

PUBLIC PARTICIPATION AND CONSULTATION

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS



SUB APPENDIX PART 1 OF 5
Comments and Responses

ADOPTED | APRIL 2016



SUB APPENDIX PART 1 OF 5
COMMUNITY INPUT | PUBLIC PARTICIPATION AND CONSULTATION

COMMENTS AND RESPONSES

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**To review responses to comments provided within the RTP/SCS matrix provided within this letter, please view responses to the Center of Demographic Research's comments (the first letter that was received containing the RTP/SCS matrix).*

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2016 RTP/SCS Comments and Responses

ID	Comment	Response
<i>Submitted by</i> Albert Perdon and Associates		Submittal 16166 Related Documents
16166.01	<p>The following input is provided in response to the invitation to submit comments on the Draft 2040 RTP/SCS. On March 14, 2014 a Brief was submitted to Ms. Deena C. Fawcett, Clerk/Administrator, Office of the Clerk, Court of Appeal, Third Appellate District State of California, 914 Capitol Mall Sacramento, CA 95814-4814</p> <p>Re: California High-Speed Rail Authority et al. v. The Superior Court of Sacramento, County, C075668</p> <p>Sacramento County Nos. 34201100113919CUMCGDS, 342011300140689CUMCGDS. A copy of this Brief was filed with Stephanie Fong Zook, Office of the State Attorney General. This Brief outlined a strategy for addressing the economic and environmental issues regarding the California High Speed Train Project. It presents an alternative land use and transportation alternative aimed at meeting the law established with voter passage of the 2008 Proposition 1A High Speed Train bond measure. The Brief presents a transportation and land development strategy for meeting air quality attainment goals. The focus of this strategy is to accommodate a significant increase in population while achieving a net reduction in air emissions and auto traffic. It achieves this result by eliminating the need for many millions of people to own and operate an automobile for commuting and other purposes. It focuses growth into very high-density "sky cities" integrated with high-speed train service and other local transit services. As the Brief reveals, this result can be accomplished using conventional value capture strategies employed in numerous locations throughout California. It is expected that SCAG will identify this growth strategy in the draft and final SRTP/SCS EIR/EIS as a viable alternative for adoption by the SCAG Regional Council.</p>	<p>Comment noted. One of the 2016 RTP/SCS land use strategies is to focus new growth around transit. Land use policy around transit stations and amenities fall under the authority of the local governing jurisdiction. The SCS and SB 375 do not require a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority.</p>

ID	Comment	Response
<i>Submitted by</i> Albert Perdon and Associates		Submittal 16167 Related Documents Link
16167.01	<p>The following input is provided in response to the invitation to submit comments on the Draft 2040 RTP/SCS. On March 14, 2014 a Brief was submitted to Ms. Deena C. Fawcett, Clerk/Administrator, Office of the Clerk, Court of Appeal, Third Appellate District State of California, 914 Capitol Mall, Sacramento, CA 95814-4814, Re: California High-Speed Rail Authority et al. v. The Superior Court of Sacramento, County, C075668 Sacramento County Nos. 34201100113919CUMCGDS, 342011300140689CUMCGDS. A copy of this Brief was filed with Stephanie Fong Zook, Office of the State Attorney General. This Brief outlined a strategy for addressing the economic and environmental issues regarding the California High Speed Train Project. A Power Point Presentation was prepared that describes the central points contained within the Brief. As in the Brief, the Power Point Presentation presents an alternative land use and transportation alternative aimed at meeting the law established with voter passage of the 2008 Proposition 1A High Speed Train bond measure. The presentation presents a transportation and land development strategy for meeting air quality attainment goals. The focus of this strategy is to accommodate a significant increase in population while achieving a net reduction in air emissions and auto traffic. It achieves this result by eliminating the need for many millions of people to own and operate an automobile for commuting and other purposes. It focuses growth into very high-density "sky cities" integrated with high-speed train service and other local transit services. As the presentation reveals, this result can be accomplished using conventional value capture strategies employed in numerous locations throughout California. It is expected that SCAG will include this presentation in the public hearing record for the draft and final SRTP/SCS EIR/EIS for adoption by the SCAG Regional Council as a viable alternative for adoption.</p>	<p>Comment noted. One of the 2016 RTP/SCS land use strategies is to focus new growth around transit. Land use policy around transit stations and amenities fall under the authority of the local governing jurisdiction. The SCS and SB 375 do not require a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority.</p>

ID	Comment	Response
<i>Submitted by</i> Albert Perdon and Associates		Submittal 16182 Related Documents Link
16182.01	<p>The following input is provided in response to the invitation to submit comments on the Draft 2040 Regional Transportation Plan/Sustainable Community Strategy (the Plan) and on the 2016PEIR. People are frustrated. Traffic continues to increase, making it more difficult to get around. Housing is less affordable today than in the past, especially for people in middle and lower income brackets. Neighborhoods are being overrun by increased density that destroys the character of the communities people have lived in for years. Billions of tax-payer dollars have gone into expanding freeways and building transit lines, yet congestion is getting worse. Hundreds of billions more have been spent in private dollars to maintain a car-dependent transportation system that cannot possibly keep up with a growing demand. On January 1, 2016, the Los Angeles Times reports in “Carmageddon West” that, “Another traffic nightmare is shaping up near downtown L.A. A 55-hour street closure in the heart of downtown Los Angeles this weekend is sure to bring some major headaches for drivers.” Carmageddon West is a major headache for millions of daily commuters throughout Southern California – including on weekends. Multiple transportation plans aimed at securing increased tax support with promises of improved traffic flow have failed to deliver on the promises. There is an opportunity to reverse past and current trends by adopting a more effective transportation plan and an improved community development strategy – a strategy that increases wealth and prosperity for people throughout the region. The opportunity lies in the inherent power of local citizens and their local city leaders to take charge of their own destiny by reducing reliance on established federal, state and regional authorities. This strategy is described in the accompany presentation prepared for the cities of Bellflower and Paramount, California. It offers a formula for achieving greater prosperity that can be applied to other cities as well. A major benefit of this strategy is a dramatic reduction in air emissions. It is expected that SCAG will include this presentation in the public hearing record for the draft and final SRTP/SCS PEIR/PEIS to be adopted by the SCAG Regional Council, and deem it to be a viable alternative for consideration.</p>	<p>Comment noted. One of the 2016 RTP/SCS land use strategies is to focus new growth around transit. Land use policy around transit stations and amenities fall under the authority of the local governing jurisdiction. The SCS and SB 375 do not require a jurisdiction’s land use policies and regulations, including its general plan, be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority.</p>

ID	Comment	Response
<i>Submitted by</i> Albert Perdon and Associates		Submittal 16211 Related Documents Link
16211.01	<p>The following input is provided in response to the invitation to submit comments on the Draft 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and 2016 PEIR. The attached Power Point Presentation describes a transit and city development alternative that will have significant benefit in resolving growth, transportation and land development issues. SCAG needs to consider and incorporate the strategies presented in this presentation in preparing the final RTP and PEIR documents. The recommendation goes well beyond the approach that SCAG has presented in its prior and current plans. The region will not attain achievable air quality mandates unless a large majority of growth is accommodated in a manner that eliminates the need for travel by an automobile. As described in this presentation, such an approach is viable and cost-effective. The presentation centers on an integrated plan for very high-density housing and high-speed transportation along the segment of the California High Speed Train corridor from Ontario to the U.S.-Mexico border at Chula Vista and Tijuana. Development of this corridor improvement resolves a major deficiency with the State's current plan for the California High-Speed Train project. The State has not developed a viable funding plan for this corridor segment, let alone for the northerly segments to the San Francisco Bay Area or Sacramento. The presentation was prepared following extensive analysis during the period 2010 to 2013. The study results are based on the data available at that time. Events occurring since then have not changed the nature or strength of the recommendations contained in this presentation. It is expected that SCAG will include this presentation in the public hearing record for the draft and final RTP/SCS and PEIR/PEIS to be adopted by the SCAG Regional Council, and deem it to be a viable alternative for consideration.</p>	<p>Comment noted. One of the 2016 RTP/SCS land use strategies is to focus new growth around transit. Land use policy around transit stations and amenities fall under the authority of the local governing jurisdiction. The SCS and SB 375 do not require a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority. The California High-Speed Rail Authority is the lead agency responsible for planning, designing, funding, implementing and operating the California High-Speed Train (CA HST). The 2016 RTP/SCS includes Phase One of the CA HST in the financially constrained plan however Phase Two, which is Los Angeles to San Diego in the SCAG region, is financially unconstrained and is in the 2016 RTP/SCS strategic plan.</p>

ID	Comment	Response
<i>Submitted by</i> Albert Perdon and Associates		Submittal 16212 Related Documents Link
16212.01	<p>The following input, in the form of the attached Power Point Presentation, is provided in response to the invitation to submit comments on the Draft 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and 2016 PEIR. The SCAG Regional Council is urged to consider this presentation entitled “Sliced Peaches” as it finalizes the development and approval of the 2016-2040 RTP and 2016 PEIR/PEIS.</p>	<p>Comment noted. SCAG respects the local jurisdictions' land use authority, and maintains that all land use authority remains with the local jurisdictions. Land use strategies in the RTP/SCS are based on the five (5) guiding principles approved by the Regional Council on November 5, 2015. These guiding principles were utilized for the Policy Growth Forecast (PGF). The PGF envisions future regional growth that is coordinated with the transportation system improvements of the approved in the previous 2012 RTP/SCS, as well as anticipated new transportation projects planned by the region’s CTCs and transit providers. It also incorporates best practices for increasing transportation choices, reducing our dependence on personal automobiles, allowing future growth in walkable, mixed-use communities and in HQTAs, and further improving air quality. The guiding principles below served as the basis for developing the PGF: • Principle #1: The Draft PGF for the 2016 RTP/SCS shall be adopted by the Regional Council at the jurisdictional level, thus directly reflecting the population, household and employment growth projections derived from the local input and previously reviewed and approved by SCAG’s local jurisdictions. The PGF maintains these projected jurisdictional growth totals, meaning future growth is not reallocated from one local jurisdiction to another. • Principle #2: The Draft PGF at the Transportation Analysis Zone (TAZ) level is controlled to be within the density ranges of local general plans or input received from local jurisdictions in this most recent round of review. • Principle #3: For the purpose of determining consistency for CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS. • Principle #4: TAZ level data or any data at a geography smaller than the jurisdictional level is included in the Draft PGF only to conduct the required modeling analysis and is therefore, only advisory and non-binding because SCAG’s sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. After SCAG’s adoption of the PGF at the jurisdictional level, the TAZ level data may be used by jurisdictions in local planning as it deems appropriate and there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with the RTP/SCS. SCAG staff plans to monitor the use of this data after the adoption of the RTP/SCS to encourage appropriate use. • Principle #5: SCAG staff continues to communicate with other agencies who use SCAG sub-jurisdictional level data to ensure that the “advisory & non-binding” nature of the dataset is appropriately maintained. SCAG established the PGF based on the guiding principles in order to provide maximum flexibility for the local jurisdictions. It is the direction of the Regional Council to maintain local land use authority, and providing supportive local policies goes beyond SCAG’s authority. The six Land Use Strategies the PGF is based on are meant to provide a foundation for local jurisdictions to implement the vision of the RTP/SCS. The 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS. These foundational policies, which have guided the development of this Plan’s strategies for land use, are: • Identify regional strategic areas for infill and investment; • Structure the plan on a three-tiered system of centers development; • Develop “Complete Communities”; • Develop nodes on a corridor; • Plan for additional housing and jobs near transit; • Plan for changing demand in types of housing; • Continue to protect stable, existing single-family areas; • Ensure adequate access to open space and preservation of habitat; and • Incorporate local input and feedback on future growth.</p>

ID	Comment	Response
<i>Submitted by</i> Albert Perdon and Associates		Submittal 16213 Related Documents Link
16213.01	<p>The following input is provided in response to the invitation to submit comments on the Draft 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and 2016 PEIR. The attached Power Point Presentation describes a transit and city development alternative that will have significant benefit in resolving growth, transportation and land development issues. SCAG needs to consider and incorporate the strategies presented in this presentation in preparing the final RTP and PEIR documents. The recommendation goes well beyond the approach that SCAG has presented in its prior and current plans. The region will not attain achievable air quality mandates unless a large majority of growth is accommodated in a manner that eliminates the need for travel by an automobile. As described in this presentation, such an approach is viable and cost-effective. The presentation centers on an integrated plan for very high-density housing and high-speed transportation along the segment of the California High Speed Train corridor from Ontario to the U.S.-Mexico border at Chula Vista and Tijuana. Development of this corridor improvement resolves a major deficiency with the State's current plan for the California High-Speed Train project. The State has not developed a viable funding plan for this corridor segment, let alone for the northerly segments to the San Francisco Bay Area or Sacramento. The presentation was prepared following extensive analysis during the period 2010 to 2013. The study results are based on the data available at that time. Events occurring since then have not changed the nature or strength of the recommendations contained in this presentation. It is expected that SCAG will include this presentation in the public hearing record for the draft and final RTP/SCS and PEIR/PEIS to be adopted by the SCAG Regional Council, and deem it to be a viable alternative for consideration.</p>	<p>Comment noted. One of the 2016 RTP/SCS land use strategies is to focus new growth around transit. Land use policy around transit stations and amenities fall under the authority of the local governing jurisdiction. The SCS and SB 375 do not require a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority. The California High-Speed Rail Authority is the lead agency responsible for planning, designing, funding, implementing and operating the California High-Speed Train (CA HST). The 2016 RTP/SCS includes Phase One of the CA HST in the financially constrained plan however Phase Two, which is Los Angeles to San Diego in the SCAG region, is financially unconstrained and is in the 2016 RTP/SCS strategic plan.</p>

ID	Comment	Response
<i>Submitted by</i> Albert Perdon and Associates		Submittal 16233 Related Documents Link
16233.01	<p>The following input is provided in response to the invitation to submit comments on the Draft 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and 2016 PEIR. The attached Power Point Presentation describes a transit and city development alternative that will have significant benefit in resolving growth, transportation and land development issues. SCAG needs to consider and incorporate the strategies presented in this presentation in preparing the final RTP and PEIR documents. The recommendation goes well beyond the approach that SCAG has presented in its prior and current plans. The region will not attain achievable air quality mandates unless a large majority of growth is accommodated in a manner that eliminates the need for travel by an automobile. As described in this presentation, such an approach is viable and cost-effective. The presentation centers on an integrated plan for very high-density housing and high-speed transportation along the segment of the California High Speed Train corridor from Ontario to the U.S.-Mexico border at Chula Vista and Tijuana. Development of this corridor improvement resolves a major deficiency with the State's current plan for the California High-Speed Train project. The State has not developed a viable funding plan for this corridor segment, let alone for the northerly segments to the San Francisco Bay Area or Sacramento. The presentation was prepared following extensive analysis during the period 2010 to 2013. The study results are based on the data available at that time. Events occurring since then have not changed the nature or strength of the recommendations contained in this presentation. It is expected that SCAG will include this presentation in the public hearing record for the draft and final RTP/SCS and PEIR/PEIS to be adopted by the SCAG Regional Council, and deem it to be a viable alternative for consideration.</p>	<p>Comment noted. One of the 2016 RTP/SCS land use strategies is to focus new growth around transit. Land use policy around transit stations and amenities fall under the authority of the local governing jurisdiction. The SCS and SB 375 do not require a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority. The California High-Speed Rail Authority is the lead agency responsible for planning, designing, funding, implementing and operating the California High-Speed Train (CA HST). The 2016 RTP/SCS includes Phase One of the CA HST in its financially constrained plan. Phase Two, which is from Los Angeles Union Station to San Diego, is not funded and is contained in the strategic unconstrained plan for informational purposes only.</p>
<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16317 Related Documents Link
16317.01	<p>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.</p>	<p>Comment noted. SCAG understands the importance of safety in which one of the notable goals of the 2016 RTP/SCS is to ensure travel safety and reliability for all people and goods in the region. Chapter 5 of the RTP/SCS includes several strategies as a means towards improving safety and security for all people and goods throughout the region. In addition, as part of the highways and arterials strategies, SCAG continues to support complete streets and opportunities where feasible and practical.</p>
16317.02	<p>2) More funding is needed for safe walking and biking facilities, especially on high speed Orange County arterial roadways.</p>	<p>Comment noted. The 2016 RTP/SCS is a fiscally constrained multi-modal transportation plan. While funding for active transportation is doubled from the previous RTP/SCS, SCAG recognizes more needs to be done. The Plan Implementation section of the Active Transportation Appendix includes strategies designed to develop additional funding solutions to help meet active transportation needs beyond what is in the 2016 RTP/SCS..</p>

ID	Comment	Response
<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16317 Related Documents Link
16317.03	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.	Comment noted. The 2016 RTP/SCS is a fiscally constrained multi-modal transportation plan. While funding for active transportation is doubled from the previous RTP/SCS, SCAG recognizes more needs to be done. The Plan Implementation section of the Active Transportation Appendix includes strategies designed to develop additional funding solutions to help meet active transportation needs beyond what is in the 2016 RTP/SCS.
16317.04	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.	Comment noted. The 2016 RTP/SCS is a fiscally constrained multi-modal transportation plan. While funding for active transportation is doubled from the previous RTP/SCS, SCAG recognizes that more needs to be done. The Plan Implementation section of the Active Transportation Appendix includes strategies designed to develop additional funding solutions to help meet active transportation needs beyond what is in the 2016 RTP/SCS.
16317.05	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.	Comment noted. SCAG is working to better develop data and tools that will help identify the benefits of active transportation.
16317.06	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.	Comment noted. SCAG is currently in the process of monetizing the health benefits of active transportation. The analysis will be incorporated into future presentations for discussion with policy makers.
16317.07	a. Costs of active transportation investment are recoupable, whereas long-term healthcare costs are increasingly unsustainable.	Comment noted.
16317.08	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.	Comment noted. Health care costs are mentioned in the main document briefly on page 55. Additional information has been included in the main document of the final Plan. However, the main document is intended to summarize findings from the appendices. The reader should refer to the appendices for more details.
16317.09	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.	Comment noted.
16317.10	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.	Comment noted. The Draft 2016 RTP/SCS projects that commute times to work will decrease for all modes regionwide compared to baseline. This will be made possible in part through land use changes and transit and active transportation investments that encourage shorter trips, which can be accomplished by active modes such as walking and bicycling.

ID	Comment	Response
<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16317 Related Documents Link
16317.11	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.”	Comment noted. The six-county SCAG region is a vast and diverse region, geographically as well as demographically. Accordingly, the 2016 RTP/SCS recognizes that 'one size fits all' approach will not work for our region. So, the plan is multi-modal and aims to address transportation needs of all segments of our society across our expansive region by expanding and enhancing travel choices. The plan creates opportunities to engage in healthy and active lifestyle through significant increase in investment in Active Transportation modes. At the same time, the plan also recognizes that over 90 percent of the trips will continue to rely on our roadways, particularly in places like Riverside and San Bernardino counties. So, strategic improvements to our roadways to improve safety and congestion must be a part of any sensible long term plan. Furthermore, it should be noted that many of these roadway improvement projects are part of the commitment made by the counties to their residents in passing the local option sales tax measures that fund many of these projects.
16317.12	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)	Comment noted. The six-County SCAG region is a vast and diverse region, geographically as well as demographically. Accordingly, the 2016 RTP/SCS recognizes that 'one size fits all' approach will not work for our region. So, the plan is multi-modal and aims to address transportation needs of all segments of our society across our expansive region by expanding and enhancing travel choices. The plan creates opportunities to engage in healthy and active lifestyle through significant increase in investment in Active Transportation modes. At the same time, the plan also recognizes that over 90 percent of the trips will continue to rely on our roadways, particularly in places like Orange County. So, strategic improvements to our roadways to improve safety and congestion must be a part of any sensible long term plan. Furthermore, it should be noted that many of these roadway improvement projects are part of the commitment made by the counties to their residents in passing the local option sales tax measures that fund many of these projects.
16317.13	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.	Comment noted.
16317.14	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 ≤ 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.	Comment noted. SCAG's 2016 RTP/SCS Active Transportation Appendix includes strategies to increase the percentage of walkers and bicyclists, particularly for short trips. In addition, SCAG is working to better develop data and tools that will help identify long-term benefits of investing in active transportation.
16317.15	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.	Comment noted. However, feasibility and practicality are necessary considerations when designing for complete streets.

ID	Comment	Response
<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16317 Related Documents Link
16317.16	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.	Comment noted. Please note that the total for active transportation capital projects represents the total for capital projects that are exclusively active transportation. Many of the capital projects in other categories (e.g., arterials, Transportation Demand Management and Transportation System Management) include active transportation components that are not reflected in the total for active transportation capital projects.
16317.17	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.	Comment noted. While not explicitly stated as in Chapter 9 (Looking Ahead), Chapter 5 (The Road to Greater Mobility and Sustainable Growth) lists in greater detail how active transportation strategies will help achieve mobility in the region. The Active Transportation Appendix further delineates how Active Transportation can benefit the region.
16317.18	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 . . .	Comment noted. SCAG implements an integrated approach in its federally-required Congestion Management Process (CMP) in order to improve and optimize the transportation system in its region. FHWA's CMP Guidebook outlines eight actions that are core requirements of the CMP which SCAG implements, including developing multi-modal performance measures and identifying, implementing and assessing strategies that include transportation demand management, transportation systems management, active transportation investments, land use strategies and multi-modal capital and operating improvements. The 2016 RTP/SCS includes significant emphasis and investments in all of these transportation elements.
16317.19	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.	Comment noted. The 2016 RTP/SCS includes a wide variety of transportation strategies and investments, recognizing that improvements to all transportation modes are necessary in order to reduce congestion and improve the transportation system in the SCAG region. These include transportation demand management, transportation systems management, active transportation investments, land use strategies and multi-modal capital and operating improvements. SCAG is also conducting a community outreach and advertising campaign, called Go Human, which seeks to reduce traffic collisions in Southern California and encourage people to walk and bike more. The goal is to create safer and healthier cities through education, advocacy, information sharing, and events that help residents re-envision their neighborhoods.

ID	Comment	Response
<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16317 Related Documents Link
16317.20	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.	The 2016 RTP/SCS includes a wide variety of transportation strategies and investments, recognizing that improvements to all transportation modes are necessary in order to reduce congestion and improve the transportation system in the SCAG region. These include transportation demand management, transportation systems management, active transportation investments, land use strategies and multi-modal capital and operating improvements. Active Transportation strategies are discussed throughout the RTP/SCS and in a separate technical appendix. The Congestion Management appendix discusses transportation demand management strategies in comprehensive and significant detail on pages 24 through 28, and Active Transportation, First/Last Mile strategies on pages 28 through 30. Table 6 on pages 33 to 43 also discuss these strategies in significant detail.
<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16318 Related Documents Link
16318.01	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%.	Comment noted. The six-county SCAG region is a vast and diverse region, geographically as well as demographically. Accordingly, the 2016 RTP/SCS recognizes that 'one size fits all' approach will not work for our region. Thus, the Plan is multi-modal and aims to address transportation needs of all segments of our society across our expansive region by expanding and enhancing travel choices. The plan creates opportunities to engage in healthy and active lifestyle through significant increase in investment in Active Transportation modes.
16318.02	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?	TSM strategies have been demonstrated to improve safety, reduce congestion, and improve travel times, and result in much higher benefit-to-cost ratios than traditional capacity improvements. See, for example, http://www.itsbenefits.its.dot.gov/ . Further, the 2016 RTP/SCS includes a wide variety of transportation strategies and investments, recognizing that improvements to all transportation modes are necessary in order to reduce congestion and improve the transportation system in the SCAG region. These include transportation demand management, transportation systems management, active transportation investments, land use strategies and multi-modal capital and operating improvements.
16318.03	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.	TSM strategies have been demonstrated to improve safety, reduce congestion, and improve travel times, and result in much higher benefit-to-cost ratios than traditional capacity improvements. See, for example, http://www.itsbenefits.its.dot.gov/ . Further, the 2016 RTP/SCS includes a wide variety of transportation strategies and investments, recognizing that improvements to all transportation modes are necessary in order to reduce congestion and improve the transportation system in the SCAG region. These include transportation demand management, transportation systems management, active transportation investments, land use strategies and multi-modal capital and operating improvements.

ID	Comment	Response
<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16318 Related Documents Link
16318.04	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.	Comment noted. The Congestion Management appendix details Safe Routes to School Programs as a TDM strategy in Table 6 on page 38. In addition, a new bullet has been inserted on page 80 in the TDM section in the second set of bullets to read: "Investments in Safe Routes to School programs and infrastructure."
16318.05	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.	Comment noted. The TSM/TDM discussion on page 80 is specific to those types of investments which help maximize the performance of the existing and planned transportation system. Strategies in addition to TSM/TDM are addressed elsewhere in the RTP/SCS document.
16318.06	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).	Comment noted. As discussed in the Public Health Appendix, public health is a new topic of consideration with in the 2016 RTP/SCS. SCAG is still exploring opportunities for data collection, analysis and reporting with regional and local partners. The full extent of the possibilities for these partnerships is yet unknown and needs to be further explored. These principles were recommended for inclusion in the Public Health Appendix at the October 8, 2015 Energy and Environment Committee.
16318.07	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.	Comment noted. Public health is a new focus area for the Plan. The Public Health Appendix is designed to serve as a reference for other agencies across the region and literature was surveyed to ensure that the focus areas were supported by current research. These guiding principles were approved by the Energy and Environment Committee to guide the development of the Appendix on October 8, 2015.
16318.08	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.	Comment noted. Uber/Lyft-type car sharing transportation services can encourage and result in a reduction in car ownership and SOV vehicle miles travelled. Car sharing can increase the effective catchment areas to transit and rail stations from less than 1/4-mile, the standard for walking access, to distances considerably greater. The 2016 RTP/SCS includes car sharing as an integral and effective first/last mile strategy.

ID	Comment	Response
<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16318 Related Documents Link
16318.09	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 West Santa Ana Branch Corridor (RTP ID 1TR1011) and the Orange County/Santa Ana and Garden Grove Streetcar (RTP ID 2TR1001) are both located along portions of the Pacific Electric Right of Way/West Santa Ana Branch Corridor.
16318.10	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.	The Strategic Plan identifies projects that the region might pursue in the future if and when additional funding becomes available. A discussion of the role of the Strategic Plan, and an identification of Strategic Plan projects, can be found on pages 170-172 of the 2016 RTP/SCS.
16318.11	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.	Comment noted. The 2016 RTP/SCS includes investments in capital and operating improvements to Metrolink and the Amtrak Pacific Surfliner in the SCAG region to increase speed and service, including bringing some of their operating segments up to the federal high-speed rail definition of 110 mph. In addition, implementation of the California High-Speed Train (CA HST) in our region is included in the financially-constrained plan. The CA HST is legally mandated to operate at speeds of up to 220 mph.
16318.12	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.	Comment noted. While SCAG is unable to amend the Regional Bikeway Network Map as requested in the final 2016 RTP/SCS, SCAG will collect active transportation geodata from other regions and incorporate into maps in future RTP/SCSs.
16318.13	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.	While there are no established standards for bike share at the present time, station siting guidelines/criteria for bike share systems are developed by the local implementation/operating entities which include safety. Current entities developing bike share include Los Angeles County Metropolitan Transportation Authority, City of Long Beach, and City of Santa Monica.
16318.14	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	Comment noted: The 2016 RTP/SCS includes both Separated Bikeways and Class 2 bike lanes, with SCAG's regional greenway network comprised of Class 1 bicycle/Multi-use paths and Class 4 separated bikeways. It may be premature to replace bike lanes with separated bikeways as a mitigation measure. The California Highway Design Manual 2015 edition, references pavement markings alone as not enhancing bicycling [for bike lanes]. Other improvements, including improvements to the surface, augmented sweeping programs, special signals, etc., may improve the situation for bicyclists [along with the pavement markings].

