | 125 | 0 | 0 | 70 | 0 |
| | greater than 100% of HAMFI | 15 | 0 | 285 | 0 | 0 | 100 | 0 |
| 480902 | less than or equal to 30 % of HAMFI | 0 | 10 | 160 | 0 | 0 | 110 | 4 |
| | greater than 30% but less than or equal to 50% of HAMFI | 0 | 0 | 240 | 0 | 0 | 140 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 40 | 0 | 85 | 0 | 0 | 125 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 0 | 80 | 0 | 0 | 55 | 0 |
| | greater than 100% of HAMFI | 25 | 10 | 215 | 0 | 0 | 110 | 0 |
| 480903 | less than or equal to 30 % of HAMFI | 4 | 0 | 159 | 0 | 0 | 15 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 15 | 0 | 95 | 0 | 0 | 100 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 4 | 0 | 29 | 0 | 0 | 80 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 14 | 0 | 50 | 0 | 0 | 0 | 0 |
| | greater than 100% of HAMFI | 44 | 20 | 205 | 0 | 0 | 155 | 0 |

Income and Race Totals

| Tract | Income | White | Black | Asian | Am. In./Alaska Native | Pacific Islander | Hispanic | Other |
|--------|--|-------|-------|-------|-----------------------|------------------|----------|-------|
| 481001 | less than or equal to 30 % of HAMFI | 55 | 10 | 240 | 0 | 0 | 75 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 40 | 0 | 165 | 0 | 0 | 30 | 15 |
| | greater than 50% but less than or equal to 80% of HAMFI | 30 | 0 | 84 | 0 | 0 | 145 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 20 | 0 | 125 | 0 | 0 | 25 | 0 |
| | greater than 100% of HAMFI | 39 | 0 | 110 | 0 | 0 | 55 | 10 |
| 481002 | less than or equal to 30 % of HAMFI | 10 | 0 | 300 | 0 | 0 | 90 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 25 | 35 | 145 | 0 | 10 | 75 | 15 |
| | greater than 50% but less than or equal to 80% of HAMFI | 45 | 10 | 240 | 0 | 0 | 120 | 80 |
| | greater than 80% but less than or equal to 100% of HAMFI | 20 | 0 | 64 | 0 | 0 | 140 | 0 |
| | greater than 100% of HAMFI | 80 | 15 | 360 | 0 | 0 | 124 | 10 |
| 481500 | less than or equal to 30 % of HAMFI | 24 | 0 | 180 | 0 | 0 | 60 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 39 | 0 | 95 | 0 | 0 | 4 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 75 | 0 | 295 | 0 | 0 | 30 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 35 | 0 | 90 | 0 | 0 | 35 | 0 |
| | greater than 100% of HAMFI | 70 | 0 | 310 | 0 | 0 | 145 | 0 |
| 481603 | less than or equal to 30 % of HAMFI | 10 | 25 | 195 | 0 | 0 | 60 | 10 |
| | greater than 30% but less than or equal to 50% of HAMFI | 0 | 0 | 150 | 0 | 0 | 74 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 20 | 0 | 140 | 15 | 0 | 109 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 0 | 80 | 0 | 0 | 30 | 0 |
| | greater than 100% of HAMFI | 85 | 0 | 155 | 0 | 0 | 110 | 0 |
| 481604 | less than or equal to 30 % of HAMFI | 10 | 0 | 180 | 0 | 0 | 20 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 45 | 0 | 140 | 0 | 10 | 75 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 45 | 35 | 205 | 0 | 0 | 65 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 4 | 20 | 34 | 0 | 0 | 45 | 0 |
| | greater than 100% of HAMFI | 65 | 10 | 150 | 0 | 0 | 84 | 10 |
| 481605 | less than or equal to 30 % of HAMFI | 10 | 0 | 210 | 0 | 0 | 30 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 0 | 0 | 100 | 0 | 0 | 55 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 0 | 0 | 115 | 0 | 0 | 20 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 34 | 0 | 110 | 0 | 0 | 35 | 0 |
| | greater than 100% of HAMFI | 35 | 0 | 105 | 0 | 0 | 180 | 15 |

Income and Race Totals

| Tract | Income | White | Black | Asian | Am. In./Alaska Native | Pacific Islander | Hispanic | Other |
|--------|--|-------|-------|-------|-----------------------|------------------|----------|-------|
| 481606 | less than or equal to 30 % of HAMFI | 10 | 0 | 315 | 0 | 0 | 30 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 0 | 0 | 305 | 0 | 0 | 90 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 0 | 0 | 225 | 0 | 0 | 110 | 4 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 0 | 75 | 0 | 0 | 45 | 0 |
| | greater than 100% of HAMFI | 15 | 35 | 245 | 0 | 0 | 45 | 0 |
| 481800 | less than or equal to 30 % of HAMFI | 20 | 0 | 69 | 0 | 0 | 25 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 24 | 0 | 50 | 0 | 0 | 8 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 20 | 0 | 135 | 0 | 0 | 40 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 50 | 0 | 64 | 0 | 0 | 10 | 0 |
| | greater than 100% of HAMFI | 105 | 0 | 235 | 0 | 0 | 55 | 0 |
| 481901 | less than or equal to 30 % of HAMFI | 24 | 0 | 65 | 0 | 0 | 140 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 55 | 0 | 39 | 0 | 0 | 35 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 140 | 0 | 140 | 0 | 0 | 114 | 10 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 0 | 45 | 0 | 0 | 114 | 0 |
| | greater than 100% of HAMFI | 140 | 0 | 414 | 0 | 0 | 440 | 15 |
| 481902 | less than or equal to 30 % of HAMFI | 20 | 0 | 130 | 0 | 0 | 14 | 0 |
| | greater than 30% but less than or equal to 50% of HAMFI | 15 | 0 | 43 | 0 | 0 | 94 | 0 |
| | greater than 50% but less than or equal to 80% of HAMFI | 25 | 0 | 180 | 10 | 0 | 145 | 0 |
| | greater than 80% but less than or equal to 100% of HAMFI | 0 | 20 | 44 | 0 | 0 | 8 | 0 |
| | greater than 100% of HAMFI | 50 | 0 | 154 | 0 | 0 | 210 | 0 |



City of Anaheim
PLANNING AND BUILDING DEPARTMENT

February 1, 2016

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

by email to: 2016PEIR@scag.ca.gov
and via on-line commenting form

Subject: Draft 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Related Program Environmental Impact Report (PEIR)

Dear Mr Ikharta,

The City of Anaheim appreciates the opportunity to comment on the Draft 2016 RTP/SCS and PEIR. Anaheim staff was actively involved with the Orange County Council of Governments (OCCOG) ad hoc committee for the review of these two documents. Therefore, Anaheim staff supports and concurs with the comment letter provided by OCCOG. Please consider the OCCOG comments as Anaheim's comments, as if provided in full with this letter.

In addition, please consider the following comments:

1. RTP/SCS, Executive Summary, Page 4, Passenger Rail: The description for the California High-Speed Train system should include its Phase 1 terminus in Anaheim. Please add Anaheim and its anticipated timing to this section and any other descriptions of the California High-Speed Train throughout the RTP/SCS and PEIR.
2. PEIR, Section 3.18 Utilities and Service Systems, Page 3.18-13, Table 3.18.2-2 Active Water Treatment Facilities in the SCAG Region: Anaheim's Lenain Treatment Plant, with design flow of 15mgd, is not listed in this table. Please revise the table to include Anaheim's facility.

Please contact me at (714) 765-4414 or skim@anaheim.net with any questions or concerns regarding the above comments.

Sincerely,

A handwritten signature in blue ink that reads "Susan Kim".

Susan Kim
Principal Planner



CITY OF CLAREMONT

Tony Ramos, City Manager

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207 Harvard Avenue
P.O. Box 880
Claremont, CA 91711-0880
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City Manager • (909) 399-5441
City Clerk • (909) 399-5460
Community Information • (909) 399-5497
Personnel • (909) 399-5450
Technology • (909) 399-5462

February 1, 2016

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

Draft 2016 RTP/SCS

The City of Claremont has been working closely with the Gold Line Authority on Phase 2B which will extend the Gold Line from Azusa to Montclair. The final plans are currently being prepared so that this extension is project ready by the end of 2016. We are pleased that Southern California Association of Governments (SCAG) has included the Foothill Gold Line from Glendora to Montclair in the Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). However, we are very concerned that the RTP/SCS forecasts completion of the project in 2040, almost two decades beyond the current plan.

The Foothill Gold Line is a critically needed link that will connect the Foothill communities, which include a dozen universities and major attractions such as the Los Angeles County Fairplex. It will link Los Angeles County with San Bernardino and Riverside Counties at the Montclair Transit Center. The Gold Line will alleviate traffic on one of the most heavily congested corridors, which is expected to assume the majority of the population and employment growth in the coming decades. Phase 2B of the Gold Line is estimated to achieve 18,300 daily boardings and reduce Vehicle Miles Traveled by over 111,000.

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

Sincerely,

Tony Ramos
City Manager

v:tramos/ltrs/

City of Diamond Bar

21810 Copley Drive • Diamond Bar, CA 91765-4178



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February 1, 2016

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

Re: Draft Program Environmental Impact Report for the 2016 Regional
Transportation Plan and Sustainable Communities Strategy

Dear Ms. Sun:

The City of Diamond Bar recognizes the importance of the Southern California Association of Governments ("SCAG") Draft 2016 Regional Transportation Plan ("2016 RTP") and Draft Program Environmental Impact Report ("PEIR"). The City is supportive of strategies that improve the regional transportation system within the SCAG region.

While the overall goal to reduce both the congestion impacts and environmental impacts is admirable, we continue to have concerns regarding the component of the 2016 RTP to designate only the Pomona (SR-60) Freeway as an East-West Freight Corridor ("Corridor") and the continued focus on the placement of 4 lanes of truck traffic within the San Jose Creek Wash ("SJC") which is located immediately adjacent to homes and business of many cities, including Diamond Bar.

We still believe it is premature to identify the State Route 60 and the San Jose Creek Wash alignments as a viable East-West Freight Corridor Project in the 2016 RTP. We have the following specific concerns:

- No studies have been conducted regarding the localized air, noise, vibration, or visual impacts of an elevated facility along the Corridor. Such studies may conclude that the impacts are significant, resulting in objections from surrounding communities and the need for costly mitigation (including ROW acquisition).
- While the SR-60 and the SJC are identified as "preferred" alignments, further studies may find it more practical/beneficial to select another alignment. There are pros/cons to each alignment, but selecting a final alignment will need to consider the results of

Nancy A. Lyons
Mayor

Jimmy Lin
Mayor Pro Tem

Carol Herrera
Council Member

Ruth M. Low
Council Member

Steve Tye
Council Member

the detailed studies for SR-60 and SJC, which have not yet been performed. Many of the possible routes were rejected in the planning process due to excessive ROW impacts. Further studies may find that the ROW impacts along SR-60 and the SJC (due to air, noise, vibration and/or visual) are as great, or greater than other corridors.

- The “preferred” alignments could potentially conflict with other vital transportation projects that include the SR-57/60 Confluence Project, missing freeway connectors between SR-60 and SR-57, SR-57 HOV lanes, I-605/SR-60 Mixed Flow and HOV direct connectors and the Gold Line light rail extension from East Los Angeles to South El Monte near I-605. These are all high priority projects that will be realized in the coming decades and are essential to all residents and businesses in Southern California that utilize public infrastructure on a daily basis.
- Lack of comprehensive review of the use of San Jose Creek Wash, as part of the “preferred” alignment for an East-West Freight Corridor from agencies such as L.A. County Public Works and the Army Corps of Engineers.
- The desired electric or zero-emission goods movement technology does not have any large-scale application to verify that it is feasible for this vision.

Given the above facts regarding the significant unknowns and that further studies are needed, it is our assertion that SCAG has under-stated the environmental impacts of the RTP by:

1. Inappropriately including the East-West Freight Corridor in the financially-constrained plan, with an estimated project cost of over \$23 billion, **it is not reasonable to assume the Corridor can be afforded within the constrained monies.** The “constrained” plan should only include projects that, in aggregate, can be demonstrated as affordable within the available revenues. The costs of the Corridor cannot be estimated with any credibility, given the lack of technical studies and corresponding lack of knowledge regarding right-of-way or mitigation costs. How the proposed Corridor connects to the SR-57/60 interchange is also undefined, which has potentially enormous cost. Much of the segment east of SR-57, within the SR-60 corridor, is severely constrained. It is not clear how the truck lane would be accommodated in this stretch; therefore, no reasonable estimate of

Draft Program EIR for 2016 Regional Transportation Plan
and Sustainable Communities Strategy
Page 3

cost can be derived. We understand that SCAG is currently conducting a Financial Study focusing on determining an initial viable operation segment. We look forward to seeing the results of this study.

2. The PEIR air quality analysis assumes that all trucks using the proposed east/west facility will be zero-emissions. **This is too speculative, given the discussion above, to take as fact in evaluating the air quality impacts of the RTP. Consequently, the emissions are understated in the PEIR.**

We respectfully request the 2016 RTP and PEIR to consider all possible routes to serve the ever-increasing demands of the east-west goods movement between I-710 and I-15. It is premature to conclude SR-60 is physically or financially feasible, and that better options may materialize through further studies.

Thank you in advance for your attention to our concerns. Should you have any questions regarding this letter, please contact Mr. David G. Liu, Director of Public Works/City Engineer at (909) 839-7041.

Sincerely,



James DeStefano
City Manager

c: City Council
David G. Liu, Director of Public Works/City Engineer



Ike Bootsma
Mayor

February 1, 2016

Joseph Tessari
Mayor Pro Tem

Southern California Association of Governments

William Link
Councilmember

Attn: Courtney Aguirre
818 W. 7th Street, 12th Floor

Clint Lorimore
Councilmember

Los Angeles, CA 90017

Adam Rush
Councilmember

Subject: Comments on the Draft 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy

Michele Nissen
City Manager

Dear Ms. Aguirre:

Thank you for the opportunity to review and comment on the Draft 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy (2016 RTP/SCS).

City of Eastvale staff has reviewed the 2016 RTP/SCS and its related Program Environmental Impact Report (PEIR). Our comments are attached.

While the document is overall very thorough and well-thought-out, we do have concern with some of the items, as noted in our comments.

Eastvale is excited to be a part of this dynamic region and looks forward to working with SCAG to implement our part of the vision set forth in the 2016 RTP/SCS.

Sincerely,

Michele Nissen
Eastvale City Manager

Cc: Clint Lorimore, Councilmember
Eric Norris, Planning Director
George Alvarez, Manager of Public Works

Eastvale Comments

Comments on the plan:

The 2016 RTP/SCS is comprehensive and correctly reflects the land use and population data that Eastvale provided to SCAG over the last few years.

The 2016 RTP/SCS Project List includes as future Eastvale projects several items that have already been completed, under construction, or are not located within Eastvale city limits, as follows:

1. Archibald Avenue between the San Bernardino County Line and 65th Street will be constructed to widen from 2 to 6 lanes.
2. Schleisman Road between the San Bernardino County Line/City of Chino and Harrison Avenue will be constructed as a 6-lane road throughout that segment within the next four years as conditions of approval for adjacent proposed project.
3. The ramp improvements identified on the 60 at Milliken in Eastvale may be misidentified and should be changed to Etiwanda in Jurupa Valley because Harrel and Iberia are both located in Jurupa Valley off Etiwanda. Eastvale staff has no knowledge of ramp improvements on the 60 Freeway at Milliken in Eastvale by 2020.
- 4.

| Financially Constrained RTP Projects | | | Route | From | To | Project | ?? | |
|--------------------------------------|----------|-----------|------------------------------|----------------------------|--------------------------|--|------|---|
| LOCAL HIGHWAY | EASTVALE | 3A01WT124 | ARCHIBALD AVE | SAN BERNARDINO COUNTY LINE | 65TH ST | WIDEN FROM 2 TO 6 LANES | 2020 | \$36,308 (is this in ten thousand ds?) |
| LOCAL HIGHWAY | EASTVALE | 3A04WT186 | SCHLEISMAN RD | SAN BERNARDINO COUNTY LINE | HARRISON AVE | WIDEN FROM 4 TO 6 LANES | 2030 | \$22,643 (is this in ten thousand ds?) |
| STATE HIGHWAY | EASTVALE | 3A04A30 | SR-60 (PM SBD 9.46 TO 10.46) | AT MILLIKEN AVE | BTWN HARREL AVE & IBERIA | RECONSTRUCT/WIDEN IC, RAMPS, AND CHANNELIZATION IMPROVEMENTS THIS PROJECT IS NOT LOCATED IN EASTVALE | 2020 | \$4,133 (is this in ten thousand ds?) |

Comments on PEIR:

As written, several Project Level mitigation measures (MM TRA 1(b), MM TRA 2(b), MM TRA 5(b) and MM GHG 3(b)) may be interpreted to compel local Lead Agencies to incorporate 2016 RTP/SCS mitigation measures or establish “other comparable measures” for each item in the RTP/SCS mitigation measure.

This is onerous and unnecessary. It also assumes that each jurisdiction would somehow create “comparable measures” for mitigation strategies which are entirely inappropriate for the agency (for instance, strategies related to “valet parking” would not be applicable to Eastvale—what would a “comparable” strategy be)?

The City of Eastvale suggests as shown within the example below, that the mitigation measures listed above be modified to clarify that not all the listed measures are required to have a “comparable” measure created by the local agency. Clear and workable guidance to local agencies on how to select those strategies which are feasible and which can be excluded would also be helpful.

The mitigation measures and the analysis in the document should also be clear that it is not expect that all of the strategies will be implemented in each jurisdiction. If the EIR assumes that all measures *will* be implemented in *every* local jurisdiction, the analysis is flawed and should be rewritten.

The following example includes 21 measures with 49 different items listed. A specific measure might apply somewhere in the region, but it should be very clear in each mitigation measure that only some of the listed strategies may be relevant and feasible in a given jurisdiction.

Please change the language as shown below in strike-through/underline. This may also need to be clarified in text elsewhere in the PEIR .

EXAMPLES OF REQUESTED CHANGE (Not All-inclusive):

~~MM-TRA--2(b)~~Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures, capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions:

1. Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation.
2. Advocate for a regional, market-based system to price or charge for auto trips during peak hours.
3. Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.
4. Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting
5. Encourage the use of car-sharing programs such as ZipCar. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation.
6. Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay.
7. Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that includes ~~at least~~ the following items and requirements, if determined feasible and applicable by the Lead Agency:
 - o A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes.
 - o Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.
 - o Location of construction staging areas for materials, equipment, and vehicles at an approved location.
 - o A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit.
 - o Provision for accommodation of pedestrian flow.

- o As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces.
 - o Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense, within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy.
 - o Any heavy equipment brought to the construction site shall be transported by truck, where feasible.
 - o No materials or equipment shall be stored on the traveled roadway at any time.
 - o Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion.
 - o All equipment shall be equipped with mufflers.
 - o Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors.
 - o Promote "least polluting" ways to connect people and goods to their destinations.
8. Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency:
- o Ensure transportation centers are multi-modal to allow transportation modes to intersect;
 - o Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail;
 - o To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges;
 - o Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations;
 - o Coordinate schedules and routes across service lines with neighboring transit authorities;
 - o Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles);
 - o Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so;

- o Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles;
 - o Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets;
 - o Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible.
9. Upgrade and maintain transit system infrastructure to enhance public use if determined feasible and applicable by the Lead Agency, including:
- o Ensure transit stops and bus lanes are safe, convenient, clean and efficient;
 - o Ensure transit stops have clearly marked street-level designation, and are accessible;
 - o Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate;
 - o Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one-half mile.
10. Enhance customer service and system ease-of-use if determined feasible and applicable by the Lead Agency, including:
- o Develop a Regional Pass system to reduce the number of different passes and tickets required of system users;
 - o Implement "Smart Bus" technology, using GPS and electronic displays at transit stops to provide customers with "real-time" arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service);
 - o Investigate the feasibility of an on-line trip-planning program.
11. Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency including:
- o Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic;
 - o Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.
12. Promote ride sharing programs if determined feasible and applicable by the Lead Agency, including:
- o Designate a certain percentage of parking spaces for ride-sharing vehicles;
 - o Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles;
 - o Provide a web site or message board for coordinating shared rides;
 - o Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit;
 - o Hire or designate a rideshare coordinator to develop and implement ridesharing programs.

13. Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency including:
 - o Provide assistance to regional and local ridesharing organizations;
 - o Advocate for legislation to maintain and expand incentives for employer ridesharing programs;
 - o Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes;
 - o Provide public recognition of effective programs through awards, top ten lists, and other mechanisms.
14. Implement a “guaranteed ride home” program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program.
15. Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations.
16. Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers.
17. Work with existing shuttle service providers to coordinate their services.
18. Facilitate employment opportunities that minimize the need for private vehicle trips, including:
 - o Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations;
 - o Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.
19. Enforce State idling laws for commercial vehicles, including delivery and construction vehicles.
20. Organize events and workshops to promote GHG-reducing activities.
21. Implement a Parking Management Program to discourage private vehicle use, including:
 - o Encouraging carpools and vanpools with preferential parking and a reduced parking fee;
 - o Institute a parking cash-out program;
 - o Renegotiate employee contracts, where possible, to eliminate parking subsidies;
 - o Install on-street parking meters with fee structures designed to discourage private vehicle use;
 - o Establish a parking fee for all single-occupant vehicles.

Additional Comments on Summary of Environmental Consequences:

- Work with school districts to improve pedestrian and bicycle to schools and restore school bus service
 - Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike lane access to transit facilities.
 - Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency
 - Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers.
 - Synchronize traffic signals to reduce congestion and air quality
 - Work with community groups and business associations to organize and publicize walking tours and bicycle events
 - Support legislative to increase funding for local street repair.