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<i>Submitted by</i> Alliance for a Healthy Orange County		Submittal 16318 Related Documents Link
16318.15	<p>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.”</p> <p>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.</p>	<p>Comment noted. Access to daily needs and activities will continue to be accomplished by all modes of transportation. While the Plan will make more places accessible using transit and active transportation, the majority of trips in the SCAG region will continue to be made by automobiles. The Plan lays out strategies for improving congestion through TSM/TDM measures and increasing the number of short trips which will make essential destinations accessible to users of all modes of transportation.</p>
16318.16	<p>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).</p>	<p>Comment noted. SCAG is required under SB 375 to measure the reduction of VMT per capita to reach its greenhouse gas reduction targets. In addition to meeting those targets, the Plan will also improve other air quality outcomes across the region as detailed in the Air Quality Conformity Appendix and PEIR, Section 3.3 Air Quality.</p>
16318.17	<p>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.</p>	<p>Comment noted. SCAG is currently performing research to monetize the benefits of active transportation through an Active Transportation Health and Economic Impact Study. However, this project is not expected to be completed in time to allow incorporation of the results into the Plan.</p>
16318.18	<p>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.</p>	<p>Comment noted. The Environmental Justice Appendix includes a comprehensive analysis of park access for environmental justice communities. Please refer to page 74 of the document for SCAG’s accessibility analysis to jobs, shopping, parks, and schools. Public health risks for areas in the SCAG region that have the highest concentration of low income and minority population is also included in the Appendix, starting on page 167.</p>
16318.19	<p>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.</p>	<p>Comment noted. The Environmental Justice Appendix includes a comprehensive analysis of park access for environmental justice communities. Please refer to page 74 of the document for SCAG’s accessibility analysis to jobs, shopping, parks, and schools.</p>

ID	Comment	Response
<p><i>Submitted by</i> Alliance for a Healthy Orange County Submittal 16318 Related Documents Link</p>		
16318.20	<p>. 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.</p>	<p>Comment noted. The Environmental Justice Appendix includes a comprehensive analysis of park access for environmental justice communities. Please refer to page 74 of the document for SCAG's accessibility analysis to jobs, shopping, parks, and schools. The Public Health Impacts section of the Environmental Justice Appendix also provides a summary of existing conditions for areas of concern in the SCAG Region, which was done using Cal/EPA's CalEnviroScreen Tool.</p>
<p><i>Submitted by</i> Alliance for a Regional Solution to Airport Congestion Submittal 16284 Related Documents Link</p>		
16284.01	<p>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.</p>	<p>Comment noted. Formation of a subcommittee of the Transportation Committee can only be initiated either by the Transportation Committee or the Regional Council.</p>
16284.02	<p>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.</p>	<p>Comment noted. Most of the projects featured in the Plan's Project List Appendix were provided by the six County Transportation Commissions (CTCs), in this case Metro. Decisions to delete, replace or modify a project must come through the CTC.</p>
16284.03	<p>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?</p>	<p>Comment noted. Completion of EIR is not a pre-requisite for inclusion of a project in the RTP/SCS. In fact, most of the projects included in the RTP/SCS have not gone through the environmental review process.</p>
16284.04	<p>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".</p>	<p>Comment noted. The RTP is not intended as an exhaustive discussion of all aviation related issues in the region. Explicit discussion of each of the issues identified in the comment would not impact the aviation forecasts in the RTP.</p>

ID	Comment	Response
<i>Submitted by</i> Alliance for a Regional Solution to Airport Congestion		Submittal 16284 Related Documents Link
16284.05	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).	Comment noted.
16284.06	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.	Comment noted. While an agreement has been reached between the City of Los Angeles and the Ontario International Airport Authority the legal transfer of the airport has not yet taken place. That said, the text has been updated to reflect the intended transfer.
16284.07	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.	Comment noted. The City's action, following a court judgment, occurred after the analyses for the RTP were complete. The impact of this action will be incorporated through future RTP/SCS update, as appropriate.
16284.08	Comments on Airport Profiles, page 7 (PDF page 9), Imperial County Airport. SeaPort Airlines discontinued all service in California on January 15, 2016.	Comment noted. SeaPort's action occurred after the release of the Draft 2016 RTP/SCS. The USDOT and Imperial County are in the process of identifying a new operator. Any impact due to this new development will be reflected in the future RTP/SCS update, as appropriate.
16284.09	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.	Comment noted. The intent of the airport profiles is to highlight trends in activity at commercial airports. Since none of the airports identified in the comment have commercial service, they are not included in this section. The RTP elsewhere describes these airports as having the ability to accommodate commercial service.
16284.10	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).	Comment noted. Staff believes, airport catchment areas do not have discreet boundaries that would allow mapping in a defensible manner.
16284.11	Comments on Page 9 (PDF page 11): 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.	Comment noted. Certain additional airports in San Diego County and Santa Barbara have been included in the SCAG forecast due to their proximity to the SCAG region and the volume of demand to and from the SCAG regions are significant. The SCAG region surrounds San Diego County, and Santa Barbara is immediately adjacent to the SCAG region. Bakersfield, Mojave, and Inyo Kern airports are significantly smaller and farther from the SCAG region, which results in their having relatively insignificant interaction with the SCAG region in terms of air travel demand. While the new Cross Border Xpress bridge has opened, service from Tijuana has been available for many years. The impact on demand from the SCAG Region due to the Cross Border Xpress is unknown. SCAG does not see a lot of value in providing forecasts or detailed analysis of airports not within its jurisdiction.
16284.12	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.	Comment noted. The air taxi services described were included in the analysis of demand for commercial air travel versus general aviation services. Detailed general aviation forecasts were not updated in the current RTP/SCS. The 2012 RTP/SCS evaluated general aviation market in greater detail. SCAG will consider updating the general aviation forecast in the next RTP/SCS update.

ID	Comment	Response
<i>Submitted by</i> Alliance for a Regional Solution to Airport Congestion		Submittal 16284 Related Documents Link
16284.13	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.	Comment noted. Staff agrees that direct flights to Greenland are generally limited to a few from European cities. However, the decision to classify Greenland in one region or another does not affect the results of the aviation demand forecasts.
16284.14	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.	Comment noted. All passenger statistics used were Origin and Destination traffic, which includes all passengers between two points without regard to routing and intermediate stops. Therefore, the absence of non-stop flights is immaterial to the data, as all passengers traveling between the SCAG region and Mexico/Central America and the Caribbean are captured. All traffic using services via connecting airports in the United States as well as outside the United States was included. Cuba was included.
16284.15	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 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.	Comment noted. All passenger statistics used were Origin and Destination traffic, which includes all passengers between two points without regard to routing and intermediate stops. Therefore, the absence of non-stop flights is immaterial to the data, as all passengers between the SCAG region and South America are captured. All cities in the South American region were included. All traffic using services via connecting airports in the United States as well as outside the United States was included.
16284.16	Comments on Page 16: 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).	Comment noted. All passenger statistics used were Origin and Destination traffic, which includes all passengers between two points without regard to routing and intermediate stops. Therefore, the absence of non-stop flights is immaterial to the data, as all passengers between the SCAG region flying Trans-Atlantic are captured. New aircraft technology was considered, as was the ability to economically fly to new non-stop destinations. All traffic using services via connecting airports in the United States as well as outside the United States was included.
16284.17	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 airline industry through consolidation and "right sizing" of aircraft to routes. U.S. airlines are now primarily focused on profits instead of market share.	Comment noted.
16284.18	Comments on Page 18: 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.	Comment noted. "Relative air fare costs at the region's airports are reflected in the ""passenger preference"" component of the model illustrated in Exhibit 3.

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<i>Submitted by</i> Alliance for a Regional Solution to Airport Congestion Submittal 16284 Related Documents Link		
16284.19	<p>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.</p>	<p>Comment noted. The Capacity Analysis Technical Memorandum has been posted on SCAG's web site. The 2009 LAX Design Day Flight Schedule was not used in the estimate of LAX capacity.</p>
16284.20	<p>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)</p>	<p>Comment noted. The RTP as written is correct. It is correct that the north airfield meets the minimum standard for parallel runway separation under VFR (visual flight rules) conditions. When conditions require instrument flight rules (IFR), FAA regulations require greater runway separation for parallel runway operations. The RTP states that the north airfield does not meet the FAA requirement for parallel runway operations under IFR conditions.</p>
<i>Submitted by</i> Alliance for a Regional Solution to Airport Congestion Submittal 16289 Related Documents Link		
16289.01	<p>Comments on Page 20: 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.</p>	<p>Comment noted. The Capacity Analysis Technical Memorandum has been posted on SCAG's web site.</p>
16289.02	<p>Comments on Page 20: 3. Long Beach Airport. Please update the daily commercial flight limit from 41 to 50.</p>	<p>The City's action, following a court judgment, occurred after the analyses for the Draft RTP/SCS were complete. The impact of this action will be incorporated through the future update to the RTP/SCS, as appropriate.</p>
16289.03	<p>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.</p>	<p>Comment noted. The majority of the Stipulated Settlement Agreement expired on December 31, 2015. The passenger gate provision in Section IV will expire on December 31, 2020. Therefore, they are not applicable to the analysis of the capacity of the airport in 2040. Should the Settlement Agreement be changed or extended in the future, SCAG will consider reflecting the changes through future update to the RTP/SCS as appropriate.</p>
16289.04	<p>Comments on Page 21: 2. Forecast Air Passenger Allocation Scenarios. Please provide the data and calculations for the unconstrained and constrained scenarios.</p>	<p>The data for every regional scenario is derived from the same data as the overall regional demand. The calculations for each scenario are described in the Aviation and Ground Access Appendix. While we did not develop a true unconstrained scenario, we believe the Less Regionalization Scenario is similar to unconstrained scenario.</p>
16289.05	<p>1. Airport Ground Access. As with page 18 comments, the price factor is missing in this discussion.</p>	<p>Comment noted. The Airport Ground Access section is focused on the ability of passengers to access each airport. It is not intended to analyze the factors that go into a passenger's choice of airports. The statement that "Passengers' choice of airports is based in part on the travel time to the airport and the convenience of access" is not intended to suggest that other factors are not important; indeed, it states that there are other factors that influence passengers' decisions."</p>

ID	Comment	Response
<i>Submitted by</i> Alliance for a Regional Solution to Airport Congestion		Submittal 16289 Related Documents Link
16289.06	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.	Comment noted. The RTP/SCS is a planning document, and the ranges reflect an appropriate amount of uncertainty given the information available at the time the document was prepared. As noted in the comment, the PEIR used the high end of the range for the analysis of potential impacts at each airport. Use of higher range of MAP in the Air Quality and environmental analysis is intended to analyze worst case scenario from impact standpoint.
16289.07	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.	Comment noted. The aviation forecast process employed in the 2016 RTP/SCS differed from that employed in recent previous RTPs. Rather than generate forecasts for each airport and sum them to calculate total regional demand, the 2016 RTP/SCS forecast began with an overall aviation demand forecast for the entire region. Several scenarios were examined as to how the regions's airports could accommodate this demand. All of the scenarios presented in the RTP/SCS assume that the region develops policies to develop its infrastructure to accommodate the entire demand. As suggested in the comment, it is possible that the region does not do so, and that potential aviation trips might be discouraged. However, such a scenario is not included in the RTP/SCS.
16289.08	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.	Comment noted. Staff have added language to incorporate this comment.
16289.09	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.	Comment noted. While an agreement has been reached between the City of Los Angeles and the Ontario International Airport Authority the legal transfer of the airport has not yet taken place. That said, the text has been updated to reflect the intended transfer.
16289.10	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).	Comment noted. The Plan has been updated to reflect this comment.
16289.11	Comments on Page 25: 2. LAX bus service. Add in Bakersfield after Ventura County.	Comment noted.
16289.12	Comments on Page 25: 3. Transportation Networking Companies (TNC’s). Add a sentence to end of the second to last paragraph, “In December 2015, LAX permitted TNC operators such as Lyft and Uber to pick-up and drop-off passengers at designated points on the Departures area on the upper level roadway.”	Comment noted. The text has been updated to reflect this comment.
16289.13	Comments on Page 26: 1. Recently Completed Ground Access Projects. After Hollywood, add in Orange Line and Long Beach.	Comment noted. The text has been updated to reflect this comment.
16289.14	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.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Alliance for a Regional Solution to Airport Congestion Submittal 16289 Related Documents Link		
16289.15	Comments on Page 28: 2. Please add in wording concerning the California High Speed Authority's plan to have a station at ONT.	Comment noted. The text has been updated to reflect this comment.
16289.16	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.	Comment noted. The text has been updated to reflect this comment.
16289.17	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 Sheriffs Office air unit and US Forest Service air resources.	Comment noted. Language regarding the Federal Inspections Service has been added.
16289.18	Comments on Page 35: 1. Southern California Logistics Airport (VCV). In the last sentence, change Oxnard Airport to Southern California Logistics Airport.	Comment noted. The text has been updated to reflect this comment.
16289.19	Comments on Page 35: 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.	Comment noted. The Capacity Analysis Technical Memorandum has been posted on SCAG's web site which includes the more detailed analysis on LAX.
16289.20	Comments on page 154, Aviation Noise Impacts 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?	The "unconstrained scenario" as shown on Table 3, of the 2016 RTP/SCS Aviation Plan and Scenario Appendix, represents a scenario in which there are no RTP/SCS in place, and there are no legal restrictions. What it is meant to portray is a 2040 MAP forecast purely driven by market demands. As such, in a world where no Plan or legal restrictions exist, the most popular airports within the region would be Los Angeles (LAX) and John Wayne (SNA) airports. The purpose of the unconstrained scenario represents a conservative and worst case scenario which was used for informational purposes only.
<i>Submitted by</i> Alliance for a Regional Solution to Airport Congestion Submittal 16291 Related Documents Link		
16291.01	Comments on page 154, Aviation Noise Impacts 2. Why are the other tables for airport forecasts not consistent throughout the RTP and PEIR?	Comment noted. Figure 3.17.4-1, Anticipated Future Passenger Demands at Major Southern California Airports, within the Draft 2016 RTP/SCS PEIR has been revised to be consistent with Table 3 of the 2016 RTP/SCS Aviation Plan and Scenario Appendix.

ID	Comment	Response
<i>Submitted by</i> Banning Ranch Conservancy		Submittal 16241 Related Documents Link
16241.01	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16241.02	<p>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.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”</p>
<i>Submitted by</i> Bel Air Skycrest Property Owner's Association		Submittal 16173 Related Documents Link
16173.01	<p>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.</p>	<p>Comment noted. Since the completion of the improvements on I-405, additional improvement needs in this corridor, including Sepulveda Boulevard, are being further examined. SCAG will work with Metro and Caltrans to reflect the ultimate improvement configuration in this corridor in the future RTP/SCS amendments or updates as appropriate.</p>

ID	Comment	Response
<p><i>Submitted by</i> Bel Air Skycrest Property Owner's Association Submittal 16173 Related Documents Link</p>		
16173.02	<p>Bel Air Skycrest Property Owners' Association agrees 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.</p>	<p>SCAG works with the county transportation commissions to develop the transportation investment strategies in the RTP/SCS. The details for the Sepulveda Pass Transit Corridor (RTP ID 1160001), were submitted to SCAG by Metro staff in the Spring of 2015. The project details submitted include project termini, stations locations, project cost assumptions, and completion year assumptions. The 2039 completion year and \$2.468 billion cost estimate are consistent with Metro's board adopted 2009 Long Range Transportation Plan (LRTP), as displayed in Figure N on page 30 of that plan. Should the project details change due to voter approval of a new sales tax measure and due to Metro updating its LRTP, then SCAG will work with Metro to update the RTP/SCS accordingly.</p>
<p><i>Submitted by</i> Bolsa Chica Land Trust Submittal 16247 Related Documents Link</p>		
16247.01	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16247.02	<p>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.</p>	<p>Comment noted.</p>
16247.03	<p>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.</p>	<p>Comment noted. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to fully address its purpose. The various data sets each have their own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps have been clarified to properly identify the purpose of the map and the specific data source.</p>

ID	Comment	Response
<i>Submitted by</i> Bolsa Chica Land Trust		Submittal 16247 Related Documents Link
16247.04	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16247.05	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your group is encouraged to participate in the effort.</p>
16247.06.1	<p>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).</p>	<p>Comment noted.</p>
16247.06.2	<p>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?</p>	<p>Comment noted. The term "Natural Lands" is used intentionally to differentiate between potentially sensitive habitat areas and urban/suburban parks that provide open space and active recreation. Specifically, "Natural Lands" refers to biologically diverse areas and landscapes that may provide ecosystem services, such as grasslands, wetlands, deserts, forests, shrublands, riparian areas, and other types of habitat lands. Natural Lands is not intended to include agricultural croplands, grazing/rangeland, other working lands, or municipal parks serving primarily recreational purposes. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>

ID	Comment	Response
<i>Submitted by</i> Bolsa Chica Land Trust		Submittal 16247 Related Documents Link
16247.07	<p>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.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”</p>
<i>Submitted by</i> Building Industry Association of Southern California, Inc.		Submittal 16364 Related Documents Link
16364.01	<p>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.</p>	<p>Comment noted.</p>
16364.02	<p>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.</p>	<p>Comment noted. SCAG will convene a working group in the Spring/Summer 2016, made up of stakeholders and jurisdiction staff, that will work towards capturing any entitlements that were not included in the local input process.</p>
16364.03	<p>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.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Building Industry Association of Southern California, Inc.		Submittal 16364 Related Documents Link
16364.04	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.	Comment noted.
16364.05	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."	The projected revenue from the mileage-based user fee is equivalent to what existing state and federal excise taxes would generate had they been indexed for inflation when last adjusted more than two decades ago. An analysis of the economic impacts of the Plan is provided in Chapter 7 and the Economic and Job Creation Analysis Appendix. Additionally, a comprehensive analysis of the California Road Charge Pilot Program will be available no later than June 30, 2018 in accordance with SB 1077. The 2016 RTP/SCS does not assume revenue from a mileage-based user fee prior to 2025. The Plan used the following guiding principles for identifying reasonably available revenues: establish a user fee based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds and ensures an equitable distribution of costs and benefits; promote national and state programs that include return-to-source guarantees, while maintaining flexibility to reward regions that continue to commit substantial local resources; leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of the Transportation Infrastructure Finance and Innovation Act [TIFIA]) to attract private capital and accelerate project delivery; and promote funding strategies that strengthen the federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The Plan includes \$10.1 billion in Mitigation Fees generated from existing development impact fee programs projected to FY2039-40.
16364.06	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: • 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.	Comment noted. The guiding land use policies included in the 2016 RTP/SCS were originally developed for the 2008 RTP, and subsequently incorporated in the 2012 RTP/SCS. The 2016 RTP/SCS continues to utilize these land use policies and the additional language proposed in this comment will not be considered for the 2016 RTP/SCS. We encourage the BIASC to be a part of the discussion and development of the guiding land use policies in the development of the 2020 RTP/SCS. Further clarity has been provided regarding "complete communities" consistent with these established policies.

ID	Comment	Response
<i>Submitted by</i> California Construction and Industrial Materials Association		Submittal 16294 Related Documents Link
16294.01	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.	Comment noted. SCAG will continue to coordinate with the Department of Conservation (DOC) and California Geological Survey (CGS) to maintain a mineral resources data base for the SCAG region including permitted and unpermitted aggregate resources, and to work with agencies to create strategies in anticipation of the aggregate demand in the SCAG region.
<i>Submitted by</i> California Cultural Resources Preservation Alliance		Submittal 16302 Related Documents Link
16302.01	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.	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.
16302.02	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.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> California Cultural Resources Preservation Alliance		Submittal 16302 Related Documents Link
16302.03	<p>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.</p>	<p>Comment noted. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to fully address its purpose. The various data sets each have their own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps have been clarified to properly identify the purpose of the map and the specific data source.</p>
16302.04	<p>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.</p>	<p>In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16302.05	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your group is encouraged to participate in the effort.</p>

ID	Comment	Response
<i>Submitted by</i> California Cultural Resources Preservation Alliance		Submittal 16302 Related Documents Link
16302.06	<p>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?</p>	<p>Park accessibility is an integral part of sustainable communities as it improves public health, air quality, and quality of life. Providing parks within infill areas has a different set of challenges that varies by jurisdiction. SCAG encourages jurisdictions to look at funding sources, such as the California Department of Housing and Community Development (HCD) Housing-related Parks program, to help build and maintain local parks. The Housing-related Parks program awards money to build and maintain parks based on the number of affordable housing units a jurisdiction has built, which can help increase park accessibility in traditionally underserved areas. SCAG will continue to provide jurisdictions information regarding funding opportunities and encourage jurisdictions to provide parks as part of their long-range plans. The term "Natural Lands" is used intentionally to differentiate between potentially sensitive habitat areas and urban/suburban parks that provide open space and active recreation. Specifically, "Natural Lands" refers to biologically diverse areas and landscapes that may provide ecosystem services, such as grasslands, wetlands, deserts, forests, shrublands, riparian areas, and other types of habitat lands. Natural Lands is not intended to include agricultural croplands, grazing/rangeland, other working lands, or municipal parks serving primarily recreational purposes. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16302.07	<p>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.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”</p>
<i>Submitted by</i> California Department of Transportation		Submittal 16147 Related Documents
16147.01.1	<p>Executive Summary Include a summary of the allocated funds, if any, for Promoting Walking, Biking and other forms of Active transportation, Leveraging Technology, improving airport access, and focusing new growth around transit.</p>	<p>Comment noted. Plan expenditures are detailed in Table 6.5 on page 135. Additionally, Table 5 in the Transportation Finance Appendix summarizes capital investments in the Plan.</p>
16147.01.1	<p>Major Initiative (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 will not be considered as HQTA; therefore, no fund will be allocated?</p>	<p>SCAG defines HQTAs as areas within one-half mile of high quality transit corridors and major transit stops, as defined in SB375; refer to the definition of HQTA in the RTP/SCS Glossary. Under this definition, the San Bernardino County Metrolink stations are considered as HQTAs since they qualify as major transit stops.</p>

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16147 Related Documents
16147.01.1	Financing our Future (page 8): It is presented that out of forecasted expenditures of \$556.5 billion \$274.9 billion is budgeted for operations and maintenance and \$250.9 billion for transportation capital improvement. Explain where \$30.7 billion is planned to be spent. What is the plan to spend \$5.6 billion after deducting \$6.9 billion for TDM and \$9.2 billion for TSM from \$30.7 billion?	Plan expenditures are detailed in Table 6.5 on page 135. As indicated in Table 6.5, debt service obligations total \$30.7 billion.
16147.01.1	02 Where we are today How We Use Land 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 HATAs. Please explain how that can be handled and how environmental justice can be served since they will be forced to leave to a more affordable area further from the transit hubs?	In Chapter 3, Challenges in a Changing Region, in the section titled Affordability, Gentrification, and Displacement, there is a discussion on the challenges of balancing increased development near transit infrastructure and the pressure of the displacement of disadvantaged communities. In regard to strategies, as part of its Environmental Justice Appendix SCAG has put together an Environmental Justice Toolbox of possible mitigation measures to address potential impacts to Environmental Justice communities. On page 196 of the appendix, there is a list specifically for potential resources and strategies related to gentrification and displacement. Because many of these strategies concern local land use decisions, the toolbox strategies are voluntary but SCAG encourages communities to consider them as part of the local decision-making process.
16147.01.1	04 Creating a Plan For Our Future 2016 RTP/SCS 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 Elect/Hybrid cars can be addressed.	The SCAG Regional Council has supported State policies and investments focused on achieving improved energy efficiency of consumer, fleet, and transit vehicles. SCAG, through its Clean Cities Coalition has facilitated local participation in state funding programs such as CA Energy Commission (CEC) grants, and Air Resources Board programs. In addition SCAG has encouraged local jurisdictions and industry partners in adopting sustainable energy-efficient building codes. The Plan notes that funding for transportation improvements is currently not sustainable, given the projected needs. Projected revenues from the gas tax, the historic source of transportation funding, will not meet transportation investment needs – and gas tax revenues, in real terms, are actually in decline as tax rates (both state and federal) have not been adjusted in more than two decades while the number of more fuel efficient and alternative powered vehicles continues to grow. It’s vital that we find new ways to make transportation funding more sustainable in the long-term, and efforts are underway to explore how we can transition from our current system based on fuel taxes to a more direct system based on user fees. Recent action by the state Legislature to launch the California Road Charge Pilot Program is a critical step in this transition.
<i>Submitted by</i> California Department of Transportation		Submittal 16307 Related Documents Link
16307.01	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.	Comment noted.
16307.02	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.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16307 Related Documents Link
16307.03	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.	Comment noted. The Caltrans RTP Checklist will be included in the final submittal of the 2016 RTP/SCS to reviewing agencies.
16307.04	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.	Comment noted. The Plan has been updated to reflect passage of the FAST Act.
16307.05	Additionally, we would suggest the SCAG add the FAST Act to the glossary of the RTP.	Comment noted. Appropriate edit will be incorporated in the Final 2016 RTP/SCS.
16307.06	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 Natural/Farm Lands Appendix references the implementation strategies outlined in the RTP/SCS as parallel to the latest State Wildlife Action Plan. SCAG participated in multiple stakeholder group meetings with Department of Fish and Wildlife in the development of the State Wildlife Action Plan (SWAP). SCAG's participation is documented by the CDFW online at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=112376&inline . Moreover, SCAG consulted with various land management agencies to refine potential approaches to support the conservation of natural lands and farmlands consistent with State conservation planning initiatives, including the State Wildlife Action Plan (SWAP), which was being updated in tandem with the development of the Draft RTP/SCS. Participants in SCAG's Open Space Conservation Working Group including the San Bernardino Association of Governments, LA Metro, Los Angeles County Department of Regional Planning, Friends of Harbors Beaches and Parks, Orange County Transportation Authority, City of Mission Viejo, City of Irvine, The Nature Conservancy, Building Industry Association, The Trust for Public Land, Town of Apple Valley, Endangered Habitats League, Amigos de Los Rios, Riverside County Transportation Commission, US Fish and Wildlife Service, and the California Department of Fish and Wildlife. This consultation ensured policies expressed in the Natural and Farm Lands Appendix, when considered jointly with land use strategies and transportation investments set forth in Chapter 5, enable the region to work toward consistency with State conservation planning initiatives. As acknowledged on p. 7 of the Draft Plan, SCAG will continue this collaborative process to ensure regional policy alignment with the updated SWAP once approved by the U.S. Fish and Wildlife Service in 2016.

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16307 Related Documents Link
16307.07	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 following text has been added to page 62 of the 2016 RTP/SCS: "Outreach and coordination efforts also included work with providers of public transportation, county transportation commissions, and designated Consolidated Transportation Services Agencies (CTSAs) to ensure consistency with the plans and programs of these agencies, including short and long range plans and Coordinated Public Transit Human Services Transportation Plans. A fuller discussion of these plans can be found on pages 61-65 of the Transit Appendix."
16307.08	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.	Comment noted. A definition for "non-reportable transportation control measures" has been added to the Glossary. The following de minimis committed TCMs are defined in the Final 2015 FTIP Guidelines as non-reportable TCMs for the purpose of TCM timely implementation reporting: • Bus/shuttle/paratransit fleet expansion projects with fewer than 5 vehicles; • Bus stop improvement projects; • Bicycle facility less than 1 mile and pedestrian facility less than 1/4 mile; • Intelligent transportation systems/control system computerization projects with fewer than 3 traffic signals; • Changeable message sign projects with fewer than 5 signs; • Bike parking facilities, new or expansion, with nine or fewer bike lockers/slots; • Expansion of bus station/shelter/transfer facilities with nine or fewer bike lockers/slots; and • Rail station expansion with addition of nine or fewer bike lockers/slots.
16307.09	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.	Section 33 of the 2006 STIP Guidelines states, "Projects included in the interregional program shall be consistent with the relevant adopted regional transportation plan(s)." Caltrans is responsible for developing and administering the Interregional Transportation Improvement Program (ITIP) and the State Highway Operations and Protection Program (SHOPP). These programs feed directly into SCAG's FTIP and form the basis of the baseline for the RTP/SCS. The FTIP is an integral part of the RTP/SCS and represents the first six years of the Plan. Revenue projections for the State Transportation Improvement Program (STIP), including the 25 percent of STIP funding for interregional transportation projects in the ITIP, incorporate the California Transportation Commission fund estimate and STIP fund estimate as described in the Transportation Finance Appendix. See page 23 of the Transportation Finance Technical Appendix for details delineating the consistency between projects in the RTP and the ITIP.
16307.10	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. 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.	Comment noted. A cross-reference has been added to Chapter 5, under SUMMARY OF THE ENVIRONMENTAL MITIGATION PROGRAM/Air Quality. TCM timely implementation is a regional transportation conformity requirement. All relevant information has been appropriately documented in the Transportation Conformity Analysis Appendix, Section III, Timely Implementation of Transportation Control Measures. In addition, the committed TCMs will be identified and included in the SCAG's portion of the 2016 South Coast Air Quality Management Plan (commonly known as the Appendix IV-C).
16307.11	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.	The amount of funding available for the 2015-2016 Affordable Housing Sustainable Communities (AHSC) program has been increased to \$320 million statewide. SCAG is providing technical assistance to all AHSC program applicants and encourages jurisdictions to consider the program when looking for funding to provide affordable housing in their respective communities.

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16308 Related Documents Link
16308.01	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.	The CHSRA Draft 2016 Business Plan does not alter the 2028 construction completion date/2029 revenue operations date for Phase 1 of the high-speed train system connecting the San Francisco Bay Area and Merced to Los Angeles and Anaheim. Due to the Business Plan adoption schedule, which will occur subsequent to Regional Council adoption of the RTP/SCS, any changes to the IOS construction phasing and schedule adopted by CHSRA may be incorporated into the RTP/SCS in a future amendment.
16308.02	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?	As noted, the 2016 RTP/SCS includes \$38.6 billion for capital projects and \$15.7 billion for operations and maintenance. This investment includes capital projects to improve passenger rail infrastructure to improve speed and service levels, and safety. The operations and maintenance funding levels include paying for the higher train volumes allowed by the capital improvements.
16308.03	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.	Plan expenditures are detailed in Table 6.5 on page 135. Additionally, Table 5 in the Transportation Finance Appendix summarizes capital investments in the Plan.
16308.04	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?	Comment noted. Funding sources are delineated in the Active Transportation Appendix and the Transportation Finance Appendix.
16308.05	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?	SCAG defines HQTAs as areas within one-half mile of high quality transit corridors and major transit stops, as defined in SB375; please refer to the definition of HQTA in the RTP/SCS Glossary. Under this definition, the San Bernardino County Metrolink stations are considered as HQTAs since they qualify as major transit stops (see Exhibit 5.1, page 71).
16308.06	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?	On page 54 in Chapter 3, Challenges in a Changing Region, in the section titled Affordability, Gentrification, and Displacement, there is a discussion on the challenges of balancing increased development near transit infrastructure and the pressure of the displacement of disadvantaged communities. In regard to strategies, as part of its Environmental Justice Appendix SCAG has put together an Environmental Justice Toolbox of possible mitigation measures to address potential impacts to Environmental Justice communities. On page 195 of the appendix, there is a list specifically for potential resources and strategies related to gentrification and displacement. Because many of these strategies concern local land use decisions, the toolbox strategies are voluntary but SCAG encourages communities to consider them as part of the local decisionmaking process.
16308.07	There are no references noting where the percentages for the different modes of transportation came from.	Comment noted. Appropriate edits have been made to incorporate this comment.
16308.08	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.	Chapter 2 (Where we are today) focuses on current conditions. Chapter 5 (The Road to Greater Mobility and Sustainable Growth) provides strategies that address the conditions detailed in Chapter 2. The various appendices to the 2016 RTP/SCS provide more information.

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16308 Related Documents Link
16308.09	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)	Comment noted. 117 million metric tons was used to capture the entire two-way trade volume through the San Pedro Bay Ports. While SPB ports are the largest container port complex in the nation, they also handle non-containerized goods that are not expressed in Twenty-Foot Equivalent Units (TEUs).
16308.10	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.	Comment noted. Text has been added: "This is because of 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" before the last sentence which is "An increase in the number of low-paying jobs, and the resulting lower income, has contributed to more people slipping into poverty."
16308.11	Page 53 - The current number of passenger and freight trains seem off on the Union Pacific Railroad’s Los Angeles, Alhambra and Yuma Subdivisions	Comment noted. The graphic on page 53 has been updated to correct misrepresentations of the train volumes for both passenger and freight.
16308.12	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.	Comment noted. Staff has incorporated language into the Plan to address the recommendation. SCAG staff has been working with ARB staff in setting the next round of regional GHG emission targets. We are committed to setting and meeting ambitious and achievable regional GHG reduction targets pursuant to SB 375. SCAG staff has also been serving on the Policy Advisory Committee of CTP 2040 and looks forward to continuing collaboration with Caltrans on GHG reduction goals, among others.
16308.13	Page 60 - Please explain the projects/programs to achieve goal #7 (Actively encourage and create incentives for energy efficiency, where possible).	The SCAG Regional Council has supported State policies and investments focused on achieving improved energy efficiency of consumer, fleet, and transit vehicles. SCAG, through its Clean Cities Coalition, has facilitated local participation in state funding programs such as CA Energy Commission (CEC) grants, and Air Resources Board programs. In addition, SCAG has encouraged local jurisdictions and industry partners in adopting sustainable energy-efficient building codes.
16308.15	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?	There are more than 18 million people in the SCAG region. In terms of active engagement (defined by physical attendance at one of SCAG's open houses, workshops, elected official briefings and public hearings or input provided by online survey), participation was less than one percent of the regional population. Details on the outreach performed, including presentations at organizational meetings, campaign emails, community events and flyer distributions and media outreach, are highlighted in the Public Participation and Consultation Appendix. SCAG does not collect demographic or socio-economic data from our participants. However, SCAG made great efforts to engage and provide accessible materials for traditionally underrepresented communities and limited English proficient populations. SCAG held several environmental justice workshops and focus group meetings throughout the region to address the concerns of minority and disadvantaged communities. SCAG engaged with Spanish, Chinese, Korean and Vietnamese-language press, and held meetings with Native American tribal representatives in the region. Additional details are provided in the Public Participation and Consultation Appendix.

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16308 Related Documents Link
16308.16	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.	Comment noted. As noted on page 63, please see the Appendix: SCS Background Documentation for information on the preliminary scenarios.
<i>Submitted by</i> California Department of Transportation		Submittal 16313 Related Documents Link
16313.01	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.	Comment noted. A description of SB 743 has been included in the appropriate section of Chapter 5.
16313.02	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.	The West Santa Ana Branch Corridor (RTP ID 1TR1011) project details were developed in part as a result of the Pacific Electric Right of Way/West Santa Ana Branch Alternatives Analysis Study performed by SCAG in partnership with Metro, OCTA and the Orangeline Development Authority/Eco Rapid Transit, which concluded in 2012. The study did evaluate a unified transit corridor connecting Los Angeles and Orange Counties. At the conclusion of that study, the project steering committee came to a consensus that the Los Angeles County portion of the corridor would move forward into further technical refinement, and that Orange County would pursue other transit priorities including those identified in the renewed Measure M and the then recently enacted 2010 Long Range Transportation Plan. This recommendation was forwarded to SCAG's Transportation Committee, who voted to adopt it and forwarded these recommendations to Metro and OCTA. The project has since moved forward into technical refinement in Los Angeles County without an Orange County component. The Orange County/Santa Ana and Garden Grove Streetcar (RTP ID 2TR1001), will, however, use part of the Right of Way in central Orange County.
16313.03	Page 73 - A table showing which cities have adopted these plans and policies would be useful.	Comment noted. In order to encourage "complete communities" that integrate land use and transportation, SCAG introduced two new concepts called "Livable Corridors" and "Neighborhood Mobility Areas." These concepts are introduced to give local jurisdictions ideas for developing sustainably in other contexts besides dense urban High Quality Transit Areas (HQTAs). The Livable Corridors concept features land use strategies that are appropriate for lower density growth areas that are served by HQTA bus corridors. The Neighborhood Mobility Areas concept features low impact land use strategies and low-cost transportation solutions to replace vehicle miles with low GHG travel modes. SCAG's intention is to assist local jurisdictions by providing a framework and allowing maximum flexibility in creating "complete communities." SCAG will continue to work with the local jurisdictions that show interest in implementing the RTP/SCS land use policies by providing information and resources to support local planning activities, such as the Sustainability Planning Grant Program and the Active Transportation Program. More information on how SCAG has assisted local jurisdictions with the Sustainability Program can be found in the Appendix: SCS Background Documentation, beginning on page 61 of the document. SCAG will consider presenting a table showing which jurisdictions have adopted relevant plans and policies in future RTP/SCS updates.

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16313 Related Documents Link
16313.04	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	Comment noted. SCAG will consider citing or adding language from the California Transportation Agency’s Infrastructure Priorities.
16313.05	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.	Comment noted. The Draft 2016 RTP/SCS has been updated to reflect the correct title of the California's plan and the glossary has been updated with a definition of the Strategic Highway Safety Plan.
16313.06	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.	The Slauson Light Rail Corridor is described in the Harbor Subdivision Transit Corridor Alternatives Analysis, published by Metro in 2009. It is referred to as the Redondo Junction Crenshaw Corridor in that document. The Metro Eastside Transit Corridor Phase 2 (RTP ID 1TR0704) has not selected a final alignment, but the final alignment decision will be made by Metro. The West Santa Ana Branch Corridor (RTP ID 1TR1011) project details were developed in part as a result of the Pacific Electric Right of Way/West Santa Ana Branch Alternatives Analysis Study performed by SCAG in partnership with Metro, OCTA and the Orangeline Development Authority/Eco Rapid Transit, which concluded in 2012. At the conclusion of that study, the project steering committee came to a consensus that the Los Angeles County portion of the corridor would move forward into further technical refinement, and that Orange County would pursue other transit priorities including those identified in the renewed Measure M and the then recently enacted 2010 Long Range Transportation Plan. This recommendation was forwarded to SCAG's Transportation Committee, who voted to adopt it and forwarded these recommendations to Metro and OCTA. The project has since moved forward into technical refinement in Los Angeles County without an Orange County component. The Orange County/Santa Ana and Garden Grove Streetcar (RTP ID 2TR1001), will, however, use part of the Right of Way in central Orange County.
16313.07	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.	Comment noted. The inclusion of these existing cooperative fare agreements in the 2016 RTP/SCS serves to illustrate the benefits of such agreements in increasing passenger rail ridership and providing an incentive to attract new riders to the passenger rail services in the SCAG region.
16313.08	Page 90, Exhibit 5.3 - The “OC Loop” project is not included.	The OC Loop is included as part of the Regional Greenway Network in Chapter 5 (Page 92) of the Final RTP/SCS and is part of Exhibit 5.3 Regional Bikeway Network.
16313.09	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.’	Comment noted. Appropriate edits have been made to incorporate this comment.

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16313 Related Documents Link
16313.10	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.	Comment noted. Appropriate edits have been made to incorporate this comment.
16313.11	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.	Comment noted. Appropriate edits have been made to incorporate this comment.
16313.12	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”.	Comment noted. Appropriate edits have been made to incorporate this comment.
16313.13	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.	Comment noted. Appropriate corrections to the mitigation measures in the PEIR are incorporated and reflected in the Clarifications and Revisions section of the Final PEIR. Please also see Chapter 8, Responses to Comments in the PEIR. The environmental mitigation measures included in Chapter 5, Environmental Mitigation Measures, of the 2016 RTP/SCS are consistent with the performance standards-based mitigation approach used in the PEIR and reflect the general scope of the PEIR’s mitigation measures.
16313.14	Page 118 – Typographical error: “...to smooth extreme congestion to more ARB friendly speeds.”	Comment noted. Appropriate edit has been incorporated in the Final 2016 RTP/SCS.
16313.15	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).	The Strategic Plan does include managed lane investments. As noted, Table 9.1 indicates additional investment in express lanes. Table 9.1 will be modified to also highlight key HOV lanes included in the Strategic Plan Project List.
16313.16	Page 171 – The document does not provide enough detail and guidance on the term ‘Corridor Sustainability Studies’ (CSS).	Comment noted. Please refer to the Highways and Arterials Appendix, which provides further information regarding Corridor Sustainability Studies.

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16313 Related Documents Link
16313.17	<ul style="list-style-type: none"> 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:<see attachment> 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? 	<p>Comment noted. Strategic list of projects are financially unconstrained. These projects are identified as potential projects for consideration in the future RTP/SCS, should funding become available and consensus emerges to consider these projects as regional priorities. The list on page 171 in the main document is intended only for illustrative purposes. Please see the Project List Appendix for a complete list of strategic projects identified in the Plan.</p>
16313.18	<p>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.</p>	<p>Comment noted. The 2016 RTP/SCS calls for increased and dedicated funding sources for passenger rail. These include additional county sales tax initiatives, the new State Cap-and-Trade Transit and Intercity Rail Capital Program, and increased and dedicated federal funding.</p>
16313.19	<p>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.</p>	<p>Comment noted. Appropriate edit has been incorporated in the Final 2016 RTP/SCS.</p>
<i>Submitted by</i> California Department of Transportation		Submittal 16319 Related Documents Link
16319.01	<p>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”.</p>	<p>Narrative and graphic updated to reflect the change in the California Highway Design Manual.</p>
16319.02	<p>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/)</p>	<p>Comment noted. Regional Bikeways are highlighted in a larger red line than Class 1 bikeways to represent the regional route structure in relation to local bikeways and are not meant to denote type of bikeway per the legend at bottom of map.</p>

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16319 Related Documents Link
16319.03	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."	Comment noted.
16319.04	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).	Comment noted. Once HOV lanes are converted to Express Lanes, they are no longer counted as pure HOV lanes.
16319.05	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..."	Comment noted.
16319.06	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.	Comment noted. Appropriate edits have been made to incorporate this comment.
16319.07	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.	Comment noted. On page 41, the I-5 South Corridor project is also identified as an HOV improvement.
16319.08	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.	Comment noted. Appropriate edits have been made to incorporate this comment.
16319.09	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.	Comment noted. Appropriate edits have been made to incorporate this comment.

ID	Comment	Response
Submitted by California Department of Transportation		Submittal 16319 Related Documents Link
16319.10	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.	Comment noted.
16319.11	Page 5 - Table 1, Please Include SR-91 Corridor System Management Plan (CSMP) for Orange County (from I-5 to Riverside County).	Comment noted. Appropriate edits have been made to incorporate this comment.
16319.12	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).	Comment noted. Table 2 has been revised to incorporate this comment.
16319.13	Page 10 - Table 5 Highway Investments, consider adding the cost multiplicative factor (e.g. millions, billions, etc.).	Comment noted. Appropriate edits have been made to incorporate this comment.
16319.14	Page 10 - Table 5 Highway Investments, there is an Asterisk (*) after HOT Lanes but no accompanying footnote explaining what it denotes.	The symbol noted is actually a quote ("), which is a typo and has been corrected.
16319.15	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).	Comment noted. Appropriate edits have been made to incorporate this comment.
16319.16	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).	Comment noted. Appropriate edits have been made to incorporate this comment.
16319.17	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.	Comment noted. Table 5.5 is intended for illustrative purposes only. Please refer to the Project List Appendix for a complete list of projects.
Submitted by California Department of Transportation		Submittal 16323 Related Documents Link
16323.01	Revise project cost for Los Angeles State Highway LA0G1116 Route 1: Pacific Coast Highway and Parallel Arterials I-105 to I-110: Signal Synchronization (EA 30990 PPNO 4800) to \$9,000	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. As part of that process, modifications to FTIP ID #LA0G1116 have been addressed.
16323.02	Add "Reconfigure" to LA0G874, to read as "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]"	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. As part of that process, modifications to FTIP ID #LA0G874 have been addressed.
16323.03	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."	Comment noted. SCAG has addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. The project descriptions included within the Project List are consistent with the funded M2 projects as described in the OCTA's Long Range Transportation Plan (Outlook 2035).

ID	Comment	Response
<i>Submitted by</i> California Department of Transportation		Submittal 16323 Related Documents Link
16323.04	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.	Comment noted. At the moment, the two projects are being carried over into the 2017 FTIP as two separate projects. We will work with OCTA through future amendment to reflect the project as a single project as needed and appropriate.
16323.05	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.	Comment noted. The project cost for FTIP ID# ORA131303 accounts for the engineering (ENG) only, while the project cost for RTP ID# 2TK01116 covers all phases of the project throughout right-of-way and construction. Hence the difference in project costs between the two Project IDs.
16323.06	Change the completion year for 2H01143-ORA111001 to 2018. Change the completion year for 2H01143-ORA111002 to 2017. Change the completion year for 2H01143-ORA990929 to 2018.	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. We will work with OCTA through future amendment to reflect the most current completion year for the specified projects.
16323.07	Change Route Name for S2160008 to "I-5/MARGUERITE PKWY"	Comment noted. Appropriate edits have been made to incorporate this comment.
16323.08	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. 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.	The constrained express lane segments in Orange County may be adjusted or changed to reflect the new findings and recommendations from SCAG's Express Travel Choices Study and Caltrans District 12's Managed Lane Network Study in subsequent amendments to the Plan. Both studies are expected to be completed in the summer of 2016.
16323.09	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.	Comment noted. The Plan includes an extensive network of managed lanes, including a regional network of express lanes and HOV lanes extending in five of the six SCAG region counties.
<i>Submitted by</i> California Department of Transportation		Submittal 16370 Related Documents Link
16370.01	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.	Comment noted. The 2016 RTP/SCS includes for the first time a broader analysis of the public health impacts of the plan within the Public Health Appendix. The policy framework within the Public Health Appendix was reviewed by SCAG's policy committees and includes seven focus areas that were identified for analysis at the policy level. These include Access, Air Quality, Affordable Housing, Climate Adaptation, Economic Opportunities, Physical Activity and Transportation Safety. SCAG plans to expand the current policy framework to include additional public health analysis in future RTP cycles and will consider these suggestions.

ID	Comment	Response
<i>Submitted by</i> California High Speed Rail Authority		Submittal 16328 Related Documents Link
16328.01	<p>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.</p>	<p>Comment noted. The 2016 RTP/SCS includes funding in the financially constrained plan to deliver the Southern California High-Speed Rail Memorandum of Understanding projects in advance of true high-speed rail arriving in our region. SCAG looks forward to continuing to work with the Authority and county transportation commission partners towards this progress.</p>

ID	Comment	Response
<i>Submitted by</i> California High Speed Rail Authority		Submittal 16328 Related Documents Link
16328.02	<p>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 1 A). 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. 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.</p>	<p>Comment noted. SCAG appreciates and acknowledges the importance of the statewide rail modernization efforts and the Proposition 1A-funded HSR connectivity projects.</p>
16328.03	<p>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.</p>	<p>Comment noted. Station area planning efforts are discussed in the Passenger Rail appendix.</p>

ID	Comment	Response
<i>Submitted by</i> California Native Plant Society - Orange County Chapter		Submittal 16231 Related Documents Link
16231.01	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.	Comment noted.
16231.02	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.	Comment noted. SCAG appreciates your contribution to the database.
16231.03	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.	Comment noted.
16231.04	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).	Comment noted. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to fully address its purpose. The various data sets each have their own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps have been clarified to properly identify the purpose of the map and the specific data source.

ID	Comment	Response
<i>Submitted by</i> California Native Plant Society - Orange County Chapter		Submittal 16231 Related Documents Link
16231.05	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your group is encouraged to participate in the effort.</p>
16231.06	<p>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.</p>	<p>The term "Natural Lands" is used intentionally to differentiate between potentially sensitive habitat areas and urban/suburban parks that provide open space and active recreation. Specifically, "Natural Lands" refers to biologically diverse areas and landscapes that may provide ecosystem services, such as grasslands, wetlands, deserts, forests, shrublands, riparian areas, and other types of habitat lands. Natural Lands is not intended to include agricultural croplands, grazing/rangeland, other working lands, or municipal parks serving primarily recreational purposes.</p>
16231.07	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your group is encouraged to participate in the effort.</p>

ID	Comment	Response
<i>Submitted by</i> California Native Plant Society - Orange County Chapter		Submittal 16231 Related Documents Link
16231.08	<p>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.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”</p>
16231.09	<p>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 (<i>Platanus racemosa</i>), willow (<i>Salix</i> spp.), alder (<i>Alnus racemosa</i>), and poplar (<i>Populus</i> spp.). The other three are oaks (<i>Quercus agrifolia</i>, <i>Q. chrysolepis</i>) and California black walnut (<i>Juglans californica</i>). 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 (<i>Ribes speciosum</i>) 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. • 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.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> California State Legislature		Submittal 16287 Related Documents Link
16287.01	<p>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. 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.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
<i>Submitted by</i> Center for Demographic Research		Submittal 16189 Related Documents Link
16189.01.1	<p>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.</p>	<p>Comment noted. Orange County's growth forecast has been utilized in the Plan.</p>
16189.01.2	<p>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.</p>	<p>Comment noted. This comment is to support the Policy Growth Forecast. SCAG appreciates the input that the Intensified Land Use Alternative is not supported as the preferred alternative for the Plan. This information will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS.</p>
16189.01.3	<p>3. Maintain objective, unbiased tone.</p>	<p>Comment noted. The Plan has been changed where deemed appropriate.</p>
16189.01.4	<p>4. Provide consistency throughout all the documents regarding the 500 foot "buffer".</p>	<p>Comment noted. The use of the word "buffer" has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB's 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day.</p>

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16189 Related Documents Link
16189.01.5	5. References to “city” or “cities” are changed to “jurisdiction” or “jurisdictions” where appropriate.	Comment noted. The Plan has been changed where deemed appropriate.
16189.01.6	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.	Comment noted. SCAG’s policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition. In addition, SCAG communicates with Hydrogen Fuel Cell industry partners to exchange information and knowledge. Plug-in Electric vehicles are specifically analyzed in the RTP/SCS due to the transportation/land use policy nexus regarding charging station siting. Regarding mobility innovations such as carsharing, and ridesourcing, SCAG does not view these as specific technologies, but rather as emerging transportation modes. In the mobility innovations appendix, SCAG identifies various new technologies that show promise in meeting the goals of the RTP/SCS, and will continue to support any and all mobility innovations.
16189.01.7	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	Comment noted. See specific comment for response.
16189.02	p. 2: Delete Our Vision & Our Overarching Strategy strategies. These sections are highly speculative and not necessary for the rest of the document.	Comment noted. We believe this section is important in providing the necessary background and context for the development of the rest of the Plan.
16189.03	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.	Comment noted. Changes have been made in the Plan.
16189.04	P. 4, column 2, paragraph 2 Existing statement:“Among the milestones: a one-year demonstration of the Express Lanes in Los Angeles County along Interstate 10 and Interstate 110 was made permanent in 2014...” Modify to read: “Among the milestones: a one-year demonstration of the tolled Express Lanes in Los Angeles County along Interstate 10 and Interstate 110 was made permanent in 2014...”	The term, "express lanes" has been added to the Glossary. The demonstration project referenced included the conversion of HOV or carpool lanes on Interstate 110 Harbor Transitway and Interstate 10 El Monte Busway to express lanes—which opened the lanes to solo drivers for a toll while maintaining free access to qualified carpools and Clean Air Vehicles.
16189.05	p. 7, column 2, paragraph 1 Existing statement: “In many instances, these chargers may double the electric range of PHEVs, reducing vehicle miles traveled that produce tail-pipe emissions.” Modify to read: “In many instances, the additional chargers will create the opportunity to increase the electric range of PHEVs, reducing vehicle miles traveled that produce tail-pipe emissions.”	Comment noted. Changes have been made in the Plan.
16189.06	p. 13, column 2, paragraph 2 Existing statement:“Since 2009, every MPO has been required to develop a Sustainable Communities Strategy...Once implemented along with the rest of the Plan, it will improve the quality of life for all residents of the region.” Modify to read: “Since 2009, every MPO in California has been required to develop a Sustainable Communities Strategy...Once implemented along with the rest of the Plan, it will improve the overall quality of life for all residents of the region.”	Comment noted. Changes have been made in the Plan.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16189 Related Documents Link
16189.07	p. 13, column 2, paragraph 3 Existing statement:“But these advances in mobility also have the potential to help Baby Boomers maintain their independence as they age.” Modify to read: “But these advances in mobility also have the potential to help Baby Boomers, and the generations that follow them, maintain their independence as they age.”	Comment noted. Changes have been made in the Plan.
16189.08	p. 14, column 1, paragraph 2 Existing statement:“In Southern California, striving for sustainability 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.” Modify to read: “In Southern California, striving for sustainability includes 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.”	Comment noted. Changes have been made in the Plan.
16189.09	p. 14, column 2, paragraph 5 Existing statement: “It is particularly important that the Plan consider the consequences of transportation projects on low-income and minority communities and minimize negative impacts.” Modify to read: “It is particularly important that the Plan consider and minimize the negative impacts of transportation projects, especially on low-income and minority communities.”	Comment noted. The existing statement in the Draft Environmental Justice Appendix is more in accord with federal and state guidance on the topic.
16189.11	p. 16, column 2 Existing statement: “2. Collaborating with Member Agencies, Jurisdictions and Stakeholders. Implementing the Plan will require SCAG to continue working closely with its member agencies...” “The agency will also have to work with key stakeholders to ensure the Plan benefits the economy and ensures social equity. To ensure that the region makes progress on its goals, SCAG will monitor its own progress toward achieving its targets and will share this information with relevant partners and the public.” Modify to read: “2. Collaborating with Member Agencies, Jurisdictions and Stakeholders. Implementing the Plan will require SCAG to continue working closely with its all jurisdictions...” “The agency will also have to work with key stakeholders to ensure the Plan benefits the economy and promotes 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 its partners and the public.”	Comment noted. Changes have been made in the Plan.
16189.12	p. 20, column 1, paragraph 3 Existing statement: “However, of the remaining developable land, only a small portion of it can be developed sustainably – 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, only two percent of the total developable land in the region is located in High Quality Transit Areas (HQTAs). A more compact land development strategy is needed, which will be discussed in Chapter 5.” Modify to read: “However, of the remaining developable land, only a small portion of it can be developed as transit-ready infill– meaning it can be reached via planned transit service and that it can readily access existing infrastructure (water resources, sewer facilities, etc.). According to land use data collected by SCAG, only two percent of the total developable land in the region is located in High Quality Transit Areas (HQTAs).	Comment noted. Text has been revised to state: "However, of the remaining developable land, only a small portion of it can be developed as sustainable transit-ready infill – 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's land use data, only two percent of the total developable land in the region is located in High Quality Transit Areas (HQTAs). A more compact land development strategy is needed, which will be discussed in Chapter 5."