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JOSEPH D. PETTA
Attorney
petta@smwlaw.com

February 1, 2016

Via E-Mail and U.S. Mail

Draft 2016 RTP/SCS PEIR Comments
Attention: Ms. Lijin Sun
Southern California Association of
Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017
2016PEIR@scag.ca.gov

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

**Re: SCAG 2016-2040 Regional Transportation Plan / Sustainable
Communities Strategy and Program EIR**

Dear Ms. Sun and Ms. Aguirre:

We submit this letter on behalf of the City of El Segundo to comment on the Southern California Association of Government's ("SCAG") 2016 Regional Transportation Plan and Sustainable Communities Strategy ("RTP" or "Plan") and the Draft Program Environmental Impact Report ("DEIR") for the RTP. El Segundo recognizes the critical role that Southern California airports play in the region's economy and thus has been on the forefront of promoting a regional air transport system.

The City is concerned that the RTP demonstrates a shift in SCAG policy away from regionalization as a means of distributing aviation demand and its impacts, toward inducing, and thus centralizing demand at LAX by funding removal of existing ground access constraints and generally encouraging greater growth. Indeed, unlike previous RTPs, the 2016 RTP's core aviation strategy appears to be centralization of the region's aviation activity at LAX. Such a strategy will ensure that the burdens of heightened demand on communities like El Segundo surrounding the airport persist well into the 21st century, while depriving other communities, like those near Ontario International Airport, of the airport growth they desire.

Ms. Lijin Sun and Ms. Courtney Aguirre
 February 1, 2016
 Page 2

The City also has serious concerns about the RTP's 2040 forecast of "constrained" demand at LAX: between 82.9 million annual passengers ("MAP") and 96.6 MAP, representing a nearly *30 percent increase* over documented passenger levels for 2015. Disturbingly, this MAP forecast assumes the approval and completion of local ground access projects that are still in the early planning and environmental review stages. These projects include the massive, controversial Landside Access Modernization Program ("LAMP") proposed at LAX, for which no environmental impact report ("EIR") has been released,¹ and the proposed Airport Metro Connector. *See* RTP Project List, Table 2 at 157, 162.

The City strongly urges SCAG not to assume completion of local airport ground access projects and other capacity enhancing projects at LAX as they are years away from realization and may never be implemented due to potential opposition by the airport's stakeholders, including the City of El Segundo. Los Angeles World Airports ("LAWA"), which has approval authority over projects at LAX, has completed no environmental review of operations above 78.9 MAP—the airport's operational capacity as set forth in the LAX Master Plan, the 2006 Stipulated Settlement Agreement that resulted from Master Plan litigation, and the Specific Plan Amendment Study ("SPAS") LAWA prepared pursuant to the Settlement.

SCAG's RTP commitment of over \$2 billion toward ground access projects at LAX is premature and inappropriately pre-ordains that the airport will expand continuously for the next quarter-century. Such a move by SCAG is particularly inappropriate because LAWA itself has consistently committed to the community that it is planning for 78.9 MAP, nothing more. *See* LAX Master Plan (2004) at 2-1 ("Alternative D" designed to serve "approximately 78 MAP, which is similar to the activity level identified in the scenario adopted by SCAG for LAX"), excerpted at Attachment A and available at http://www.lawa.org/uploadedFiles/OurLAX/pdf/Final_LAX_MP/009_MainDocument_Ch_2.00.pdf; LAX Master Plan Final EIR (2004), Executive Summary available at http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/FEIS_EIR_Part1-01_ExecutiveSummary.pdf; 2006 Stipulated Settlement at 9, attached as Attachment B; Final LAX SPAS Report (2013) at 1-1 (identifying

¹ Los Angeles World Airports issued an initial study and notice of preparation of an EIR for the LAMP project on February 5, 2015. *See* <http://connectinglax.com/files/LAX.LAMP.Initial.Study.2015.pdf>; <http://connectinglax.com/files/LAX.LAMP.NOP.2015.pdf> (last visited February 1, 2016).

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 Page 3

amendments to the LAX Specific Plan that plan for “a practical capacity of 78.9 [MAP]”), excerpted at Attachment C and available at <http://www.lawa.org/uploadedFiles/SPAS/PDF/LAX%20SPAS%20Final%20SPAS%20Report%20Document%20Final%20CD-Web%20Version%2001%2030%202013.pdf>; City of Los Angeles LAX Specific Plan (2005) at 12 (requiring LAWA to initiate a new specific plan amendment study if annual passenger forecast is anticipated to exceed 78.9 MAP), available at <http://planning.lacity.org/complan/specplan/pdf/LAX.pdf>.² As LAWA has not completed the public, environmental, and political processes necessary to evaluate such massive growth beyond 78.9 MAP, SCAG should not be relying on numbers as high as 96.6 MAP and the proposed RTP funding for ground access projects at LAX should be reduced accordingly.³

I. SCAG Should Adopt 78.9 MAP as the 2040 Constrained Demand Forecast for LAX.

Purporting to calculate existing “airfield” and “terminal” capacity constraints at each “constrained” airport in the region, the RTP concludes that “the [2040] capacity of LAX is in the range of 82.9 MAP to 96.6 MAP, limited by the airfield, based on the runway configuration described . . . in the SPAS.” RTP Aviation & Ground Access Appendix 22. *See also id.* at 19 (“airfield” constraint looks at runways’ and taxiways’ overall aircraft capacity; “terminal” constraint looks at passenger gates as a limiting factor on demand). This forecast is as much as 30 percent higher than documented

² All Web addresses last visited February 1, 2016. All documents, including draft and final versions, attachments, appendices, and addenda, are incorporated by reference herein. The 2006 Stipulated Settlement was signed by LAWA and City of Los Angeles, County of Los Angeles, Alliance for Regional Solution to Airport Congestion, City of El Segundo, City of Culver City and City of Inglewood.

³ On December 23, 2015 the City submitted a request under the California Public Records Act for various SCAG documents relating to, among other things, SCAG’s method for calculating the 2040 constrained demand forecast for LAX and the DEIR’s basis for concluding the forecast would not result in certain significant environmental impacts. On January 7, 2016, SCAG indicated it would need an additional 14 days to respond, and on January 21, provided some responsive documents. On February 1, we followed up regarding the missing documents and requested a more complete response. Given this delay of critical documents and information, the City hereby repeats its request for a two-week extension of the comment deadline. SCAG has not responded to this request. This letter therefore contains the City’s comments to date, which the City may supplement after the deadline with additional comments responding to the records SCAG disclosed.

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passenger levels in 2015, and 25 percent higher than LAWA's current planned capacity of 78.9 MAP, all using the same airport facilities (i.e., gates and airfield) that LAWA's own recent environmental review documents consistently conclude would result in serving 78.9 MAP.⁴

The Master Plan, SPAS, and the 2006 Settlement establish a maximum operational capacity of 78.9 MAP. The Master Plan's design for a total of 153 gates is based on a maximum capacity of 78.9 MAP. *See* SPAS Draft EIR (2012) at 2-4, excerpted at Attachment E. LAWA's recent environmental review of all airport development projects consistently assumes this capacity for the purpose of evaluating projects' environmental impact. *See, e.g.*, Draft EIR, Midfield Satellite Concourse ("MSC") (March 2014) at 4-16 fn. 10 (stating project would comply with LAX Master Plan gate cap limit), excerpted at Attachment F; "MSC North FAQs," available at <http://www.lawa.org/mscnorth/faq.aspx> (stating MSC Program will comply with 2006 Stipulated Settlement "at all times").⁵ These documents are not mere paper exercises, but rather official representations to the public regarding LAWA's plans for the future of LAX as it relates to surrounding residential and other sensitive land uses. The City of El Segundo and the public generally have participated actively in the evaluation of LAX development plans and relied in good faith on LAWA's representations about constrained growth at LAX, one of the busiest airport in the United States.

Thus, the sudden and unprecedented increase in the LAX passenger forecast is a blow to the public's faith in SCAG as the region's foremost planning agency, and in LAWA as the operator of LAX. Increasing the airport's capacity for planning purposes is a public process that must begin at LAWA and involve the full LAX stakeholder

⁴ The MAP forecast for LAX fails to include an important third constraint: existing ground access. The purpose of the RTP is to identify and address existing (and future) ground access constraints, not assume their removal before the RTP or any local ground access project is approved. By adopting this approach, SCAG attempts to avoid responsibility for evaluating any growth in LAX operations by claiming they would have occurred with or without ground access improvements. We recognize that during the 2016 RTP process, SCAG asserted that "current research has demonstrated that access to the airport is not a barrier for capacity" because "passengers will continue to purchase tickets even if airport access is challenging (for example drive an alternate route or stay at an adjacent airport hotel.)" Report from Ryan Hall to SCAG Transportation Committee, July 23, 2015 at 9, excerpted at Attachment D. This "research" is insufficiently documented to demonstrate that ground access at LAX is not a demand constraint.

⁵ *See supra*, footnote 2.

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community. Furthermore, SCAG's prior statements regarding the importance of the 78.9 MAP cap call into question the proposed RTP's compliance with SCAG's mandate under State law to "prepare and adopt a regional transportation plan directed at achieving a *coordinated and balanced regional transportation system*, including, but not limited to . . . aviation facilities and services." Gov. Code § 65080(a) (emphasis added).⁶ The public could reasonably assume that SCAG has been listening to LAWA, to the exclusion of other interested stakeholders.⁷

LAWA, not SCAG, must take principal responsibility for an open, public process to evaluate any potential increase in the passenger forecast for LAX beyond the 78.9 MAP number currently contained in LAWA's approved plans for LAX. For example, LAWA could elect to update the LAX Master Plan and SCAG could then include the resulting capacity numbers in a future RTP. SCAG should not, as currently proposed, "get out ahead" of LAWA on this important issue, as doing so would improperly and prematurely give credence to LAWA's new plan to abruptly depart from its historic assurances to the public before conducting proper environmental analysis of the actual impacts of increased passenger forecast.

II. The DEIR Fails to Analyze the Environmental Impacts of Implementing the 2016 RTP.

If the RTP proceeds as currently proposed, it will induce growth at LAX by removing existing ground access constraints so that LAX can realize a passenger forecast of 82.9–96.6 MAP. As explained above, this induced growth will far exceed the present

⁶ Not only did SCAG adopt 78.9 MAP as the 2035 forecast in the previous RTP, but SCAG also states, in a report from the current RTP planning process, that "an important issue to consider in the future demand forecast would be whether to continue assuming the 78.9 MAP capacity constraint even beyond 2020. *Lifting the cap at LAX could have a profound impact on the ability of regional airports, particularly ONT, to fulfill its full potential in the foreseeable future.*" Report from Rich Macias to SCAG Transportation Committee, June 6, 2013 at 101 (emphasis added), excerpted as Attachment G.

⁷ Although it is evident that LAWA and other airports provided extensive input on the MAP forecasts during the RTP's preparation (including, among other things, data on airport layout, gate and terminal configurations, and historic passenger levels), the extent of LAWA's political influence on the RTP's forecasts is not yet fully clear. SCAG's January 21 response to the City's records request contained SCAG communications to LAWA regarding the latter's comments on MAP forecast calculations, but did not include LAWA's comments. The City will continue to seek this and other information apparently missing from SCAG's records disclosure.

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Page 6

operations capacity of 78.9 MAP established in LAWA's planning documents for LAX, and any level previously analyzed by LAWA under the California Environmental Quality Act ("CEQA") or National Environmental Policy Act ("NEPA").

Taken together, the RTP and DEIR suffer from a distinct internal inconsistency: while the RTP assumes approval and construction of local ground access projects for the purpose of calculating its constrained demand forecasts, the DEIR avoids analyzing the local impacts of those forecasts, evidently because SCAG considers these impacts the local agencies' responsibility. DEIR at 3.13-32 (concluding noise impacts "less than significant" because "major public airports have an airport land use plan that provides guidance on noise levels and land use in adjacent areas"). CEQA, however, requires that every EIR be detailed, complete, and reflect a good faith effort at full disclosure. CEQA Guidelines § 15151. The document should provide a sufficient degree of analysis to inform the public about the proposed project's adverse environmental impacts and to allow decision-makers to make intelligent judgments. *Id.* Consistent with this requirement, the information regarding the project's impacts must be "painstakingly ferreted out." *Environmental Planning & Information Council of Western El Dorado County v. County of El Dorado* ("EPIC") (1982) 131 Cal.App.3d 350, 357.

SCAG attempts to excuse the DEIR's lack of detail based on the fact that it is merely a "program" EIR that may be general in nature. The "program" nature of the DEIR, however, is no excuse for its lack of detailed analysis, particularly of the RTP's impacts on noise and air quality at and around LAX. CEQA requires that even a program EIR provide an in-depth analysis of a large-scale project, looking at effects "as specifically and comprehensively as possible." Guidelines § 15168(a), (c)(5). While programmatic review allows an agency to avoid speculating, the practice "does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later EIR." § 15152(b). Clearly SCAG does not consider ground access projects at LAX merely "speculative," as it assumes their completion to arrive at the 2040 MAP forecast.

Whether a lead agency prepares a "program" EIR or a "project-specific" EIR under CEQA, the requirements for an adequate EIR remain the same. Guidelines § 15160. "Designating an EIR as a program EIR also does not by itself decrease the level of analysis otherwise required in the EIR." *Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency* (2000) 82 Cal.App.4th 511, 533; *see also* Guidelines § 15146 (degree of specificity required in program EIR varies not with "program" label, but rather with degree of specificity in underlying activity). Even a program-level EIR must contain "extensive detailed evaluations" of a plan's effects on the existing

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 February 1, 2016
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environment. *See EPIC*, 131 Cal.App.3d at 358. *See also Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692,723-24 (where the record before an agency contains information relevant to environmental impacts, it is both reasonable and practical to include that information in an EIR).

The DEIR's reliance on future, project-level environmental review by LAWA or other local agencies is also misplaced. Again, CEQA's policy favoring early identification of environmental impacts does not allow agencies to defer analysis of a plan's impacts to some future EIR for specific projects contemplated by that plan. *See Bozung v. Local Agency Formation Comm.* (1975) 13 Cal.3d 263, 282-84; *Christward Ministry v. Superior Court* (1986) 84 Cal.App.3d 180, 194; *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 409. Because the RTP as currently proposed identifies passenger growth at LAX as part of the project, the DEIR must analyze the potential environmental impacts resulting from it.⁸ If such analysis were performed, it would necessarily disclose the additional noise, air quality, and traffic impacts that would be experienced by the already heavily-impacted communities around LAX, including El Segundo. *See, e.g.*, LAX Final Noise Exposure Map Report (2015) Exhibit 5-2 (showing impact of airport noise on City of El Segundo), available at http://www.lawa.org/pdf/14CFRPart150_FinalNEMReport_LAX_Entire%20Report_read_Redacted.pdf; LAX Air Quality & Source Apportionment Study (2013) at 6-52 (summarizing airport's air quality impacts on City of El Segundo), available at <http://www.lawa.org/uploadedFiles/OurLAX/pdf/Vol%202%20-%20LAX%20AQSAS%202014%2003%2011s.pdf>; *id.* at 7-18 (identifying South Airfield, adjacent to El Segundo, as a "main source area[] for SO₂").⁹

For the foregoing reasons, the City of El Segundo requests that SCAG delay further action on the proposed 2016 RTP until the Plan is revised to reflect the capacity for LAX established and analyzed in LAWA's planning documents; in other words, 78.9 MAP. If SCAG does not revise its MAP forecast for LAX, then SCAG must revise and

⁸ The DEIR is flawed for the additional reason that it improperly assumes that certain impacts, including noise, will be less than significant merely because the 2016 RTP's regional MAP forecast is lower than the previous RTP's forecast. DEIR at 3.13-32. This is patently impermissible under CEQA. In *EPIC*, for example, the court found an EIR for a proposed general plan amendment inadequate on grounds that the EIR should have compared the plan amendment to the existing state of the *physical environment*, not to the existing *plan*. 131 Cal.App.3d at 358.

⁹ *See supra*, footnote 2.

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recirculate the DEIR to adequately evaluate all of the foreseeable environmental impacts of approving the RTP, including local noise, air quality, and traffic impacts at and around LAX.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Joseph "Seph" Petta

749764.2

Attachment A

2 Alternative D Development and Refinement

Alternative D was developed as a new alternative in response to public comment on Master Plan Alternatives A, B, C, and the No Action/No Project Alternative. **Figure 2.0-1** presents the relationship between Alternative D and the Master Plan alternatives described in the 2001 documents.

To ensure that the communities' full range of priorities were represented, Alternative D would be developed to offer a regional airport development alternative for LAX. Alternative D would be designed to serve approximately 78 MAP, which is similar to the activity level identified in the scenario adopted by SCAG for LAX. The Alternative D design would encourage other airports in the region to develop facilities to accommodate regional demand beyond the level served at LAX. In the short term, LAX would continue to serve as the region's predominant airport for international passenger and cargo operations due to the specialized facilities developed over time to serve the international demand.

In response to increased security threats, Alternative D would protect all airport users and critical airport infrastructure from security threats, incorporate Transportation Security Administration (TSA) recommendations, avoid concentrations of people in public areas, enhance on-airport law enforcement presence and surveillance capabilities, and enhance emergency response. Protection of people is paramount in all areas of the airport. The facilities in the CTA and the surrounding ground access network have been identified as infrastructure components critical to airport operations. The objective of Alternative D is to provide a facility that can continue to operate under the highest security levels with minimal impacts to the passenger processing experience. The facilities in the CTA and the surrounding ground access network have been identified as infrastructure components critical to airport operations. Refer to **Appendix I** for a detailed assessment of the security and safety features of Alternative D.

As a result, the ground access network would be redeveloped to limit vehicle access to the CTA and to remove vehicle parking from this area. All facilities would be designed to minimize vulnerability of people to security threats. Passengers and employees would access the CTA via the Landside Automated People Mover (APM) system that would be developed as part of Alternative D.

Attachment B

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FILED
SUPERIOR COURT OF CALIFORNIA

FEB 17 2005



SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

CITY OF EL SEGUNDO, a California
municipal corporation,

Petitioner,

v.

CITY OF LOS ANGELES; CITY COUNCIL
OF THE CITY OF LOS ANGELES; JAMES
K. HAHN, Mayor of the City of Los Angeles;
LOS ANGELES WORLD AIRPORTS a/k/a
DEPARTMENT OF AIRPORTS OF THE
CITY OF LOS ANGELES; and BOARD OF
AIRPORT COMMISSIONERS OF THE
CITY OF LOS ANGELES,

Respondents.

Case No. RIC 426822

(Los Angeles Superior Court Case No. BS094279;
transferred and consolidated with related cases Los
Angeles Superior Court Nos. BS094320, BS094359
and BS094503)

[Assigned To The Honorable Stephen D. Cunnison
For All Purposes]

~~PROPOSED~~ JUDGMENT PURSUANT TO
STIPULATED SETTLEMENT

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COUNTY OF LOS ANGELES,
CALIFORNIA, a political subdivision of the
State of California; CITY OF INGLEWOOD,
CALIFORNIA, a chartered municipal
corporation; and CITY OF CULVER CITY,
CALIFORNIA, a chartered municipal
corporation,

Petitioners and Plaintiffs,

v.

THE CITY OF LOS ANGELES,
CALIFORNIA, a chartered municipal
corporation; CITY COUNCIL OF THE CITY
OF LOS ANGELES; JAMES K. HAHN,
Mayor, City of Los Angeles; LOS ANGELES
WORLD AIRPORTS a/k/a DEPARTMENT
OF AIRPORTS OF THE CITY OF LOS
ANGELES; LOS ANGELES BOARD OF
AIRPORT COMMISSIONERS and DOES 1
through 100, inclusive,

Respondents and Defendants.

Petition Filed: January 6, 2005

ALLIANCE FOR A REGIONAL SOLUTION
TO AIRPORT CONGESTION,

Petitioner,

v.

CITY OF LOS ANGELES, a Municipal
Corporation; CITY COUNCIL OF THE CITY
OF LOS ANGELES; JAMES K. HAHN,
Mayor, City of Los Angeles; BOARD OF
AIRPORT COMMISSIONERS; LOS
ANGELES WORLD AIRPORTS;
CALIFORNIA COASTAL COMMISSION, a
California state agency; and DOES 1-X,

Respondents.

Petition Filed: January 6, 2005

[PROPOSED] JUDGMENT PURSUANT TO STIPULATED SETTLEMENT

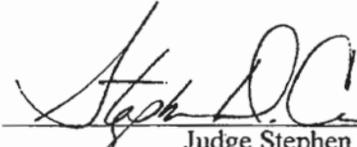
WHEREAS, Petitioners City of El Segundo, City of Inglewood, City of Culver City, County of
Los Angeles, and Alliance for a Regional Solution to Airport Congestion ("Petitioners") and
Respondents Los Angeles World Airports, City of Los Angeles, Los Angeles City Council, Mayor of

1 the City of Los Angeles, and the Los Angeles Board of Airport Commissioners ("Respondents") have
2 agreed to, and this Court has reviewed, the Stipulated Settlement, which is attached hereto as Exhibit A
3 and incorporated herein by this reference.

4 Good cause appearing, it is ORDERED that the Stipulated Settlement is entered as the Final
5 Judgment in this matter. The Stipulated Settlement is intended to serve in lieu of any determination by
6 this Court as to the merits of Petitioners' allegations in the litigation. Petitioners' actions are hereby
7 dismissed with prejudice, except that jurisdiction is retained for the limited purposes set forth in
8 Section XIII of the Stipulated Settlement. Notwithstanding any current, applicable provisions of Part
9 II, Title VIII, Chapter 1.5 of the Code of Civil Procedure regarding dismissal for delay in prosecution,
10 this Court shall retain jurisdiction over this case and the parties thereto until expiration of the
11 Stipulated Settlement.