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16189 Related Documents Link
16189.13	p. 20, column 1, paragraph 4 Existing statement: “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 types and classifications of land uses in...” Modify to read: “As the agency prepared the 2016 RTP/SCS, it needed to organize the many different land use types and classifications in...”	Comment noted. Existing statement will remain. This statement reflects the Five Guiding Principles of the Growth Forecast utilized in the Plan.
16189.14	p. 20, column 1, paragraph 5 Existing statement: "To accurately represent land uses throughout the region, SCAG reviewed information from jurisdictions and simplified the types and classifications of land use. The agency identified 35 "Place Types"... the Urban Footprint Sustainability Planning Model (SPM), which guided and evaluated urban development in the Plan in terms of form, scale and function in the built environment." Modify to read: "To accurately represent land uses throughout the region, SCAG aggregated information from jurisdictions and simplified the types and classifications of land use into a consolidated set of land use types. The agency then converted these consolidated land uses into 35 "Place Types"... the Urban Footprint Scenario Planning Model (SPM), to demonstrate urban development in the Plan in terms of form, scale and function in the built environment."	Comment noted. Revisions to the Plan have been made as appropriate.
16189.15	p. 20, column 2, paragraph 2 Existing text: “SCAG then 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 reflect the varied conditions of buildings and roadways, transportation options, and the mix of housing and employment throughout the region.” Modify to read: “SCAG then classified 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; and reflect the varied conditions of buildings and roadways, transportation options, and the mix of housing and employment throughout the region.”	Comment noted. Revisions to the Plan have been made as appropriate.
16189.16	p. 21, column 1, paragraph 3 Existing text: “Conversely, some areas, especially near the edge of existing urbanized areas, do not have plans for conservation and are susceptible to development pressure. ... – meaning these are areas that are home to a high number of species and serve as highly functional habitats.” Modified to read: “Some areas, especially near the edge of existing urbanized areas, do not have plans for conservation and may be slated for development – meaning these areas are home to a high number of species and serve as highly functional habitats.” Also- “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.	Comment noted. Revisions to the Plan have been made as appropriate.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16189 Related Documents Link
16189.17	p. 22, column 1, paragraph 1 “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.” 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?	The source of this data are submitted annual progress reports to the California Department of Housing and Community Development (HCD) that are required by State housing law. The data source time frame is between 2002 and 2014. SCAG acknowledges that this data is often incomplete and inconsistently reported and represents only a portion of affordable housing building activity. Because of this, SCAG is developing a pilot survey to determine how to encourage jurisdictions in the region to submit this information to HCD on a more consistent basis so that the data is more accurate than what is currently available. This language has been updated to provide a general description of affordable housing building activity.
16189.18	p. 22, column 2, paragraph 1 Existing text: “... of our region’s jurisdictions have adopted housing elements.” Modify to read: “... of our region’s jurisdictions have certified housing elements.”	The housing element compliance report published by the California Department of Housing and Community Development (HCD) has two categories listed, adoption status and compliance status ("certified"). To reflect the modification to certified, the datapoint has been updated as well to reflect those deemed by HCD to have an "in compliance" status.
16189.19	p. 22, column 2, paragraph 3 Define “high quality” housing	To minimize confusion of terms "high quality housing" and "high quality transit area", the text has been slightly revised to clarify that high density housing does not necessarily mean subpar amenities or durability and is in fact of quality.
16189.20	p. 23, Figure Define “demand response” in “Passenger Miles by Mode” figure	The term Demand Response is defined on page 181, in the Glossary section of the 2016 RTP/SCS. The definition provided reads as follows: " A transit mode comprised of automobiles, vans, or small buses operating in response to calls from passengers or their agents to the transit operator, who then dispatches a vehicle to pick up the passengers and transport them to their destinations. A demand response operation is characterized by vehicles that do not operate over a fixed route or on a fixed schedule except on a temporary basis." This definition of demand response service was obtained from the National Transit Database (NTD), and is closely related to the NTD data used in the existing conditions analyses for public transportation in the 2016 RTP/SCS. The definition is consistent with the definitions of demand response provided by the FTA in 49 C.F.R. 604.3(g) and Circular 2710.2A, and is a public transportation industry standard.
<i>Submitted by</i> Center for Demographic Research		Submittal 16190 Related Documents Link
16190.01	p. 24, Exhibit 2.1 Define “High Value Habitat” Add county boundaries to map.	The definition for "Habitat Value" has been added to exhibit 2.1. This term more broadly explains the content of the map.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16190 Related Documents Link
16190.02	p. 25, column 2, paragraph 2 Existing text: “This network includes fixed-route local bus lines, community circulators, express and rapid buses, Bus Rapid Transit (BRT), demand response,3 light rail transit, heavy rail transit (subway) and commuter rail.4” Modify to read: “This network includes fixed-route local bus lines, community circulators, express and rapid buses, Bus Rapid Transit (BRT), paratransit,3 light rail transit, heavy rail transit (subway) and commuter rail.4”	The term Demand Response is defined on page 181, in the Glossary section of the 2016 RTP/SCS. The definition provided reads as follows: " A transit mode comprised of automobiles, vans, or small buses operating in response to calls from passengers or their agents to the transit operator, who then dispatches a vehicle to pick up the passengers and transport them to their destinations. A demand response operation is characterized by vehicles that do not operate over a fixed route or on a fixed schedule except on a temporary basis." This definition of demand response service was obtained from the National Transit Database (NTD), and is closely related to the NTD data used in the existing conditions analyses for public transportation in the 2016 RTP/SCS. The definition is consistent with the definitions of demand response provided by the FTA in 49 C.F.R. 604.3(g) and Circular 2710.2A, and is a public transportation industry standard. The term demand response is also inclusive of services offered that go beyond the statutory mandates of the Americans with Disabilities Act (ADA). For instance, the senior dial-a-ride service offered by Thousand Oaks Transit offers demand response service to all passengers over the age of 65. The term paratransit, as described in 49 C.F.R. 37, typically refers to those comparable transportation services that must be provided for individuals unable to use fixed route systems.
16190.03	p. 26, column 1, paragraph 2 Existing text: “typically pay 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 with public subsidies, including a larger share of federal grants.” Modify text to read: “Transit users directly 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 through various taxes and public subsidies, including a larger share of federal grants.”	The text has been changed to read "Transit users typically pay 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 with public subsidies, including a larger share of federal grants."
16190.04	p. 28, column 1, paragraph 2 Existing text: “The regional bike network is 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.” Modify text to read: “The regional bike network is expanding 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.” 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.	Text modified, eliminating bike path/lane ratio to lane miles.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16190 Related Documents Link
16190.05	p. 28, column 1, paragraph 2 Existing text: "Most walk trips (83 percent) are less than one half mile; walkers are often discouraged from traveling farther. Routes to stops and stations are often..." Modify text to read: "Most walk trips (83 percent) are less than one half mile; walkers are less likely to travel farther. Routes to bus stops and stations are often..."	Text modified, indicating pedestrians discouraged by infrastructure.
16190.06	p. 33, column 1, paragraph 2 Existing text: "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." Modify text to read: "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)."	Comment noted. Appropriate edits have been made to incorporate this comment.
16190.07	p. 36, column 2, paragraph 2 "Therefore, any passenger who arrives at or departs from an airport in our region is good for the region as a whole." Move sentence to end of paragraph. Reference the Economic & Job Creation Appendix.	Comment noted.
16190.08	p. 54, column 2, paragraph 4 Existing text: "Certainly, the overall quality of life will increase for many people." Modify to read: "The overall quality of life is expected to increase for many people."	Comment noted. Changes have been made in the Plan.
16190.09	p. 55, column 1, paragraph 3 "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." Cite number and source or delete sentence (The second sentence that starts with, "Millions of more people...")	Comment noted. Plan changed to provide number and source.
16190.10	p. 56, column 1, paragraph 1 Existing text: "Ongoing drought conditions, water shortages due to less rainfall as well as declining snowpack in our mountains, and an agriculture industry in crisis have become hard realities in recent years." Modify to read: "California is experiencing ongoing drought conditions, water shortages due to less rainfall as well as declining snowpack in our mountains, and an agriculture industry in crisis."	Comment noted.
16190.11	p. 61, column 1, paragraph 2 Add statement that says "These preliminary scenarios are not the ones modeled in the PEIR."	Comment noted. Changes have been made in the Plan.
16190.12	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.	Comment noted. Paragraph will remain unchanged. More information on the outreach process and the surveys can be found in the Appendix: Public Participation and Consultation.
16190.13	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'?	Comment noted. Language has been revised and further explanation of the survey results has been included in the chapter and Appendix. Language has been revised to "Having safe areas for walking, biking and physical activity was also a concern, as was access to healthy food."

ID	Comment	Response
Submitted by Center for Demographic Research		Submittal 16190 Related Documents Link
16190.14	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?	Comment noted. Survey responses informed the development of the Draft 2016 RTP/SCS. Numerous responses supported/reflected CTC and jurisdictional input, as well as input from stakeholder working groups. Some individual comments related to specific projects were received, but in those cases SCAG referred to CTCs for guidance.
16190.15	p. 65, column 1, paragraph 4 Delete text: “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.	Comment noted. Text will not be deleted but language has been added to describe that SCAG took additional step of accepting information from jurisdictions regarding specific planned development projects with entitlements, other planned projects, and recently completed developments in order to improve policy growth forecast.
16190.16	p. 65, column 2, bottom note “*With the exception of the 6 percent of TAZs that have average density below the density range of local general plans.” Please clarify the footnote. Did SCAG lower the growth or is General Plan buildout expected after 2040?	The TAZs showing lower densities than GP designations are consistent with existing conditions and future land use and growth projections provided by local jurisdictions, SCAG did not lower the growth.
16190.17	p. 69, column 2, paragraph 1 Existing text: “By 2040, the integrated growth forecast projects that these figures will increase by 3.8 million people...” Modify text to read: “By 2040, the Plan projects that these figures will increase by 3.8 million people...”	Comment noted. Changes have been made in the Plan.
16190.18	p. 70, column 1, paragraph 1 Existing text: “In addition, local jurisdictions 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.” Modify to read: “In addition, local jurisdictions are encouraged to 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.”	Comment noted. Changes have been made in the Plan.
16190.19	p. 70, Table 5.1 Add note to table “Adopted in 2013”	Note added to table 5.1.
16190.20	p. 73, column 2, paragraph 4 Define “riparian”	Comment noted. Riparian is defined on page 21 paragraph 3 of the Natural/Farm Lands Appendix: "These include lands that are important and unique habitats and have high per-acre habitat values, such as riparian habitat (i.e., areas adjacent to bodies of water such as streams or rivers)." The term has also been added to the glossary.
Submitted by Center for Demographic Research		Submittal 16191 Related Documents Link
16191.01	p. 76, paragraph 1 How many of these trips are alone vs. with others? Are these linked trips/trip segments?	These are linked trips. Text states that 38% of all trips in the region are 3 miles or less, which indicates both alone trips and with others.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16191 Related Documents Link
16191.02	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.	Comment noted. The text was revised to clarify that Neighborhood Mobility Area policies would be conducive to more Neighborhood Electric Vehicle use, but are not integral to the use of NEVs.
16191.03	p. 77 Figure needs title	The title for the Neighborhood Mobility Area Illustration has been added.
16191.04	p. 79, Figure 5.2 Clarify if the preservation and operations expenditures apply to the SCAG region or California State.	The indicated expenditures apply to the SCAG region.
16191.05	p. 83, column 2, paragraph 5 Existing text: “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 local jurisdictions in which they operate to implement them, at least for peak-period operation.” Modify text: “Bus lanes are even more effective at increasing speeds, however in our region there is a dearth of such lanes. SCAG encourages transit agencies and local jurisdictions to implement them, where appropriate.”	Comment noted. Changes have been made in the Plan.
16191.06	p. 88, column 1, paragraph 4 Existing text: “The 2016 Active Transportation Plan updates the 2012 Active Transportation Plan...” Modify text to read: “The Active Transportation portion of the 2016 Plan updates the 2012 Plan...”	Comment noted. Changes have been made in the Plan.
16191.07	p. 89, column 2, paragraph 2 Existing text: “SCAG has developed 12 regionally significant bikeways that connect the region.” Modify text to read: “SCAG has identified 12 regionally significant bikeways that connect the region.”	Comment noted.
16191.08	p. 92, column 1, paragraph 2 Existing text: “The launch date coincided with the decline in daylight hours, a period when bicycle and pedestrian collisions peak during the year.” Modify text to read: “The launch date coincided with the end of daylight savings time, a period when bicycle and pedestrian collisions peak during the year.”	Comment noted. Noting daylight savings time may infer causality rather than correlation, as pedestrian involved collisions traditionally continue to remain high during winter months. Text revised to read "The launch date coincided with the decline in daylight hours, a period when pedestrian collisions begin to peak."
16191.09	p. 93, column 1, paragraph 4 Define “no-maintenance exercise spots”	Revised text to read "exercise spots"
16191.10	p. 103, column 1, paragraph 3 “...figure “2040 Airport Demand Forecasts” on the previous page...” Properly label figure and page reference.	Comment noted.
16191.11	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.	Comment noted. SCAG has worked with the Airport Authorities and the CTCs through the RTP/SCS process to identify and include transportation projects in the long range plan that enhance and support airport access. More specifically, as an example, SCAG has recently initiated a study in partnership with key stakeholders that will explore connectivity between LA and San Bernardino County. A key component of this study will be to study and identify transit access improvement options to Ontario Airport.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16191 Related Documents Link
16191.12	p. 111, column 1, paragraph 2 Existing text: "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 projects as deemed applicable and feasible by such agencies." Modify text to read: "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 transportation projects as deemed applicable and feasible by such agencies."	Comment noted. Mitigation measures are categorized into SCAG mitigation measures and project-level mitigation measures that are linked with performance standards. Project-level mitigation measures are a menu of options for projects envisioned by the 2016 RTP/SCS that lead agencies can and should consider where applicable and feasible. For a complete discussion on the performance standards-based mitigation measures, please see Master Response No. 4 in the PEIR.
16191.13	p.111-119 & PEIR Update language on the mitigation measures to be consistent with any language changes to the PEIR document.	Comment noted. Appropriate corrections to the mitigation measures in the PEIR are incorporated and reflected in the Clarifications and Revisions section of the Final PEIR. Please also see Chapter 8, Responses to Comments in the PEIR. The environmental mitigation measures included in Chapter 5, Environmental Mitigation Measures, of the 2016 RTP/SCS are consistent with the performance standards-based mitigation approach used in the PEIR and reflect the general scope of the PEIR's mitigation measures.
16191.14	p. 159, column 2, paragraph 2 Existing text: "Since new development is focused in areas where infrastructure already exists, there is not as much need to extend or build new local roads, water and sewer systems, and parks." Modify text to read: "Since new development is focused in areas where infrastructure already exists, sometimes there is not as much need to extend or build new local roads, water and sewer systems, and parks, but in other instances, modernization of utilities needs to be considered and completed to accommodate the additional usage."	Comment noted. Changes have been made in the Plan.
16191.15	p. 165, column 1, paragraph 1 Define 'sensitive receptors'	Comment noted. Definition provided in final RTP/SCS. Sensitive receptors are land uses where people most vulnerable to poor air quality are likely to be located. SCAG identified these areas based on guidance from the California Air Resources Board (CARB), which states that "sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to be located include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses)" (http://www.arb.ca.gov/ch/handbook.pdf).
16191.16	Label Y axis on all figures	Revisions made as appropriate in the Demographic and Growth Forecast Appendix.
16191.17	P. 2, column 1, paragraph 3 Add text: "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)."	Comment noted. The 2016 RTP/SCS is the product of a bottom-up, iterative local input process. SCAG has actively sought consensus from our subregional partners on local SCS consistency determination for future funding and other opportunities consistent with the core principles specified in Chapter 4. It has been re-emphasized that the preferred scenario and corresponding forecast of population, household, and employment growth is adopted at the jurisdictional level as part of the 2016 RTP/SCS, and any corresponding sub-jurisdictional level data and/or maps is advisory only.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16191 Related Documents Link
16191.18	P.42-43 How do the SPM Place Types nest into the Land Development Categories?	Comment noted. A table that reflects how SPM Place Types nest into the Land Development Categories has been added to the "Reference Documents" section at the end of the Appendix: SCS Background Documentation.
16191.19	p.6/43 Move the definitions of Urban, Compact Walkable, and Standard Suburban from page 43 to page 6 before the maps	Comment noted. A note on the maps has been included to note the definitions are on page 43.
16191.20	p. 41, column 1, paragraph 4 Existing text: "Scenario modeling with UrbanFootprint brings meaningful, comprehensible, and timely results to those wanting to understand how growth and development choices will impact their community, city, or region in the coming years and decades." Modify text to read: "Scenario modeling with UrbanFootprint brings meaningful, comprehensible, and timely results to those local jurisdictions wanting to understand how growth and development choices will impact their community, city, or region in the coming years and decades."	Comment noted. Changes have been made in the Plan.
<i>Submitted by</i> Center for Demographic Research		Submittal 16193 Related Documents Link
16193.01	p. 50, 51, 54, 56 maps Clarify in map legends if growth refers to population, housing and/or employment.	Comment noted. Revisions have been made to map legends to reflect data displayed on the map.
16193.02	p. 41, column 2, paragraph 2 Existing text: "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)." Modify text to read: "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)."	Comment noted. Changes have been made in the Plan.
16193.03	p. 56 column 1, last paragraph Existing text: "The scope of these four scenarios, 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." Modify text to read: "These four scenarios were developed in early 2015 by SCAG and their consultant and shared, with the CEHD Committee and SCAG's Technical Working Group (TWG)."	Comment noted. Revisions to the Plan have been made as appropriate.
16193.04	p. 56 column 2, paragraph 2 Existing text: "Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing." Modify text to read: "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 modernization of utilities needs to be considered and completed to accommodate the additional usage."	Comment noted. Revisions to the Plan have been made as appropriate.
16193.05	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 "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."	Comment noted. The existing statement refers to water costs savings for new growth. Assessing impacts of household utility cost savings on potential future utility rates is beyond the scope of the Draft RTP/SCS.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16193 Related Documents Link
16193.06	P. 83, column 2, paragraph 2 Existing text: "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, public health and community impacts." Modify text to read: "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, and public health regional impacts."	Comment noted. Revision to the Plan have been made.
16193.07	P. 83, column 2, last sentence Delete: "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."	Comment noted. Sentence has been deleted as requested.
16193.08	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 Acknowledge the improvement over time of AT usage and the lowering of accident and death rates	Comment noted. The Active Transportation Appendix notes as part of its education and encouragement strategy, "Getting more people to bicycle and walk is not just about building the infrastructure. They must feel safe biking and walking. Safety campaigns that include advertising, public service announcements and media kits are all part of a suite of safety education strategies. Other strategies include educating bicyclists, pedestrians and motorists on the rights and responsibilities of sharing the road."
16193.09	p. 5 Existing text: "Class I Bikeways ...A Class I Bikeway provides a completely separated way 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 rivers may provide additional opportunities for "interested but concerned" cyclists." Modify existing text: "Class I Bikeways ...A Class I Bikeway provides a completely separated right-of-way 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 along rivers, utility corridors, and flood control channels may provide additional opportunities for "interested but concerned" cyclists."	Comment noted. Changes have been made in the Plan.
16193.10	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	Comment noted. SCAG staff is unaware of the actual distance within an intersection that counts toward pedestrian injuries at intersections as these distances are determined by investigating officers for each collision.
16193.11	p.6, column 1 Existing text: "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." Modify text to reflect: "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 update to their General Plan's circulation element."	Comment noted. Text changed to "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 local jurisdictions to incorporate the concept of Complete Streets to any substantive update to their General Plan's circulation element." .

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16193 Related Documents Link
16193.12	p.8, column 1 Existing text: "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." Modify existing text: "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, 13,280 pedestrians were injured and 702 pedestrians were killed."	Comment noted. Changes have been made in the Plan.
16193.13	p. 17, Table 5 Create separate tables for columns 1 to 3 and columns 3 to 10.	Comment noted.
16193.14	p. 24, column 1, paragraph 1 Existing text: "2012 RTP/SCS PROGRESS The 2016 Active Transportation Plan ...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." Modify existing text: "2012 RTP/SCS PROGRESS The Active Transportation portion of the Plan ...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'	Incorporated recommended change noting The Active Transportation component of the 2012 RTP/SCS (2012 Plan) Incorporated recommended change Page 20 of the Active Transportation Appendix changed to "The 2012 Plan examined access to transit, noting that 95 percent of SCAG residents would be within walking (0.5 mile) or biking (two miles) distance from a transit station, defined as a bus station, light rail station, or heavy rail station."
16193.15	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	Comment noted.
16193.16	P. 25, second column, Bullet 6 Add 4th bullet under #6: "OCCOG is working on a comprehensive Complete Streets design manual for the entire county which will be completed in 2016."	Comment noted. Changes have been made in the Plan.
16193.17	P.26, Table 9 Add 4th bullet under #6: "OCCOG is working on a comprehensive Complete Streets design manual for the entire county which will be completed in 2016."	Comment noted. Changes have been made in the Plan.
16193.18	P.26, Table 9 Existing text: Change language for Orange County: Not yet Planned. Modify existing text: Change language for Orange County: In Process	Comment noted. Changes have been made in the Plan.
16193.19	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.	Incorporated clarification throughout the document.
16193.20	P.66-67, Tables 16 & 17 Add note to Table: "These draft scenarios are not the alternatives that were evaluated in the PEIR."	Comment noted. It may be confusing to readers to reference the PEIR solely as a single footnote without context. The PEIR itself provides context over what was evaluated.
<i>Submitted by</i> Center for Demographic Research		Submittal 16194 Related Documents Link
16194.01	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.	Comment noted. The comprehensive Strategic Plan is included in the main document (Chapter 9 of the 2016 RTP/SCS beginning on page 173) and includes same strategies identified in the Active Transportation Appendix. The strategic plan provides an indication of what jurisdictions could implement beyond the constraints of the 2016 RTP/SCS.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16194 Related Documents Link
16194.02	P.8-10, Table 4 Label all Performance Measures that were new in 2016 Plan P.11 Add definition of HQTA to map. p.20 LSPT was used for 2012 RTP. Add information on the SPM. p. 31, Table 12 Add model sources to bottom of table.	Thank you for taking the time to review the Performance Measures Appendix. Your comments have been incorporated into the document as appropriate.
16194.03	Final document should contain hyperlinks to other documents. Spell out Acronyms in Tables/Figures Titles e.g. CHIS	Comment noted. Acronyms were removed from chart titles and sources added beneath charts.
16194.04	p.1, column 1 Existing text: "Public health is increasingly an area of emphasis for Metropolitan Planning Organizations (MPOs) and Departments of Transportation (DOTs) across the country, due to the prevalence of chronic diseases such as obesity, hypertension, asthma and heart disease." Modify text to read: "Metropolitan Planning Organizations (MPOs) and Departments of Transportation (DOTs) across the country, have an opportunity to impact the prevalence of chronic diseases such as obesity, hypertension, asthma and heart disease through transportation planning which promotes increased physical activity."	Comment Noted. The proposed changes do not reflect the full extent to which land use and transportation affect health outcomes. The Public Health Appendix outlines seven focus areas, one of which is physical activity. Changes have been made to the Plan to clarify.
16194.05	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.	Comment noted. Changes have been made to the Plan.
16194.06	p.1, column 2 Existing text: "Climate Adaptation: Support efforts to prevent climate change and make the region more resilient to future changes with reductions in VMT and greenhouse gas emissions." Modify text to read: "Climate Adaptation: Support efforts to mitigate climate change and make the region more resilient to future changes with reductions in VMT and greenhouse gas emissions."	Comment noted. Changes have been made in Plan.
16194.07	p.2, Figure 1 Arrows should go both ways.	Comment noted. Changes have been made to the Plan.
16194.08	p.3, column 1, paragraph 2 Existing text: "Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors can play a role in supporting healthy behaviors." Modify text to read: "Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors and related conditions can play a role in supporting healthy behaviors."	Comment noted. Changes have been made to the Plan.
16194.09	p.3, column 2, paragraph 3 Existing text: "The costs of poor population health and chronic disease..." Modify text to read: "The costs of poor public health and chronic disease..."	Comment noted. Changes have been made to the Plan.
16194.10	p.3, column 2, paragraph 3 Existing text: "Access to healthy food environments such as grocery stores, farmers' markets and community gardens decreases food insecurity and obesity." Modify text to read: "Access to healthy food environments such as grocery stores, farmers' markets and community gardens can play an important role in food insecurity and obesity."	Comment noted. Changes have been made in the Plan.
16194.11	p.7, column 1, first line Define "weather insurance"	Comment noted. Changes have been made to the Plan.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16194 Related Documents Link
16194.12	p.7, column 2, paragraph 2 Existing text: "... Providing access to jobs with a living wage is critical to ensuring communities become and stay healthy." Modify text to read: "... Providing access to education and job training aligned with job opportunities in the region is critical to ensuring communities become and stay healthy."	Comment noted. Changes have been made to the Plan.
16194.13	p.7, column 2, paragraph 3 Existing text: "...Creating infrastructure and facilities that encourage active transportation such as biking and walking provides opportunities for residents to increase their daily physical activity." Modify text to read: "...Creating infrastructure policies and community conditions and facilities that encourage active transportation such as biking and walking provides opportunities for residents to increase their daily physical activity."	Comment noted. Changes have been made to the Plan.
16194.14	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. 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. p.9 Add table with data for walking. p.10, column 2 Consider including funding as both a challenge and an opportunity.	p.8 - Comments noted. Changes have been made to the Plan. p.9 - Comments noted. SCAG plans to expand its analysis of public health data over the coming years and will incorporate these suggestions. However, SCAG believes additional outreach is necessary to identify any concerns local jurisdictions might have regarding the incorporation of smaller geographic analysis into the Plan. SCAG will incorporate newer data into the 2020 RTP/SCS, however, SCAG will continue to use the 2011 CHIS data for the 2016 RTP/SCS to be as consistent as possible in reporting base year statistics. p.9 - Comments noted. Changes have been made to the Plan. p.10 - Comments noted.
16194.15	p.10, column 1, last sentence Existing text: "Much of our local arterial system is also in need of pavement improvements, as local roadways in the SCAG region average a score of 69 out of 100 in the Pavement Condition Index (PCI), where a score of 70 or less typically translates to conditions that are inadequate." Modify text to read: "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 more costly to repair."	Comment noted. Changes have made to the Plan.
16194.16	p.10, column 2, paragraph 4 Existing text: "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. Within the region, health outcomes vary widely based on geography, income and race." Modify text to read: "With more than 18 million people, 191 cities, six counties and hundreds of local and regional agencies, Southern California is a diverse region. Within the region, health outcomes vary widely based on many things, such as geography, income and race."	Comment noted. Changes have been made to the Plan.
16194.17	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. p. 15-20, Tables 5,6,7,8,9,10,11 Cite sources of table data. Define SHSP in Table 11	p. 15 - Comment noted. Changes made to the Plan. The use of the word "buffer" has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB's 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day. p. 15-20 - Comment noted. Changes have been made to the Plan.

ID	Comment	Response
<i>Submitted by</i> Center for Demographic Research		Submittal 16194 Related Documents Link
16194.18	p. 16, column 1, paragraph 1 Existing text: "Region-wide, about ten percent of the land area within HQTAs is also within the 500 foot buffer of the freeway. To balance regional policy goals, the Plan accommodates the vast majority of growth within HQTAs outside of the 500 feet buffer of freeways..." Modify text to read: "Region-wide, about ten percent of the land area within HQTAs is also within 500 feet of the freeway. To balance regional policy goals, the Plan accommodates the vast majority of growth within HQTAs but beyond 500 feet of freeways..."	Changes have been made to the Plan, and the use of the word "buffer" has been omitted. However, SCAG will continue to utilize the advisory recommendation from ARB's 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day.
16194.19	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. 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. 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.)	p.17 Comment noted. Changes have been made to the Plan. p.19 Comment noted. In 2013, the SCAG Regional Council adopted the recommendations of the Public Health Subcommittee to "Provide robust public health data and information, as feasible, to better inform regional policy, the development of the 2016-2040 RTP/SCS, and support public health stakeholder participation," and to "Promote and seek ongoing partnerships with regional partners, local public health departments and other stakeholders." The strategies and actions in the Public Health Appendix incorporate the Subcommittee recommendations and will be adopted as part of the Plan. The title of this section has been changed to Plan Implementation to align with other Plan components. p.22-29 Comment noted. Changes have been made to the Plan to refer to the examples as "Initiatives." SCAG will work with jurisdictions across the region to collect additional examples of promising initiatives as part the implementation of the Plan.
16194.20	p. 4, Exhibit 2 Exhibit is labeled warehouse & distribution centers but shows manufacturing firms total employment. Correct.	Comment noted. The exhibit title has been corrected.

<i>Submitted by</i> Center for Demographic Research		Submittal 16237 Related Documents Link
16237.01	Existing statement: "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. The data is controlled to be within the density ranges of local general plans and/or input received from local jurisdictions. For the purpose of determining consistency for California Environmental Quality Act (CEQA) streamlining, lead agencies have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS. Modify to read: "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. The advisory subjurisdictional 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)."	Comment noted. The 2016 RTP/SCS is the product of a bottom-up, iterative local input process. SCAG has actively sought consensus from our subregional partners on local SCS consistency determination for future funding and other opportunities consistent with the core principles specified in Chapter 4. It has been re-emphasized that the preferred scenario and corresponding forecast of population, household, and employment growth is adopted at the jurisdictional level as part of the 2016 RTP/SCS, and any corresponding sub-jurisdictional level data and/or maps is advisory only.