12 It is further ORDERED that the individual cases filed by Petitioners shall be consolidated for
13 all such further purposes. Upon the Parties' stipulation and this Court's approval pursuant to Rule 244
14 of the California Rules of Court, any and all judicial enforcement proceedings shall be conducted
15 before a judicial officer pursuant to the terms of Section XIII of the Stipulated Settlement.

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17 Dated: Feb. 17, 2006



Judge Stephen D. Cunnison
Riverside County Superior Court

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STIPULATED SETTLEMENT

This Stipulated Settlement (this "Settlement") is made and entered into as of this 16th day of February, ~~2005~~, 2005, by and among Petitioners City of El Segundo ("El Segundo"), City of Inglewood ("Inglewood"), City of Culver City ("Culver City"), County of Los Angeles (the "County"), and Alliance for a Regional Solution to Airport Congestion ("ARSAC") and Respondents Los Angeles World Airports ("LAWA"), City of Los Angeles, Los Angeles City Council, Mayor of the City of Los Angeles, and the Los Angeles Board of Airport Commissioners ("BOAC"). This Settlement is entered into by the Parties for the purpose of resolving the litigation filed by Petitioners challenging Respondents' approval of the LAX Master Plan Program. This Settlement is intended to serve in lieu of any determination by the Court as to the merits of Petitioners' allegations, and, upon execution of this Settlement by all Parties, the Parties shall request, pursuant to Code of Civil Procedure section 664.6, that the Court (a) dismiss all causes of action brought by Petitioners challenging the LAX Master Plan Program and (b) retain jurisdiction over this case solely for the purpose of enforcing the mutual obligations incurred by the Parties as specified by the enforcement provisions in this Settlement.

RECITALS

A. Los Angeles International Airport ("LAX") is the primary commercial air transportation hub of the Los Angeles region. LAX is owned and operated by the City of Los Angeles, whose BOAC oversees the policy, management, operation and regulation of LAX. The Executive Director and the staff of LAWA administer the day-to-day operations of LAX under the direction of BOAC.

B. LAWA has sought for a number of years to improve and modernize LAX. Commencing in 1994, LAWA undertook the drafting of a new LAX Master Plan to serve as a conceptual framework for future improvements at LAX. In 1997, LAWA and the FAA initiated the preparation of an Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") to evaluate the potential environmental effects of each alternative being considered for the LAX Master Plan.

C. Petitioners have long been concerned about the ongoing and projected impacts of LAX operations on traffic, noise, air quality, human health risks and the quality of life in communities surrounding LAX. During the public review period for the EIS/EIR, Petitioners submitted extensive comments on issues including mitigation measures to offset the potentially significant environmental effects of the LAX Master Plan. Petitioners' comments also addressed the need to limit future growth of activity at LAX in conjunction with a broad regional effort to satisfy growing air transportation demand at other airports in the Southern California region.

D. LAWA has indicated that in response to public comments and in light of the greatly elevated issue of airport security following the events of September 11, 2001, LAWA formulated an LAX Master Plan alternative, Alternative D, to be considered within the range of options for the LAX Master Plan. LAWA has indicated that Alternative D was designed to accommodate passengers and cargo activity levels at LAX comparable to activity levels that would likely result without any LAX Master Plan improvements, thereby encouraging other airports in the region to absorb a greater share of the regional demand. LAWA has indicated that Alternative D was also designed with an emphasis on airport safety and security.

E. On or about December 7, 2004, the Los Angeles City Council approved the LAX Master Plan (Alternative D), the LAX Plan, the LAX Specific Plan, and related entitlements. The LAX Plan is the Los Angeles' general plan for the airport, setting out goals, policies, objectives and programs for the long-term development and use of the airport. The LAX Specific Plan provides a procedural mechanism by which the broad goals and objectives of the LAX Plan will be achieved.

F. In January of 2005, Petitioners filed lawsuits challenging the approval of the LAX Master Plan Program and the Final EIR under CEQA in State Court against, among others, the City of Los Angeles, the Los Angeles City Council, the Mayor of the City of Los Angeles, LAWA and BOAC. In July of 2005, El Segundo, Inglewood, Culver City and the County filed lawsuits challenging the ROD under NEPA and the Clean Air Act in the Ninth Circuit Court of Appeals.

DEFINITIONS

As used in this Settlement, the following capitalized terms will have the following meanings. All definitions include both the singular and plural form.

"Aircraft Noise Mitigation Program" or **"ANMP"** means the noise mitigation program operated by LAWA in accordance with the Land Use Mitigation Program as adopted by Board Resolution No. 21481.

"Airport Layout Plan" means the narrative description and graphic depiction of existing and proposed airport layouts for runways, roadways, parking, and other airport facilities at LAX, as approved by the FAA's Record of Decision.

"Alternative D" means the LAX Master Plan Alternative D as described and evaluated in the LAX Master Plan EIR.

"ALUC" means Los Angeles County Airport Land Use Commission.

"Avigation Easement" means an easement that conveys the right to subject a property to noise, vibrations, fumes, smoke, fumes and soot, and other effects which are inherent in the operation of aircraft.

"Board of Airport Commissioners" or **"BOAC"** means the head of the Los Angeles Department of Airports created under Charter Section 600 *et seq.*

"CEQA" means the California Environmental Quality Act.

"FAA" means the Federal Aviation Administration.

"General Fund" means the City of Los Angeles fund for deposit of general receipts which are not restricted, such as property, sales and business taxes and various fees; also functions as a set of subfunds (primarily by departments) to track appropriations and expenditures.

"LAX Master Plan" means the document approved by the Los Angeles City Council on or about December 7, 2004 as a conceptual strategic framework for future improvements at LAX through 2015.

“LAX Master Plan EIR” means the Final Environmental Impact Report (State Clearinghouse No. 1997061047) for the LAX Master Plan Program, dated April 2004, as supplemented by four Environmental Impact Report Addenda prior to certification of the Environmental Impact Report by the Los Angeles City Council on December 7, 2004.

“LAX Master Plan EIS” means the Final Environmental Impact Statement approved by the FAA in connection with its approval of the Airport Layout Plan in May of 2005.

“LAX Master Plan EIS/EIR” means the LAX Master Plan EIS and the LAX Master Plan EIR.

“LAX Master Plan Program” means the entire program that comprises the approval by both the Los Angeles City Council and the FAA in its ROD, and subsequent implementation of Alternative D, including the initial approval of all entitlements and other actions in conjunction with the Los Angeles City Council’s approval of the LAX Master Plan, including, but not limited to, the following:

- LAX Master Plan;
- LAX Plan;
- LAX Specific Plan;
- Other associated general plan amendments;
- LAX Zone and zone changes;
- Tentative Tract Map Nos. 54407, 54408 and 54409;
- LAX Master Plan EIS/EIR;
- Mitigation Monitoring and Reporting Program for the LAX Master Plan;
- CEQA Findings;
- Statement of Overriding Considerations;
- Land Use Findings;
- Conceptual Approval of the Draft Relocation Plan;
- Airport Layout Plan;
- ROD for the Airport Layout Plan;
- ALUC Override Findings;
- ALUC inconsistency determination override approvals; and
- ALUC “impasse” appeal process and determination.

The LAX Master Plan Program includes subsequent LAWA, BOAC, and/or Los Angeles City Council approvals of all entitlements and other actions for any of the specific project components and activities that implement Alternative D.

“LAX Plan” means the City of Los Angeles’ general plan component for LAX, setting out goals, policies, objectives and programs for the long-term development and use of the airport consistent with the vision established by the LAX Master Plan Program.

“LAX Specific Plan” means Ordinance No. 176345, adopted by the Los Angeles City Council on December 14, 2004, which establishes zoning and land use regulations and procedures for the processing of future specific projects and activities that are anticipated under the LAX Master Plan Program.

“Los Angeles World Airports” or “LAWA” means the Los Angeles Department of Airports created under Charter Section 600 *et seq.*

“NEPA” means the National Environmental Policy Act.

“Petitioners” means El Segundo, Inglewood, Culver City, the County, and ARSAC.

“Party” means any Petitioner or any Respondent.

“Record of Decision” or “ROD” means the FAA’s record of decision for the proposed LAX Master Plan, dated May 20, 2005, as well as all documents supporting or relied on for the FAA’s record of decision approving the Airport Layout Plan, including, but not limited to, the agency actions constituting the basis for the Clean Air Act general conformity determination, the Endangered Species Act biological opinion of no jeopardy, and the Coastal Zone Management Act consistency determination and consistency certification.

“Released Claims” mean any and all state and/or federal law based suits, petitions, claims or causes of action challenging the sufficiency or legal validity of the LAX Master Plan Program, the Tom Bradley International Terminal Improvement Project, the In-Line Baggage Screening Implementation Project, and/or the associated environmental documents for those projects. Notwithstanding the foregoing, the Released Claims shall not include any state law based suits, petitions, claims or causes of action challenging the sufficiency or legal validity of the Yellow Light Projects. For purposes of clarification, the Released Claims include, but are not limited to, any and all claims challenging the South Airfield Improvement Project and the West Satellite Concourse.

“Respondents” mean the City of Los Angeles, the Los Angeles City Council, the Mayor of the City of Los Angeles, LAWA and BOAC.

“Yellow Light Projects” for the purposes of this Settlement mean:

- (a) Development of the Ground Transportation Center (“GTC”), including the baggage tunnel, associated structures and equipment;
- (b) Construction of the Automated People Mover (“APM”) from the GTC to the Central Terminal Area (“CTA”), including its stations and related facilities and equipment;
- (c) Demolition of CTA Terminals 1, 2 and 3;
- (e) Reconfiguration of the north airfield as contemplated in the LAX Master Plan, including center taxiways; and
- (f) Improvements to on-site roadways associated with (a) and (b) above.

STIPULATED SETTLEMENT PROVISIONS

NOW, THEREFORE, in consideration of the mutual covenants, promises and undertakings set forth in this Settlement and other consideration, the receipt and adequacy of which the Parties acknowledge, the Parties stipulate and agree as follows:

SECTION I. SETTLEMENT OVERVIEW

A. No Admission of Liability. This Settlement is entered into by the Parties without any admission of liability by any Party.

B. Recitals True and Correct. The above recitals are true and correct and are incorporated as a part of this Settlement.

C. Mutual Consideration. The commitment by each of Petitioners to abide by the terms of this Settlement is consideration for LAWA's commitment to abide by the terms of this Settlement. LAWA's commitment to abide by the terms of this Settlement is consideration for the commitment by each of Petitioners to abide by the terms of this Settlement.

D. Term of Settlement. This Settlement shall be operative from the date of its approval by the Parties through December 31, 2015, except that this Settlement's passenger gate provisions set forth in Section IV shall be operative through December 31, 2020.

E. No City Expenditure Required. Under no circumstances may any of LAWA's obligations under this Settlement require any expenditure from the City's General Fund or any other City-controlled source of funds, except LAWA funds.

F. Regulation of LAX. The Parties acknowledge that the operation of LAX is regulated by state and federal legislation. The intention of the Parties is that this Settlement complies with all applicable state and federal legal requirements, including requirements imposed by the FAA and other regulatory authorities. The Parties, recognizing the significance of the FAA's involvement in this process, pledge their full support and cooperation to endorse and implement the terms of this Settlement subject to FAA approval.

G. FAA and Other Regulatory Determinations. Notwithstanding any provision of this Settlement, LAWA shall not be required to take any actions or to expend any funds (i) that are prohibited or disapproved by an FAA determination or any other regulatory agency or (ii) for which the FAA or any other federal agency makes a determination that the actions or fund expenditures will result in withholding or demand for remittance of federal funds. When such a determination is made, LAWA shall fulfill requirements of this Settlement consistent with the FAA determination and the determination of any other regulatory agency. Prior to execution of this Settlement, the Parties, cooperating and working together, sought and obtained the FAA's review and written statement regarding the effect of the passenger gate provisions set forth in Section IV on FAA's environmental obligations and matters under FAA's statutory authority ("Statement"). Based on such review, the FAA did not object to the passenger gate provisions set forth in Section IV.

H. Rescission of Impasse Appeal Proceeding. The City of El Segundo and the County of Los Angeles shall request that the Los Angeles County Airport Land Use Commission rescind its April 20, 2005 decision upholding the "impasse" administrative appeals regarding the LAX Master Plan Program. All of LAWA's obligations to perform under this Settlement are conditioned on the Los Angeles County Airport Land Use Commission's prior rescission of its April 20, 2005 decision. Petitioners shall promptly notify LAWA of such rescission.

SECTION II. DISMISSAL OF PENDING ACTIONS AND RELEASE OF CLAIMS

A. Dismissal of Pending Actions. Upon execution of this Settlement by all Parties, Petitioners shall thereupon dismiss with prejudice any pending judicial and/or administrative proceedings including (i) the consolidated litigation challenging the LAX Master Plan Program in Riverside County Superior Court (Case No. RIC 426822), (ii) the federal litigation in the Ninth Circuit Court of Appeals (Case Nos. 05-74051 and 05-74272), and (iii) any action that may have been initiated challenging the South Airfield Improvement Project. Upon execution of this Settlement by all Parties, the Parties shall request that the Riverside County Superior Court (a) dismiss all causes of action brought by Petitioners challenging the LAX Master Plan Program and (b) retain jurisdiction over this case solely for the purpose of enforcing the mutual obligations incurred by the Parties as specified by the enforcement provisions in this Settlement set forth in Section XIII. For all such further purposes, the Parties shall request that the individual cases filed by the various Petitioners shall be consolidated.

B. Release of Claims. Upon execution of this Settlement by all Parties, Petitioners shall thereupon waive, release, and forever discharge Respondents and the FAA from all Released Claims in full and final settlement of the Released Claims. The Parties intend and agree that this Settlement shall be effective as a full and final accord and satisfaction and general release of and from all Released Claims. In furtherance thereof, each Party acknowledges that it is familiar with Section 1542 of the Civil Code of the State of California, which provides as follows:

"A general release does not extend to claims which the creditor did not know or suspect to exist in his favor at the time of executing the release, which if known by him, must have materially affected his settlement with the debtor."

Except as otherwise specifically set forth in this Settlement, Petitioners waive any and all rights they have or may have under California Civil Code Section 1542 and/or any successor section to it with respect to the Released Claims. In connection with this waiver, Petitioners acknowledge that they are aware that they may hereafter discover claims presently unknown or unsuspected or facts in addition to or different from those that they now know or believe to be true with respect to the subject matter of this Settlement. Nevertheless, Petitioners intend by this Settlement, and with and upon the advice of their own independently selected counsel, to release fully, finally and forever all Released Claims. In furtherance of such intention, the releases set forth in this Settlement shall be and shall remain in effect as full and complete releases notwithstanding the discovery or existence of any such additional or different claims or facts relevant hereto.

C. Covenant Not to Bring Any Released Claims. Petitioners will not directly or indirectly file, prosecute, bring, encourage, participate in, facilitate or advance any suit, claim or legal action of any kind against Respondents or the FAA based upon any Released Claims. Petitioners covenant

against filing any administrative proceedings and to dismiss or cause to be dismissed any administrative proceedings and/or appeals already brought as of the date of this Settlement.

D. Defense Against Released Claims. This Settlement may be pleaded as a defense to, and may be used as the basis for an order of specific performance ordering the dismissal by Petitioners of any Released Claims in any judicial or administrative proceeding against Respondents or the FAA.

SECTION III. FAA DETERMINATION REGARDING LAWA EXPENDITURES

In order to secure an FAA approval or FAA determination regarding LAWA's funding of the provisions and/or mitigation measures set forth in this Settlement:

A. Prior to any LAWA expenditure under this Settlement, LAWA may prepare and present a letter to the FAA requesting an advisory opinion on whether the proposed expenditure is an acceptable use of airport revenues under federal statutes, regulations and FAA policy guidance. The letter may request an expedited decision by the FAA and that, if the FAA determines that the use of airport revenue for a specific program or programs is not acceptable, the FAA include in its written advisory opinion the grounds upon which the Agency has made this determination.

B. If the FAA's advisory opinion indicates that use of airport revenues for any particular LAWA program or action would constitute revenue diversion or other impropriety, then LAWA, with Petitioners' consent, shall in good faith revise the language of this Settlement in order to meet the FAA criteria. LAWA is not obligated to obtain the consent of any Petitioner that would not be materially benefited by the provisions and/or mitigation measures subject to revision. If the proposed expenditure cannot be made consistent with FAA criteria, LAWA will have no further obligation to make such expenditure.

SECTION IV. PASSENGER GATE PROVISION

A. LAX currently has 163 total passenger aircraft gates available for loading and unloading of passengers during scheduled aircraft operations. Gates are defined as specific locations where passengers are enplaned and deplaned. Except as provided in Subsection B.1 below, LAWA will operate no more than 163 passenger gates at LAX throughout the term of this Settlement. As noted in the FAA's Record of Decision for the Proposed LAX Master Plan Improvements ("ROD") (May 20, 2005) on page 17, one objective of the LAX Master Plan is to improve the efficiency of passenger operations while also, "encouraging, but not requiring, other airports in the Los Angeles Basin to increase capacity." According to the ROD "[t]his is accomplished by restricting the overall availability of gates where passengers will board and exit an aircraft." The FAA's ROD identifies a number of projects that comprise the LAX Master Plan and notes that these improvements will be implemented in phases. Appendix C of the ROD lists the proposed project phasing and notes that, "[t]he listing of these projects is not necessarily the order in which these projects may be implemented." The following minimum criteria will be used by LAWA to implement the proposed LAX improvements in a timely manner in order to achieve the local and regional benefits described in the LAX Master Plan and in the ROD while also maintaining LAX's operational efficiency.

B. With respect to passenger gates at LAX, LAWA will accomplish the following:

1. Having received the FAA's Statement regarding the effect of this provision on FAA's environmental obligations and matters under FAA's statutory authority, and consistent therewith, commencing in 2010, LAWA will discontinue passenger operations at two narrow body equivalent gates ("NBEG") per year at LAX until LAWA has discontinued passenger operations by a total of 10 NBEG. By December 31, 2015, the total number of passenger gates (including remote gates) shall be reduced to no more than 153 passenger gates. These reductions will be achieved through the build out of improved contact passenger gate facilities and the elimination of remote gate facilities as approved in FAA's ROD. Implementation of this Settlement will not restrict access at LAX to levels below those disclosed in FAA's Final EIS and ROD for the No Action and the approved project scenario in 2015.

2. If LAWA discontinues passenger operations at any gate during the period of time before 2010, LAWA shall receive an NBEG credit which may be used to offset any obligations to reduce NBEG at any time during this Settlement, and LAWA shall also receive an NBEG credit for any annual NBEG reduction after 2009 in excess of two NBEG, such that LAWA will not be required to reduce the existing number of NBEG by more than a total of 10 NBEG.

C. Subsection B.1 above shall not apply if either (1) total passenger operations at LAX are below 75 million annual passengers or (2) the LAX Master Plan Program is substantially revised pursuant to the LAX Specific Plan Amendment Process such that the total number of gates is reduced to 153 or less.

D. Subsection B.1 above shall not apply either (1) during cases of emergency as declared by LAWA's Executive Director or a duly authorized law enforcement official or (2) during peak periods of passenger activity when LAWA needs operational flexibility to use additional gates, but under no circumstances shall LAWA exceed the NBEG requirement of Subsection B on more than 30 calendar days per year for such peak periods.

E. Subsection B.1 above shall not apply to general aviation flights, charter flights, presidential flights, cargo flights, military flights or any other unscheduled passenger activity at LAX.

F. LAWA shall determine which combination of gates is to be operated at any given time, and shall, upon determining to change which gates are to be non-operational, notify Petitioners of such changes. No more than four times per year total, Petitioners shall have the right to conduct physical inspections at LAX to verify LAWA compliance with this Section IV. Petitioners shall provide LAWA with reasonable written notice of their intent to inspect, no less than 24 hours prior to the proposed inspection, to the office of the Deputy Executive Director of the Office of Quality and Compliance. LAWA shall provide Petitioners' representative with the appropriate security clearance and on-airport transportation to conduct such physical inspections.

G. The Parties agree that the West Satellite Concourse and associated Automated People Mover segments shall no longer be subject to the "yellow light" provisions of the LAX Specific Plan. To effectuate this change, the City of Los Angeles may amend the LAX Specific Plan to delete subpart

(d) of Section 7.H.1. If requested, Petitioners will support this amendment to the LAX Specific Plan.

SECTION V. LAX SPECIFIC PLAN AMENDMENT STUDY PROCESS

A. Within 60 days of the date of this Settlement, LAWA will commence the LAX Specific Plan Amendment Study Process as identified in Section 7.H of the LAX Specific Plan approved by the Los Angeles City Council on December 14, 2004. In approving the LAX Specific Plan, the Los Angeles City Council required a Specific Plan Amendment Study be undertaken at certain decision points in the LAX Master Plan implementation process (see Section 7.H.1, 7.H.2, and 7.H.3 of the LAX Specific Plan). However, the City Council did not provide detailed requirements for the conduct of the Specific Plan Amendment Study. The intent of this section of the Settlement is to provide a clear definition of the nature, scope, timing and procedural elements of the LAX Specific Plan Amendment Study that will be performed in fulfillment of Section 7.H of the LAX Specific Plan.

B. During an initial phase, LAWA will undertake such tasks as selecting a contractor and preparing a budget and scope of work for an LAX Specific Plan Amendment Study. LAWA will make a good faith effort to complete the initial phase within six months of the commencement date.

C. Upon the completion of the initial phase, LAWA will prepare a proposed LAX Specific Plan Amendment Study and prepare all necessary environmental documents. LAWA will make a good faith effort to complete the LAX Specific Plan Amendment Study Process within 24 months of the commencement date of this second phase. The LAX Specific Plan Amendment Study will, consistent with previous local and federal approvals, identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA.

D. To fulfill the intent of Section 7.H of the LAX Specific Plan, LAWA will focus the LAX Specific Plan Amendment Study on the following:

1. Potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers (the "Alternative Projects"). The West Satellite Concourse and associated Automated People Mover segments shall not be considered Yellow Light Projects for the purposes of this Settlement.
2. Security, traffic and aviation activity of such alternative designs, technologies, and configurations for the Alternative Projects.
3. Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR.

E. The Parties agree that LAWA shall have discretion to determine an appropriate methodology to conduct the LAX Specific Plan Amendment Study. The LAX Specific Plan Amendment Study will be prepared pursuant to CEQA and may, in consultation with FAA, also be prepared to comply with applicable federal environmental laws.

F. While the LAX Specific Plan Amendment Study is being processed, LAWA may continue to process and develop projects that are not Yellow Light Projects, consistent with the LAX Specific Plan Compliance Review procedures.

G. The environmental review of potential traffic impacts for the Alternative Projects will be conducted in consultation with all affected local jurisdictions and the Los Angeles Department of Transportation ("LADOT"). After LAWA has determined the appropriate scope of the traffic study in consultation with all affected local jurisdictions and LADOT, LAWA will provide Petitioners with a list of the intersections/roadways that LAWA plans to analyze for the LAX Specific Plan Amendment Study. The Parties agree that Petitioners may elect to add a maximum of 15 intersections to the traffic study. For any new significant traffic impact that is identified as a result of the traffic study, LAWA will propose feasible mitigation measures, if any, to mitigate the potentially significant impact. If, as the result of the LAX Specific Plan Amendment Study, an LAX Specific Plan Amendment is approved by the Los Angeles City Council, LAWA shall fund or diligently seek funding for the applicable mitigation measures and will implement them as quickly as feasible pursuant to a phasing plan. Where LAWA is not the implementing agency, LAWA will contribute its fair share for each mitigation measure to the implementing agency.

H. Should the Los Angeles City Council approve at a future time an LAX Specific Plan Amendment, LAWA will be required to seek FAA review and approval of, at a minimum, changes to the LAX Airport Layout Plan. LAWA will seek such review and approval from FAA. FAA has made clear in its Record of Decision for the LAX Master Plan Program that any such future decision by the Los Angeles City Council to amend any aspect of the project approved in FAA's Record of Decision will require further review by FAA of the proposed changes and compliance with all applicable federal laws, including NEPA and the conformity requirements under the Clean Air Act.

I. The evaluation of security for the Alternative Projects will be conducted in consultation with security experts. LAWA will select appropriate security experts in consultation with Petitioners.

J. An LAX Specific Plan Amendment Process Advisory Committee shall be created consisting of representatives of the City of Los Angeles, County of Los Angeles, El Segundo, Inglewood, Culver City, and ARSAC. LAWA shall consult with the Committee during each significant step of the LAX Specific Plan Amendment Process.

SECTION VI. FUNDING OF ADDITIONAL MITIGATION MEASURES

LAWA will fund the cost of implementing the measures set forth in **Exhibit A** to mitigate the impacts of LAX and its operations, so long as the FAA approves the use of airport revenue funds for this purpose pursuant to Section III.

SECTION VII. REGIONAL AIRPORT WORKING GROUP

LAWA shall invite the FAA, the Southern California Association of Governments ("SCAG"), the Counties of Los Angeles, Orange, Ventura, Riverside, and San Bernardino, and airport operators in the Los Angeles Region to participate in a regional airport working group to discuss and make recommendations regarding current and future plans to achieve a regional distribution of air traffic demand. The regional working group will consider a common framework for coordinating all airport master planning and facility construction consistent with the adopted SCAG Regional Aviation Plan. For the purposes of encouraging, coordinating and effectuating a regional approach to Southern California's air transportation needs, the regional working group shall consider: (1) coordinating with the Southern California Regional Airport Authority, or its successor; (2) the feasibility of entering into a joint powers agreement to create a regional airport authority; and/or (3) supporting legislative efforts to create such an authority. Notwithstanding the formation of the regional working group, the potential formation of a joint powers authority or any other aviation authority, LAWA and the City of Los Angeles will maintain financial and operational control of LAX, Ontario International Airport, Palmdale Regional Airport, and Van Nuys Airport.

SECTION VIII. REGIONAL STRATEGIC PLANNING

LAWA shall develop a regional strategic planning initiative to encourage the growth of passenger and cargo aviation activity at underutilized LAWA-owned commercial airports in the region (currently Ontario International Airport and Palmdale Regional Airport). The regional strategic planning initiative will be prepared annually and will describe potential marketing strategies, potential opportunities for increased utilization of under-utilized facilities, and other techniques by which LAWA can coordinate and support regional strategic planning for LAWA-owned commercial airports within the region. The first regional strategic planning initiative will be prepared by December 31, 2006.

SECTION IX. OUTREACH TO AIRPORT NEIGHBORS

LAWA shall join a Working Group with ARSAC and Council District 11, seeking input from other Petitioners, airport neighbors, and interested parties, to make recommendations to BOAC on how LAWA can improve and better coordinate efforts to hear from and address the concerns of airport neighbors.

The objectives of the Working Group shall be to make recommendations that facilitate:

- Obtaining information from LAWA and LAX projects and programs, and communicating them to the communities surrounding LAX in an effective and understandable form, including through the use of articles in local newspapers, information on a website, and the use of leaflets;
- Identifying concerns of the surrounding communities about LAX operations and communicating them effectively to LAWA;
- Coordinating with various LAWA staff with responsibilities for responding to community complaints, such as noise, and assuring that the community concerns are addressed; and

- Working with the surrounding communities, LAWA, and locally elected officials in attempting to resolve LAX-related problems experienced by the communities.

The Working Group shall review the position of stakeholder liaison as well as other LAWA community outreach functions, and make structural recommendations, including proposed LAX Specific Plan amendments, to BOAC and the Los Angeles City Council, as appropriate.

SECTION X. AVIGATION EASEMENTS

A. Except as provided in Subsection B below, LAWA shall not require the dedication of avigation easements, noise easements, easements of right-of-way, or any other easements (collectively "easements") in return for funding of, or participation in, the residential acoustical treatment portion of LAWA's Airport Noise Mitigation Program.

B. Where applicable sections of the California Airport Noise Standards (Cal. Code Regs. tit. 21, section 5000 *et seq.*) deem acoustical treatments alone insufficient to convert residential land uses to compatibility with airport operations, the following conditions apply:

1. In the case of residences constructed on or after January 1, 1989, LAWA may require the dedication of an easement in return for acoustical treatment funding from LAWA.

2. In the case of residences constructed before January 1, 1989 exposed to a noise level of 75 dB CNEL or above, and having an exterior normally cognizable private habitable area such as a backyard, patio or balcony, LAWA may condition the provision of acoustical treatment funding from LAWA on the property owner's agreement to LAWA's acquisition of an easement for Fair Market Value. LAWA's Fair Market Value valuation and good faith negotiations with eligible property owners will be in compliance with the provisions of the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR Part 24). In the event that the parties cannot agree on the value of the easement through these negotiations, LAWA may require the dedication of an easement in return for acoustical treatment.

3. Under those circumstances in which LAWA requires the dedication of an easement in return for acoustical treatment pursuant to Subsections B.1 and B.2 above, LAWA shall require the dedication of a noise easement in substantially the form attached as **Exhibit B**, to the extent that the California Department of Transportation accepts the use of such noise easement in lieu of an avigation easement to render incompatible land uses to compatible land uses under the California Airport Noise Standards. If the California Department of Transportation determines that a noise easement is insufficient for the purpose described above, LAWA may require an avigation easement or any other easement. Under those circumstances in which LAWA acquires an easement through good faith negotiations as provided in Subsection B.2 above, LAWA may acquire any type of easement from the property owner.

C. All homeowners receiving LAWA provided or funded acoustic insulation will be required to provide to the local jurisdiction, among other things, authorization to proceed with the installation, a written acknowledgement that the homeowner is aware of the proposed level of noise reduction, and

after installation, acknowledgement that the improvements have been installed and meet an interior CNEL due to aircraft noise of 45 dB or less in all habitable rooms per California Airport Noise Standards.

D. This Settlement shall neither enlarge nor diminish any rights of the Parties existing prior to the effective date of this Settlement, and LAWA expressly reserves and the Parties agree that LAWA may continue to rely upon, any and all prescriptive rights, aviation easements and other entitlements for the operation of LAX.

E. If the County of Los Angeles, Inglewood, El Segundo, or Culver City approve any zoning or other land use amendment that has the effect of converting a property that was compatible under the California Airport Noise Standards at the time of this Settlement into an incompatible property, such jurisdictions shall condition that approval on the property owner granting LAWA an aviation easement satisfying compatibility requirements under California Airport Noise Standards.

SECTION XI. FURTHER STUDY REGARDING WEST EMPLOYEE PARKING STRUCTURE

Before the Executive Director of LAWA recommends approval of the West Employee Parking Structure pursuant to the LAX Specific Plan Compliance Review procedures, LAWA will prepare a project-specific EIR that includes consideration of (a) alternative locations for the West Employee Parking Structure, and (b) the appropriate size of the structure needed to serve only the employees working in the western areas of LAX and associated visitors for official business.

SECTION XII. STUDY OF LAX CONNECTION TO GREEN LINE

LAWA will study feasible methods to connect LAX to the Green Line in ways that will maximize the use of public transit to LAX. Within one year from the date of this Settlement, LAWA will compile the results of this study into a report and provide such report to the Petitioners.

SECTION XIII. ENFORCEMENT OF THIS SETTLEMENT

A. Mutual Desire to Avoid Further Litigation and Jurisdiction to Enforce Settlement.

1. The Parties have entered this Settlement for the purpose of avoiding litigation. Enforcement of this Settlement is to be brought solely through the procedures set forth in this section, which are designed to avoid resorting to court enforcement in the first instance, and, if resort to court is necessary, to provide simple, straightforward and predictable relief.

2. The Parties shall request that the Riverside County Superior Court retain jurisdiction of this case solely for the limited purpose of enforcing the mutual promises of this Settlement pursuant to the procedure set forth in this section.

B. Preliminary Enforcement Procedures.

1. Right to Cure. If any Party believes that another Party's performance is in default of that Party's obligations under this Settlement, the Party shall provide written notice to the other Party of the alleged default; offer to meet and confer in a good faith effort to resolve

the issue; and provide the other Party 60 days to cure the alleged default commencing at the time of receipt of the notice of a properly detailed written default notice. Any notice given pursuant to this provision will specify in reasonable detail the nature of the alleged default and, where appropriate, the manner in which the alleged default satisfactorily may be cured. If the FAA or any other regulatory authority determines that LAWA's performance under this Settlement is prohibited or would result in the withholding or demand for remittance of federal funds, LAWA's failure to perform shall not constitute a default under this Settlement.

2. Mediation. If an alleged default in performance has not been cured during the 60-day period provided in Section XIII.B.1 above, either Party may request that the dispute first be submitted to mediation prior to judicial enforcement. The Party requesting mediation will pay for the services of the mediator. If mediation is requested by any Party, all Parties shall make a good faith effort to first resolve through mediation any dispute about another Party's alleged default in performance. If the Parties cannot agree on the identity of the mediator, the judicial officer shall designate the mediator. The Parties will commence mediation within 15 days after notice of the mediation and designation of the mediator and shall conclude mediation within 45 days after commencement. Each Party shall bear its own fees and costs relating to the mediation.

C. Judicial Enforcement of This Settlement.

1. In order to provide a simple, straightforward and predictable method of enforcement of this Settlement, within 60 days of the execution of this Settlement, the Parties will select a judicial officer provided by the JAMS service or a comparable service. If they cannot agree on the identity of a mutually agreeable judicial officer, they will use the applicable JAMS selection procedure to identify and select such a person. LAWA shall pay any fees associated with the initial selection of a judicial officer. Said judicial officer shall be appointed by the Riverside County Superior Court to be the sole judicial officer who entertains any and all enforcement proceedings brought pursuant to this Settlement, provided that a non-prevailing Party may appeal a final enforcement ruling to the Court of Appeals in Riverside and, under the appellate rules, to the Supreme Court. The judicial officer so appointed shall remain as the judicial officer until such time as he or she shall resign or shall become unable to serve. If so, the Parties shall select a new judicial officer pursuant to the above procedure.

2. The Parties agree that, unless modified by the mutual agreement of the Parties, the judicial officer presiding in the enforcement action shall follow the rules of procedure and evidence that would otherwise be applicable in the Riverside County Superior Court, and such discovery procedures as the Parties may agree or that may be permitted by the judicial officer.

3. The sole procedural relief that a Party may request from the judicial officer to enforce this Settlement shall be an affirmative order enforcing the obligation of another Party. The judicial officer will have the power to order affirmative equitable and/or affirmative injunctive relief, temporary or permanent, requiring the other Party to comply with this Settlement. The judicial officer will normally issue a final enforcement ruling that (1) clarifies the Parties' respective obligations under this Settlement, (2) if a Party is determined

to have breached an obligation under this Settlement, orders affirmative performance of the obligation, and (3) determines and allocates the costs of the judicial officer's fees and costs incurred. No Party may seek judicial relief ordering, and the judicial officer will not have the power to order, LAWA to cease, suspend or modify operation at LAX, implementation of the LAX Master Plan Program or any other LAWA program or activity. The judicial officer shall have authority, if necessary, to order LAWA to comply with its obligation under section IV above to operate LAX with specified numbers of gates. No order relating to specified numbers of gates may direct LAWA to operate any particular configuration of gates at any time or contrary to any FAA directive. No Party may seek judicial relief ordering, and the judicial officer will not have power to direct, any Party to undertake any action except for those actions provided for by this Settlement. No Party may seek judicial relief ordering, and the judicial officer will not have power to award, any money damages. Each Party will bear its own fees and costs of such court enforcement. The Party seeking an enforcement ruling shall initially post and pay for any required fees and costs payable for the judicial officer's services. The judicial officer will have the authority to order that his or her fees and expenses incurred as the judicial officer shall be paid by the non-prevailing Party. The standard for imposition of such costs on the non-prevailing Party shall not be whether the non-prevailing Party's enforcement action was frivolous, but whether the judicial officer determines it to be appropriate in his or her discretion.

SECTION XIV. EXTRAORDINARY FINANCIAL SITUATIONS.

A. LAWA's financial obligations under this Settlement shall be suspended in any of the following circumstances:

- 1.** An extraordinary financial situation exists that was caused by circumstances outside of LAWA's normal budgetary control (a) such that LAX-derived airport revenues in excess of LAX's basic operating budget and any debt service and other financial obligations do not exist in an amount sufficient to fund the obligations set forth in this Settlement; and (b) that the situation may likely result in a decline in annual LAX-derived operating revenue in excess of five percent of the then current fiscal year's operating budget, or \$50 million, whichever is less;
- 2.** An extraordinary financial situation exists such that performing its obligations under this Settlement would necessarily result in a violation of the financial covenants LAX has made to its creditors and lienholders in return for the extension of credit in the form of bonds, loans, letters of credit and other forms of financing necessary to maintain LAWA's overall financial stability; or
- 3.** An extraordinary financial situation exists such that LAWA is financially unable to enter into any construction contract for a New LAX Master Plan Project while also concurrently performing its obligations under this Settlement. For the purposes of this section, a "New LAX Master Plan Project" means any substantial component of the LAX Master Plan Program that has not yet been approved pursuant to the LAX Specific Plan, but does not include completion of previously approved projects that have commenced construction. LAWA agrees that financial obligations under this Settlement are an integral component of the LAX Master Plan Program and that these obligations will have the same budgetary

priority as LAX Master Plan Program project costs, such that New LAX Master Plan Projects shall not go forward while financial obligations of this Settlement are suspended.

B. LAWA shall consult with Petitioners about the necessity for the suspension of its obligations and the estimated time period of the suspension. During the suspension period, LAWA shall consult with Petitioners each quarter regarding the status of its efforts to resolve pertinent financial problems and to develop outside sources of revenue to fund LAWA's financial obligations including grants from federal, state or regional agencies or from foundations or other third parties.

C. "Extraordinary financial situation" as used in this Section means circumstances that include, but are not limited to, the type of financial circumstances that LAWA experienced following the events of September 11, 2001; a natural disaster such as an earthquake; or extended increased security deployments in response to external threats.

D. Upon the conclusion of these extraordinary circumstances, LAWA will promptly resume performance of its financial obligations under this Settlement.

E. Following the conclusion of any period during which LAWA's financial obligations under this Settlement were suspended due to an extraordinary financial situation ("Suspension Period"), LAWA shall return to compliance with its financial obligations. In addition, the term of this Settlement shall be extended by an amount of time equal to the Suspension Period with respect only to aviation easements set forth in Section X and aircraft noise mitigation set forth in Exhibit A, Section A. The term of this Settlement shall not be extended with respect to any other obligation under this Settlement.

SECTION XV. MISCELLANEOUS

A. Notices. All notices and other communications required or permitted under this Settlement will be in writing and will be deemed to have been duly given on the date of delivery when delivered personally or when transmitted by telefacsimile or email to the Parties as specified below, or three days following the date of deposit in the United States mail. In the case of a notice or communication by telefacsimile or email, the notice or communication will be sent to the number or email address listed below, and a written copy will be mailed or personally delivered to the address below within three days of the transmittal of the telefacsimile or email. All notices or communications sent by United States mail will be sent postage prepaid by certified first class mail, return receipt requested to the address specified below.

If to LAWA:

Lydia Kennard
Executive Director
1 World Way
P.O. Box 92216
Los Angeles, CA 90009-2216
Fax: (310) 646-0523
lkennard@lawa.org

With a copy to:

Raymond S. Ilgunas
Assistant City Attorney, Airport Division
1 World Way
P.O. Box 92216
Los Angeles, CA 90009-2216
Fax: (310) 646-9617
rilgunas@lawa.org

If to City of El Segundo:

Jeff Stewart
City Manager
City of El Segundo
350 Main Street
El Segundo, CA 90245
Phone: (310) 524-2334
Fax: (310) 322-7137
jstewart@elsegundo.org

With a copy to:

E. Clement Shute, Jr.
Osa L. Wolff
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102
Phone: (415) 552-7272
Fax: (415) 552-5816
wolff@smwlaw.com
shute@smwlaw.com

If to City of Inglewood:

Barbara E. Lichman, Ph.D.
Berne C. Hart
Ricia R. Hager
Chevalier, Allen & Lichman, LLP
695 Town Center Drive, Suite 700
Costa Mesa, CA 92626
Phone: (714) 384-6520
Fax: (714) 384-6521
cal@calairlaw.com

With a copy to:

Anita Willis, City Attorney
City of Inglewood

1 Manchester Blvd., Suite 860
City of Inglewood, CA 90301
Phone: (310) 412-5372
Fax: (310) 412-8865
awillis@cityofinglewood.org

If to Culver City:

Barbara E. Lichman, Ph.D.
Berne C. Hart
Ricia R. Hager
Chevalier, Allen & Lichman, LLP
695 Town Center Drive, Suite 700
Costa Mesa, CA 92626
Phone: (714) 384-6520
Fax: (714) 384-6521
cal@calairlaw.com

With a copy to:

Carol Schwab, City Attorney
City of Culver City - City Hall
9770 Culver Boulevard
Culver City, CA 90232
Phone: (310) 253-5660
Fax: (310) 253-5664
carol.schwab@culvercity.org

If to County of Los Angeles:

Barbara E. Lichman, Ph.D.
Berne C. Hart
Ricia R. Hager
Chevalier, Allen & Lichman, LLP
695 Town Center Drive, Suite 700
Costa Mesa, CA 92626
Phone: (714) 384-6520
Fax: (714) 384-6521
cal@calairlaw.com

With a copy to:

Raymond G. Fortner, Jr., County Counsel
Richard D. Weiss, Assistant County Counsel
Thomas J. Faughnan, Principal Deputy County Counsel
648 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012-2713

Phone: (213) 974-1810
Fax: (213) 617-7182
tfaughnan@counsel.co.la.ca.us

If to Alliance for a Regional Solution to Airport Congestion:

Jennifer Dakoske Koslu
224 Redlands Street
Plaza Del Rey, CA 90293
Phone: (310) 306-4651
Fax: (310) 306-4651
dakoske@aol.com

With a copy to:

Jan Chatten-Brown
Chatten-Brown & Carstens
3250 Ocean Park Boulevard, Suite 300
Santa Monica, CA 90405
Phone: (310) 314-8040
Fax: (310) 314-8050
jcb@cbcearthlaw.com

Any Party may designate different notice information by providing written notice to the other Parties as provided in this section. The change of contact information will not be considered an amendment to this Settlement.

B. Severance. If any part of this Settlement is invalidated, set aside, modified or disapproved as a result of a judicial or administrative ruling or determination, the remainder of the Settlement shall remain in full force and effect, and the Parties shall fulfill their obligations under this Settlement consistent with the remainder of this Settlement.

C. Relationship to Other Obligations. LAWA's performance of its obligations under this Settlement may constitute satisfaction of other LAWA obligations outside of this Settlement. Notwithstanding any such other obligations outside of this Settlement, subject to the provisions of Section XIV above, LAWA shall perform its obligations in this Settlement.