ID	Comment	Response
<i>Submitted by</i> City of Alhambra		Submittal 16146 Related Documents Link
16146.01	<p>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.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
<i>Submitted by</i> City of Anaheim		Submittal 16248 Related Documents Link
16248.01	<p>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.</p>	<p>Comment noted. The Phase 1 description has been clarified to incorporate Anaheim.</p>
<i>Submitted by</i> City of Calimesa		Submittal 16044 Related Documents
16044.01	<p>Wildlife Corridor's connecting under or over freeways and major Roads. We must provide this protection for the wildlife movement.</p>	<p>The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide "incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries." The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>

ID	Comment	Response
<i>Submitted by</i> City of Claremont		Submittal 16340 Related Documents Link
16340.01	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.	The funding identified in the Draft 2016 RTP/SCS for the Foothill Gold Line Extension Phase 2B is based upon innovative strategies that are not expected to be available in the near term. The earliest completion date for this project would be 2035 and the RTP/SCS has been adjusted accordingly. Should this project be advanced by Metro as it updates its Long Range Transportation Plan, the completion date can be adjusted through a future 2016 RTP/SCS amendment at the request of Metro.
<i>Submitted by</i> City of Diamond Bar		Submittal 16345 Related Documents Link
16345.01	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.	Comment noted. SCAG acknowledges the need for continuing analyses and dialogue with stakeholders. Please note that the inclusion of the East-West Freight Corridor in the 2016 RTP/SCS allows for further analyses to be conducted. Specific costs, refined user demand, accessibility concerns, designs, and alternative alignments would be identified through a project level Environmental Impact Report (EIR) . Further discussion of project mitigation concerns would also be addressed through upcoming processes.
16345.02	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).	Comment noted. The specific impacts of the East-West Freight Corridor project, including localized air, noise, vibration, or visual impacts, would be determined through the completion of a project-level Environmental Impact Report (EIR). SCAG acknowledges the need for continuing analyses and dialogue with stakeholders.
16345.03	• 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 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.	Comment noted. Numerous potential alignments along alternative freeway corridors were considered and analyzed as part of the Comprehensive Regional Goods Movement Study and Implementation Plan (2012) and the 2012 RTP/SCS including the I-210, SR-60, I-10, and SR-91. This was in addition to other alignments (e.g., the UPRR corridor as noted above, hybrid alignments). Right-of-way acquisition was only one criteria considered in identification of the proposed alignment of the East-West Freight Corridor. Among other criteria considered were proximity to manufacturing facilities, warehousing, and other goods movement dependent industries, potential impacts to local residents and businesses, and geographic limitations. SCAG acknowledges the need for continuing analyses and dialogue with stakeholders.
16345.04	• 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.	Comment noted. SCAG acknowledges the need for continuing analyses and dialogue with stakeholders to identify the most desirable use for the SR-60 corridor. Please also note that analyses to date on the EWFC have not precluded the development of the other transportation projects referenced.
16345.05	• 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.	Comment noted. Inclusion of the East-West Freight Corridor in the 2016 RTP/SCS allows for further work to be conducted on the project through an Environmental Impact Report (EIR).

ID	Comment	Response
<i>Submitted by</i> City of Diamond Bar		Submittal 16345 Related Documents Link
16345.06	<ul style="list-style-type: none"> 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. 	The 2016 RTP/SCS lays out a regional roadmap to achieving goods movement environmental objectives recognizing the technological, operational, and cost challenges for the broad scale deployment of zero-emission technologies.
16345.07	<p>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 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.</p>	In accordance with state and federal requirements, the 2016 RTP/SCS includes a financial plan that estimates how much funding will be needed to implement transportation investment needs, as well as operate and maintain the transportation system as a whole over the life of the Plan. The Plan must demonstrate that there is a balance between the estimated costs of the projects and programs described in the Plan and revenue sources reasonably expected to be available for transportation investments. SCAG recognizes that additional project development work is needed for this corridor, including environmental and financial analyses. SCAG has amended the Plan as necessary to update the project description and cost estimate.
16345.08	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 1-710 and 1-15. It is premature to conclude SR-60 is physically or financially feasible, and that better options may materialize through further studies.	Comment noted. Inclusion of the East-West Freight Corridor in the 2016 RTP/SCS allows for further work to be conducted on the project through an Environmental Impact Report (EIR). Further, numerous potential alignments along alternative freeway corridors were considered and analyzed as part of the Comprehensive Regional Goods Movement Study and Implementation Plan (2012) and the 2012 RTP/SCS including the I-210, SR-60, I-10, and SR-91. SCAG acknowledges the need for continuing analyses and dialogue with stakeholders.
<i>Submitted by</i> City of Eastvale		Submittal 16304 Related Documents Link
16304.01	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 2to 6 lanes.	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. We will work with RCTC to revise the completion year for RTP 3A01WT124 in a future RTP Amendment.
16304.02	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.	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. We will work with RCTC to revise the completion year for RTP ID# 3A04WT186 in a future RTP Amendment.
16304.03	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	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. We will work with RCTC to revise the Lead Agency within the Project List.

ID	Comment	Response
<i>Submitted by</i> City of El Segundo		Submittal 16305 Related Documents Link
16305.01	<p>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.</p>	<p>Comment noted. The Airport Ground Access sections details the extensive efforts underway throughout the region to improve access to all of the region's airports, not just LAX. In addition, the forecast growth rate is higher at the other regional airports than LAX. Per Transportation Committee action, SCAG remains committed to regionalization of aviation into the future.</p>
16305.02	<p>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, and the proposed Airport Metro Connector. See RTP Project List, Table 2 at 157, 162.</p>	<p>Comment Noted. SCAG recognizes that the projects are pending or will undergo environmental review. Environmental clearance is not a prerequisite for including a transportation project in the RTP/SCS. As with other projects included within the Project List, once a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with the CTC to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
16305.03	<p>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.</p>	<p>Comment Noted. SCAG recognizes that the projects are pending or will undergo environmental review. Environmental clearance is not a prerequisite for including transportation improvement projects in the RTP/SCS. As with other projects included within the Project List, once a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with the CTC to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>

ID	Comment	Response
<i>Submitted by</i> City of El Segundo		Submittal 16305 Related Documents Link
16305.04	<p>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 Parti-01 ExecutiveSummarv.pdf; 2006 Stipulated Settlement at 9, attached as Attachment B: Final LAX SPAS Report (2013) at 1-1 (identifying 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/uDlodedFiles/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. 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.</p>	<p>Comment noted. The 82.9 - 96,6 MAP range for LAX was supported by LAWA and inclusion of the ground access projects at LAX was submitted by LAWA via Metro, consistent with our planning practice. Nothing in the RTP relieves LAWA of any responsibility to conduct project level environmental review according to state and federal guidelines.</p>
16305.05	<p>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 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.</p>	<p>The 82.9 to 96.6 MAP range is not a demand forecast. It is an estimate of the upper bound of the physical capacity of the airport. We believe the actual demand at LAX could be even higher by 2040, if it was not capacity constrained. This estimate is consistent with LAWA's current planning efforts for its facilities based on the gate cap of 153 imposed by the settlement agreement through 2020. This is further explained in the Analysis of Airport Capacity which has been placed on SCAG's website: http://www.scag.ca.gov/Documents/AnalysisOfAirportCapacityConstraints.pdf</p>

ID	Comment	Response
<i>Submitted by</i> City of El Segundo		Submittal 16305 Related Documents Link
16305.06	<p>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”). 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 airports in the United States.</p>	<p>Comment noted. The 82.9 - 96.6 MAP range for LAX was supported by LAWA. Nothing in the RTP relieves LAWA of any responsibility it has to conduct its own environmental reviews in accord with State and Federal law.</p>
16305.07	<p>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 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). The public could reasonably assume that SCAG has been listening to LAWA, to the exclusion of other interested stakeholders.</p>	<p>Comment noted. The individual airport demand forecasts were developed through a public process, including review by SCAG’s Aviation Technical Advisory Committee, Transportation Committee and Regional Council. Nothing in the RTP relieves LAWA of any responsibility it has to conduct its own environmental reviews in accord with State and Federal law.</p>
16305.08	<p>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.</p>	<p>Comment noted. SCAG agrees that LAWA has the responsibility to evaluate the potential impact of any future development at LAX. The 82.9 – 96.6 MAP range for LAX was supported by LAWA. Nothing in the RTP relieves LAWA of any responsibility it has to conduct its own environmental reviews in accord with State and Federal law.</p>
16305.09	<p>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.</p>	<p>Comment noted. As the preparer of the RTP/SCS, SCAG has the responsibility to prepare an independent assessment of the demand for and capacity of the region’s transportation system. With regard to aviation, SCAG conducted its own analysis and sought input and feedback from the operators of each airport in the region, to gain the benefit of their detailed knowledge of their facilities. SCAG also held public meetings on its aviation analysis with its various committees and Board. The present RTP meets its obligation to present a fair and honest assessment of the region’s aviation system.</p>
<i>Submitted by</i> City of Glendale		Submittal 16341 Related Documents Link
16341.01	<p>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.</p>	<p>Glendale Beeline has been added to the table.</p>

ID	Comment	Response
<i>Submitted by</i> City of Glendale		Submittal 16341 Related Documents Link
16341.02	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.	We concur that additional funding is needed to address projected needs, including funding for local transit services. Note that the Plan does not assume funding from a potential additional sales tax measure or an extension of Measure R within Los Angeles County. If such an additional sales tax measure is approved by Los Angeles County voters, it can be incorporated into the Plan through subsequent amendments. In addition, SCAG invites staff from all transit providers to participate in the quarterly meetings of the Regional Transit Technical Advisory Committee (RTTAC). In the future, this could be a great forum for Glendale Beeline staff to present their concerns regarding funding for local operations in the regional transportation planning process.
16341.03	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.	Comment noted. The SR 134 Transit Corridor connecting the North Hollywood Red and Orange Line stations to the Metro Gold Line in Pasadena via Glendale is a financially-constrained project (RTP ID# 7120009) in the 2016 RTP/SCS. It is shown on Exhibit 18 in the Transit Appendix. The Metro Orange Line BRT extension to Burbank Bob Hope Airport is a Strategic Plan project (RTP ID# S1120001) as well as the Burbank/Glendale LRT project (RTP ID# S1120013). Should Metro request the advancement of a Strategic Plan project into the RTP/SCS after it updates its long-range transportation plan and/or after voter approval of a new countywide sales tax measure, this could be accommodated in a future RTP/SCS amendment.
16341.04	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.	Comment noted. Active transportation is part of a fiscally constrained multi-modal transportation plan. Because of the financial constraints, no transportation mode is funded to meet 100% of its needs.
16341.05	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 1-10 and SR-134/1-210, 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.	Comment noted. The environmental analysis of the SR-710 North project is programmed in the Federal Transportation Improvement Plans (FTIP) and already underway. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.
<i>Submitted by</i> City of Irvine		Submittal 16306 Related Documents Link
16306.01	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.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> City of Irvine		Submittal 16306 Related Documents Link
16306.02	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.	Comment noted.
16306.03	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.	Comment noted, this comment is to support the Policy Growth Forecast.
16306.04	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.	Comment noted. The Draft RTP/SCS does not assume new growth will be prohibited within 500 feet of a freeway or busy roadway. Region-wide, projected growth within 500 feet of a freeway or busy roadway reflects local input data. The Draft RTP/SCS encourages local jurisdictions to establish their own policies to direct growth outside these areas based on factors covered in the Appendix: Environmental Justice. The use of the word “buffer” has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB’s 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day.
16306.05	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.	• Comment noted. The use of the word “buffer” has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB’s 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day. • Comment noted. Changes have been made where appropriate. • Comment noted. The distance measured is edge of roadway. • Comment noted. The transportation corridor being identified is a freeway. • Comment noted. The RTP/SCS does not contain a policy that prohibits development within these areas. It encourages local jurisdictions to establish their own policies to limit growth in these areas based on factors covered in the Appendix: Environmental Justice – the emphasis is on mitigation.

ID	Comment	Response
<i>Submitted by</i> City of Irvine		Submittal 16306 Related Documents Link
16306.06	<p>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.</p>	<p>Comment noted. SCAG’s policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition. In addition, SCAG communicates with Hydrogen Fuel Cell industry partners to exchange information and knowledges. Plug-in Electric vehicles are specifically analyzed in the RTP/SCS due to the transportation/land use policy nexus regarding charging station siting. Regarding mobility innovations such as carsharing, and ridesourcing, SCAG does not view these as specific technologies, but rather as emerging transportation modes. In the mobility innovations appendix, SCAG identifies various new technologies that show promise in meeting the goals of the RTP/SCS, and will continue to support any and all mobility innovations.</p>
<i>Submitted by</i> City of Irvine		Submittal 16366 Related Documents Link
16366.05	<p>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.</p>	<p>Comment noted. We believe this section is important in providing the necessary background and context for the development of the rest of the Plan.</p>
16366.06	<p>“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 “should consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.</p>	<p>Comment noted. Please see Master Response No. 4 and Response to Comment No. 4 in the City of Irvine comment letter (Comment Letter 19) in the Response to Comments of the proposed Final PEIR.</p>

ID	Comment	Response
<i>Submitted by</i> City of Irvine		Submittal 16367 Related Documents Link
16367.01	On page 163 of Appendix 8 to the PEIR, the following change should be made to 2016-2040 RTP/SCS Project ID 2120006: Existing text: "Project feasibility study of six miles of new roadways including Trabuco Road, O Street, and Marine Way." Revised text: "Project feasibility study of two miles of new roadways including Marine Way." The modification is consistent with information submitted by the City of Irvine to OCTA.	Comment noted. The FTIP projects included within the RTP/SCS Project List incorporates the adopted 2015 FTIP and Amendments 1 – 7, and 12. Regarding Project #2120006, the description has been updated through a subsequent amendment and will be reflected in the 2017 FTIP list of projects.
<i>Submitted by</i> City of Irwindale		Submittal 16171 Related Documents Link
16171.01	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, Nox, PM10 and PM 2.5 levels. The current forecast in the Draft RTP/SCS of completing the Foothill Gold Line in 2040 is too late and should be amended to complete this vitally needed project as soon as possible. No other rail project in Los Angeles County is as ready as this one. The project will be ready in 2017 to break ground and SCAG should find ways to include innovative sources to fully fund the \$1,216 M project sooner as they are doing with other unfunded rail projects.	The funding identified in the Draft 2016 RTP/SCS for the Foothill Gold Line Extension Phase 2B is based upon innovative strategies that are not expected to be available in the near term. The earliest completion date for this project would be 2035 and the RTP/SCS has been adjusted accordingly. Should this project be advanced by Metro as it updates its Long Range Transportation Plan, the completion date can be adjusted through a future RTP/SCS amendment at the request of Metro.
<i>Submitted by</i> City of La Canada Flintridge		Submittal 16333 Related Documents Link
16333.01	We respectfully request that SCAG eliminate the SR-710 North Project from the 2016 RTP/SCS. First, the Freeway Tunnel Alternative is flawed and unnecessary, failing to provide a real solution to the region's transportation needs. Second, the Freeway Tunnel would be inconsistent with the RTP/SCS's goal that transportation projects be sustainable and environmentally protective. Third, there are viable alternatives to the Freeway Tunnel that improve mobility and expand transportation options while limiting dependence on personal vehicles.	Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.
<i>Submitted by</i> City of La Habra		Submittal 16049 Related Documents
16049.01	I recommend zooming in the bicycle trail maps so that you can actually see what cities the routes go through. For instance, the Orange County Loop bike trail is zoomed out so far you can't see what the cities the route touches. For a staff person who knows the details more intimately, it's fine, but for the general public or lay-person, the map is almost unreadable. Thanks	Comment noted: The Regional Bikeways maps denote proposed routes that cover the majority of the 38,000 square mile region and are displayed primarily for illustrative purposes, not navigation. Individual routes may also change as they are finalized by the local implementing jurisdictions.

ID	Comment	Response
<i>Submitted by</i> City of La Habra		Submittal 16049 Related Documents
16049.02	General question - are the light rail future extensions ranked? If not, it might be good to show the rankings of the projects to show which ones are more likely to be built as compared to the lower ranking projects.	SCAG does not rank projects within the context of the RTP/SCS. Project implementation schedules (estimated year of completion) are identified in the Project List Appendix.
16049.03	Map comment for light rail - I recommend zooming in the maps where possible to show what cities the light rail/heavy rail/commuter rail extension projects touch. The maps are zoomed out so far to show the whole Southern California region that it is difficult to see exactly where these projects are occurring.	Exhibits 12 through 17 on pages 68 through 73 of the Transit Appendix to the Draft 2016 RTP/SCS contain more localized maps of existing services and planned transit capital investments.
<i>Submitted by</i> City of Laguna Niguel		Submittal 16335 Related Documents Link
16335.01	I recently reviewed the comments submitted by the Orange County Council of Government (OCCOG) in association with a number of cities, including our neighboring City of Mission Viejo, and I, as an individual Council Member, would like to express my concurrence with their findings. I appreciate SCAG's efforts in developing a plan that is critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air quality standards.	Comment noted.
<i>Submitted by</i> City of Lake Forest		Submittal 16309 Related Documents Link
16309.01	We appreciate the ongoing coordination on the growth forecast between SCAG and the Center for Demographic Research (CDR) at California State University, Fullerton to ensure that the 2014 Orange County Projections (OCP) and its updates were included in the 2016 RTP/SCS. In addition, we appreciate that all entitlements, development agreements, and projects recently completed or under construction, as provided to you in our July 10, 2015 correspondence, were properly reflected in the 2016 RTP/SCS growth forecast.	Comment noted.
<i>Submitted by</i> City of Los Angeles		Submittal 16262 Related Documents
16262.01	Add pending project for LA River from its master plan.	The Los Angeles River is considered as part of the 2016 RTP/SCS. Please see the Active Transportation Appendix. The River is considered both a regional greenway, and part of the regional bikeway network.
16262.02	It is important to delineate between walking and cycling both have very different demographics.	Comment noted. Walking and bicycling in the SCAG region is discussed in greater detail in the Active Transportation Appendix.
16262.03	There are images of bulb out that have water filtration features but no mention of green streets has a method to reduce and/or calm traffic. It is in line with goals mentioned in pg 122 for biological resources as they have several benefits.	Comment noted. Traffic calming can include green streets.
16262.04	Pg. 115 There is no mention large water restoration programs or local water policies like LA River Revitalization Master Plan, One Water, prop 1 and prop o.	Comment noted. Page 97 of the RTP/SCS supports the integration of river restoration programs and active transportation in the formation of urban greenways as part of the Regional Greenway Network.

ID	Comment	Response
<i>Submitted by</i> City of Los Angeles - Department of City Planning		Submittal 16155 Related Documents Link
16155.01	<p>Given the severity of the housing affordability crisis faced by the region, and the direct impact unaffordability has on Plan goals such as mobility, air quality and economic well-being, the City of Los Angeles expected the housing topic to receive a higher overall profile throughout the report. When the topic was addressed in detail, it often did so in ways that may inadvertently be counter-productive to many of the Plan’s goals. SB 375, which established the requirement to create a sustainable communities strategy, is meant to better coordinate planning for transit and housing. Planning for housing is one of the primary purposes of the SCS. Three of the eight statutory requirements in Health and Safety Sec. 65080 (b)(2)(B) involve housing, including a consideration of the state housing goals and the identification of areas within the region sufficient to house “all the population of the region, including all economic segments of the population” as well as “an eight-year projection of the regional housing need for the region.” It is not clear in the Plan how or where these housing-related requirements would be satisfied. The 2016 RTP/SCS acknowledges that the region only built 10% of the housing necessary for those with low incomes during the previous period and missed its targets for above moderate income households as well. The 8-year regional housing needs assessment for the SCAG region is for 412,000 new housing units, more than 270,000 of which are supposed to be affordable for those with moderate income or less. The SCS should help answer how and where the region should grow to ensure the housing needs of more are met and lead on the hard policy choices that need to be made around housing, particularly in this time of limited public funding. Examples of an overall lack of focus on housing affordability includes:</p> <ul style="list-style-type: none"> • The list of nine 2016 RTP/SCS Goals (pg. 60) does not mention housing. • The sections titled “What Will We Accomplish” and “How Will We Ensure Success” in the Executive Summary (pg. 8 and 9) do not mention any housing related goals. • There is little discussion of how unaffordability undermines the goals of the RTP/SCS, including suburban sprawl, longer job commutes, higher vehicles mile travelled and greenhouse gas emissions, etc. While the Plan contains a statement that transit investments and strategies will be most effective if “coordinated with land use strategies such as TOD and providing affordable housing” (pg. 92), this discussion should occur earlier in the document and be expanded. • The scale of the housing problem is not adequately addressed. For example, under the “Challenges We Face” section (pg. 3 - Executive Summary), the Plan summarizes the region’s housing problems simply as: “Housing prices are increasing: Housing prices are rising steadily and affordability is declining...” This language simply fails to capture the magnitude of the crisis facing the region. The Los Angeles metro area not only has the lowest affordability rate in the country, but no area of the country has ever seen incomes and housing costs so out of whack as they are today in Los Angeles. When taking into account the high cost of housing, LA County has been recently identified as having the highest effective poverty rates in the State[1]. • The section titled “Our Progress Since 2012” does not mention the progress towards meeting the region’s housing needs as expressed through the required Regional Housing Need Assessment (RHNA) allocation. Nor does it describe how past residential growth trends met prior goals. These are two of the primary components of the Sustainable Communities Strategy (per 65080 (b)(2)(B). State legislation around housing funding is mentioned, but not other significant laws such as AB 2222 (2014) and AB 744 (2015). 	<p>SCAG acknowledges that progress on affordable housing has been insufficient in meeting the needs of the region. The language of the draft 2016 RTP/SCS has been edited to draw more attention to the dire need of affordable housing in the region. As a regional planning agency, SCAG encourages jurisdictions to consider different strategies to utilize at the local level to promote the development of affordable housing, and SCAG has included an affordable housing strategy toolbox for jurisdictions as part of the affordable housing section in chapter 3. We are committed to working with our local jurisdictions to ensure that their housing elements are in compliance with State housing law and offer technical assistance for affordable housing grant programs such as the Affordable Housing & Sustainable Communities (AHSC) program, California Department of Housing and Community Development Transit-Oriented Development (TOD) grant, and establishing community revitalization and investment agency or enhanced infrastructure financing districts. The draft RTP/SCS on page 54 has been updated to reflect your comments on highlighting issues associated with unaffordability and the effectiveness of considering both transit and land use strategies. In regard to monitoring progress made in affordable housing built, SCAG is developing a pilot survey to determine affordable housing building activity in the region. Currently available data by jurisdiction is incomplete and inconsistent and SCAG will be working to increase the State-mandated annual progress report submittal rates in the region.</p>

ID	Comment	Response
<i>Submitted by</i> City of Los Angeles - Department of City Planning		Submittal 16155 Related Documents Link
16155.02.1	<p>2. Provide greater clarity in the discussion of gentrification and displacement Demographic change is an important contributor to regional land use outcomes and equity concerns. The Department appreciates the Plan’s interest and concern for the issues of gentrification and displacement, particularly in relation to areas around transit stations (e.g. pgs. 12, 54, 69,), and is grateful for the amount of data and research devoted to this complicated subject. We also agree with the assessment that jurisdictions need to be sensitive to this topic and work to employ strategies that mitigate potential negative impacts on communities. Unfortunately, some of the discussion and conclusions on these topics, as presently worded, could be misconstrued or cause confusion about intended policy objectives, and potentially result in less housing affordability. Given the importance of the topic, the Department requests that the sections below be reconsidered. • The definition of “displacement” in the Glossary may be partially responsible for potential confusion. The definition appears to refer only to a process that “drives out” existing residents and businesses. It does not include the (much more common) process whereby lower income residents become unable to access properties in certain areas due to increasing housing prices (often referred to as “exclusionary displacement”). This limited definition influences the discussion of the process and strategies to respond. • There is an apparent disconnect between the evidence on gentrification presented in the Plan and some of the claims being made. The detailed study in the Environmental Justice Appendix found “no statistical significance” in the difference of demographic change occurring in transit-oriented areas of the SCAG region versus outside them. Despite this lack of evidence, the Plan often discusses new investment in transit-oriented communities as a cause for rising home prices and displacement (pgs. 3, 55, 163). This language needs to be carefully worded to avoid inadvertently undermining transit-oriented investment (such as transit infrastructure and housing) that is complementary to the Plan’s objectives.</p>	<p>The definition of displacement in the glossary has been updated to include the specific problem of housing inaccessibility to gentrifying areas for lower income residents. SCAG acknowledges the challenge of balancing the transit-oriented investment with the risk of gentrification and displacement of disadvantaged communities. However, gentrification can still occur without the conclusive identification of its cause. The discussion on page 55 indicates that there is evidence that gentrification is occurring and indicates that low-income communities near transit infrastructure may face displacement in the overall context of affordability but does not discuss a primary cause. The discussion on page 163 indicates that growth patterns point to transit investment as a likely cause but as indicated in the Environmental Justice appendix, there is no statistical significance because current studies are inconclusive as to whether transit investment is definitively its cause. SCAG will be conducting future studies to monitor and study growth patterns in transit investment areas for further research on gentrification and displacement.</p>
16155.02.2	<p>• The Environmental Justice Appendix relies on a variety of indicators to evaluate various equity issues in relation to Plan objectives like growth in transit-oriented communities (jobs-housing balance, median income, median rents, Hispanic population, etc.) We’d suggest adding some additional factors that are worthy of analysis and monitoring. These include cost burdens for renters and owners, transportation costs, the price of single-family homes versus condos and including Black and Asian households (in addition to Hispanic) in this metric.</p>	<p>SCAG has added additional information on the cost burden for renters and owners, along with impacts for African American and Asian households to enhance the gentrification/displacement analysis. Other suggested variables will be taken into account for future analysis.</p>

ID	Comment	Response
<i>Submitted by</i> City of Los Angeles - Department of City Planning		Submittal 16155 Related Documents Link
16155.03	<p>3. Provide greater clarity on how local jurisdictions are to determine SCS Consistency of a given project. Increasingly, important areas of State land use and environmental policy are requiring a determination of “SCS consistency.” Examples include the recent CEQA streamlining efforts mentioned in the Plan but also Cap and Trade mitigation funding, Enhanced Infrastructure Finance Districts and, analyzing greenhouse gases for CEQA purposes. The ability for a local jurisdiction to be able to accurately and efficiently establish whether a project, plan or program is consistent with the SCS has therefore gained prominence. The current RTP/SCS is a high-level planning document that sets out transportation policies for the region, but does not provide specific policies for local agencies to use in advancing land use strategies. To the limited extent SCS consistency is discussed in the Plan, is the statement that “lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the 2016 RTP/SCS” (for example, pg. 65 and throughout the SCS Background Documentation Appendix). This statement, unfortunately, does not provide much direction or clarity as to how local jurisdictions, or anyone else, should evaluate consistency with the SCS. SCS consistency is an emerging area of state law without many precedents or interpretations. Other MPOs have provided guidance in their Plans, as well as separate consistency checklists, for their local jurisdictions. The current draft 2016 RTP/SCS offers insufficient information on which to base sound decisions. An unintended result is that projects, plans and programs in the SCAG region could be at a disadvantage with other regions. As an example, SB 375 references project consistency (for Transit Priority Projects using CEQA streamlining) as whether or not the project matches the “general use designation, density, building intensity, and applicable policies specified for the project area in the SCS.” We believe there are several issues associated with the Plan that make this task very difficult for local jurisdictions. (see next comment)</p>	<p>Comment noted. SCAG acknowledges that SCS consistency is becoming a more frequent criteria in state law and state programs. SCAG maintains that local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS. That said, SCAG serves as resource to local jurisdictions to assist them in making their consistency determinations.</p>