D. Litigation Legal Fees. Upon the dismissal of pending actions and release of claims as set forth in Section II, LAWA will pay Petitioners' reasonable attorneys' fees and costs related to the consolidated litigation challenging the LAX Master Plan Program in Riverside County Superior Court (Case No. RIC 426822) of \$1.5 million. LAWA will pay such attorneys' fees and costs within 45 days of Petitioners' reporting to LAWA of their attorneys' fees and costs in reasonable detail including the basis of their lodestar amount being in excess of \$1.5 million, but in no event shall LAWA be required to pay such attorneys' fees until 45 days after execution of this Settlement.

E. Legal Fees and Costs for Preparation and Enforcement of this Settlement. Subject to Section XV.D above, each Party will bear its own legal fees and costs resulting from the preparation, negotiation, execution and enforcement of this Settlement.

F. Waiver. The waiver by any Party of any breach or violation of any provision of this Settlement will not be deemed to be a waiver of any breach or violation of any other provision or of any subsequent breach or violation of the same or other provisions.

G. Successors. This Settlement will be binding on any successors of the Parties.

H. No Third-Party Beneficiaries. This Settlement has no third party beneficiaries and no one other than the Parties will have any rights to enforce any of the obligations created in this Settlement.

I. Amendments to Settlement. The Parties may change, modify or amend this Settlement only by a written amendment that is executed by all Parties. In the event one Party desires to amend the Settlement, it will notify the other Parties as specified in Section XV.A and designate the issues it wants an amendment to address. The Parties will meet and confer in good faith concerning proposed amendments.

J. Representations of Counsel. Each of the Parties has been represented by counsel in the negotiation and drafting of this Settlement. Accordingly, this Settlement will not be strictly construed against any Party, and the rule of construction that any ambiguities be resolved against the drafting Party will not apply to this Settlement.

K. California Law. This Settlement will be construed in accordance with the laws of the State of California.

L. Interpretation. Specific provisions of this Settlement will take precedence over conflicting general provisions.

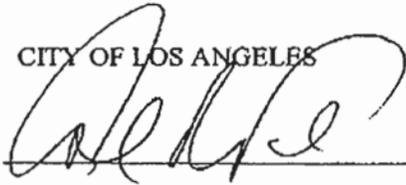
M. Headings Not Limiting. Section and subsection headings contained in this Settlement are included for convenience only and will not be deemed to govern, limit, modify or in any manner affect the scope, meaning or intent of the provisions of any section or subsection in this Settlement.

N. Entire Settlement. This Settlement represents the entire agreement of the Parties with respect to the subject matter of the Settlement. No prior written or oral statements, proposals or agreements will alter any term or provision of this Settlement.

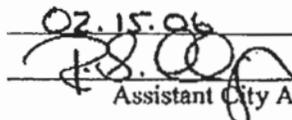
O. Authority of Signatories. Each Party represents and warrants that it has taken all legally required actions to authorize its representative to execute this Settlement and that the individual executing this Settlement on that Party's behalf has the authority to sign on behalf of said Party.

IN WITNESS WHEREOF, the Parties here cause this Settlement to be duly executed by their respective signatures.

Dated: February 16, 2006
By: Antonio R. Villarraigosa
Title: Mayor, City of Los Angeles

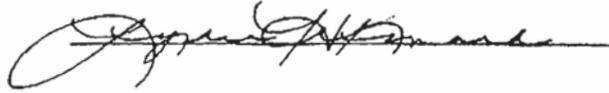
CITY OF LOS ANGELES


APPROVED AS TO FORM:
Rockard J. Delgadillo, City Attorney

Date: 02.15.06
By: 
_____ Assistant City Attorney

Dated: _____
By: _____
Title: _____

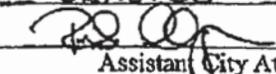
LOS ANGELES WORLD AIRPORTS

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APPROVED AS TO FORM:

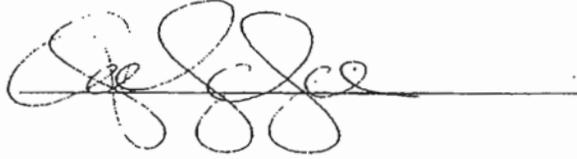
Rockard J. Delgadillo, City Attorney

Date: 02.15.06

By:  _____
Assistant City Attorney

Dated: 01.20.06
By: Jennifer Dakoske Koslu
Title: President ARSAC

ALLIANCE FOR A REGIONAL SOLUTION
TO AIRPORT CONGESTION

A handwritten signature in black ink, appearing to read 'Jennifer Dakoske Koslu', written over a horizontal line.

Dated: FEBRUARY 15, 2006
By: THOMAS J. FAUGHNAN
Title: PRINCIPAL DEPUTY COUNTY COUNSEL

COUNTY OF LOS ANGELES

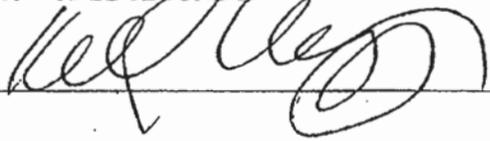


A handwritten signature in cursive script, appearing to read 'Tom Faughnan', is written over a horizontal line.

3562

Dated: 30 January 2006
By: Kelly McDowell
Title: Mayor

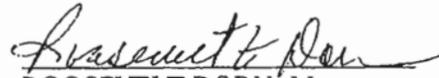
CITY OF EL SEGUNDO



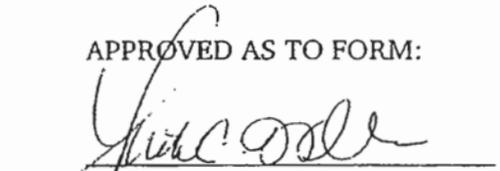
ATTEST: 
Deputy City Clerk

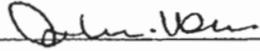
Dated: January _____, 2006

CITY OF INGLEWOOD

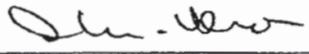

ROOSEVELT DORN, Mayor

APPROVED AS TO FORM:


ANITA C. WILLIS, City Attorney

Dated: February 15, 2006
By: 
Title: Mayor Albert Vera

CITY OF CULVER CITY


Albert Vera

Approved As To Form


City Attorney

**EXHIBIT A
ADDITIONAL MITIGATION MEASURES**

A. Aircraft Noise Mitigation.

1. 2006-2007 Funding for ANMP. Upon Petitioners' dismissal of pending actions and release of claims, as provided for in Section II of this Settlement, LAWA shall provide Aircraft Noise Mitigation Program ("ANMP") funding to the County of Los Angeles and Cities of El Segundo and Inglewood in the following amounts covering calendar years 2006 and 2007 in two annual installments.

| | |
|------------------------|----------------|
| County of Los Angeles: | \$20.6 million |
| City of El Segundo: | \$14.9 million |
| City of Inglewood: | \$24.5 million |

The first installment will be made within 60 days of the execution of this Settlement and the remainder of each jurisdiction's allocation will be provided one year after the first installment. The first installment will be made for one half of the total listed above for each jurisdiction, except in the case of the County of Los Angeles, which shall receive \$15 million of its total allocation in the first year. LAWA's expenditure of funds under this Section A.1 is contingent on the County of Los Angeles and Cities of El Segundo and Inglewood complying with all requirements established in BOAC Resolution No. 21481 except to the extent that such requirements are superceded by the terms of this Settlement, and with FAA regulations.

2. Unused Funds. It is up to each jurisdiction to make good use of the funds provided, and with respect to Airport Improvement Program or Passenger Facility Charge ("PFC") funds, use of those funds as approved by the FAA. A status report from each jurisdiction to LAWA is required on January 15, 2007 as to the number of units made compatible under this section and the number of homes with an executed sound insulation contract in place for construction. This report will aid LAWA's effort to apply to the FAA for additional PFC authority for future funding. This report will also be used by LAWA to determine any adjustments to the second installment under Section A.1 above. LAWA will make such determination and make any appropriate allocation of funds within 60 days of the report being provided to LAWA, but in no event will such allocation of funds be required prior to March 1, 2007. If a jurisdiction has used all of its 2006 allocation as evidenced by its status report, that jurisdiction will receive its 2007 funding allocation. If a jurisdiction has not used all of its 2006 allocation, an amount equal to the unused portion will be deducted from their 2007 allocation and that deducted portion will be reallocated to the remaining jurisdiction(s) that used all of their 2006 allocation. If no jurisdiction has used all of their 2006 allocation then the deducted amounts from each jurisdictions 2007 allocation will be allocated by LAWA for use in 2008. The same reallocation procedure described above for unused Section A.1 funds shall apply for the 2009 allocation. This annual funding rollover and reallocation process is applicable to funds provided in Section A.1 and will only extend through calendar year 2009. Any remaining unused funds under Section A.1 after 2009 will revert back to LAWA's ANMP program, with a priority for Petitioners' use in sound insulation projects.

3. Future Funding. The purpose of the ANMP is to achieve compatibility. LAWA has limited funds to apply to this goal. Future funding under this section for the County of Los Angeles and the Cities of El Segundo and Inglewood is capped at \$22.5 million per year for calendar year 2008 through calendar year 2015 for a maximum total of \$180 million. This funding cap under this Settlement will not affect the ability of each jurisdiction to demonstrate its ability to effectively use additional ANMP funding. LAWA will consider each of these requests on a case-by-case basis through the existing ANMP process. Similar to Section A.2 above, an annual status report from each jurisdiction to LAWA will be required on or before the 15th day of January of each year through 2015. The annual proportion of funds allocated to the County of Los Angeles and the Cities of El Segundo and Inglewood under this section will be determined by the number of units made compatible under this section and the number of homes with an executed sound insulation contract in place for construction. The maximum annual proportion allocated to any one jurisdiction under this section will not exceed 41 percent of the calendar year total. If any jurisdiction is unable to use its annual allocation of funds, the unused funds shall be allocated to the other jurisdictions to the extent that (a) the jurisdictions have used all of their allocation for the year, and (b) the jurisdictions have established that they are capable of using such funds for sound insulation, as determined by the number of homes made compatible under this section and the number of homes with an executed sound insulation contract in place for construction. Any unused funds at the conclusion of each year under this section will be allocated by LAWA for use in the ANMP, with a priority for use by the County of Los Angeles and the Cities of El Segundo and Inglewood in sound insulation projects.

4. Sound Insulation for Traditional Places of Worship. Inglewood has identified 15 traditional places of worship that will require sound attenuation for a total of approximately \$2.5 million. Inglewood will be seeking money from the FAA as well as permission to use its portion of the money identified in Sections A.1 through A.3 for this purpose. LAWA agrees to support Inglewood's request to the FAA. LAWA will also support any similar request to the FAA by El Segundo and/or County of Los Angeles. In the event the FAA denies such requests, LAWA will submit an application to the FAA to amend the PFC to allow for the sound attenuation of traditional places of worship at the conclusion of the residential soundproofing component of the ANMP.

5. Land Recycling. Inglewood represents that it will be seeking FAA approval for its use of FAA discretionary funds for Darby Dixon and open space projects. LAWA agrees to support Inglewood's request to the FAA for this purpose.

6. Noise Mitigation in Lennox. The County of Los Angeles has identified 215 units outside of the 1992 4th quarter ANMP contour, in an area located just south of the contour and north of the 105 freeway in Lennox, that the County would like to provide noise mitigation. LAWA agrees to support the County's request to the FAA for permission to use its portion of money identified in Sections A.1 through A.3 for this purpose.

7. Code Violations. Inglewood, El Segundo, and the County of Los Angeles may request that FAA allow them to use their portion of money identified in Sections A.1 through A.3 for incidental rehabilitation or corrections necessary to proceed with sound insulation. For example, the County of Los Angeles has represented that it needs no more than \$1000 per unit to fix code violations for certain properties in order to proceed with sound insulation

under its ANMP program. LAWA agrees to support these requests to the FAA for permission to use its portion of money identified in Sections A.1 through A.3 for incidental rehabilitation or corrections necessary to proceed with sound insulation.

8. Pilot Program for Noise Insulation of Certain Inglewood Residences. On a pilot project basis, LAWA and Inglewood will study certain areas where residences do not otherwise qualify for sound insulation. For mutually agreed-upon special circumstances and unique reasons that apply to specific residential areas, LAWA and Inglewood may agree that it is necessary and appropriate to provide noise insulation benefits in order to reduce interior noise levels to certain mutually agreed-upon levels. LAWA and Inglewood will cooperate in seeking to obtain, where necessary, federal approval for the expenditure of airport-related funds in connection with such noise mitigation measures. Subject to this approval, LAWA will make available up to \$10 million during the term of this Settlement to fund this pilot program. LAWA and Inglewood will prepare a schedule and work program by which this pilot program will be implemented.

9. End-of-Block Soundproofing. El Segundo, Inglewood, and the County of Los Angeles may seek FAA approval to commence an end-of-block soundproofing program, under which, if any residence on a particular block falls within the applicable noise contour for that block, then each residence on that block will be eligible for soundproofing. LAWA agrees to support the jurisdictions' request(s) to the FAA for permission to use their portion of money identified in Sections A.1 through A.3 for this purpose.

10. Part 161 Noise Study. LAWA has initiated a Part 161 study to the feasibility of implementing restrictions on departures between the hours of midnight and 6:30 a.m. over the communities to the east of LAX. Upon completion of the study, LAWA will seek FAA approval of various penalties that can be imposed on airlines whose flights violate night-time over-ocean policies and procedures. LAWA will expedite processing of this study.

B. Construction Noise Mitigation for the SAIP.

1. Noise Control Plan. LAWA shall implement a mandatory Construction Noise Control Plan that includes sufficient feasible measures to mitigate South Airfield Improvement Project ("SAIP") significant construction noise impacts on El Segundo to below the applicable level of significance. LAWA shall consult with El Segundo regarding potentially feasible measures to mitigate significant construction noise impacts. Measures to be considered for inclusion in the plan shall include, without limitation, temporary sound barriers and enclosures, equipment mufflers, and work curfews.

2. Noise Monitoring and Hotline. LAWA shall implement a noise monitoring and hotline program during SAIP construction, not to exceed \$20,000 per month for staffing and hotline expenses, consisting of the following components:

- a.** LAWA shall prepare monthly construction noise monitoring reports and shall provide these reports to Petitioners and interested members of the public.
- b.** LAWA shall establish a construction noise hotline and shall staff the hotline during all work hours, investigate complaints within 60 minutes of receipt, and

communicate the results of investigations to complainants as soon as such results are obtained.

C. Air Quality Mitigation.

1. FlyAway Service. LAWA shall develop at least eight FlyAway sites with service similar to the service provided by the Van Nuys FlyAway currently operated by LAWA. The intent of these FlyAway sites will be to reduce the number of vehicles going to and from LAX by providing regional locations where LAX employees and passengers can pick up an LAX-dedicated, clean-fueled bus that will transport them from a FlyAway closer to their home or office into LAX and back. Final selection of the FlyAway sites must be completed on a schedule that allows for property acquisition or leasing, terminal design, construction, and implementation of all sites by 2015. LAWA shall also implement a public outreach program to inform potential users of the terminals about their existence and their locations.

2. Conversion of Ground Support Equipment. LAWA shall develop and implement a phased program to convert ground support equipment ("GSE") at LAX to extremely low emission technology (such as electric power, fuel cells, or other future technological developments). The phased program will apply to all GSE in use at LAX, including both LAWA-owned equipment and tenant-owned equipment. The goal of the phased program shall be to complete the conversion of GSE to extremely low emission technology by 2015.

3. Electrification of Passenger Gates. LAWA shall ensure that all LAX passenger gates, defined for this section as structures used to transfer passengers from a terminal area to an aircraft, are equipped and able to provide electricity sufficient for aircraft needs under the following schedule:

- a. All passenger gates for which new construction (excluding maintenance) is completed after the execution of this Settlement shall be equipped and able to provide electricity to parked aircraft from the date of initial operation and at all times thereafter.
- b. Three years from the execution of this Settlement, and at all times thereafter, at least fifty percent of passenger gates at LAX shall be equipped and able to provide electricity to parked aircraft.
- c. Five years from the execution of this Settlement, and at all times thereafter, one hundred percent of the passenger gates at LAX shall be equipped and able to provide electricity to parked aircraft.

D. Construction Air Quality Mitigation for the SAIP.

1. Best Available Emission Control Devices Required. LAWA shall require all construction equipment for the SAIP to be equipped with best available emission control devices verified or certified by the California Air Resources Board ("CARB"). The focus of emission control shall be PM₁₀, PM_{2.5}, and nitrogen oxides. Devices certified or verified for mobile engines may be effective for stationary engines and that technology from CARB on-

road verification lists may be used in the off-road context. LAWA shall not be required to used best available emission control devices under either of the following circumstances:

- a. The construction equipment operator provides a written finding, based upon appropriate market research and approved by LAWA, that best available emission control devices for reducing emissions of pollutants are unavailable for the construction-related equipment, and the construction equipment operator uses appropriate technology, if any, to reduce the emission of pollutants from the construction-related equipment.
- b. The construction-related equipment is used for fewer than 20 calendar days per calendar year.

Any and all exemptions under this Section D.1 approved by LAWA shall be reported in writing to Petitioners prior to use of the equipment in question.

2. Ultra-Low Sulfur Diesel Fuel. All construction equipment used for construction of the SAIP shall use only Ultra-Low Sulfur Diesel fuel (15 ppm or lower), so long as there are adequate supplies of ULSD in the Southern California area. Prior to September 1, 2006, if ULSD is unavailable, then all construction equipment may utilize emission control devices that do not require ULSD for only the same period of time that ULSD is unavailable. On or after September 1, 2006, if adequate supplies of ULSD are not available in the Southern California area, then other fuels may be used, provided that the other fuels do not result in a greater emissions of PM₁₀, PM_{2.5} or nitrogen oxides than that which would be produced by use of ULSD at 15 ppm or lower. Any and all exemptions under this Section D.2 shall be reported in writing to Petitioners prior to use of the equipment in question.

E. Air Source Apportionment Study.

1. LAWA shall fund a study by an independent expert of toxic air contaminants and criteria air pollutant emissions from jet engine exhaust and other airport-related emission sources ("Source Apportionment Study"). The study shall identify the concentration of toxic air pollutants from airport-related sources based on updated draft protocols developed for the "Air Quality and Source Apportionment Study" described in LAWA, *Air Quality and Source Apportionment Study of the Area Surrounding Los Angeles International Airport, Technical Workplan*, November 17, 2000, and all associated documents, as listed in part in **Exhibit C**. The protocols used will be those specified by EPA following LAWA's consultation with EPA regarding any needed updating or revision to the November 17, 2000 draft protocol.
2. LAWA shall require the selected contractor to provide written annual progress reports to LAWA. LAWA shall promptly forward these reports to the Petitioners. Within 15 days of completion of the Source Apportionment Study, LAWA will provide the Source Apportionment Study to Petitioners, and shall make it available to the public.
3. LAWA shall make a good faith effort to initiate the Source Apportionment Study by December 31, 2006. LAWA will consult with Petitioners regarding the duration of the Source Apportionment Study, and will inform Petitioners of the likely date for completion following the EPA's identification of the updated protocols to be used in the Source

Apportionment Study. LAWA will meet and confer with Petitioners' representatives regarding the study's results and regarding such further studies and steps to be taken with respect to toxic air pollutants as the Parties may mutually agree.

F. Traffic Mitigation.

1. Roadway Improvements. Upon Petitioners' dismissal of pending actions and release of claims, as provided for in Section II of this Settlement, El Segundo will provide appropriate justification for roadway improvements set forth below. Upon FAA approval pursuant to Section III, LAWA shall provide traffic mitigation funding to El Segundo in the following amounts for improvements to the following roadways:

| | |
|----------------------|-------------|
| Douglas Street: | \$750,000 |
| Nash Street: | \$675,000 |
| Imperial Highway: | \$1 million |
| Sepulveda Boulevard: | \$910,000 |

2. Extension of Century Boulevard Traffic Corridor. LAWA and Inglewood will cooperate to study a potential extension of the Century Boulevard traffic corridor into Inglewood from La Cienega Boulevard to Crenshaw Boulevard. LAWA and Inglewood will cooperate in seeking to obtain on an expedited basis any necessary federal approvals for LAWA's funding participation in this extension project. Subject to this approval, LAWA will make available up to \$10 million during the term of this Settlement in order to fund such improvements. LAWA and Inglewood will prepare a schedule and work program by which the extension project will be implemented. Upon completion of the traffic study set forth in Section V.F of this Settlement, LAWA will support Inglewood's application to the FAA for discretionary funds for an additional \$23 million to fund traffic improvements for designated segments of Century Boulevard. LAWA will also support Inglewood's application to the FAA for discretionary funds for traffic improvements to designated segments of La Cienega Boulevard and of Imperial Highway.

G. Aesthetic Mitigation.

1. Landscaping in the Dunes. In the northern portion of the Los Angeles/El Segundo Dunes, LAWA shall, in consultation with Petitioners, implement a plan for a project that does not exceed \$3 million to: (1) remove as much existing pavement as possible from abandoned streets and sidewalks, and (2) plant appropriate native vegetation in that area. All work associated with this plan shall be accomplished under the supervision of a registered biologist to ensure minimal disruption to the existing habitat areas. This plan shall only extend to areas outside of the El Segundo Blue Butterfly Preserve. LAWA will consult with the California Coastal Commission, the U.S. Fish and Wildlife Service, the California Department of Fish and Game, and any other applicable agencies as appropriate. LAWA will coordinate with the FAA to ensure that the plan is consistent with aviation safety requirements and site requirements for navigational aids located in the subject area.