ID	Comment	Response
<i>Submitted by</i> City of Los Angeles - Department of City Planning		Submittal 16155 Related Documents Link
16155.04	<p>1) In order for a local jurisdiction to claim SCS consistency, it should be shown that a project or plan is in line with the “applicable policies” mentioned in the Plan. While six Land Use Strategies are presented in Chapter 5, the Plan does not clearly identify local policies that could advance its Policy Goals. Policies can be inferred from the Plan’s text, but nowhere are they specifically identified or described. Although SB 375 does not empower SCAG to impose its land use strategies or policies on its member local jurisdictions, SCAG can suggest or recommend the sorts of local policies that would advance the six Land Use Strategies at the local level. This would be useful to the city in its effort to promote the RTP/SCS’s vision and benefit from the opportunities established under state law. As such, the utility of the 2016 RTP/SCS Land Use Strategies would be substantially improved by adding a discussion of “Supportive Local Policies” to the discussion of each in Ch. 5. 2) Within the 2016 RTP/SCS, two new concepts are introduced around the idea of creating “complete communities.” They are “Livable Corridors,” and “Neighborhood Mobility Areas.” The discussion of Livable Corridors beginning on page 74 (Chapter 5) is an example of insufficient policy guidance. It states that “The Livable Corridor Strategy specifically advises local jurisdictions to plan and zone for increased density at key nodes along the corridor and replacement of single-story under-performing strip retail with well-designed higher density housing and employment centers.” (emphasis added) Similarly, the discussion of Neighborhood Mobility Areas that follows states that: “The Neighborhood Mobility Areas strategy represents a set of state and local policies to encourage the use of active and other non-automotive modes of transportation, particularly for shorts trips in many suburban areas...” (emphasis added). Unfortunately, the Department does not see that any such advice is actually provided, nor are any state and local policies identified in the RTP/SCS. Further, there are no maps nor figures in the RTP/SCS that identify Livable Corridors or Neighborhood Mobility Areas. Without maps, the city cannot readily determine where Livable Corridors or Neighborhood Mobility Areas are located (or should be located) within its jurisdiction, limiting its ability to apply these strategies. Exhibits to illustrate the locations of Livable Corridors and Neighborhood Mobility Areas would be helpful.</p>	<p>Comment noted. Response to 1) Land use in the RTP/SCS is based on the five (5) guiding principles approved by the Regional Council on November 5, 2015. These guiding principles were utilized for the Policy Growth Forecast (PGF). The PGF envisions future regional growth that is coordinated with the transportation system improvements of the approved in the previous 2012 RTP/SCS, as well as anticipated new transportation projects planned by the region’s CTCs and transit providers. It also incorporates best practices for increasing transportation choices, reducing our dependence on personal automobiles, allowing future growth in walkable, mixed-use communities and in HQTAs, and further improving air quality. The guiding principles below served as the basis for developing the PGF: • Principle #1: The Draft PGF for the 2016 RTP/SCS shall be adopted by the Regional Council at the jurisdictional level, thus directly reflecting the population, household and employment growth projections derived from the local input and previously reviewed and approved by SCAG’s local jurisdictions. The PGF maintains these projected jurisdictional growth totals, meaning future growth is not reallocated from one local jurisdiction to another. • Principle #2: The Draft PGF at the Transportation Analysis Zone (TAZ) level is controlled to be within the density ranges of local general plans or input received from local jurisdictions in this most recent round of review. • Principle #3: For the purpose of determining consistency for CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the 2016 RTP/SCS. • Principle #4: TAZ level data or any data at a geography smaller than the jurisdictional level is included in the Draft PGF only to conduct the required modeling analysis and is therefore, only advisory and non-binding because SCAG’s sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. After SCAG’s adoption of the PGF at the jurisdictional level, the TAZ level data may be used by jurisdictions in local planning as it deems appropriate and there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with the RTP/SCS. SCAG staff plans to monitor the use of this data after the adoption of the RTP/SCS to encourage appropriate use. • Principle #5: SCAG staff continues to communicate with other agencies who use SCAG sub-jurisdictional level data to ensure that the “advisory & non-binding” nature of the dataset is appropriately maintained. SCAG established the PGF based on the guiding principles in order to provide maximum flexibility for the local jurisdictions. It is the direction of the Regional Council to maintain local land use authority. The six Land Use Strategies relate directly to the PGF principles and are meant to provide a foundation for local jurisdictions to implement the vision of the RTP/SCS. Response to 2) SCAG has revised the text of “Livable Corridors” and “Neighborhood Mobility Areas” to reflect utilization as “strategies”, not policies. With SB 375, SCAG is tasked with integrating land use and transportation. The land use policies listed in Chapter 5, under the “Our Strategies for Transportation and Land Use” section, are the foundational policies that guided the development of the RTP/SCS land use strategies. In order to encourage “complete communities” that integrate land use and transportation, SCAG introduced two new concepts called “Livable Corridors” and “Neighborhood Mobility Areas.” These concepts are introduced to give local jurisdictions ideas for developing sustainably in other contexts besides dense urban High Quality Transit Areas (HQTAs). The Livable Corridors concept features land use strategies that are appropriate for lower density growth areas that are served by HQTA bus corridors. The Neighborhood Mobility Areas concept features low impact land use strategies and low-cost transportation solutions to replace vehicle miles</p>

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		with low GHG travel modes. SCAG’s intention is to assist local jurisdictions by providing a framework and allowing maximum flexibility in creating “complete communities”. SCAG will continue to work with the local jurisdictions that show interest in implementing the RTP/SCS land use policies by providing information and resources to support local planning activities, such as the Sustainability Planning Grant Program and the Active Transportation Program. Programs and policies at both the state and local level are in place that will assist local jurisdictions in creating “complete communities”, such as the Active Transportation Program at the state level, and, for example, the First-Last Mile Strategic Plan from Los Angeles County Metropolitan Authority (Metro).
16155.05	<p>3) Although not explicit in the RTP/SCS, the City of Los Angeles understands the 2040 “Forecasted Regional Development Types” maps” found in the Background Documentation Appendix (Exhibits 1-33) are to be used in determining whether a project is consistent with the SCS. There are 2012 (baseline) and 2040 (proposed plan) maps for each geographic subregion. A SCS consistency argument for a project should show that a project or plan is aligned with the general use category and density and intensity shown on the 2040 maps. Unfortunately, the Development Type maps for the City of Los Angeles (Exhibit 13 and 14) are presented at such a scale to make them largely illegible from a user’s perspective. It simply is not possible to make an accurate determination in what color (i.e. Development Type designation) a given site in the City is located within. As such, the City respectfully requests the following: a. The Development Type maps shown for the City of Los Angeles (and perhaps any other geography of a similar large scale) should be broken up into zoomed-in sub-regional quadrants, or at least be made available to local jurisdictions that request them. b. Development Type maps should contain additional information such as major streets and transit lines to help orient users. c. Even when the correct Development Type can be understood for a given parcel, it is unclear how exactly to interpret such information as to general use, density and intensity. There does not appear to be a guide that translates the three Development Types (Urban, Compact, Standard) into use categories or density and intensity ranges. As far as we can tell, there is only a paragraph description of each of these critical SCS designations (pg. 20 of the Plan). Through use of the Scenario Planning Model, Place Types are the foundation of the forecasted Development Types maps. Place Types do have uses, densities and intensities expressed in a usable manner in the Plan, however local jurisdictions don’t have ready access to the information. Therefore, background data on Development Type, including the underlying Place Type should be provided to local jurisdictions that request it. The information would remain advisory in nature, but could be helpful in supporting a SCS consistency analysis in many instances. In addition, more information to translate the three Development Type categories into use categories or density and intensity ranges should be included in the Plan. (cont.)</p>	<p>Comment noted. Response to 3)a. Comment noted. The Forecasted Development Types maps will be made available to local jurisdictions as requested. Response to 3)b. Comment noted. The SCAG region covers about 38,600 square miles, and including additional information on the maps will create maps unsuitable for viewing. Response to 3)c. Comment noted. A table has been provided that places Scenario Planning Model Place Types into Land Development Categories.</p>

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<i>Submitted by</i> City of Los Angeles - Department of City Planning		Submittal 16155 Related Documents Link
16155.06	<p>(cont. from previous) d. It is unclear how gradations between each Development Type category should be treated (e.g. the orange color between Urban red and Compact yellow). The gradations effectively create five Development Type categories, two of which are completely undefined. 4) The footnote at the bottom of each Development Type map in the SCS Background Documentation Appendix (Exhibits 1-3) raises several questions and concerns. a. One sentence in the footnote says "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." While the Department understands the meaning, this sentence could be read as meaning that the Development Type maps, which are based on the TAZ level data, should not be used as part of establishing SCS consistency. When combined with a lack of other direction in the Plan, the phrase may raise unnecessary confusion. b. Another sentence in the footnote says "For the purpose of determining consistency for California Environmental Quality Act (CEQA) streamlining, lead agencies have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS." This sentence should be broadened to include the increasingly diverse areas of state policy that references SCS consistency. 5) The 2016 RTP/SCS Plan appears to use three different terms to refer to the same thing. The Plan uses the term "Development Category", to refer to the Urban, Compact and Standard designations, while the SCS Background Documentation Appendix uses the terms "Development Type" on the maps and "Land Development Category." This should be reconciled to avoid confusion. 6) To address many of these concerns, SCAG could create a "SCS Consistency" section of the plan. Key factors should include means to interpret consistency with Development Type maps, a list of key GHG-related policies, a list of relevant SCS EIR GHG mitigation measures, and quantitative analysis that a project does not conflict with the GHG reduction target with the county or region where relevant. Other metropolitan planning organizations have created "SCS Consistency Checklists" and other more helpful information to guide decision-makers.</p>	<p>Response to 3)d. Comment noted. The gradation between the colors of each Land Development Category (LDC) shown on the maps is meant to represent a range amongst the Place Types that fall within one use of the LDC. For example, the "Town", "Village" and "Neighborhood" Place Types fall within the "Compact" LDC. Response to 4)a. and b. Comment noted. The 2016 RTP/SCS is the product of a bottom-up, iterative local input process. SCAG has actively sought consensus from our subregional partners on local SCS consistency determination for future funding and other opportunities consistent with the core principles specified in Chapter 4. It has been re-emphasized that the preferred scenario and corresponding forecast of population, household, and employment growth is adopted at the jurisdictional level as part of the 2016 RTP/SCS, and any corresponding sub-jurisdictional level data and/or maps is advisory only. There are certain State programs such as the Affordable Housing Sustainable Communities (AHSC) program administered by the Strategic Growth Council asks applicants to demonstrate how a specific project "supports implementation of an applicable SCS," and does not utilize the term "consistency." Response to 5) Comment noted. Documentation has been revised to avoid confusion. Response to 6) Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> City of Los Angeles - Department of Transportation		Submittal 16178 Related Documents Link
16178.01	<p>Regarding the Strategic Plan list, since the approval of the 2012 RTP, the City of Los Angeles has adopted significant mobility-related policy directives aimed at creating a safer and more sustainable City with convenient mobility choices for all users of the transportation system. Namely, Mobility Plan 2035, the Great Streets Initiative, Great Streets for Los Angeles - LADOT Strategic Plan, and the Vision Zero Initiative have been released or adopted since the last RTP cycle. Also, in April 2015, Mayor Eric Garcetti released the City's first ever sustainability plan - the Sustainable City pLAn. The Plan includes mobility and environmental targets including GHG reduction goals (60% reduction by 2035), VMT-per-capita reduction goals (10% reduction by 2035) and mode share targets (50% of all trips by walk, bike or transit by 2035). Together with SCAG's continued leadership at the regional level, these local plans and initiatives will help achieve the goal of a truly sustainable transportation future. Working with Metro on the update of the Long Range Transportation Plan (last adopted in 2009), the City of Los Angeles has developed a comprehensive list of projects that include rail, transit, shared-use mobility, active transportation, first/last mile solutions, goods movement, and highway and freeway improvements. Collectively, these projects are expected to enhance safety, mobility and accessibility for all transportation users, while helping to achieve the goals of the Sustainable City pLAn. These projects should be included in the RTP Strategic Plan, pending further refinement and funding availability. Inclusion in the Strategic Plan does not obligate the City to implement the projects, but facilitates further consideration of the projects. The project descriptions will be provided to SCAG under separate cover for inclusion in the Strategic Plan.</p>	<p>Comment noted. SCAG has reviewed and incorporated the projects as part of the strategic portion of the Project List.</p>
16178.02	<p>Consistency with the SCS has recently been a key requirement, and will likely become more so, for proposed affordable housing and other projects to receive State funding. For example, the recent Affordable Housing & Sustainable Communities (AHSC) grants required consistency with the SCS. It is likely that in the future consistency with the SCS for funding opportunities will also apply to certain types of proposed transportation projects. Accordingly, the City requests that the RTP/SCS include language that states that SCS "consistency" for funding and other incentives will be determined using data approved by the local jurisdictions for such purposes. The objective of this comment is that only SCS data that the City has reviewed and approved shall be utilized. Inserting such language into the SCS is particularly important given the magnitude of funding likely to be available that is linked to consistency with the SCS. It is anticipated that billions of dollars in Cap and Trade funding will be available statewide over the next several years for programs and projects that are consistent with the SCS, pursuant to the goals of AB 32 and SB 375. In addition, other recent laws, including SB 628 pertaining to Enhanced Infrastructure Financing Districts (EIFDs), are also linked to implementation of the SCS. The City wishes to meet the threshold requirements and effectively compete for these types of funding programs and qualify for these incentives.</p>	<p>Comment noted. The 2016 RTP/SCS is the product of a bottom-up, iterative local input process. SCAG has actively sought consensus from our subregional partners on local SCS consistency determination for future funding and other opportunities consistent with the core principles specified in Chapter 4. It has been re-emphasized that the preferred scenario and corresponding forecast of population, household, and employment growth is adopted at the jurisdictional level as part of the 2016 RTP/SCS, and any corresponding sub-jurisdictional level data and/or maps is advisory only.</p>

ID	Comment	Response
<p><i>Submitted by</i> City of Los Angeles - Department of Transportation Submittal 16178 Related Documents Link</p>		
16178.03	<p>The Scenario Planning Model of the SCS is based on modeling several datasets, including Tier Two Traffic Analysis Zone (TAZ) demographic data, and Tier Three Scenario Planning Zone (SPZ) land use place types. For the City, there are approximately 2,000 TAZs and 25,000 SPZ place types (about a 1:12 ratio). Each of the 25,000 SPZs is assigned one of 35 possible place types for modeling purposes. The City Planning staff has reviewed the 2,000 TAZ dataset for the City's projected population, housing and employment through 2040, but has not reviewed or approved either the SPZ methodology or actual place type maps for the City. It should also be noted that the Tier 3 SPZ data and place type maps have not been reviewed by staff of SCAG's fifteen subregions. Therefore, the City requests that language substantially similar to the following be inserted into both the appropriate maps and text of the Background Documentation appendix of the SCS: "For purposes of qualifying for future funding opportunities and/or other incentive programs, advisory sub-jurisdictional data used to determine consistency with the Sustainable Communities Strategy should only be used at the discretion and with the approval of the local jurisdiction. Sub- jurisdictional data includes, but is not limited to, the Tier 2 Traffic Analysis Zone (TAZ) dataset and the Tier 3 Scenario Planning Zone (SPZ) data and maps."</p>	<p>Comment noted. The 2016 RTP/SCS is the product of a bottom-up, iterative local input process. SCAG has actively sought consensus from our subregional partners on local SCS consistency determination for future funding and other opportunities consistent with the core principles specified in Chapter 4. It has been re-emphasized that the preferred scenario and corresponding forecast of population, household, and employment growth is adopted at the jurisdictional level as part of the 2016 RTP/SCS, and any corresponding sub-jurisdictional level data and/or maps is advisory only.</p>
16178.04	<p>DIRECT the Department of Transportation to request that SCAG include the updated project cost estimate of \$250 million for the Downtown LA Streetcar project (FTIP ID #LAOG901).</p>	<p>Comment noted. The FTIP projects included within the RTP/SCS Project List incorporates the adopted 2015 FTIP and Amendments 1 – 7, and 12. Regarding FTIP ID #LAOG901, as it currently stands the amount of \$125,000,000 has been carried over to the 2017 FTIP. Please consult with Metro FTIP staff to make the necessary changes including project cost for inclusion as part of the 2017 FTIP.</p>
<p><i>Submitted by</i> City of Los Angeles - Department of Transportation Submittal 16192 Related Documents Link</p>		
16192.01	<p>Greetings, On behalf of the City of Los Angeles, I am submitting five project lists to be added to the Strategic Plan of the Project List Appendix of the 2016 RTP/SCS. The project lists, representing five Metro "subregions", are as follows: Arroyo Verdugo COG, Central Subregion, San Fernando Valley COG, South Bay Cities COG, and Westside Cities COG. It should be noted that, except for Central Subregion, the above referenced lists contain projects from multiple cities, including Los Angeles. If you have any questions or need additional information, please contact me. Thank you, Miles Mitchell</p>	<p>Comment noted. Edits have been made to incorporate this comment.</p>
<p><i>Submitted by</i> City of Los Angeles - Department of Transportation Submittal 16215 Related Documents Link</p>		
16215.01	<p>The first project (top row) on the attached Financially Constrained Project list, for the City of Los Angeles, should have an RTP ID # of LAF5317. This project is also on the FTIP list with an FTIP ID # of LAF5317. Thank you very much.</p>	<p>Comment noted. Changes have been made in the Plan.</p>

ID	Comment	Response
<i>Submitted by</i> City of Mission Viejo		Submittal 16275 Related Documents Link
16275.01	<p>The 2016 RTP/SCS incorporates a growth forecast for the City of Mission Viejo that the City of Mission Viejo has reviewed, corrected, and fully supports. Our review concludes that the 2016-2040 RTP/SCS growth forecast accurately reflects the amount and distribution of population, households and employment at the citywide and traffic analysis zone levels for the City of Mission Viejo, from Year 2012 (Existing) through Year 2040. Further, the 2016-2040 RTP/SCS growth forecast accurately reflects the amount and location of all residential and non-residential entitlements, development agreements, and projects recently completed and constructed within the City of Mission Viejo during the plan timeframe. The City of Mission Viejo thus fully supports the 2016-2040 RTP/SCS growth forecast, and fully supports the adoption of this growth forecast at a geographic level no lower than the jurisdictional level.</p>	Comment noted.
16275.02	<p>The City of Mission Viejo supports the comments on the draft 2016 RTP/SCS and draft Program EIR, as outlined in the Orange County Transportation Authority's (OCTA) January 11, 2016 comment letter and the Orange County Council of Government's (OCCOG) January 28, 2016 comment letter. These comments identify policy and technical issues that are of concern to Orange County, and the City of Mission Viejo respectfully requests that SCAG respond to the comments detailed in said referenced transmittals.</p>	Comment noted.
<i>Submitted by</i> City of Montclair		Submittal 16332 Related Documents Link
16332.01	<p>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, Nox, PM10, and PM2.5 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 million project sooner as they are doing with other unfunded rail projects.</p>	<p>The funding identified in the Draft 2016 RTP/SCS for the Foothill Gold Line Extension Phase 2B is based upon innovative strategies that are not expected to be available in the near term. The earliest completion date for this project would be 2035 and the RTP/SCS has been adjusted accordingly. Should this project be advanced by Metro as it updates its Long Range Transportation Plan, the completion date can be adjusted through a future 2016 RTP/SCS amendment at the request of Metro.</p>

ID	Comment	Response
<i>Submitted by</i> City of Monterey Park		Submittal 16136 Related Documents Link
16136.01	<p>I am writing on behalf of the City of Monterey Park 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 reduction of time on the road, enhancement of economic opportunities and air quality improvements. 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, also was 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 is critical that SCAG maintain support for the tunnel and sustain inclusion of the project in the 2016-2040 RTP/SCS. Completion of the freeway is vital to the health and safety of thousands of Los Angeles area residents. We are confident that SCAG, along with the City of Monterey Park, will remain steadfast in support for the tunnel as the best alternative for completion of the 710 freeway.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
<i>Submitted by</i> City of Moreno Valley		Submittal 16060 Related Documents
16060.01	<p>How much oversight does SCAG maintain on the identified Regional Trail network? The specific example would be the Santa Ana River Trail (SART). Certain agencies may not implement the minimum design that is envisioned in the Regional context (diverting the trail to the arterial street network, providing minimal width / no amenities, and not preserving right of way for the complete network). There needs to be unity on how the final facility will operate. Additionally, there needs to be consistent maintenance throughout the trail network to maintain safety and proper operation of the regional trail. There should be an underlying guiding document that would address these issues.</p>	<p>Comment noted. Regional trails, such as the 115 mile Santa Ana River Trail would be implemented by local agencies where the trail is within their jurisdiction. Minimum standards/requirements and signage are established by the California Highway Design Manual (Chapter 1000) and California Manual for Uniform Traffic Control Devices (Chapter 9) respectively. Maintenance jurisdiction would also be the local jurisdiction's responsibility. An underlying guiding document may be considered as implementation plans are developed.</p>

ID	Comment	Response
<i>Submitted by</i> City of Moreno Valley		Submittal 16061 Related Documents
16061.01	<p>My concern is regarding safety on the I 60 corridor between the city of Moreno Valley and the city of Beaumont, commonly referred to as the badlands. The drive into the badlands even though it is getting a truck climbing lane is still remain dangerous and congested. When is this gap expected to be improved to it's ultimate condition?</p>	<p>Comment noted. Safety of traveling public on our highway system is of utmost importance and accordingly the 2016 RTP/SCS identifies this issue, in general, as a high priority for the region. We do not disagree with your observation that certain segments of I-60 may be considered dangerous and congested by the public and more needs to be done. Caltrans District 8, the agency overseeing the state highway system within the counties of Riverside and San Bernardino has prepared a transportation concept report (TCR) for SR-60 forecasting conceptual improvements for future needs along the corridor. This may address some of your concerns. But, it takes some lead time between conceptualizing a solution to a problem to finding the funds needed to implement the solution and actual implementation. SCAG will work with District 8 to look at this issue in our future planning efforts.</p>
<i>Submitted by</i> City of Rancho Mirage		Submittal 16174 Related Documents Link
16174.01	<p>January 21, 2016 Via Email Draft 2016 RTP/SCS Comments Attn: Courtney Aguirre Southern California Association of Governments 818 W. 7th Street, 12th Floor Los Angeles, CA 90017 Re: Draft 2016 RTP/SCS Comments Dear Ms. Aguirre: Thank you for providing us with the opportunity to review and comment on the Draft 2016 RTP-SCS. It is quite clear that much time, effort and thought went into the development of said document, and we recognize the challenges that you face in trying to address current and future transportation needs within such a vast and diverse region. The purpose of this letter is to reinforce some of the ideologies which are presented in the Plan (Draft 2016 RTP-SCS), and to promote a more targeted approach to transportation planning in the Coachella Valley. It is stated multiple times that this Plan seeks to “place a priority on investing in the transportation system that we already have,” and “that deferring maintenance of infrastructure leads to costlier repairs in the future.” We here at the City of Rancho Mirage also embrace this philosophy. There are many miles of dilapidated streets and sidewalks throughout the Coachella Valley that are in desperate need of repair. A targeted local approach to transportation investment would be much more beneficial to the Coachella Valley than a new large scale regional project (CV-Link), which would only add to the collection of infrastructure that requires ongoing maintenance. Furthermore, by dedicating such large investments to the CV-Link project, in lieu of addressing current deficiencies, existing disparities throughout our region will be intensified, leading to continued deterioration of the system and costlier future repairs. An incremental approach to the repair and maintenance of the current transportation network will do more to strengthen our region than would a large scale project which will be used primarily for recreational purposes. Thank you again for the opportunity to comment on the Draft 2016 RTP-SCS; we appreciate the chance to be included in the region’s visioning and to share our concerns. Sincerely, Jeremy Gleim Planner City of Rancho Mirage CC: Randal K. Bynder, City Manager Isaiah Hagerman, Director of Administrative Services</p>	<p>Comment noted. Though the 2016 RTP/SCS is grounded in a system management approach, which prioritizes protecting our previous investments and getting the most out of every component of our system, the Plan is also grounded in a multimodal approach towards addressing congestion. This multimodal approach prioritizes providing people with more options for getting around the region, including transit, bicycling, and walking. Essentially, the Plan aims to reduce single occupancy vehicle (SOV) demand on our highways and local arterials so that the region can experience reduced congestion and other negative impacts (e.g., poor air quality). The specific project referenced, the CV-Link project, was prioritized at the county-level and will provide people with alternatives to driving.</p>

ID	Comment	Response
<i>Submitted by</i> City of Riverside		Submittal 16069 Related Documents
16069.01	corridor from 15 freeway to 241 freeway is needed to serve region.	Comment noted. The project listed as RTP ID# S3160001 in the Strategic Plan portion of the Project List is intended to serve this purpose. SCAG will consider including this project in the constrained plan in the future upon identification of needed funding and concurrence of implementing agencies.
<i>Submitted by</i> City of Riverside		Submittal 16246 Related Documents
16246.01	The 2016 Draft Plan recognizes the changing region and places emphasis that SCAG encompasses one of the biggest and most influential metropolitan regions in the world. Consequently it is imperative that the regional transportation system drafted in the plan promotes an equitable plan for economic growth and sustainability. As one of the six counties in SCAG's region, Riverside and San Bernardino have not seen as much support or funds compared to Orange and Los Angeles County. The metropolitan statistical area population of the Inland Empire is over 4.2 million people and is the 13th largest metropolitan area in the United States. It is necessary for SCAG to focus on the needs of the Inland Empire rather than continuously promote the needs of Los Angeles County. In recent years there have been informal discussions and the idea of formalizing an Association to represent the needs of the communities in the IE. It is essential to recognize the Inland Empire as we work towards preserving and expanding a sustainable regional transportation system.	Comment noted.
<i>Submitted by</i> City of San Clemente		Submittal 16311 Related Documents Link
16311.01	The City of San Clemente concurs with the comments SCAG will receive from the Orange County Council of Governments (OCCOG) and the Orange County Transportation Authority (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.	Comment noted.
16311.02	Overall, the City of San Clemente 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 City of San Clemente supports The Plan since the growth forecast accurately reflects Orange County's Projections dataset. The Plan growth forecast reflects entitlements, development agreements, and projects recently completed or under construction in Orange County. The City of San Clemente appreciates the ongoing coordination between SCAG and the Center for Demographic Research (CDR) at California State University Fullerton on behalf of all Orange County jurisdictions. The Orange County Projections have been used by the Orange County Transportation Authority (OCTA) in the development of its Orange County Long-Range Transportation Plan demonstrating that Orange County has integrated transportation and land use planning for decades.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> City of San Clemente		Submittal 16311 Related Documents Link
16311.03	Language throughout the draft 2016 RTP/SCS and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues such as active transportation and public health. While these issues are important, it is recommended that the document utilize a more unbiased, objective tone. For example, the City of San Clemente recommends the removal of "Our Vision" and "Our Overarching Strategy" from the Executive Summary of the document. These two sections are highly speculative and are not necessary to the document. "Our Vision" and "Our Overarching Strategy" go above and beyond the requirements of the RTP. Additional examples of overly emphatic language are outlined in Attachment 1.	Comment noted. We believe this section is important in providing the necessary background and context for the development of the rest of the Plan.
16311.04	The Draft RTP assumes that almost no new growth will occur within 500 feet of a freeway or busy transportation corridor. The Draft RTP states that a "buffer" is consistent with the California Air Resources Board's 2005 advisory guidance that housing be discouraged within 500 feet of high volume roadways such as freeways. It is important to note that CARB's guidance is not a prohibition of development near high-volume roadways; nevertheless, SCAG's "buffer" strategy eradicates growth in these areas that are otherwise rich in connections to jobs, retail and housing accessible by many transportation modes. Furthermore, the proposed "buffer" does not reflect the availability of mitigation measures to address near-roadway emissions that remain despite a dramatic reduction of diesel emissions in the last decade. At best, this strategy is a short-term response and problematic because it prevents the kind of density and proximity between land uses that actually reduce trips and associated VMT. As vehicle engines and fuels become cleaner, the "buffer" strategy will become obsolete yet will leave behind a legacy of inefficient land use patterns. Moreover, throughout the SCAG Region, the prevailing existing land use patterns include residential and sensitive receptor uses within 500 feet of a major transportation corridor. In many cases, these areas demonstrate compact development form and serve as affordable housing. Removing this massive portion of land from availability for use is premature and counter to the overarching principles of SB375 to locate housing near job centers and previously urbanized areas.	Comment noted. The Draft RTP/SCS does not assume new growth will be prohibited within 500 feet of a freeway or busy roadway. Region-wide, projected growth within 500 feet of a freeway or busy roadway reflects local input data. The Draft RTP/SCS encourages local jurisdictions to establish their own policies to direct growth outside these areas based on factors covered in the Appendix: Environmental Justice. The use of the word "buffer" has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB's 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day.
16311.05	There needs to be consistency throughout all the documents regarding the 500 foot "buffer": • The word "buffer" should not be used. • Clarify the amount of distance (the documents have various ranges from 500 feet to 1,000 feet) • Clarification on where distance is measured from (e.g. centerline, edge of roadway, edge of right of way) • Types of transportation corridors being identified (e.g. freeways, high quality transit corridors, high volume corridors, rail etc.) • Clarify that the emphasis should be on mitigation, not on discouraging development. o Resolve the conflict with discouraging development within 500 feet of transportation corridors and regional goals for emission reductions. With reductions in emissions and fleet changes over time, it will be unnecessary and counterproductive to use this mitigation approach.	<ul style="list-style-type: none"> • Comment noted. The use of the word "buffer" has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB's 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day. • Comment noted. Changes have been made where appropriate. • Comment noted. The distance measured is edge of roadway. • Comment noted. The transportation corridor being identified is a freeway. • Comment noted. The RTP/SCS does not contain a policy that prohibits development within these areas. It encourages local jurisdictions to establish their own policies to limit growth in these areas based on factors covered in the Appendix: Environmental Justice – the emphasis is on mitigation.
16311.06	Throughout the documents, specific examples of technology are identified. It should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more flexible.	Comment noted. SCAG's policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition. In addition, SCAG communicates with Hydrogen Fuel Cell industry partners to exchange information and knowledge.