2. Street Lighting. LAWA shall establish a fund of \$1 million from which LAWA will participate in street lighting projects affecting residential neighborhoods immediately adjacent to the northern boundary of LAX property. LAWA shall consult with

representatives of Council District 11 regarding proposed street lighting projects. Any participation by LAWA in the funding of street lighting projects shall be subject to FAA approval and shall be based on establishment of a clear nexus between the property and airport impacts.

H. Job Training.

1. Funding for Job Training. Beginning in fiscal year 2006-2007, LAWA shall provide \$500,000 per year for five years to fund a job training program at the South Bay Workforce Investment Board in Inglewood to fund job training for airport jobs at LAX, aviation-related jobs related to LAX, and for pre-apprenticeship programs. Any funds unspent in a particular year shall be rolled over to the subsequent year. At the conclusion of the five-year period, any unused funds shall revert to LAWA.

2. Job Training Programs. Jobs operating Transportation Charter Party limousines, non-tenant shuttles, or taxis shall not be considered airport jobs. Pre-apprenticeship programs are defined as job readiness and job training programs designed to prepare individuals to enter apprenticeships in the construction and building trades for LAX Master Plan Program related construction.

3. LAX Gateway Program. LAWA shall undertake outreach efforts to ensure the inclusion of Inglewood high school and college students in the existing LAX Gateway Program.

I. SAIP Hydrology Mitigation. In order to address drainage concerns raised by the County of Los Angeles with respect to the SAIP, LAWA shall: (1) prepare a study to determine peak flows and Hydraulic Grade Line ("HGL") related to the South Airfield according to the County's new hydrology methodology; (2) consult and coordinate the results of the study with the County's Department of Public Works; and (3) incorporate reasonable modifications required to mitigate increased flows into the Dominguez Channel, if necessary. LAWA agrees to provide information on existing hydrologic conditions and the proposed design of the SAIP to the County before commencing the above study. The County of Los Angeles shall review and comment on the results of the above study within 30 days of receipt. The Parties agree that under no circumstances shall LAWA's obligations under this provision delay construction and/or completion of the SAIP.

**EXHIBIT B
NOISE EASEMENT**

GRANT OF EASEMENT

(Civil Code Section 1468; Public Utilities Code Section 21652)

This NOISE EASEMENT (Easement) is executed and delivered as of this ____ day of _____, 2004, by Property Owner(s)] _____ (Grantor) and the LOS ANGELES WORLD AIRPORTS (Grantee);

WHEREAS, Grantors are the owners in fee simple of certain real property located at [address] and more particularly described in attached Exhibit "A," incorporated by this reference (Grantors' Property);

WHEREAS, Grantors have been offered the opportunity to participate in a publicly funded program (Noise Insulation Program), which will cause changes to be made to Grantors' Property that may result in the reduction of aircraft noise currently being imposed on the interior of the structure or structures located on Grantors' Property;

WHEREAS, the funding source for this Noise Insulation Program will include funding from the Grantee, in its capacity as the owner and operator of the Los Angeles International Airport (LAX), and may include funding from the United States Government pursuant to the Aviation Safety and Noise Abatement Act of 1979 (commencing at 49 U.S.C. Section 2101);

WHEREAS, Grantee requires as a condition precedent to its participation in the Noise Insulation Program that Grantors provide Grantee with an easement upon Grantors' Property to permit noise, vibration, discomfort, inconvenience, interference with use and enjoyment, and any consequent reduction in market value, on the Grantor's Property all due to the operation of aircraft to and from

WHEREAS, Section 21652 of the Public Utilities Code of the State of California authorizes Grantee to obtain this Easement,

NOW, THEREFORE, IT IS HEREBY AGREED BY THE PARTIES TO THIS AGREEMENT THAT:

1. Grantors do hereby, grant, convey and assign to Grantee, and its successors and assigns, a permanent and perpetual easement for the purpose of permitting the imposition of noise, vibration, discomfort, inconvenience, interference with use and enjoyment, and any consequent reduction in market value, all due to noise caused by the operation of aircraft to and from LAX upon Grantors' Property.
2. This Easement shall become effective upon the execution of this document by Grantors and Grantee and payment to Grantors, or on their behalf, by Grantee, of the sum agreed upon as the cost of the Noise Insulation Program with respect to Grantors' Property.
3. The Community Noise Equivalent Level (CNEL) map and boundaries produced by flight operations to and from LAX for the quarter-year ending December 31, 1992 (Fourth Quarter 1992 CNEL Map) filed with the State of California, Department of Transportation, Division of Aeronautics, in accordance with Section 5025 of Title 21 of the California Code of Regulations, shall be the basis for determining the baseline noise level for the Grantors' Property.

4. Pursuant to this Easement, Grantee may impose upon Grantors' Property noise levels up to and including 3 dB CNEL above the CNEL noise level shown for Grantors' Property on the Fourth Quarter 1992 CNEL Map.
5. Grantee will not be deemed to have exceeded the allowable level of imposition of noise, applicable to Grantors' Property, identified in Paragraph 4, unless that level is shown to have been exceeded in three of the four most recent quarterly CNEL maps for LAX filed with the State of California, Department of Transportation, Division of Aeronautics, in accordance with Section 5025 of Title 21 of the California Code of Regulations.
6. Grantee may further impose upon Grantees' Property any other adverse impacts arising from the allowable level of imposition of noise, applicable to Grantors' Property, identified in Paragraph 4, including, but not limited to, any resulting vibration, discomfort, inconvenience, interference with use and enjoyment, and any consequent reduction in market value.
7. Any change in the noise level reported on a quarterly CNEL map for LAX filed with the State of California, Department of Transportation, Division of Aeronautics, in accordance with Section 5025 of Title 21 of the California Code of Regulations, which results from the temporary increased use of certain runways, due to construction or repair of other runways, or due to any other cause beyond the control of Grantee (e.g., weather or wind conditions, but not flight pattern shifts authorized by the Federal Aviation Administration) shall not be used to compute the noise level imposed on Grantors' Property for purposes of Paragraph 4.
8. This Easement shall neither enlarge nor diminish any rights of either party existing prior to the effective date of this Easement, and Grantee expressly reserves and may continue to rely upon, any and all prescriptive rights, avigation easements and other entitlements for the operation of LAX.
9. Grantors covenant that Grantors are the owners in fee simple of the Grantors' Property, and that at the time of executing this Grant of Easement, Grantors have full ownership rights and powers to convey this Grant of Easement free and clear from all other grants, bargains, sales, liens, taxes, assessments and encumbrances of whatever kind or nature.
10. All easements, promises, covenants, conditions and reservations contained in this Grant of Easement are made and entered into for the benefit of the LAWA lands described in attached Exhibit "B" and for the Grantee and its successors and assigns to the maximum extent now or hereafter permitted by statute or case law, and are intended by the parties to comply with California Civil Code Section 1468. Grantors for himself/herself/themselves and his/her/their successors and assigns waive all rights under Civil Code section 1542. "Successors and assigns" as used here includes without limitation: invitees, licensees, permittees, tenants, lessees, and others who may use the Easement rights reserved in this Easement or use or be upon Grantors' Property or the lands described in Exhibit "B," as the case may be, and/or their respective officers, agents and employees.
11. Grantors release Grantee from any present and future liability and promises not to sue Grantee for damages or any other relief directly or indirectly based on noise vibration, discomfort, inconvenience, interference with use and enjoyment, and any consequent reduction in market value upon Grantors' Property, occurring as a result of lawful aviation or airport or airport-related operations, if any, at or otherwise associated with LAX. The release and covenant includes, but is not limited to claims (known or unknown) for damages for physical or emotional injuries, discomfort, inconvenience, property damage, death, interference with the use and enjoyment of property, nuisance, or inverse condemnation, or for injunctive or other extraordinary or equitable relief. Grantor agrees that Grantee shall not have any duty to avoid or mitigate the damages.

Grantor further agrees to defend at his/her/their own cost, hold harmless and indemnify Grantee from any claims, demands or liability for or based upon the exercise of the Easement rights granted in this Easement.

12. No violation or breach of any provision of this Grant of Easement may be waived unless in writing. Waiver of any one breach of any provision of this Grant of Easement shall not be deemed to be a waiver of any other breach of any provision of this Grant of Easement.

13. In the event that one or more covenant, condition, right or other provision contained in this Grant of Easement is held to be invalid, void or illegal by any court of competent jurisdiction, that covenant, condition, right or other provision shall be deemed severable from the remainder of this Grant of Easement and shall in no way affect, impair or invalidate any other covenant, condition, right or other provision of this Grant of Easement.

14. This Grant of Easement has been negotiated and entered into in the State of California, and shall be governed by, construed and enforced in accordance with the statutory, administrative and judicial laws of the State of California.

15. Grantee shall cause this conditional Grant of Easement to be recorded in the office of the Recorder of the County of Los Angeles within 30 days of the date of its acceptance by Grantee.

IN WITNESS WHEREOF, the parties have caused this agreement to be executed this ____ day of _____, 200_.

GRANTORS

[Owner 1]

[Owner 2]

[Owner 3]

GRANTEE

Los Angeles World Airports

By: _____

[ADD NOTARY PUBLIC BLOCK]

Exhibit "A": Legal Description of Grantors' Property

Exhibit "B": Legal Description of Lands Within the jurisdiction of LAWA

EXHIBIT C

Documents Related to:

Air Quality & Source Apportionment Study of the Area Surrounding
Los Angeles International Airport

- Technical Workplan, November 17, 2000
- Pilot Study Monitoring Plan, February 5, 2001
- Preliminary Draft Emission Inventory Protocol, April 20, 2001
- Pilot Study Quality Assurance Project Plan, September 4, 2001
- Draft Quality Assurance Project Plan
Appendix - Standard Operating Procedures, July 6, 2001:

--Standard Operating Procedures Provided by Tracer Environmental:

TECO Model 42C Oxides of Nitrogen Analyzer
API 400 Ozone Analyzer
TECO Model 48C CO Analyzer
TECO Model 43C SO2 Analyzer
Calibration Procedure for TECO 146 Calibrator
ESC 8816 Data Acquisition System
Met One 010C Wind Direction Sensor
Met One 020C Wind Direction Sensor

--Standard Operating Procedures Provided by Desert Research Institute (DRI)

I-207.10- Sequel Filter Sampler: Operation, Maintenance, and
Field Calibration
I-209.3 - Portable PM10 Survey Sampler Field Operations
I-210.1 - Portable PM10 or PM2.5 Survey Sampler Field Operations
I-701.4 - Canister Cleaning and Certification
I-702b.3 - Operation of DRI 3-Canister Sampler
I-702c.3 - Operation of DRI 6-Canister Sampler
I-710.3 - DRI Carbonyl Sampler
I-720.2 - Procedure for Collecting Tenax Samples
I-720.3 - Procedure for Collecting Tenax Samples
I-750.4 - 4 Channel Sequential FP/SVOC Sampler
2-102.3 - Gravimetric Analysis

-- Standard Operating Procedures Provided by DRI (continued)

- 2-106.3 - Pre-firing of Quartz-Fiber Filters for Carbonaceous Material Sampling
- 2-108.3 - Sectioning of Teflon and Quartz Filter Samples
- 2-109.4 - Extraction of Ionic Species from Filter Samples
- 2-110.4 - Filter Pack Assembly, Disassembly, and Cleaning
- 2-111.4 - Sample Shipping, Receiving, and Chain-of-Custody
- 2-203.4 - Anion Analysis of Filter Extracts and Precipitation Samples by Ion Chromatography
- 2-204.6 - Thermal/Optical Reflectance Carbon Analysis of Aerosol Filter Samples
- 2-206.3 - Analysis of Filter Extracts and Precipitation Samples by Atomic Absorption Spectroscopy
- 2-207.5 - Analysis of Filter Extracts and Precipitation Samples for Ammonium by Automated Colorimetric Analysis
- 2-703.4 - Analysis of VOC in Ambient Air by Gas Chromatography with Cryogenic Concentration
- 2-704.1 - Analysis of VOC in Ambient Air by Gas Chromatography and Mass Spectrometry
- 2-710.1 - Analysis of Carbonyl Compounds by High Performance Liquid Chromatography
- 2-720.4 - Analysis of VOC in C8 - C20 Range Collected on Tenax by GC with FID or MSD/FTIR Detection
- 2-750.4 - Analysis of Semi-Volatile Organic Compound by GC/MS
X-Ray Fluorescence (XRF) Analysis of Aerosol Filter Samples

Attachment C

1. INTRODUCTION

This Final Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS) Report identifies potential amendments to the LAX Specific Plan that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by Los Angeles World Airports (LAWA). The Final LAX SPAS Report identifies the LAWA Staff-Recommended Alternative and the proposed amendments to the LAX Specific Plan and LAX Plan associated with the SPAS alternatives, including the LAWA Staff-Recommended Alternative.

LAWA prepared the Preliminary LAX SPAS Report to identify potential LAX Specific Plan amendments consistent with the requirements of the LAX Specific Plan and the LAX Master Plan Stipulated Settlement. The Preliminary LAX SPAS Report also documented the planning process used to identify potential LAX Specific Plan amendments and potential alternative designs, technologies, and configurations for the LAX Master Plan Program in accordance with the SPAS Process defined in Section 7.H of the LAX Specific Plan and Section V of the LAX Master Plan Stipulated Settlement. The amendments and alternatives identified in this Final LAX SPAS Report were addressed in the Final Environmental Impact Report (EIR) prepared for the LAX SPAS. The Final EIR and the Final LAX SPAS Report together make up the Specific Plan Amendment Study.

The SPAS is required under Section 7.H of the LAX Specific Plan and Section V of the Stipulated Settlement, as discussed in more detail in Section 1.2 of the Preliminary LAX SPAS Report. Through the SPAS process, nine alternatives were formulated to provide a broad range of options for improvements to the north airfield, terminals, and the ground transportation system at LAX, all of which are identified in the Preliminary LAX SPAS Report. As further described below in Chapter 2, a detailed description of the proposed project, including the proposed alternatives, is provided in Section 1.4 and Chapter 6 of the Preliminary LAX SPAS Report. The LAWA Staff-Recommended Alternative, which was derived from the range of alternatives discussed in Section 1.4 and Chapter 6 of the Preliminary LAX SPAS Report, is discussed below in Chapter 2.

LAWA has identified a range of potential improvements at LAX in conjunction with completion of the LAX SPAS. The SPAS process includes the identification and evaluation of potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that certain improvements within the Master Plan, referred to as "the Yellow Light Projects," were designed to address. The SPAS process also includes identification of potential amendments to the LAX Specific Plan that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA. Presented herein is the Final LAX SPAS Report, as further described below.

On July 27, 2012, LAWA published the Preliminary LAX SPAS Report, which was made available for public review in conjunction with the SPAS Draft EIR, published on the same date. The SPAS Draft EIR was circulated for public review for 75 days, providing an expanded opportunity for public review and input beyond the 45-day review period required by Section 15105 of the State CEQA Guidelines, with the SPAS Draft EIR review period closing on October 10, 2012. Additional means for public involvement during the SPAS Draft EIR review and comment period were provided through three public meetings, held during the comment period on August 25, 2012, August 28, 2012, and August 29, 2012, as well as through a "virtual meeting" available online between September 10, 2012 and October 10, 2012, and through a project website (laxspas.org). A total of 251 unique commentors submitted comments in conjunction with the SPAS Draft EIR public review period, through written correspondence and e-mails to LAWA, oral testimony and video-taped comments at the aforementioned public meetings, and comments on the virtual meeting and project website. A total of 2,063 individual comments were received by LAWA.

Attachment D

REPORT

characteristics/schedules/turn times, load factors (percentage of occupied seats), and the size of gate hold rooms and the flexibility for different airline/aircraft types. The terminal capacity in general is more subjective to determine than airfield capacity. Current research has demonstrated that access to the airport is not a barrier for capacity. Passengers will continue to purchase tickets even if airport access is challenging (for example drive an alternate route or stay at an airport adjacent hotel). The capacity numbers were presented and have subsequently been updated to reflect additional comments received from the airports. Note that legal constraints are not taken into account during this task. The following table summarizes the capacity to handle passengers at each of these four capacity constrained/urbanized airports.

Airport Capacity Constraints

MAP (Million Annual Passengers)

| AIRPORT | CONSTRAINT | | | |
|---------|-------------------|----------|-------------------|------------|
| | AIRFIELD | TERMINAL | POLICY | OVERALL |
| BUR | 7.3 | 12.2 | -- | 7.3 |
| LAX | 82.9- 96.6 | 103.6 | 78.9 ^a | 78.9- 96.6 |
| LGB | 9.5 | 6.6 | 5.0 ^b | 5.0 |
| SNA | 16.2 ^c | 15.4 | 12.5 ^d | 12.5 |

^aLAX Settlement Agreement expires in 2015. The number of gates is limited to 153.

^bGrandfathered noise control ordinance permits 41 commercial and 25 "commuter" (GTW < 75,000 lbs) per day.

^cWith minor airfield infrastructure improvements the capacity can increase to 16.9 MAP (County of Orange JWA Settlement Agreement, Alternative C).

^dAlthough Settlement Agreement expires in 2030, County Board action would be required to increase MAP limit

The future demand for flights from residents and non-residents, that are traveling for business/leisure/visiting friends and relatives is determined based on population growth, the U.S. GDP (plus the world economic outlook as well as the California and SCAG region economies [including jobs, income, personal wealth]) and historical trends. Using these inputs, the overall regional demand is generated as a total number of potential passengers for the SCAG region as a whole. In Southern California more than half of the passengers using our airports are visitors to the region- the U.S. GDP is by far the most important predictor of potential visitors to our region. Furthermore, unlike many other regions in the U.S. there is a relatively long-term positive outlook for continued growth in our region, which should bode well for greater future air travel demand to and from our region.

Using this approach, in 2040, the total regional aviation demand is forecast to be approximately 136.2 MAP (million annual passengers). As a reference, the regional total demand was 88 MAP in 2013. So the projected growth in air travel demand between 2013 and 2040 is approximately 55%, which is equivalent to a 1.6% annual growth rate, consistent with aviation forecasts being conducted in other large

Attachment E

2. Project Description

improvements (i.e., Crossfield Taxiway Project), terminal improvements (i.e., Bradley West Project), and other related improvement underway at the time, will create 39,900 jobs over the course of the program, or an average of 5,500 to 6,000 jobs per year. Of these, between 3,500 and 4,000 jobs will be in construction industries.²⁷

It is LAWA's desire to provide improvements that further enable LAX to support and advance the economic growth and vitality of the Los Angeles region.

4. Plan Improvements That Do Not Result in More Than 153 Passenger Gates at 78.9 MAP

In identifying and evaluating alternatives to the demolition of Terminals 1, 2, and 3, LAWA is seeking to maintain consistency with the LAX Master Plan design for a total of 153 passenger gates, which was based on a future passenger activity level of 78.9 million annual passengers (MAP) at LAX in 2015. The need to demolish portions of Terminals 1, 2, and 3 is due to the reconfiguration of the north airfield as contemplated in the LAX Master Plan. As described in Section 1.1, the demolition of those terminals and the reconfiguration of the north airfield are both Yellow Light Projects being addressed in SPAS. The formulation of alternatives for reconfiguration of the north airfield includes various options for moving runways and associated taxiways northward or southward, each of which has implications relative to Terminals 1, 2, and 3. The formulation of potential alternatives to the demolition of Terminals 1, 2, and 3 is substantially influenced by the alternatives for the north airfield reconfiguration. While the extent to which terminals are reconfigured under each terminal alternative will vary depending on which airfield reconfiguration alternative it is linked to, LAWA is seeking to maintain consistency between all terminal alternatives such that none of them results in more than 153 passenger gates at the projected passenger activity level of 78.9 MAP.

5. Enhance Safety and Security at LAX

During the preparation of the LAX Master Plan, which began in the 1990s, Alternative D was formulated following the events of September 11, 2001 and integrated into the CEQA review process for the LAX Master Plan as the "Enhanced Safety and Security Plan." In now identifying and evaluating alternatives to the Yellow Light Projects, which are key elements of the LAX Master Plan, LAWA is seeking to maintain the ability of the LAX Master Plan, if and as modified by the outcome of the SPAS process, to enhance safety and security at LAX.

6. Minimize Environmental Impacts on Surrounding Communities

LAX is a major international airport located within a very urbanized area, with established communities situated directly to the north, east, and south. These communities are affected to varying degrees by existing operations at the airport. Recognizing that these existing effects to the surrounding communities may change based on the alternatives being considered in SPAS, LAWA seeks to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities.

7. Produce an Improvement Program that is Efficient, Sustainable, Feasible, and Fiscally Responsible

The nature and scope of improvements associated with the Yellow Light Projects are substantial. Each of those projects represents a major undertaking, requiring substantial funding; considerable planning, engineering, and design; and major construction activities. The costs for each of these major improvement projects would be financed primarily by Airport Improvement Program grants, Passenger Facility Charges (PFCs), and bond sales, all of which are subject to federal requirements regarding expenditure of airport funds, and which will also be utilized to finance other airport improvements outside of the scope of SPAS. The ability to successfully fund such improvements is, to a large extent,

²⁷ Los Angeles Economic Development Corporation, Economic Impact Analysis - LAX Airfield and Terminal Construction Projects, 2011.

Attachment F

4.1 Air Quality

Operations

The operational air quality assessment was conducted in accordance with the *L.A. CEQA Thresholds Guide*⁸ and the SCAQMD's *CEQA Air Quality Handbook*⁹ for evaluating air quality impacts. The methodology for estimating airport-related emissions and assessing the significance of impacts followed standard practices for determining impacts of aviation sources that have been found acceptable by USEPA, CARB, and SCAQMD; this methodology is summarized below.

Regional and localized operational air quality impacts were assessed based on the incremental increase in emissions for: the 2012 With Project scenario compared to 2012 existing conditions, and the 2019 With Project compared to the 2019 Without Project scenario. In accordance with the State *CEQA Guidelines* and the *L.A. CEQA Thresholds Guide*, the impacts of the proposed Project were compared to baseline conditions to determine significance under CEQA.

Emission Source Types

Aircraft

Information on the number and types of aircraft operations considered at LAX for 2012 and 2019 was developed specifically for the MSC North Project. The aircraft activity levels for the existing conditions are from calendar year 2012. The aircraft activity levels for future conditions were based on aircraft activity growth forecasts for LAX in the year 2019.¹⁰ These data were used to develop airport simulation models (SIMMOD) of aircraft operations for existing and future conditions, with and without the Project. The SIMMOD used information about facilities and operations to predict specific timing, volume, and location (e.g., runway used) for aircraft operations.

The analysis of aircraft emissions was conducted by estimating taxi and idle times without and with the proposed MSC North Project using the LAX MSC North Project SIMMOD results. The completion of the proposed MSC North Project would have a slight beneficial impact on taxi/idle times of aircraft moving around the airfield at LAX (compared to Without Project conditions), based on analysis of arriving and departing passenger aircraft that could use the new gates at MSC North instead of having to use the West Remote Gates/Pads. As no other phases of the landing-takeoff (LTO) cycle (approach, taxi/idle, takeoff, and climbout) would be affected by the

⁸ City of Los Angeles, *L.A. CEQA Thresholds Guide*, (2006) B-1.

⁹ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993, as updated by *SCAQMD Air Quality Significance Thresholds*, March 2011, Available: <http://www.aqmd.gov/CEQA/handbook/signthres.pdf>.

¹⁰ The approved LAX Master Plan includes a gate cap limit at LAX, which effectively limits the number of aircraft passengers that can be processed/accommodated at LAX. This was established in the Final EIS/EIR for the LAX Master Plan, which showed forecasted activity levels for the No Action/No Project alternative essentially the same as for the approved Alternative D. The MSC, while providing modern aircraft gates, does not increase the passenger processing capabilities of the airport and would have no effect on the number or type of aircraft operations at LAX. Therefore, the MSC North Project and the future phase(s) of the MSC Program will comply with the gate cap as discussed in the LAX Master Plan. The MSC North Project will allow LAWA to modernize the existing terminal area without having to reduce the number of available gates and will reduce the number of operations at the West Remote Gates/Pads. Once the future phase(s) of the MSC Program is completed, the West Remote Gates/Pads would be eliminated.

Attachment G

REPORT

- Projected demand for the SCAG Region airports in 2035 is approximately 146 million annual passengers (MAP).
- Approximately 5.61 million tons of air cargo will be handled by the SCAG Region airports in 2035.
- A decline of general aviation traffic by approximately 32% through the year 2035.
- Implement market based ground transportation disincentives to change passenger behavior.
- Support legislation that allows for more flexible use of airport revenues.
- Promote increased coordination between airport planning and land use planning on both regional and local levels.

CURRENT POLICY RELATED CHALLENGES AND OPPORTUNITIES:

As the federally designated metropolitan planning organization (MPO) for the SCAG region, one of SCAG's key mandates is to develop a long-term multi-modal transportation investment plan called the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS must address all modes of transportation, including adequate means of ground transportation to access our regional airports. As part of this regional planning work, SCAG develops a regional aviation demand at each of the current and future regional airports for both passenger and air cargo. This forms the basis for ensuring adequate provisions for airport ground transportation at each of the regional airports as required under the federal regulations. There is no other agency that takes a more comprehensive and regional approach to developing airports in our region. While SCAG continues to fulfill its role as an MPO in ensuring regional aviation planning is integrated into the overall regional transportation planning process, there are new and emerging challenges and opportunities that may require SCAG to be more active and engaged in this process. As a regional planning agency, SCAG can be a facilitator of a sustained and sustainable development of our regional airports to maximize their benefits and at the same time minimize impacts in a way that is fair, equitable and efficient to most of our residents. The following describes some of the key challenges and opportunities where SCAG may play a role to maximize the potential of our regional airports.

Airport Capacity Constraints: Our region's airports, particularly those that are located in highly urbanized settings, are very much constrained. Although the region enjoys a relatively large number of established air carrier airports, the collective acreage of the six (6) established air carrier airports is very small, totaling only 7,900 acres. This is barely more than the acreage of Chicago O'Hare, less than half that of Dallas-Ft. Worth, and less than one-quarter that of Denver International. At 3,500 acres, LAX is a very small international airport, despite being the 3rd busiest in the country and 5th busiest in the world, in terms of passengers served. San Diego International, the busiest one-runway airport in the world, is also facing capacity limits that will eventually impact the SCAG region if San Diego cannot find substantial additional airport capacity to serve its needs. Like San Diego International, the urban air carrier airports in the SCAG Region, including LAX, Bob Hope, Long Beach, and John Wayne have been encroached by incompatible development for decades and have little room to expand. Further, Long Beach and John Wayne Airports are the only two (2) commercial airports in the country that have legally-enforceable capacity constraints that can be continued in perpetuity, and LAX has a 78.9 million air passenger (MAP) settlement agreement constraint that expires in 2020. An important issue to consider in the future demand forecast would be whether to continue assuming the 78.9 MAP capacity constraint even beyond 2020. Lifting the cap at LAX could have a profound impact on the ability of the regional airports, particularly ONT, to fulfill its full potential in the foreseeable future. The forecast will also need to reflect how air passengers choose airports when they have a variety of airports to choose from in a multi-airport system.



February 1, 2016

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

Ms. Aguirre,

Thank you for the opportunity to comment on the Draft SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. The 2016 RTP/SCS provides a meaningful framework for reducing emissions and enhancing the region's health, welfare, and economy through smart land use and transportation planning.

Locally, the City of Glendale has a number of community and mobility planning efforts underway that are consistent with the goals of the Draft 2016 RTP/SCS:

- The SCAG Compass Blueprint-funded Space 134 freeway cap park planning effort, which will improve public health, increase physical activity, improve safety, and reduce Greenhouse Gas emissions in the region;
- The South Glendale Community Plan, a General Plan-level document that directs projected growth in and around High Quality Transit Areas. It enables sustainable mixed-use development through revisions to land use/zoning policies and establishes neighborhood design guidelines;
- The Tropico Center Plan is an area plan that encourages walkable, mixed-use, and transit-oriented development in a neighborhood anchored by the regional Glendale Transportation Center and hospital/medical uses;
- The Glendale Citywide Pedestrian Plan coordinates, updates, and consolidates the City's various pedestrian planning, engineering, and enforcement efforts into a single data-driven action plan to encourage pedestrianism, reduce Vehicle Miles Traveled (VMT), and save lives;
- The Citywide Safe Routes to School Program and Citywide Safety Education Initiative both recognize that public education and behavior change are important factors in improving how users interact with city streets and with each other;
- Implementation of the Glendale Bicycle Transportation Plan, including \$1.6 million in improvements around the Hoover High/Keppel Elementary/Toll Middle School complex and along East Chevy Chase Drive;
- An updated Travel Demand Model that incorporates assumptions from the SCAG regional model as well as Active Transportation modes, permitting thorough analysis of projects to reduce VMT and meet regional greenhouse gas reduction goals;
- Improvements to on and off-ramps along State Route 134 to improve efficiency and access to the state highway system for regional commuters, as well as soundwalls along Interstate 210 as part of ongoing local investment in the region's highways;
- Ongoing improvements to the Glendale Beeline Bus service, providing transit options for 2.2 million annual boardings and improving air quality with a 100% CNG fleet.

In light of our comments on the 2012 Draft RTP/SCS, we remain concerned about the need for funding of local transportation agencies, including the Glendale Beeline. Local transit agencies continue to play a critical role in RTP/SCS transit and rail policies, and as first-last mile connections to existing and planned light rail, commuter rail, Bus Rapid Transit, and High-Speed Rail service. This is particularly important given the lack of funding allocated to local transit programs in the proposed Los Angeles County Measure R sales tax extension. Additionally, we wanted to point out that Table 34, "Transit Agencies Providing Data to Google via GTFS" in the Transit appendix, incorrectly omits the Glendale Beeline.

The Red Line Extension to Bob Hope Airport remains on the Financially-Constrained RTP Projects list, while the Metro Red and Orange Line Extensions to Bob Hope Airport, SR-134 Transit Corridor connecting North Hollywood and Pasadena via Glendale, and Burbank/Glendale LRT projects remain in the list of Strategic Projects. The City of Glendale remains of the opinion that all five of these key transit projects should be considered among the first tier for "reasonably available revenue" on the Financially-Constrained list.

We commend the additional allocation of funding for Active Transportation in the Draft 2016 RTP/SCS; however, while the allocation has roughly doubled, from \$6.7 billion to \$12.9 billion, it remains just 2.3% of the total RTP budgeted amount of \$556.5 billion. We continue to believe Active Transportation should play a larger role in regional efforts to improve air quality, reduce Vehicle Miles Traveled, and reduce GHG emissions; and we again recommend a greater allocation than currently proposed.

Finally, consistent with a 2009 vote of the Glendale City Council, the City of Glendale must reiterate its opposition to any "gap closure" of SR-710 between I-10 and SR-134/I-210, studies of which are included in the Financially Constrained list for funding using "reasonably available revenue." We believe the \$70.4 million allocated to this project in the RTP should instead be spent on multi-modal alternatives that benefit corridor mobility and air quality; examples include expanding mass transit systems, maintaining and preserving existing infrastructure, and further increasing the use of rail for long-distance goods movement from the ports of Long Beach and Los Angeles.

The City of Glendale appreciates SCAG's continued leadership on sustainability and long range transportation planning in Southern California. As SCAG enters its 51st year, such issues are truly regional, and require coordination, vision, and cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan A. Loomis". The signature is stylized and fluid, with a long horizontal stroke extending to the right.

Alan A. Loomis, AICP
Deputy Director for Urban Design & Mobility



Steven S. Choi, Ph.D., Mayor

cityofirvine.org

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575

949-724-6233

February 1, 2016

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

Subject: Comments on the Draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and Draft Program Environmental Impact Report

Dear Mr. Ikhata:

The City of Irvine appreciates the opportunity to review and provide comments on the Draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) and Draft Program Environmental Impact Report (PEIR). The City of Irvine commends the Southern California Association of Governments (SCAG) staff for the tremendous amount of work and effort in preparing the documents. The following general comments and recommendations are offered by the City of Irvine on the 2016-2040 RTP/SCS, associated appendices, and the PEIR. In support of this letter, please find attached more specific detailed comments from the City of Irvine that are consistent with the comments provided by the Orange County Council of Governments (OCCOG). The City of Irvine requests that this letter and all of its attachments be included in the public record as our collective comments on the 2016-2040 RTP/SCS, PEIR, all associated appendices and documents, and online inventory of maps.

RTP/SCS

- **The City of Irvine concurs with the Orange County Council of Governments (OCCOG) and Orange County Transportation Authority (OCTA) comments.**

The City of Irvine concurs with the comments SCAG will receive from the OCCOG and the OCTA. The City requests that SCAG respond to all of the comments detailed in the OCCOG and OCTA letters and to act upon any changes advocated by OCCOG, of which the City is a member agency.

Mr. Hasan Ikhata
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- **Growth Forecasts**

Overall, the City of Irvine supports the 2016-2040 RTP/SCS growth forecast and the adoption of the growth forecast at a geographic level no lower than the jurisdictional level. The 2016-2040 RTP/SCS growth forecast accurately reflects the City of Irvine data that was incorporated into the Orange County Projections 2014. The 2016-2040 RTP/SCS growth forecast reflects all entitlements, development agreements, and projects recently completed or under construction in the City of Irvine.

Pages 4-6 of the PEIR, state that Alternative 3: Intensified Land Use Alternative "is based on a transportation network for the 2016-2040 RPT/SCS (Scenario 3 of the Draft Scenario Planning Matrix), plus more aggressive densities and land use patterns of Scenario 4, in the Draft Scenario Planning Matrix." The PEIR further states "The land use pattern in this Alternative builds on the land use strategies as described in the 2016-2040 RTP/SCS and beyond. Specifically, it increases densities and intensifies land use patterns of the Plan, especially around high quality transit areas (HQTAs) in an effort to maximize transit opportunities. The growth pattern associated with this Alternative optimizes urban areas and suburban town centers, transit oriented developments (TODs), HQTAs, livable corridors, and neighborhood mobility areas."

The City of Irvine has completed a comprehensive review of Alternative 3: Intensified Land Use growth forecast at the Traffic Analysis Zone (TAZ) level and it appears that it was built upon the June 24, 2015 Policy Growth Forecast and NOT the 2016-2040 RTP/SCS as stated in the PEIR. The City of Irvine has expressed concern through written correspondence and at various meetings of the Community, Economic and Human Development Committee and Regional Council, that the June 24, 2015 Policy Growth Forecast has significant errors and does not accurately reflect existing development agreements, entitlements, and projects recently completed or under construction. I have requested at various SCAG meetings, and at our meeting on September 3, 2015, that the 2016-2040 RTP/SCS and all alternatives be based on the Policy Growth Forecast that includes the technical corrections provided by the Center for Demographic Research, on behalf of the City of Irvine. The growth forecast included in the Intensified Land Use alternative is not based on the technically corrected Policy Growth Forecast, is in conflict with the local growth forecast provided to SCAG through Orange County Projections 2014, and is inconsistent with the City of Irvine General Plan. The Intensified Land Use alternative (Alternative 3 in the PEIR) is, therefore, unrealistic and unlikely to occur.

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Examples of the Intensified Land Use Alternative growth forecast of concern to the City of Irvine include:

1. Reduction of approximately 5,000 planned housing units from the City of Irvine's Northern Sphere and Great Park Neighborhoods development areas. These units are approved and fully vested through legally binding Development Agreements. A reduction of intensity is outside the legal control of the City of Irvine. These areas are being developed in a manner that SCAG would classify as "complete communities," with the Great Park Neighborhoods specifically being located adjacent to the multimodal Irvine Station (TAZ: 33117200, 33112400, 33112200, 33112100, 33116200, 33116100, 33109400, 33109300, 33109500, 33110100, 33106100).
2. Reduction of approximately 1,000 planned housing units from Planning Area 18/39. These units are approved and fully vested through legally binding Development Agreements and are under construction or entitled (TAZ: 32788200, 32788100).
3. Reduction of approximately 4,000 planned housing units from the Irvine Business Complex. These units are approved and fully vested through legally binding Development Agreements and are under construction or entitled. The Irvine Business Complex features medium to high density housing that is located within one of the business centers of Irvine in an area served by a short headway transit system with direct access to the Tustin Metrolink Station (TAZ: 32773200, 32772400, 32772300, 32772200, 3273100, 33078200, 33079700, 33079400, 33079300).
4. Reallocation of a portion of the above-described units to: existing fully built-out single-family neighborhoods and multi-family neighborhoods where several thousand lots are owned by individual homeowners. Larger lots within these areas are occupied by the Jeffery Office Park, the Chinese Cultural Center, the Cypress Village Shopping Center, and Southern California Edison easements (TAZ: 33105300, 33105400, 33105600, 33105200, 33099200, 33099100, 33094300, 33091200, 33095400, 33100200, 33100300, 33097200, 33097300, 33097400, 33097600).

The City of Irvine recommends that the PEIR Alternative 3: Intensified Land Use Alternative should include language indicating that the land use pattern was built upon a policy growth forecast that does not take into consideration existing development agreements, entitlements, projects recently completed or units under construction and may be inconsistent with existing General Plans. The land use pattern identified in the alternative is both unlikely to occur and unrealistic. This should be noted for any reference of Alternative 3: Intensified Land Use Alternative throughout the 2016-2040 RTP/SCS, PEIR, and associated appendices.

Mr. Hasan Ikhata
February 1, 2016
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- **Maintain Unbiased, Objective Tone**

Language throughout the 2016-2040 RTP/SCS and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues such as active transportation and public health. While these issues are important, it is recommended that the document utilize an unbiased, objective tone. The City of Irvine recommends the removal of "Our Vision" and "Our Overarching Strategy" from the Executive Summary of the document. These two sections are highly speculative and are not necessary to the document. "Our Vision" and "Our Overarching Strategy" go above and beyond the requirements of the RTP. Additional examples of overly emphatic language are outlined in the enclosed matrix.

General Comments

- **"Can and Should"**

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

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

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- **500 foot “Buffer”**

The 2016-2040 RTP/SCS assumes that almost no new growth will occur within 500 feet of a freeway or busy transportation corridor. The 2016-2040 RTP/SCS states that a “buffer” is consistent with the California Air Resources Board’s 2005 advisory guidance that housing be discouraged within 500 feet of high volume roadways such as freeways. It is important to note that CARB’s guidance is not a prohibition of development near high-volume roadways. SCAG’s “buffer” strategy eradicates growth in these areas that are otherwise rich in connections to jobs, retail and housing accessible by many transportation modes. The proposed “buffer” does not reflect the availability of mitigation measures to address near-roadway emissions that remain despite a dramatic reduction of diesel emissions in the last decade. This strategy is a short-term response and problematic because it prevents the kind of density and proximity between land uses that actually reduce trips and associated vehicle mileage traveled (VMT). As vehicle engines and fuels become cleaner, the “buffer” strategy will become obsolete yet will leave behind a legacy of inefficient land use patterns. Throughout the SCAG Region, the prevailing existing land use patterns include residential and sensitive receptor uses within 500 feet of major transportation corridors. In many cases, these areas demonstrate compact development form and serve as affordable housing. Removing this massive portion of land from availability for use is premature and counter to the overarching principles of SB 375 to locate housing near job centers and previously urbanized areas.

There needs to be consistency throughout all the documents regarding the 500 foot “buffer.” Specifically:

- The word “buffer” should not be used.
- The amount of distance should be clarified (the documents have various ranges from 500 feet to 1,000 feet).
- Where the distance is measured from should be clarified (e.g., centerline, edge of roadway, edge of right of way) should be included.
- The types of transportation corridors being identified should be clarified (e.g., freeways, high quality transit corridors, high volume corridors, rail etc.).
- Clarify that the emphasis should be on mitigation not prohibition of development.
- Clarify there is a conflict with discouraging development within 500 feet of these transportation corridors now and that with changes in emissions reductions and fleet changes over time that development within 500 feet will not need to be discouraged in the future. A mitigation approach will allow for flexibility with the changing fleet mix in the future.

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 February 1, 2016
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- **Remain Neutral on Technology**

Throughout the documents, there are specific examples of technology identified. It should be noted these are only examples and future technologies should not be ignored or excluded from meeting the goals of the 2016-2040 RTP/SCS. This will allow the document, including mitigation measures, to be more flexible. At the 2016 Consumer Electronics Show, the Ehang 184 was showcased. The all-electric drone developed by Chinese UAV manufacturer Ehang, is capable of carrying a 100kg person for 23 minutes at speeds of 100 kph. It is unknown if this type of technology will reach general use, but a technology that would have the potential to significantly reduce VMT, traffic congestion, and emissions should not be excluded from the plan.

PEIR

- **City of Irvine – Financially Constrained 2016-2040 RTP/SCS Project**

On page 163 of Appendix B to the PEIR, the following change should be made to 2016-2040 RTP/SCS Project ID 2120006:

“Project feasibility study of six two miles of new roadways including Trabucco Road, O Street, and Marine Way.” The modification is consistent with information submitted by the City of Irvine to OCTA.

- **PEIR Mitigation Measures**

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

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

- c. Priority and Funding Preference for Transportation Projects:
 To address the significant impacts of increasing VMT and traffic congestion, the PEIR for SCAG’s 2016-2040 RTP/SCS proposes project-level mitigation measures that include language allowing for:
 - (1) Giving priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita [Mitigation Measure MM-TRA-1(b)]; and,

Mr. Hasan Ikhata
February 1, 2016
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- (2) Giving funding preference to improvements in public transit over other new infrastructure for private automobile traffic [Mitigation Measure MM-TRA-2(b)].

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

The language in these provisions implies a specific emphasis towards policy consideration to the prioritization, selection and funding of transportation projects that, to our knowledge, has not been discussed nor endorsed by SCAG's Transportation Committee, or Regional Council, as a regional strategy for the implementation of the 2016-2040 RTP/SCS.

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

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

- **Fees and Taxes**

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

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

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- **Duplicative/Existing Regulations**

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

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

Mr. Hasan Ikhata
February 1, 2016
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There are specific mitigation measures included in the Hydrology section that may be in conflict with Storm Water Permits issued by Regional Water Quality Control Boards. In the SCAG region, there are five water quality control boards each with its own Municipal NPDES Storm Water Permit. The regulations and requirements contained in these permits vary from each other. By listing specific measures in the PEIR that are not included in a project's applicable Municipal NPDES Storm Water Permit, the PEIR creates conflicting compliance requirements. To eliminate potential conflict with existing regulations, the mitigation measures regarding specific best management practices (BMPs) should be removed and replaced with a single requirement that each project must comply with its applicable Municipal NPDES Storm Water Permit.

The City of Irvine appreciates your consideration of all comments provided in this letter and its attachments and looks forward to your responses. It is a shared goal to have a Regional Transportation Plan and Sustainable Communities Strategy adopted on April 7, 2016 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. If you have any questions, please do not hesitate to contact me.