ID	Comment	Response
Submitted by City of San Clemente		Submittal 16311 Related Documents Link
16311.07	a. Under plan sections of LIVABLE CORRIDORS, NEIGHBORHOOD MOBILITY AREAS, LOOKING AHEAD, and “Encouraging Active Transportation for Short Trips”, include roundabouts and Intersection Control Evaluations similar to Caltrans Directive 13-02. Under Livable Corridors and neighborhood mobility areas- Change graphics to replace traffic signal with a modern day roundabout. Refer to the following resources: • Alternative Intersections/Interchanges: Informational Report (AIIR) http://www.fhwa.dot.gov/publications/research/safety/09060/ • FHWA Roundabout Website (http://safety.fhwa.dot.gov/intersection/roundabouts/) • Roundabouts: An Informational Guide, Second Edition (NCHRP Report 672) (.pdf file) http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_672.pdf	Comment noted. Roundabouts as treatments are increasing in use along low speed streets throughout California, such as in Long Beach, La Jolla and Pasadena (which also includes stop signs). Roundabouts have been added to the list of complete streets treatments for Neighborhood Mobility Areas.
16311.08	b. To address all the goals mentioned in the plan, the plan should include a strategy to replace traffic signals with modern day roundabouts where feasible. This one action would do more to further the principal goals mentioned in this Plan more than any other strategy mentioned.	Comment Noted. SCAG supports the use of roundabouts in Southern California where applicable and appropriate. SCAG has actually hosted a Roundabouts session as part of the Toolbox Tuesdays series. Documentation can be found at http://sustain.scag.ca.gov/Pages/Online-Training-Materials.aspx
16311.09	c. Under MOBILITY INNOVATIONS - include in the white paper the analysis and benefits of replacing traffic signals and all way stops with roundabouts.	Comment Noted. SCAG has supported the use of roundabouts in Southern California by hosting a Roundabouts session as part of the Toolbox Tuesdays series. Documentation can be found at http://sustain.scag.ca.gov/Pages/Online-Training-Materials.aspx
16311.10	d. Include Roundabout Intersection Evaluation projects in the project list throughout SCAGs communities.	Comment Noted. Most of the projects featured in the Plan's Project List Appendix were provided by the six County Transportation Commissions (CTCs), in which decisions to modify and/or add projects must come through the CTCs. However, SCAG does support the use of roundabouts in Southern California where applicable and appropriate. SCAG has actually hosted a Roundabouts session as part of the Toolbox Tuesdays series. Documentation can be found at http://sustain.scag.ca.gov/Pages/Online-Training-Materials.aspx
Submitted by City of San Gabriel		Submittal 16342 Related Documents Link
16342.01	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. On behalf of the City of San Gabriel, I am confident that SCAG will remain steadfast in support for the tunnel as the best alternative for completion of the 710 freeway.	Comment noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.
Submitted by City of Santa Clarita		Submittal 16334 Related Documents Link
16334.01	High Quality Transit Areas Exhibit 5.1 in the draft RTP/SCS document identifies High Quality Transit Areas (HQTAs) within the SCAG region. In the 2012 RTP/SCS, three HQTAs were identified in Santa Clarita. These areas corresponded to the three Metrolink stations located within the City. Exhibit 5.1 in the draft RTP/SCS document appears to have downgraded the three HQTAs in the City to “Rail Stations.” It is unclear if these rail stations are considered HQTAs by SCAG. If they are not, the City recommends attaching the HQTA designation to each of the three Metrolink stations located within the City of Santa Clarita.	Rail stations are considered major transit stops and are included in the definition of HQTAs (see RTP/SCS Glossary definition of HQTA). Exhibit 5.1 has been clarified.

ID	Comment	Response
<i>Submitted by</i> City of Santa Clarita		Submittal 16334 Related Documents Link
16334.02	<p>As one of the communities directly impacted by the California High-Speed Rail Authority's (CHSRA) proposed project, the City of Santa Clarita will continue to closely monitor the progress of the overall project and will actively participate in the environmental review process for the Palmdale to Burbank section. We recognize that SCAG is supportive of Phase I of the proposed High-Speed Rail project, primarily predicated on the Memorandum of Understanding (MOU) in which a \$1 billion investment is committed to local rail improvements within Southern California. Inasmuch as there is a lack of agreement among SCAG's membership regarding the proposed High-Speed Rail project, the City of Santa Clarita strongly recommends the inclusion of clarifying language within the 2016 RTP/SCS. In recognition of concerns by some communities in the SCAG Region, Transportation Committee Chairman Alan Wapner clarified the basis upon which SCAG is supporting the CHSRA project during remarks he made at the December 3, 2015, Regional Council meeting. In essence, Mr. Wapner reiterated that SCAG's support for the project is based upon the commitment contained within the MOU for the expenditure of \$1 billion on local rail improvements. We believe that incorporating a statement reflecting Chairman Wapner's clarifying comments would be appropriate. Mr. Wapner stated to the Regional Council, "So once again, I want to remind you that what we are voting on is the inclusion of the portion that falls within the SCAG region in return for the CHSRA's commitment to the expenditure of \$1 billion on local rail improvements, which is extremely important to us here in Southern California. And the draft plan includes only support for Phase 1 of the high-speed rail project."</p>	<p>Comment noted. The commitment to the \$1 billion in regional investments as identified in the Southern California High-Speed Rail MOU is discussed in detail in the Passenger Rail section of Chapter 5 of the 2016 RTP/SCS. SCAG and the other Southern California agencies who are signatories to the MOU are working to advance the MOU projects and obtain funding from the California High-Speed Rail Authority to deliver these "bookend" projects.</p>
16334.03	<p>The City of Santa Clarita deeply appreciates SCAG staff working with City staff to accurately refine the population numbers contained within the Draft RTP/SCS. The City of Santa Clarita completed significant annexations in 2012 that substantially increased the City's population by well over 10 percent. We are pleased to see that the population numbers contained within the Draft RTP/SCS are consistent with the completed annexations and future City growth forecasts. * Please refer to table in letter for specific population estimates* The City of Santa Clarita anticipates the occurrence of annexations between the current date and 2040. Because the nature and extent of these annexations is unknown at this time, it is not possible to estimate how these future annexations will impact the City's population. The City will continue to coordinate with SCAG regarding changes to population data as future RTP/SCS cycles occur.</p>	<p>Comments noted. SCAG will continue to work with the City of Santa Clarita to update its local growth forecast in future RTP/SCSs.</p>
16334.04	<p>Exhibit 5.4 of the draft RTP/SCS document identifies High Occupancy Vehicle (HOV) Lane projects throughout the SCAG region. One of the HOV Lane projects is identified within the Santa Clarita Valley. If the HOV Lane project within the Santa Clarita Valley is considered for change to a High Occupancy Toll (HOT) Lane project, the City strongly recommends that extensive additional public outreach and inter-agency coordination be conducted by SCAG and/or any responsible agency to ensure that the appropriate type of project is ultimately identified. Currently, there is not local consensus on whether a HOT Lane project is appropriate or acceptable in our community.</p>	<p>Comment noted. The Plan includes the indicated segment of I-5 in the Santa Clarita Valley as HOV lanes in Exhibit 5.4. Please see Exhibit 8 in the Highways and Arterials Appendix for the regional express lane network included in the Plan, which does not include this section of I-5 within the Santa Clarita Valley.</p>

ID	Comment	Response
<i>Submitted by</i> City of Santa Paula		Submittal 16197 Related Documents
16197.01	Looking this over for the City of Santa Paula - just curious, on page 172, Table 9.1, under Ventura County, the "Santa Paula Branch Line" is referenced. I'm having trouble finding more information on what that project is, exactly. Is it part of the High Speed Rail project? Or XpressWest?	Comment noted. The Santa Paula Branch Line is a potential future passenger rail corridor in Ventura County connecting the East Ventura Metrolink station with Los Angeles County, roughly following SR 126 through Fillmore and Santa Paula. It is an unfunded strategic plan project (RTP ID S512002) submitted by the Ventura County Transportation Commission.
<i>Submitted by</i> City of South Pasadena		Submittal 16214 Related Documents Link
16214.01	The City of South Pasadena (City) appreciates the opportunity to review and comment on the Southern California Association of Governments (SCAG) Draft 2016 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS); and Draft Program Environmental Impact Report (SCH#2015031035, PEIR). As a member of the 5-Cities Alliance (Glendale, La Canada Flintridge, Pasadena, Sierra Madre, and South Pasadena), the City adopts the comments provided in the letter submitted by Shute, Mihaly, and Weinberger, LLP on behalf of the 5-Cities Alliance regarding the SC AG Draft 2016 RTP/SCS and PEIR. The City provides the following additional comments, and requests that SCAG make clear in its Final 2016 RTP/SCS and PEIR that the State Route 710 Tunnel Alternative (SR-710 Tunnel) has been excluded from the list of constrained projects. While the longstanding SR-710 debate spans decades, in the four years since SCAG last developed an RTP/SCS, actions by the Legislature and other agencies now hasten an end to the controversy and point SCAG and the corridor communities toward a series of constructive and non-harmful transportation improvements.	Comment noted. The 710 project is included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan, as well as in previous SCAG RTPs. SCAG understands that a project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis. Regarding financial constraint, SCAG's analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained." The proposed project cost of \$5.6 billion represents the worst case scenario for project cost as a place holder for the project. Actual cost associated with the LPA will be reflected in the future RTP/SCS once the LPA is identified.
16214.02	Below, the City reiterates the comments that it made during the 2008 and 2012 RTP/SCS comment periods regarding the lack of "committed, available, or reasonably available" funding for freeway projects; and the adverse air quality impacts associated with the inclusion of the SR- 710 freeway in the RTP/SCS, jeopardizing the Clean Air Act (CAA) localized conformity in the San Gabriel Valley. The City also summarizes developments in the intervening four years that reinforce the City's 2008 and 2012 comments, and remove any remaining doubt that the SR-710 Tunnel lacks funds and threatens localized CAA nonconformity. The City next challenges SCAG's assertion that the alignment is "to be determined," establishing from the draft RTP/SCS and PEIR that the true project proposed by SCAG remains the SR-710 Tunnel. The City then details its comments on SCAG's air quality analysis, and concludes with a solution that will work for SCAG and the corridor communities: developing a "Beyond the 710 series of corridor improvements.	Comment noted. SCAG's analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained." Under the U.S. Department of Transportation Metropolitan Planning regulations and the EPA's Transportation Conformity regulations, the 2016 RTP/SCS is required to pass the following four conformity tests in order to demonstrate transportation conformity: 1) Regional Emissions, 2) Timely Implementation of Transportation Control Measures (TCMs), 3) Financial Constraint, and 4) Interagency Consultation and Public Involvement. The Regional Council adopts the initial transportation conformity determination, while FHWA/Federal Transit Administration (FTA) approves the final transportation conformity determination for the 2016 RTP/SCS. As documented in the Transportation Conformity Appendix, the 2016 RTP/SCS meets all federal transportation conformity requirements and demonstrates transportation conformity. The findings associated with the conformity tests are described in detail in the Transportation Conformity Appendix.

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16214 Related Documents Link
16214.03	<p>The SR-710 Tunnel Should Be Removed from the Constrained List The following developments establish that it is unrealistic -- legally, economically, and environmentally -- to expect that an SR-710 Tunnel would ever be funded or constructed. For these reasons SCAG should remove the tunnel from its constrained list in the Final RTP/SCS and PEIR, and invest the region's limited financial resources in projects that have earned enthusiastic community support. Within the past four years the City's ability to veto any freeway construction within its jurisdiction has been restored through the Legislature's repeal of Streets and Highway Code section 100.4 and its restoration of rights under Streets and Highways Code section 100.2. In addition, enactment of Government Code section 54237.8 in 2013 eliminated any further consideration of a surface freeway within the SR-710 North Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). The State's commitment terminating the surface freeway has been confirmed in the May 13, 2015 judgment dismissing City of South Pasadena v. Slater, United States District Court (U.S.D.C.) no. CV-98-6996-DP.</p>	<p>Comment noted. Regarding financial constraint, SCAG's analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained."</p>
16214.04	<p>The formal opposition of the three principal cities (Los Angeles, Pasadena, and South Pasadena) through which the SR-710 Tunnel would course precludes its lawful construction. Indeed, Caltrans has acknowledged that the SR-710 tunnel cannot be constructed without "modifications to freeway agreements from Alhambra, Los Angeles, South Pasadena, and Pasadena." (Caltrans Draft EIR/EIS p. 2-113) Freeway agreements are required by Caltrans regulations whether or not city streets are closed. (Streets and Highways Code, §100.2; Caltrans Project Development Procedures Manual, p. 24-4; City of South Pasadena v. Department of Transportation (1994) 29 Cal. App. 4th 1280, 1284.) By formal actions the City Councils and Mayors of Los Angeles, Pasadena, and South Pasadena have explicitly opposed construction of the SR-710 North Tunnel Alternative. (Los Angeles Resolution 12-0002-S82 of August 28, 2012; Pasadena Motion of April 13, 2015; and South Pasadena Resolution 7420 of July 15, 2015.) Moreover, the SR-710 Tunnel cannot be advanced as "closing the 710 gap", as the Draft RTP/SCS signifies at page 37 of Appendix B; nor can the wishbone construction in Pasadena be described, as the Caltrans Draft EIR/EIS attempted at page 1-5, as "[e]xisting SR-710." By order of the United States District Court for the Central District of California, the wishbone construction was allowed in 1976 as an exception to the 1973 injunction as a component of the I-210 interchange, sponsored by the 1-210 contract. The U.S.D.C. opinion records that "only the southern portion of the Long Beach Freeway has been completed and now terminates at Valley Boulevard." (City of South Pasadena v. Volpe (C.D. Cal. 1976) 417 F. Supp. 854, 858.)</p>	<p>Comment noted. The project with RTP ID 1M0101 was submitted by Los Angeles County Metro with the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)." Requests to modify projects included within the RTP/SCS must come directly from the County Transportation Commissions, in this case, Metro. The Project List entry for the 710 North Project is the approved project description in the adopted Federal Transportation Improvement Program (FTIP).</p>

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16214 Related Documents Link
16214.05	<p>Only \$740 million of Los Angeles County Measure R funds remain for construction of a San Gabriel Valley transportation project. These Measure R funds are not specifically designated for the SR-710 Tunnel, as the Second District Court of Appeal found when it denied the claims of the Cities of South Pasadena and La Canada Flintridge that the Los Angeles County Metropolitan Transportation Authority (Metro) had pre-determined selection of the SR-710 Tunnel in violation of the California Environmental Quality Act (CEQA). In its trial and appellate briefs, Metro represented that "Measure R ... does not commit Metro to any projects," and that "if a 710 Tunnel is not pursued ... the funds 'earmarked' for a possible tunnel can be applied to other projects or programs." The appellate court ruled that, notwithstanding the inclusion of the SR-710 tunnel in the 2008 RTP and in Measure R, "[Metro] did not promise the public a 710 tunnel. Measure R literature includes the 1-710 North Gap Closure (Tunnel) in a list of 'Proposed Projects and Programs.' (Italics added.) Ordinance Section 11, paragraph (a) discloses that [Metro] 'may amend this Ordinance, including Attachment A [the expenditure plan] ... for any purpose.'" (City of South Pasadena, City of La Canada Flintridge v. Los Angeles County Metropolitan Transportation Authority; California Department of Transportation RPI) (2011) 2d Civil No. B221118, unpublished opinion.)¹ On August 20, 2015 San Gabriel Valley Council of Governments' (SGVCOG) Governing Board voted to omit the SR-710 Tunnel project from its Mobility Matrix Transportation Project Priority List. This momentous change reflects the SGVCOG's realization that the SR-710 Tunnel project poses a significant drain on future transportation funding in the region. Similarly, the Los Angeles County Metropolitan Transportation Authority (Metro) has omitted the SR-710 from the Subregional Stakeholder Draft Project Priorities list for the potential 2016 sales tax measure. As SCAG moves forward finalizing its Draft 2016 RTP/SCS, SCAG should replace the controversial SR-710 Tunnel with a more financially responsible and sustainable transportation solution.</p>	<p>Comment noted. RTP ID 1M0101 includes the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)" and includes the following footnote, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document."</p>
16214.06	<p>In sum, beyond the SR-710 Tunnel's legal infeasibility, the funds necessary to design and build the SR-710 Tunnel have not been identified, let alone committed. Continued inclusion of the SR-710 Tunnel fails to meet the federal requirement that any project listed as fiscally constrained must establish that funds for it are "committed, available, or reasonably available." (23 C.F.R. §450.104.) For these reasons the project cannot remain on the constrained list of RTP/SCS projects.</p>	<p>Comment noted. Regarding financial constraint, SCAG's analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained."</p>

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16214 Related Documents Link
16214.07.1	<p>Although the RTP/SCS Claims to be SR-710 Alternative Neutral, It and the PEIR Repeatedly Identify the Project as the SR-710 Tunnel Perhaps recognizing the legal and political vulnerability of expressly propounding the SR-710 Tunnel as part of the RTP/SCS, Appendix B page 149 describes the project as "SR-710 North Extension (Alignment TBD)." A footnote seeks to explain this agnosticism by claiming that project environmental review will select the project, which will be subsequently amended into the RTP/SCS. Notwithstanding the purported agnosticism regarding SR-710 alternatives, the body of the RTP/SCS and PEIR reveal that the Appendix B listing is at best inaccurate, and possibly deceptive and dishonest. As shown below, from "alternative neutral," the draft documents actually select the SR-710 Tunnel: The draft FTIP, Appendix B page 37, seeks funding "to close the 710 freeway gap." Listing the project as a "freeway gap closure" only maintains the fiction that the project itself is a freeway, the only version of which remains is the SR-710 Tunnel. The Appendix B "System" designation of the project as a "State Highway," like the "Route #" of SR-710 (appendix B, pp. 37, 149) further defines the actual project as the SR-710 Tunnel, which is the only state highway alternative identified in the Caltrans 710 North Study. The draft PEIR describes the SR-710 North Project as a toll lane. (See, e.g., Figure 2.4.2- 1: Major Highway Projects; Figure 2.4.2-5: Major Toll Projects.) The only Caltrans 710 North Project alternative that calls for a toll road is the Freeway Tunnel.</p>	<p>Comment noted. Page 37 and 149) The Project List entry for the SR-710 environmental studies within the RTP/SCS is the approved project description in the adopted Federal Transportation Improvement Program (FTIP) which is solely programmed for environmental studies. Regarding system classification and route #, the SR-710 North project has historically been classified as a state highway. As previously mentioned, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
16214.07.2	<p>The draft PEIR relies on tolls received from the SR-710 North Project to partially fund its "financially constrained Plan." (See Figure 2.4.2-5.) Specifically, the draft PEIR at page 2-26 identifies \$23.5 billion from highway tolls as part of its "innovative funding strategies." Again, only the SR-710 Tunnel is proposed to generate tolls, revealing that the tunnel forms the project included in the 2016 RTP/SCS. In addition to the above references the City submits the attached Supplemental Questions and Comments regarding the Draft RTP/SCS and PEIR as Attachment 1.</p>	<p>RTP ID 1M0101 includes the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)" and includes the following footnote, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document." As noted in the Plan and in the Transportation Finance Appendix, the highway toll revenue included under the New Revenue Sources/Innovative Financing is associated with the East-West Freight Corridor and regional express lane network.</p>
16214.08.1	<p>SCAG's modeling for the RTP/SCS is premised on an SR-710 project consisting of four toll lanes in each direction — the SR-710 Tunnel — and no other project alternative. (Email correspondence between C. Aguirre and M. Lin, included herein as Attachment 2.)</p>	<p>Comment noted. As part of the Regional Travel Demand Model, only one alternative can be modeled. The modeling assumptions provided to SCAG have not changed since the 2012 RTP/SCS. SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis once a locally preferred alternative (LPA) is identified.</p>
16214.08.2	<p>SCAG's RTP/SCS stated project cost of \$5.6 billion, at Appendix B page 149 also identifies the SR-710 Tunnel as the selected alternative, as that is the only alternative whose estimated cost matches that amount. The other alternatives are less than half that cost. See SR- 710 North Study, Executive Summary at pp. 5,8,10 and 14.</p>	<p>Comment noted. The project with RTP ID 1M0101 was submitted by Los Angeles County Metro with the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)." Requests to modify projects included within the RTP/SCS must come directly from the County Transportation Commissions, in this case Metro. SCAG included the following footnote to describe the current status of the project, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document."</p>

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16214 Related Documents Link
16214.09	<p>The SR-710 Tunnel Is Inconsistent with Most Goals Expressed in the Draft 2016 RTP/SCS SCAG’s Initiatives Inclusion of the Tunnel Alternative in the Final RTP/SCS and PEIR would go against many of the valid major initiatives established by the Draft 2016 RTP/SCS, including:</p> <ul style="list-style-type: none"> • Preserving the Transportation System We Already Have (Fixing it First) - continuing to allocate funding towards the study and construction of the Tunnel Alternative diverts scarce funding resources away from important system preservation projects and further expands the highway system beyond what may reasonably be maintained based on current funding projections • Expanding Our Regional Transit System to Give People More Alternatives to Driving Alone - the proposed Tunnel Alternative fails to expand the regional transit system • Expanding Passenger Rail - the proposed Tunnel Alternative fails to expand passenger rail and further propagates single-occupancy vehicle usage • Improving Highway and Arterial Capacity - the Tunnel Alternative does not focus on technology and system/demand management strategies that would effectively increase highway and arterial capacity, rather the expansion of the highway system would further induce demand along already congested highways and arterials causing significant strain on the operations and maintenance of the existing system • Managing Demand on the Transportation System - contrary to this initiative the Tunnel Alternative would induce demand, resulting in an increase in Vehicle Miles Traveled (VMT) • Optimizing the Performance of the Transportation System - the high cost of the proposed Tunnel Alternative would reduce available highway funding for Transportation System Management (TSM), Intelligent Transportation Systems (ITS) improvements, and other key transportation projects in the region • Promoting Walking, Biking and Other Forms of Active Transportation - the proposed Tunnel Alternative would not promote short trips or the use of active transportation in the region • Strengthening the Regional Transportation Network for Goods Movement - many proponents of the Tunnel Alternative have stated that they would not support the inclusion of truck traffic in the tunnel • Focusing New Growth Around Transit - development of a highway alternative reduces the amount of opportunities for growth around new transit in the San Gabriel Valley 	<p>Comment noted. The 2016 RTP/SCS is rooted upon a multi-modal approach towards addressing congestion and provides individuals with various options ranging from transit, bicycling, and walking as a means towards reducing single occupancy demand (SOV) demand on our highways and local arterials. As one of strategies for highways and arterials, the system management approach serves to address congestion by reducing demand and increasing efficiency without the need for expansion through the use of transportation system management (TSM) and transportation demand management (TDM) strategies. Examples of TSM/TDM include providing real time traffic information, advanced ramp metering, and incentivizing carpooling. However, in addition to those strategies, the system management approach also includes a strategy built upon the existing transportation network for all modes of travel including rail and roadways. SCAG recognizes that the SR-710 North project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16214 Related Documents Link
16214.10	<p>SR-710 Tunnel is Inconsistent with Recent Legislation Furthermore, inclusion of the SR-710 Tunnel conflicts with the principles and goals of recent legislation including Assembly Bill 32 (AB 32) and Senate Bill 375 (SB 375). The SR- 710 Tunnel would induce demand, increase vehicle miles traveled (VMT), and result in an increase in greenhouse gas (GHG) emissions. This inclusion is contrary to the requirements set forth by AB 32 to reduce GHG emissions. A SR-710 freeway is a mid-20th Century project that is not capable of achieving the state’s goals of improved air quality or the transportation demands of the region. Similarly, the California Supreme Court’s recent rejection of the EIR for the Newhall Ranch project (Center for Biological Diversity v. California Dept, of Fish and Wildlife (2015) 62 Cal.4th 204 indicates that impacts of induced demand and their relation to GHG emissions must be taken seriously. In addition to conflicting with recent legislation, inclusion of the SR-710 would directly contradict the Caltrans Strategic Management Plan and California Air Resources Board reduction goals to implement AB 32. As the Metropolitan Planning Organization for the region, SCAG should take the lead in developing policies that are able to efficiently and effectively improve air quality, by promoting and advocating transportation projects that would actually reduce VMT and GHG emissions. By including the SR-710 Tunnel in the Draft 2016 RTP/SCS simply because the project was included in the 2012 RTP/SCS or Metro’s 2009 Long Range Transportation Plan (LRTP), SCAG is defaulting into a passive role in the planning process.</p>	<p>Comment noted. The RTP/SCS must demonstrate compliance with SB 375 and the Federal Clean Air Act . However, compliance with these regulatory requirements is not predicated on a single project, such as the I-710 project. Demonstration of SB 375 GHG reduction target achievement and federal transportation conformity is analyzed at the regional level, looking at regional package of projects, programs and policies contained in the 2016 RTP/SCS.</p>
16214.11	<p>SR-710 Tunnel Project Cost Is Not Committed, Available or Reasonably Available Although RTP ID 1M0101 states “Alignment TBD,” as stated on page 4 above, the project cost of \$5.6 billion identifies the SR-710 Tunnel as the selected alternative. Furthermore, as set forth on pages 2-3 above, the \$5.6 billion is not “committed, available, or reasonably available.” Additional tunnel “commitments” are highly unlikely to be forthcoming from the anticipated sales tax measure (Measure R2) on the November 2016 ballot, since Metro has omitted the project from its Subregional Stakeholder Draft Project Priorities list for Measure R2. SCAG’S previous error of including the SR-710 in the 2012 Constrained Plan should be remedied in the Draft 2016 RTP/SCS by moving the project to the Strategic Plan. Even if theremaining \$740 million Measure R funds were truly “committed” to the SR-710 Tunnel (which they are not, as discussed earlier), they are woefully inadequate to meet the project cost of the single-bore tunnel, let alone the dual-bore tunnel variation. Thus, the California Transportation Commission (CTC) in its April 1, 2015 letter to former Assemblymember Anthony Portantino pointed to the ongoing lack of a defensible project cost determination, a deficiency that also ignores the Federal Highway Administration (FHWA) further requirement in the 710 corridor to cure “[c]ontinued uncertainty regarding the financing of [the SR-710 freeway] project and the failure to develop a comprehensive financial plan for its implementation.” (FHWA environmental re-evaluation withdrawing the 1998 federal approval, p. 7 (December 17, 2003).)</p>	<p>SCAG’s analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including “sufficient financial information for demonstrating that projects” in the plan “can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained.”</p>

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16214 Related Documents Link
16214.12	<p>The Highways and Arterials Appendix Consistently Identifies the SR-710 Tunnel as the Transportation Project in the 710 Corridor The Accuracy of the Transportation Model Results Is in Question The inappropriate inclusion of the SR-710 Tunnel in the Draft 2016 RTP/SCS further calls into question the accuracy of the SCAG Transportation Model. This error is especially relevant since the SR-710 North Draft EIR/EIS was released many months before the Draft RTP/SCS and PEIR were issued. Although SCAG does not specifically state that the SR-710 project has been identified as the SR-710 Tunnel as set forth at pages 3-4 above, the exhibits and project descriptions all and uniformly indicate that the project included in the Draft 2016 RTP/SCS is the SR-710 Tunnel. Nevertheless, the SR-710 North Draft EIREIS demonstrates that the SR-710 Tunnel would not improve traffic but would simply shift traffic congestion to other areas in the region. Indeed, certain streets in the cities of Alhambra, Rosemead, Pasadena, San Marino, and South Pasadena would become more congested as a result of cut-through traffic associated with the Tunnel Alternative. Failure to remove the SR-710 Tunnel from the 2016 RTP/SCS would raise questions regarding the validity of the Transportation Model since the SR-710 Tunnel would induce demand, increase VMT, and worsen air quality in the region. While SCAG staff has cited federal conformity requirements as the reasoning for including the SR-710 Tunnel in the Transportation Model and Draft 2016 RTP/SCS, no state or federal authority requires SCAG to include all of the projects listed in Metro’s 2009 LRTP. Finally, inclusion of the SR-710 Tunnel is not necessary to secure regional air quality conformity. Indeed, comments of the federal and regional air quality authorities, summarized on page 7 below, conclude that the SR-710 Tunnel would produce localized air quality nonconformity.</p>	<p>Comment noted. As part of the Regional Travel Demand Model, only one alternative can be modeled. The modeling assumptions provided to SCAG have not changed since the 2012 RTP/SCS. SCAG modeled the SR-710 North Project Study as four toll lanes in each direction since it is the most conservative scenario with respect to environmental impacts. This does not express SCAG’s preference for this alternative. SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis once a locally preferred alternative (LPA) is identified.</p>