Sincerely,



Steven S. Choi, Ph.D.
Mayor

Enclosure: Detailed Comments on the 2016-2040 RTP/SCS, PEIR, and Related Appendices – City of Irvine

cc: Irvine City Council
Sean Joyce, City Manager
Sharon Landers, Assistant City Manager
Eric Tolles, Assistant City Manager, Great Park
Susan Emery, Director of Community Development
Manuel Gomez, Director of Public Works
Barry Curtis, Manager of Planning Services
Katie Berg-Curtis, Project Development Administrator
Bill Jacobs, Principal Planner
Marika Poynter, Senior Planner
Marnie Primmer, Interim Executive Director OCCOG (email)
Naresh Amatya, Acting Director, Transportation Planning, SCAG (email)
Huasha Liu, Director, Land Use & Environmental Planning, SCAG (email)
Linjin Sun, Senior Regional Planner, SCAG (email)
Courtney Aguirre, SCAG (email)

**DETAILED COMMENTS ON THE 2016 RTP/SCS, PEIR, AND
RELATED APPENDICES – CITY OF IRVINE**

2016 RTP/SCS

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

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

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

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

| # | TOPIC | PAGE REFERENCE | RTP NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|------------------------------|--|
| 27 | Clarification | p. 61, column 1, paragraph 2 | Add statement that says " <u>These preliminary scenarios are not the ones modeled in the PEIR.</u> " |
| 28 | Clarification | p. 64, column 1, paragraph 1 | Clarification should be made that attendance was self-selected as was the survey participation. Attendees were strongly encouraged by SCAG staff to fill out a survey. A more detailed description should be included that explains that these results are not scientific. |
| 29 | Clarification | p. 64, column 2, paragraph 2 | "...was also a principal concern, as was access to healthy food." What percentage of respondents elevates an item to a 'principle concern'? |
| 30 | Clarification | p. 64, column 2, paragraph 4 | "Collectively, the survey responses offered an invaluable guide to help finalize the Plan's investments, strategies and priorities. They reflect how regional stakeholders want us to address priority areas such as transit and roadway investments, system management, active transportation, land use and public health." Did the survey responses change the Plan? Clarify if a higher priority in making changes was afforded to survey respondents' feedback over jurisdictional and CTC input? |
| 31 | Clarification | p. 65, column 1, paragraph 4 | "Jurisdictions were asked to provide input on the growth scenario, including information on specific planned development projects with entitlements, other planned projects, or recently completed developments." Comment: During the local input process, SCAG requested feedback on the distribution of new households and employment. SCAG did not request information from jurisdictions on specific planned development projects with entitlements, other planned projects, and recently completed developments. During review of the draft policy growth forecast (PGF) in summer 2015, technical errors throughout the draft PGF were identified. These "technical errors" in the dataset were that entitlements, development agreements, and projects currently under construction or recently completed were not properly reflected. It was then that SCAG stated that jurisdictions could provide the information if jurisdictions wanted corrections made to the PGF. |

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

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

ACTIVE TRANSPORTATION APPENDIX

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

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

DEMOGRAPHICS/GROWTH FORECAST APPENDIX

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

GOODS MOVEMENT

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

PERFORMANCE MEASURES APPENDIX

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

PUBLIC HEALTH APPENDIX

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

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|----------------------------|---|
| 3 | Clarification | p.1, column 1 | "Public health is increasingly an area of emphasis for Metropolitan Planning Organizations (MPOs) and Departments of Transportation (DOTs) across the country, <u>have an opportunity to impact due to the prevalence of chronic diseases such as obesity, hypertension, asthma and heart disease through transportation planning which promotes increased physical activity.</u> " |
| 4 | Clarification | p.2, column 1 | Introduction- first paragraph sentence beginning with "Public health outcomes are the product of Social Determinants of Health....." consider adding "and other factors. |
| 5 | Clarification | p.1, column 2 | "Climate Adaptation: Support efforts to prevent <u>mitigate</u> climate change and make the region more resilient to future changes with reductions in VMT and greenhouse gas emissions." |
| 6 | Correction | p.2, Figure 1 | Arrows should go both ways. |
| 7 | Clarification | p.3, column 1, paragraph 2 | "Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors <u>and related conditions</u> can play a role in supporting healthy behaviors." |
| 8 | Clarification | p.3, column 2, paragraph 3 | "Access to healthy food environments such as grocery stores, farmers' markets and community gardens decreases <u>can play an important role in</u> food insecurity and obesity." |
| 9 | Define | p.7, column 1, first line | Define "weather insurance" |
| 10 | Clarification | p.7, column 2, paragraph 2 | "... Providing access to <u>education and job training aligned with job opportunities in the region</u> jobs with a living wage is critical to ensuring communities become and stay healthy." |
| 11 | Clarification | p.7, column 2, paragraph 3 | "...Creating infrastructure <u>policies and community conditions</u> and facilities that encourage active transportation such as biking and walking provides opportunities for residents to increase their daily physical activity." |
| 12 | Clarification | p.8, paragraph 3 | Consider adding the recommendations for children which has a higher standard of one hour per day. This is valuable as jurisdictions look at health co-benefits of safe routes to school infrastructure changes and related programming. |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|--|--|
| 13 | Clarification | p.9, all figures | Recommend using the more current 2014 data. Also, it might be helpful to look at these metrics on a smaller level of geography and/or by poverty and/or by race/ethnicity. Especially since there are often funding set asides to reach disadvantaged communities, it might be interesting to see what each of these indicators looks like at a more refined level. The need is not equally distributed throughout any jurisdiction. |
| 14 | Clarification | p.9 | Add table with data for walking. |
| 15 | Clarification | p.10, column 2 | Consider including funding as both a challenge and an opportunity. |
| 16 | Clarification | p.10, column 1, last sentence | "Much of our local arterial system is also in need of pavement improvements, as local roadways in the SCAG region average a score of 69 out of 100 in the Pavement Condition Index (PCI), where a score of 70 or less typically translates to conditions that are <u>inadequate more costly to repair.</u> " |
| 17 | Clarification | p.10, column 2, paragraph 4 | "With more than 18 million people, 191 cities, six counties and hundreds of local and regional agencies, Southern California is one of the most complex regions on earth <u>a diverse region</u> . Within the region, health outcomes vary widely based on <u>many things, such as</u> geography, income and race." |
| 18 | Clarification | p. 15, column 2, paragraph 3; & throughout all | "500 foot buffer"- be consistent with usage and description throughout all documents in whether this is adjacent to just freeways or freeways, rail, and high frequency transit corridors. |
| 19 | Clarification | p. 16, column 1, paragraph 1 | "Region-wide, about ten percent of the land area within HQTAs is also within the 500 feet <u>feet</u> buffer of the freeway. To balance regional policy goals, the Plan accommodates the vast majority of growth within HQTAs <u>but beyond</u> outside of the 500 feet buffer of freeways..." |
| 20 | Clarification | p. 17, column 1 | "Water Consumption" and "Land Consumption" Specify the time period for the change or difference in numbers. Compare this to 2040 Baseline. |
| 21 | Clarification | p. 19, column 2 | "Public Health Work Program" Clarify if this work program was approved by the RC or SCAG staff is pursuing these tasks under direction of RC to incorporate more public health into RTP. |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|----------------|---|
| 22 | Clarification | p. 22-29 | Are these all "best practices" or are they local examples of promising practices? Since some of these are in process, are the results there to show that this particular practice has proven efficacy over another? These may have the potential to be best practices. If the project is based upon a best practice, it is recommended to link to the best practice so other jurisdictional leaders could consider for replication. If it is not already a proven practice, suggest calling it something different such as "local promising practices". Add the Complete Streets Guidelines that are being developed in Orange County (which integrates in best practices.) |

SCS BACKGROUND DOCUMENTATION APPENDIX

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|---|-----------------|------------------------------|---|
| 1 | Clarification | P.42-43 | How do the SPM Place Types nest into the Land Development Categories? |
| 2 | General Comment | All maps | "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. <u>The advisory sub-jurisdictional data shall not be required should not be used for purposes of qualifying for future grant funding or other incentives. The data is controlled to be within the density ranges of local general plans and/or input received from local jurisdictions. the purpose of or for determining a proposed project's consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA) streamlining, lead agencies have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS.</u> " |
| 3 | Clarification | p.6/43 | Move the definitions of Urban, Compact Walkable, and Standard Suburban from page 43 to page 6 before the maps |
| 4 | Clarification | p. 41, column 1, paragraph 4 | "Scenario modeling with UrbanFootprint brings meaningful, comprehensible, and timely results to those <u>local jurisdictions</u> wanting to understand how growth and development choices will impact their community, city, or region in the coming years and decades." |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|--------------------------------|--|
| 5 | Correction | p. 41, column 2, paragraph 2 | "Since 2012... Developers of UrbanFootprint have also met with regional agencies, such as SCAG, Sacramento Area Council of Governments (SACOG), and San Diego Association of Governments (SANDAG); Orange County Council of Governments (OCCOG). " |
| 6 | Clarification | p. 50, 51, 54, 56 maps | Clarify in map legends if growth refers to population, housing and/or employment. |
| 7 | Correction | p. 56 column 1, last paragraph | "The scope of t These four scenarios were developed in early 2015 by SCAG and their consultant and shared, which were developed in consultation with the CEHD Committee and the SCAG's Technical Working Group (TWG), evolved throughout the first five months of 2015. " |
| 8 | Clarification | p. 56 column 2, paragraph 2 | "Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing, <u>but sometimes modernization of utilities needs to be considered and completed to accommodate the additional usage.</u> " |
| 9 | Clarification | P. 58, column 2, paragraph 4 | "Saving water also saves on costs, and the RTP/SCS saves about \$1.2 billion over the span of the plan, and saves households in the SCAG region \$93 million on annual water bills." <u>Add "Notwithstanding, infrastructure operations and maintenance costs require continued funding; further, these costs could offset ratepayer savings resulting from the implementation of RTP/SCS policies, conservation efforts, or installation and use of efficient appliances."</u> |
| 10 | Clarification | P. 83, column 2, paragraph 2 | "The SPM includes a suite of tools and analytical engines that help to quickly illustrate alternative plans and policies and to estimate their transportation, environmental, fiscal, <u>and public health and community regional impacts.</u> " |
| 11 | Clarification | P. 83, column 2, last sentence | "SPM will serve as a common platform for communications between SCAG and local jurisdictions in the process of local input and public outreach, providing local planners advanced analytical capabilities." |

PEIR

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|---|-----------------|----------------|---|
| 1 | General Comment | All | Any changes to mitigation measure language should be updated in both the Executive Summary and the chapters throughout the PEIR, as well as the RTP/SCS document. |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|-----------------|----------------|---|
| 2 | General Comment | All | Cite original source data, not other documents, e.g. SCAG's Local Profiles |
| 3 | Clarification | ES-14 | "MM-AES-1(b): Consistent ... the Lead Agency can and should consider mitigation measures..." |
| 4 | Clarification | ES-14 & 15 | "MM-AES-3(b): Consistent ...the Lead Agency can and should consider mitigation measures... • Require <u>Encourage</u> development of design guidelines... • Require <u>Encourage</u> that sites are kept in a... "" |
| 5 | Define | ES-16 | Define 'Natural Resource Inventory Database and Conservation Framework & Assessment' |
| 6 | Define | ES-16 | Define 'Conservation Plan' |
| 7 | Define | ES-16 | Define 'mitigation banks' |
| 8 | Clarification | ES-19 | MM-Air-2(b): "• Require <u>Encourage</u> contractors to assemble... •As appropriate require <u>encourage</u> that..." |
| 9 | Clarification | ES-19 | MM-Air-4(b): "• Require <u>Encourage</u> clean fuels, and reduce petroleum dependency." |
| 10 | Clarification | ES-19 | "MM-Air-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects or development projects resulting from the land use patterns in the 2016 RTP/SCS would be located." |
| 11 | Clarification | ES-20 | MM-BIO 1(b): • Require <u>Encourage</u> project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible." |
| 12 | Clarification | ES-22 | MM-BIO-2(b): "• Require <u>Encourage</u> project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible." |
| 13 | Clarification | ES-22 | MM-BIO-3(b): "• Require <u>Encourage</u> project design to avoid federally protected wetlands consistent with the provisions of Section 404..." "• Require <u>Encourage</u> review of construction drawings by a certified wetland delineator..." |
| 14 | Clarification | ES-23 | MM-BIO-4(b): "• Require <u>Encourage</u> review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDDB..." |

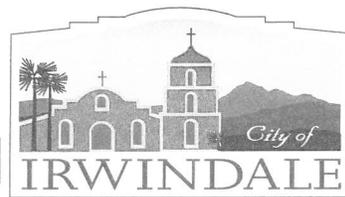
| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|------------------------|---|
| 15 | Clarification | Appendix B Page 163 | On page 163 of Appendix B to the draft Program Environmental Impact Report, the following change should be made to RTP Project ID 2120006: "Project feasibility study of six two miles of new roadways including Trabuco Road, O Street, and Marine Way." The modification is consistent with information submitted by the City of Irvine to the Orange County Transportation Authority. |
| 15 | Clarification | ES-24 | MM-BIO-5(b): " •-Require <u>Ensure</u> that no change in existing ground level occur from the base of any protected tree at any time. Require <u>It is recommended</u> that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree." " •-Require <u>Encourage</u> that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require <u>It is recommended</u> that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require <u>It is recommended</u> that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require <u>It is recommended</u> that no sign, other than a tag showing the botanical classification, be attached to any protected tree." " •... require <u>ensure</u> replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed." |
| 16 | Clarification | ES-31 | MM-GHG-3(a)(11): " •-Require <u>Encourage</u> amenities for non-motorized transportation, such as secure and convenient bicycle parking." |
| 17 | Clarification | ES-40 | MM-LU-1(a)(3): "SCAG shall work with its member cities and counties to encourage <u>but not require</u> that transportation projects and growth are consistent with the RTP/SCS." |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|-----------------------------------|--|
| 18 | Clarification | ES-40 | MM-LU-1(a)(4): "SCAG shall coordinate with member cities and counties to encourage <u>but not require</u> that general plans consider and reflect as appropriate RTP/SCS policies and strategies. SCAG will work to encourage <u>but not require</u> consistency between general plans and RTP/SCS policies." |
| 19 | Clarification | ES-40 | MM-LU-1(a)(8): "SCAG shall continue to use its Intergovernmental Review Process to provide comments to lead agencies on regionally significant projects, that may be considered for determining consistency with the RTP/SCS. " |
| 20 | Clarification | ES-52 | MM-TRA-1(b): "•... bicyclist accommodations, and require <u>encourage</u> new development and redevelopment projects to include bicycle facilities..." |
| 21 | Clarification | ES-53 | MM-TRA-1(b): "• Require <u>Encourage</u> new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use." |
| 22 | Clarification | ES-53 | MM-TRA--2(b) "•Where traffic signals or streetlights are installed, require <u>encourage</u> the use of Light Emitting..." |
| 23 | Clarification | ES-54 | MM-TRA--2(b) "•Diode (LED) technology, <u>or similar technology.</u> " |
| 24 | Clarification | ES-55 | MM-TRA--2(b) "• Require <u>Encourage</u> the development of Transportation Management Associations for large employers and commercial/ industrial complexes;" |
| 25 | Clarification | ES-59 | MM-USS-6(b): "• Require <u>Encourage</u> the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard)." |
| 26 | Clarification | ES-59 | MM-USS-6(b): "Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible." Comment: Trash disposal should be addressed regionally while considering distance instead of being limited to within the SCAG region. It is possible that disposal could be done nearby while crossing regional boundaries. |
| 27 | Delete | P. 3.3-26 Regional Air Quality | It is not appropriate to use the American Lung Association grading system to rate the region's the transportation plan. This section (paragraph and Table 3.3.2-1) should be deleted. |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
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| 28 | Clarification | P. 3.3-29 Sensitive Receptors & Table 3.3.2-3 | "Sensitive Receptors by County" Clarify what the source data was and how the tally of sensitive receptors was made. |
| 29 | Clarification | Figure 3.3.2-3 | Figure needs legend, labels, source of data and definition of sensitive receptors |
| 30 | Clarification | P. 3.10-5 Section 3.10.1, Regulatory Framework | The definition of a Municipal Separate Storm Sewer System (MS4) is incomplete and incorrectly cited. |
| 31 | Clarification | p. 3.10-15 Section 3.10.1, Orange County General Plan | Specific mention of the Orange County Stormwater Program's Drainage Area Management Plan (DAMP) should be made under PEIR heading Orange County General Plan. The DAMP is Orange County's principle policy and program guidance document for urban nonpoint source pollution mitigation. The PEIR should reference the DAMP's agreements, structure, and programs, and, at the project level, make note to consider the specific water pollution control elements of the DAMP that apply to land development and redevelopment projects. Transportation infrastructure projects deemed to be Priority Projects, in accordance with DAMP designation (Exhibit 7.1 Table 7-1.1), would require the development of a Project Water Quality Management Plan (WQMP) in conformance with Orange County's Model WQMP. |
| 32 | Clarification | p. 3.10-17 Section 3.10.2, Existing Conditions | Table 3.10.2-1 lists San Juan Creek as a surface water resource within Santa Ana (Region 8) jurisdiction. San Juan Creek is located within the San Diego Regional Water Quality Control Board (Region 9) jurisdictional boundary. |
| 33 | Clarification | p. 3.10-56 Section 3.10.6, Mitigation Measures | Mitigation Measures: Parts of this section list mitigation measures that are already being required by municipal stormwater programs across the region. Instead of listing specific mitigation measures, the PEIR should make reference to these programs. In Orange County, for example, this program is detailed in the DAMP/Model WQMP. The Model WQMP describes the process that the cities and County employ for requiring a Project WQMP, which is a plan for minimizing the adverse impacts of urbanization on site hydrology, runoff flow rates, and pollutant loads at the project level. A reference to the Model WQMP and equivalent documents in the region's other counties, should replace the last ten bullet points of section MM-HYD-I(b). |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|--|--|
| 34 | Clarification | p. 3.10-56 Section 3.10.6, Mitigation Measures | If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out. |
| 35 | Clarification | p. 3.10-56 Section 3.10.6, Mitigation Measures & Table ES 4-1 (page ES-37) | The PEIR states that "where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project." While the intent with many mitigative measures is to preserve (emphasis added) perviousness, the PEIR should not be establishing performance measures for land development/redevelopment outside of established local stormwater programs. |
| 36 | Clarification | 3.11-8&9, 3.11-13 3.11-16 & 17 | Need to specify the vacant areas that are permanently preserved or undevelopable, even park space that is vacant <ul style="list-style-type: none"> i. Identify the source of the data used to identify vacant land. ii. What are the following items classified as (e.g. vacant, open space): HOA open space, HOA streets, private parking lots, lakes. <p>Table 3.11.2-2- Break out vacant land category into permanently preserved/undevelopable or developable</p> <p>Figure 3.11.2-7 Need to correctly label national forests as permanently preserved open space. Areas labeled vacant need to be reviewed to correctly allocate lands that are permanently preserved/undevelopable and which are developable.</p> |
| 37 | Clarification | 3.11-10 | Table 3.11.2-1- Define 'Established Communities'; Correct label or number of square miles by county |
| 38 | Define | 3.11-11 | Define 'carbon sinks' |
| 39 | Define | 3.11-14 | Define medium, high, and low density housing within text |

| # | TOPIC | PAGE REFERENCE | NARRATIVE, COMMENT & RECOMMENDATION |
|----|---------------|---|---|
| 40 | Clarification | 3.11-34 | <p>3.11.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION IMPACT LU-1...</p> <p>It is likely that in some instances currently adopted general plans and other adopted plans will not General Plans are not required to be consistent with the 2016 RTP/SCS policies and land use strategies, and they are not required to be consistent for purposes of the SCS pursuant to SB 375. Implementation of mitigation measures MM-LU- 1(a)(1), MM-LU-1(a)(2), MM-LU-1(a)(3), MM-LU-1(a)(4), MM-LU-1(a)(5), MM-LU-1(a)(6), MM-LU- 1(a)(7), MM-LU-1(a)(8), and MM-LU-1(b) would may reduce some of these impacts. However, direct, indirect, and cumulative impacts would remain significant and unavoidable.</p> |
| 41 | Correction | 3.14-9 | Update Table 3.14.2-1 with May 2015 DOF data and label columns as 'Households' not 'Housing Units' |
| 42 | Correction | 3.14-12 | Update Table 3.14.2-3 with May 2015 DOF data |
| 43 | Correction | 3.14-13 | Update Table 3.14.2-5 with May 2015 DOF data |
| 44 | Define | Figures 3.14.2-1 3.14.2-2 3.14.2-3 | Define subjects of maps |
| 45 | Clarification | 3.14.22, paragraph 4 | Clarify if discussion is on new lane miles or existing; Define "additional transportation facilities" |
| 46 | Clarification | 4-1, 4.1 add after last bullet | <u>"If an alternative is rejected and the project approved, it is the EIR for the proposed project that is to be used for future tiering purposes."</u> |
| 47 | Clarification | P. 4-6, and all related documents' references to Alternative 3. | <p>Alternative 3: Intensified Land Use Alternative "The <u>hypothetical</u> land use pattern in this Alternative builds on the land use strategies as described in the 2016 RTP/SCS and beyond. Specifically, it increases densities and intensifies land use patterns of the Plan, especially around high quality transit areas (HQTAs) in an effort to maximize transit opportunities. The <u>hypothetical</u> growth pattern associated with this Alternative..."</p> <p>Comment: Update all references to Alternative 3 in all RTP/SCS documents where it mentions that the land use pattern was developed based on the Plan to say that Alternative 3's land use plan is hypothetical.</p> |



January 25, 2016

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

SUBJECT: Draft 2016 RTP/SCS Comments

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

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

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

Sincerely,

John Davidson
City Manager