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16214 Related Documents Link
16214.13	<p>SCAG Should Consider Inclusion of the Beyond the 710 Initiative As a member of the Connected Cities and Communities (C3) the City has participated in the development of the Beyond the 710: Moving Forward - New Initiative for Mobility and Community (Beyond the 710, included herein as Attachment 6). This initiative was developed in collaboration with nongovernmental advocates such as the National Trust for Historic Preservation, Natural Resources Defense Council, 5-Cities Alliance, and other public stakeholders. The Beyond the 710 initiative provides a valid starting point to engage local communities and explores potential solutions to enhance the quality of life for communities through innovative strategies similar to SCAG’s 2016 Draft RTP/SCS Land Use Strategies, including:</p> <ul style="list-style-type: none"> • Reflect the Changing Population and Demands - most of Los Angeles County is already developed and leaves little room for new forms of development, the Beyond the 710 Initiative provides the cities of Los Angeles and Pasadena with the opportunity to revitalize underutilized land with strategic infill and investment that may benefit the region • Focus New Growth Around Transit - the Beyond the 710 Initiative promotes the development of compatible land uses around new transit hubs, in areas that currently do not provide substantial public transit • Plan for Growth Around Livable Corridors - the Beyond the 710 aims to use innovative and sustainable transportation strategies such as “Complete Streets” or “Complete Corridors” to promote the use of active transportation and create more livable communities • Provide More Options for Short Trips - by replacing the focus on a car dependent mode, such as the SR-710 Tunnel, the Beyond the 710 aims to provide stakeholders with greater mobility options such as transit and active transportation by building up the transit and bicycle network in the area • Support Local Sustainability Planning- the C3 has worked with local stakeholder groups to develop an understanding of the type of development that is desired around the north and south stub • Protect Natural Land - the Beyond the 710 includes strategies to create new open space and restoration of the Arroyo Rosa de Castilla creek. 	<p>Comment noted. SCAG is not the project sponsor for the SR-710 North project. Please work with the Los Angeles County Metro regarding the integration of Beyond the 710 initiative as part of the Locally Preferred Alternative (ILPA) to be considered. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a LPA is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
16214.14	<p>SCAG could take a leadership role with the SR-710 by adopting the Beyond the 710 Initiative as a starting point to further develop an East Los Angeles/Pasadena or West San Gabriel Valley Mobility Plan similar to SCAG’s previous Corridor Planning studies. By evaluating the SR-710 corridor SCAG may clearly identify the mobility problems of the region and develop sustainable solutions that adhere to the goals and objectives outlined in the Draft 2016 RTP/SCS.</p>	<p>Comment noted. SCAG is not the project sponsor for the SR-710 North project. Please work with the Los Angeles County Metro regarding the Beyond the 710 initiative as a Locally Preferred Alternative (ILPA) to be considered. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a LPA is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
<i>Submitted by</i> City of South Pasadena		Submittal 16221 Related Documents Link
16221.01	<ul style="list-style-type: none"> • Page 6 - Major Initiatives: Improving Highway and Arterial Capacity; “The 2016 RTP/SCS calls for investing \$54.5 billion in capital improvements... This includes focusing on achieving maximum productivity by adding capacity primarily by closing gaps in the system...” <ul style="list-style-type: none"> o Does the \$54.5 billion estimate include the \$5.636 billion needed to complete the Tunnel Alternative? 	<p>The \$54.5 billion figure under the "Improving Highway and Arterial Capacity" section is the sum of capital improvements for the state highway system and regionally significant local streets and roads throughout the region. RTP ID 1M0101 is included in this figure. RTP ID 1M0101 includes the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)" and includes the following footnote, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document."</p>

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16221 Related Documents Link
16221.02	<ul style="list-style-type: none"> Page 38 - Our Progress Since 2012: Highways; “The expansion of highways has slowed considerably over the last decade because of land, financial, and environmental constraints. Still, several projects have been completed since 2012 to improve access and close critical gaps and congestion chokepoints in the regional network. These include the Interstate 5 South Corridor Project in Los Angeles County;... among others.” o Clarify; which other projects are considered “highway gaps”? Does SCAG consider the SR-710 North a “highway gap”? 	<p>Comment noted. Please refer to the Project List for a complete list of improvements including gap closure projects. As part of the Regional Travel Demand Model, only one alternative can be modeled. The modeling assumptions provided to SCAG have not changed since the 2012 RTP/SCS. SCAG modeled the SR-710 North Project Study as four toll lanes in each direction since it is the most conservative scenario with respect to environmental impacts. This does not express SCAG's preference for this alternative. SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis once a locally preferred alternative (LPA) is identified.</p>
16221.03	<ul style="list-style-type: none"> Exhibit 2.2: 2012 Base Year Transit Network; includes a “Rapid Bus and Bus Rapid Transit” for 2012 Base Year o Clarify; is this the BRT alternative from the SR-710 North Project EIR? 	<p>No, the SR-710 North Project EIR BRT alternative was not included in Exhibit 2.2. The base year transportation network includes only facilities and services that were in operation by the close of Fiscal Year 2011-12.</p>
16221.04	<ul style="list-style-type: none"> Exhibit 5.2: 2040 Transit Network Planned and Existing; includes a “Rapid Bus and Bus Rapid Transit” for 2012 Base Year o Clarify; is this the BRT alternative from the SR-710 North Project EIR? 	<p>No, the SR-710 North Project EIR BRT alternative was not included in Exhibit 5.2. The base year transportation network includes only facilities and services that were in operation by the close of Fiscal Year 2011-12. The 2012 base year projects identified here were those that meet the above definition.</p>
16221.05	<ul style="list-style-type: none"> Exhibit 5.4: Major highway Projects; includes an “Improvement TBD” o Should be removed since the alignment/mode has yet to be determined and may not necessarily be a highway project. 	<p>Comment noted. As part of the Regional Travel Demand Model, only one alternative can be modeled. The modeling assumptions provided to SCAG have not changed since the 2012 RTP/SCS. SCAG modeled the SR-710 North Project Study as four toll lanes in each direction since it is the most conservative scenario with respect to environmental impacts. This does not express SCAG's preference for this alternative. SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis once a locally preferred alternative (LPA) is identified.</p>
16221.06	<ul style="list-style-type: none"> Page 95 - Highways and Arterials “However, given that critical gaps and congestion chokepoints still existing with the network, improvements beyond TSM and TDM strategies need to be considered. Closing these gaps to complete the system will allow residents and visitors alike to enjoy improved access to opportunities such as jobs, education, recreation and healthcare.” o Does SCAG consider the SR-710 North a “highway gap”? If so, what is the reasoning it is considered a “gap”? What is the basis for determining if there is a “gap” in the system? 	<p>Comment noted. 2016 RTP/SCS does not necessarily identify the SR-710 North project as a gap project. However, inclusion of this project without commitment to a specific alternative in the 2016 RTP/SCS is an acknowledgement of transportation need in this corridor. The projects as provided by the CTC's include several gap closures which are typically deemed as improvements to close gaps within the existing network as a means to improve mobility. Please refer to the Project List for a complete listing of projects included in the RTP/SCS.</p>
16221.07	<ul style="list-style-type: none"> Page 95 - Highways and Arterials “Although we recognize that we can no longer rely on system expansion alone to address our mobility needs, critical gaps and congestion chokepoints in the network still hinder access to certain parts of the region. County transportation plans have identified projects to close the gaps, eliminate congestion chokepoints and complete the system. Such improvements are included in the 2016 RTP/SCS.” o Does this mean that ALL projects included in Metro’s Long Range Plan will be included in the 2016 RTP/SCS? 	<p>Comment noted. Yes, the RTP/SCS is consistent with Metro's 2009 Long Range Transportation Plan (LRTP). Once Metro updates the LRTP, SCAG will amend the RTP/SCS to maintain consistency if and as needed.</p>
16221.08	<ul style="list-style-type: none"> Table 5.5: Sample Major Highway Projects Committed by the Counties o Does not include the SR-710 North o Why does SCAG include the SR-710 in their Exhibit 5.4: Major Highway Projects if it is not included as a County committed project? o Are there additional projects that are currently not included in this list? 	<p>Comment noted. Table 5.5 only provides a sample of major highway projects and is intended for illustrative purposes only. Please refer to the Project List which includes a complete listing of projects included within the RTP/SCS.</p>

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16221 Related Documents Link
16221.09	<ul style="list-style-type: none"> Exhibit 3: Major Toll Projects by Counties; includes toll lanes (plan 2040) for the SR-710 North project o Should be removed since the alignment/mode has yet to be determined. 	Comment noted. SCAG will consider revising the map to indicate improvement has yet to be determined.
16221.10	<ul style="list-style-type: none"> Exhibit 5: Major Highway Projects; includes a “Improvement TBD” o Should be removed since the alignment/mode has yet to be determined and may not necessarily be a highway project. 	Comment noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description, associated modeling analysis, and exhibits.
16221.11	<ul style="list-style-type: none"> Exhibit 9: Baseline 2040 to Plan 2040 Freeway Speed Changes, PM Peak; includes a “5.0 or greater increase” in speed along the SR-710 North o Clarification regarding which alignment/mode should be provided. o Should be removed since the alignment/mode has yet to be determined. 	Comment noted. As part of the Regional Travel Demand Model, only one alternative can be modeled. The modeling assumptions provided to SCAG have not changed since the 2012 RTP/SCS. SCAG modeled the SR-710 North Project Study as four toll lanes in each direction since it is the most conservative scenario with respect to environmental impacts. This does not express SCAG’s preference for this alternative. SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis once a locally preferred alternative (LPA) is identified.
16221.12	<ul style="list-style-type: none"> Exhibit A2: Plan 2040 Number of Freeway Lanes (mixed-flow and toll); includes a 4-lane in each direction freeway along the SR-710 North o Should be removed since the alignment/mode has yet to be determined. 	Comment noted. As part of the Regional Travel Demand Model, only one alternative can be modeled. The modeling assumptions provided to SCAG have not changed since the 2012 RTP/SCS. SCAG modeled the SR-710 North Project Study as four toll lanes in each direction since it is the most conservative scenario with respect to environmental impacts. This does not express SCAG’s preference for this alternative. SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis once a locally preferred alternative (LPA) is identified.
16221.13	<ul style="list-style-type: none"> Exhibit A7: Baseline 2040 to Plan 2040 Freeway Speed Changes, AM Peak; includes a “5.0 or greater increase” in speed along the SR-710 North o Clarification regarding which alignment/mode should be provided. o Should be removed since the alignment/mode has yet to be determined. 	Comment noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description, associated modeling analysis, and exhibits.
16221.14	<ul style="list-style-type: none"> Exhibit A12: Baseline 2040 to Plan 2040 Freeway Speed Changes - PM peak; includes a “5.0 or greater increase” in speed along the SR-710 North o Clarification regarding which alignment/mode should be provided. o Should be removed since the alignment/mode has yet to be determined. 	Comment noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description, associated modeling analysis, and exhibits.
16221.15	<ul style="list-style-type: none"> Page 37 - FTIP Project ID: 18790 “to close the 710 freeway gap” o Remove “freeway gap” language o Change the project description to the SR-710 North Project 	Comment noted. The Project List entry for the 710 environmental studies is the project description in the adopted Federal Transportation Improvement Program (FTIP). FTIP description changes must be requested through the standard FTIP database update process.
16221.16	<ul style="list-style-type: none"> Page 148 - Financially-Constrained RTP Projects ID 18790 “Route 710: Study to perform alternative analysis, engineering and environmental studies to close 710 freeway gap”, completion year 2025, \$70,454 o Remove “freeway gap” language o Change the project description to the SR-710 North Project 	Comment noted. The Project List entry for the 710 environmental studies is the project description in the adopted Federal Transportation Improvement Program (FTIP). FTIP description changes must be requested through the standard FTIP database update process.

ID	Comment	Response
<i>Submitted by</i> City of South Pasadena		Submittal 16221 Related Documents Link
16221.17	<ul style="list-style-type: none"> Page 149-Financially-Constrained RTP Projects ID 1M0101 “SR-710North Project Study Alternatives (Alignment TBD)”, completion year 2025, \$5,636,000 o Change the System from “State Highway” to “Other” o Move the RTP Project ID 1M0101 to the Strategic Project list o Why is the Project Cost listed as \$5.636 billion? Does this indicate that the project is the Tunnel Alternative? 	<p>Comment noted. The 710 project is included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan and was submitted by Metro for inclusion as part of the financially constrained RTP Project List. Requests to modify projects included within the RTP/SCS must come directly from the County Transportation Commissions, in this case Metro. Project cost of \$5.636 billion represents the worst case alternative, which will be replaced with the revised cost through an amendment to the 2016 RTP/SCS once a locally preferred alternative is approved.</p>
16221.18	<ul style="list-style-type: none"> Page 340 - Strategic Projects RTP ID S1120082 “SR-710 Transportation Improvement Options” o Clarify which improvements? Is this related to the SR-710 North Project? 	<p>Strategic Plan component of the RTP/SCS are unfunded and would require future funding and commitments. This project is intended to capture all potential improvements along SR-710, including those identified through the CEQA review process for the SR-710 North that is still in progress, without committing to any specific alternative. If and when additional details and funding commitments are identified through future planning initiatives, some of the elements of improvement on this corridor could move forward as financially constrained project through future amendment or update to the RTP/SCS.</p>
16221.19	<ul style="list-style-type: none"> Page 345 - Strategic Projects RTP ID S1120031 “North-South Rail Corridor between Port Communities of Los Angeles/Long Beach and Arroyo Verdugo Subregion-SR-710 Transportation Improvement Options” o Clarify; is this the LRT alternative from the SR-710 North Project EIR? 	<p>The Strategic Plan component of the RTP/SCS is unfunded and would require future funding and commitments. In addition, more consensus would be needed and in some cases further studies would be warranted before specific projects could move forward. This project is intended to capture all potential improvements on the rail corridor between the ports of Los Angeles and Long Beach and Arroyo Verdugo Subregion, including those identified through the CEQA/NEPA review process for the SR-710 North that is still in progress, without committing to any specific alternative. If and when additional details and funding commitments are identified through future planning initiatives, some of the elements of improvement on this corridor could move forward as a financially constrained project through future amendment or update to the RTP/SCS.</p>
16221.20	<ul style="list-style-type: none"> Page 4: County RTP Projects; includes “SR-710 north project (improvements TBD) from Valley Blvd. to California Blvd./Pasadena Ave.”; and Cost “\$5.3 B”. o Remove “from Valley Blvd. to California Blvd./Pasadena Ave.” language o Why is the Project Cost listed as \$5.636 billion? Does this indicate that the project is the Tunnel Alternative? 	<p>Comment noted. The 710 project is included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan and was submitted by Metro for inclusion as part of the financially constrained RTP Project List. Requests to modify projects included within the RTP/SCS must come directly from the County Transportation Commissions, in this case Metro. The proposed project cost of \$5.6 billion represents the worst case scenario for project cost as a place holder for the project. Actual cost associated with the LPA will be reflected in the future RTP/SCS once the LPA is identified.</p>
<i>Submitted by</i> City of Tustin		Submittal 16310 Related Documents Link
16310.01	<ol style="list-style-type: none"> The City of Tustin supports the 2016-2040 RTP/SCS growth forecast for Orange County and the adoption of the growth forecast at a geographic level no lower than the jurisdictional level. This level of the growth forecast accurately reflects Orange County's Projections dataset. Because the Intensified Land Use Alternative (Alternative 3) in the DPEIR does not include the technically corrected growth forecast for Orange County, the City of Tustin would not support the consideration of Alternative 3 as the preferred alternative or for any other purpose. 	<p>Comment noted; this comment is to support Policy Growth Forecast.</p>

ID	Comment	Response
<i>Submitted by</i> City of Tustin		Submittal 16310 Related Documents Link
16310.02	<p>The Draft RTP/SCS incorrectly assumes that most new housing in the SCAG region will be constructed more than 500 feet from a freeway or other major transportation corridor. This assumption is based on the California Air Resources Board's (CARB) 2005 advisory guidance that new housing be discouraged within 500 feet of high volume roadways, including freeways, due to roadway emissions. This guidance from CARB does not prohibit housing development near major roadways. However, SCAG's "buffer" strategy assumes little growth in these areas, which are often highly accessible to employment, retail, and housing centers that are connected through various transportation modes. Further, the use of the "buffer" strategy does not take into account the many mitigation measures that are available to address roadway emissions, nor the significant reduction in diesel emissions over the last decade. The implementation of a "buffer" strategy will discourage proximity and accessibility between different land uses that often reduce vehicle trips and vehicle miles traveled. As technology advances and vehicle engines and fuels become less polluting, the "buffer" strategy will become more obsolete. The "buffer" strategy is also contrary to the overarching principles of SB 375 to locate housing near job centers, existing urban areas, and transportation opportunities. Therefore, the City of Tustin urges that the "buffer" strategy be removed from the Draft RTP/SCS and that the Draft RTP/SCS emphasize the use of mitigation for housing developments that may be exposed to higher levels of roadway emissions, rather than discourage such development.</p>	<p>Comment noted. The Draft RTP/SCS does not assume new growth will be prohibited within 500 feet of a freeway or busy roadway. Region-wide, projected growth within 500 feet of a freeway or busy roadway reflects local input data. The Draft RTP/SCS encourages local jurisdictions to establish their own policies to direct growth outside these areas based on factors covered in the Appendix: Environmental Justice. The use of the word "buffer" has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB's 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day.</p>
16310.03	<p>6. The City of Tustin participates on the Orange County Council of Governments (OCCOG) Board and OCCOG Technical Advisory Committee. Although the comments from the OCCOG Board on the Draft RTP/SCS and PEIR are not fully restated in this comment letter, the City of Tustin concurs with the comments identified by the OCCOG Board in its letter to SCAG, dated January 28, 2016. A copy of the OCCOG letter is attached for reference.</p>	<p>Comment noted.</p>
<i>Submitted by</i> Climate Plan		Submittal 16327 Related Documents Link
16327.01	<p>Measuring progress on the last plan We enclose the Executive Summary of our forthcoming report, "Toward a Sustainable Future: Is Southern California On Track? From Vision to Action: Measuring Progress on Southern California's Sustainable Community Strategy." Our report measures progress in the implementation of the 2012 RTP/SCS and presents lessons learned. We believe this will be useful and informative in finishing the 2016 plan to make sure that it is actually implemented—to live up to the plan's potential to meet required climate goals while creating a more healthy, prosperous, and sustainable region for all. We want to particularly thank SCAG's research staff for the assistance they provided and encourage support for their work to collect more and better data—which is much needed—on implementation. * Please review report attached to letter.</p>	<p>Thank you for your comments and for your enclosure. SCAG is aware of the report being prepared by ClimatePlan. We share your belief in the critical importance of monitoring progress toward achieving the regional sustainability objectives outlined in the 2016 RTP/SCS in a continuous, on-going manner. One of the new tools we will be introducing this year to assist in our on-going monitoring efforts is the web-based 'REVISION' tool which will be available for use by local and regional planners and decision-makers, as well as to members of the public. REVISION will allow users to analyze current conditions and emerging trends in land use, transportation, housing, socio-economics, and demographics at the local level. We sincerely applaud your endeavors in supporting implementation of the RTP/SCS and encourage your continued participation in our sustainability planning activities in support of the 2016 RTP/SCS.</p>
16327.02	<p>Revising the new plan Our partners have also submitted additional comment letters, with more detailed input on the current draft plan but we wanted to submit this together, as we have put considerable work into it together, to inform the new plan. We are hoping for a transparent, inclusive fair process as comments are collected and incorporated to revise the draft plan.</p>	<p>Comment noted. All formal comments received have been responded to and will be presented to SCAG policymakers to be considered as part of the Final 2016 RTP/SCS.</p>

ID	Comment	Response
<i>Submitted by</i> Cyrus Planning		Submittal 16208 Related Documents
16208.01.1	<p>I admire that SCAG is recognizing many of the problems that exist today. However their solutions to do not effectively target the problems and bring superb alternatives. I am in favor of providing all ranges of transportation from transit to free flowing car travel and also in favor of all housing types to be easily implemented from high-density mixed-use development to large lot single family homes. The transit options ranging from bus, light rail, Metro, Metrolink, and the High Speed Rail although have benefits, do not fully provide a real effective alternative for transportation. Other more cost effective, greater speed technologies that are more up-to-date ranging from SkyTran (personal rapid transit) and the Hyperloop (High-speed travel far faster and actually being planned and tested in California) are hardly even presented in the regional plan. SCAG will need to make some updates. Besides, it necessary to know why SCAG is rarely focusing on these methods for transportation which as a matter of fact will decrease our dependency for fossil fuels, reduce energy use per-person, decrease emissions, substantially reduce traffic for vehicle and airline travel, and reduce private and public sector costs.</p>	<p>Comment Noted. The RTP/SCS focuses on transit systems that are being pursued by our partner County Transportation Commissions (CTCs). Personal Rapid Transit (PRT) has only been deployed in a few limited cases around the world. Though automated connected vehicle technology may rekindle interest in PRT, most automakers and technology companies are developing vehicles to operate legally on existing roadways. The hyperloop and other untested advanced technologies are being pursued by private sector interests and may warrant further consideration after further development.</p>
16208.01.2	<p>Also many of the infill projects (Although this is a concern that is addressed by developers and cities) are not as effective as making trips shorter and attracting pedestrians effectively. The layouts, design, and features are not as attractive as the mixed-use projects in the early 20th century. We must learn to absorb some of those features.</p>	<p>Comment noted. With SB 375, SCAG is tasked with integrating land use and transportation. One of the 2016 RTP/SCS land use strategies is to focus new growth around transit. Land use policy in the vicinity of transit stations and amenities fall under the authority of the local governing jurisdiction. The SCS and SB 375 does not require a jurisdiction's land use policies and regulations be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority. A 2016 RTP/SCS foundational land use policy that seeks to create opportunities for shorter trips and attract pedestrian activity is developing "complete communities." In order to encourage "complete communities" that integrate land use and transportation, SCAG introduced two new concepts called "Livable Corridors" and "Neighborhood Mobility Areas." These concepts are introduced to give local jurisdictions ideas for developing sustainably in other contexts besides dense urban High Quality Transit Areas (HQTAs). The Livable Corridors concept features land use strategies that are appropriate for lower density growth areas that are served by HQTA bus corridors. The Neighborhood Mobility Areas concept features low impact land use strategies and low-cost transportation solutions to replace vehicle miles with low GHG travel modes. SCAG's intention is to assist local jurisdictions by providing a framework and allowing maximum flexibility in creating "complete communities". SCAG will continue to work with the local jurisdictions that show interest in implementing the RTP/SCS land use policies by providing information and resources to support local planning activities, such as the Sustainability Planning Grant Program and the Active Transportation Program.</p>

ID	Comment	Response
<i>Submitted by</i> Eastern Coachella Valley Coalition		Submittal 16325 Related Documents Link
16325.01	<p>SCAG’s “Framework for Sustainable Growth” Does Not Include Models for Rural Regions Hundreds of communities distributed throughout the SCAG region are simply not dense enough, nor will they qualify, for the models that SCAG lays out for sustainable development: Livable Corridors, High Quality Transit Areas (HQTAs) and Neighborhood Mobility Areas (NMAs), as they are currently defined. While the concept of NMAs expands the model of sustainable growth and development beyond the confines of an HQTA, it is not suitable for many small urban and rural communities given anticipated population densities, intersection densities and level of retail connections. We recommend SCAG undertake a comprehensive analysis of best practices and models for sustainable growth in more rural sub-regions and create appropriately scaled models for development and investment. SCAG should use this analysis to plan for and develop proper scale of retail and density, access to appropriate transit options, access to active travel, and best practices for rural infill development.</p>	<p>With SB 375, SCAG is tasked with integrating land use and transportation. The land use policies listed in Chapter 5, under the “Our Strategies for Transportation and Land Use” section, are the foundational policies that guided the development of the RTP/SCS land use strategies. In order to encourage “complete communities” that integrate land use and transportation, SCAG introduced two new concepts called “Livable Corridors” and “Neighborhood Mobility Areas.” These concepts are introduced to give local jurisdictions ideas for developing sustainably in other contexts besides dense urban High Quality Transit Areas (HQTAs). The Livable Corridors concept features land use strategies that are appropriate for lower density growth areas that are served by HQTA bus corridors. The Neighborhood Mobility Areas concept features low impact land use strategies and low-cost transportation solutions to replace vehicle miles with low GHG travel modes. SCAG’s intention is to assist local jurisdictions by providing a framework and allowing maximum flexibility in creating “complete communities”. SCAG will continue to work with the local jurisdictions that show interest in implementing the RTP/SCS land use policies by providing information and resources to support local planning activities, such as the Sustainability Planning Grant Program and the Active Transportation Program.</p>
16325.02	<p>The SCS’s Guiding Principle of Prioritizing Investment to Existing Multi-Modal Transportation Systems Will Perpetuate Underinvestment in Communities with Inadequate Transit and Infrastructure SCAG’s Guiding Policy 2 (pg. 61) is as follows: "Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal transportation system should be the highest RTP/ SCS priorities for any incremental funding in the region” (emphasis added). This policy perpetuates historic patterns of underinvestment in communities with severely inadequate transportation infrastructure or void of multi-modal transportation. Many of the region's rural unincorporated DACs are marked by dirt roads, inexistent bicycle and pedestrian facilities and deficient transit services. Severe poverty matched with chronic underinvestment has left many DACs, particularly rural DACs, without the basic features of healthy and sustainable communities. SCAG must prioritize improving and transit service and addressing lack of pedestrian and bike facilities in existing communities. We recommend SCAG rewrite this guiding policy to prioritize investment in existing, or be inclusive of communities that lack infrastructure and multi-modal transportation. Funds should serve existing communities, especially the most disadvantaged, even when infrastructure does not currently exist in those places. In subsequent sections of this letter we identify programs and policies that will secure investments in communities most in need of transit and infrastructure investment and upgrades.</p>	<p>Comment noted. As you may be aware, our transportation system has become increasingly compromised by decades of underinvestment. The quality of many of our roads, highways, bridges, transit, and pedestrian and bicycle facilities is deteriorating, and the longer they deteriorate, the more expensive they will be to fix in the future. The 2016 RTP/SCS prioritizes system preservation so that we can maintain the system we already have and aim to use what we have better. The Plan includes strategies for expanding our passenger rail and transit networks, as well as our regional bikeway and pedestrian facilities so that people have more alternatives to driving alone. The Plan also includes strategies for closing critical gaps in our highways and arterials network. Please refer to the "Geographic Distribution of Transportation Investments" section in the Environmental Justice Appendix for a breakdown of these such improvements in rural and disadvantaged communities. As can be seen from this section, transportation investments by mileage in rural and disadvantaged communities are in proportion or larger than these area's share of the region's population.</p>

ID	Comment	Response
<i>Submitted by</i> Eastern Coachella Valley Coalition		Submittal 16325 Related Documents Link
16325.03	<p>The SCS reflects insufficient investment in transit for disadvantaged, rural communities. The SCS does not reflect improved transit options and increased access to opportunity through alternate modes of transportation for residents of the Eastern Coachella Valley. Many residents have no adequate transit and have no access to employment and educational options in the western half of the Coachella Valley as a result. As noted in the coalition letter, increases in transit investment throughout the SCAG region reflect increased investment primarily in Los Angeles County. The RTP does not reflect increased transit investments as a share of overall RTP transportation investments in the Inland Empire, thus reinforcing reliance on personal vehicles and impeding opportunity for those without access to cars. Our review of the project list for projects located in Eastern Riverside County reflects inadequate investments in communities most in need of improved transit and connectivity. Instead of robust investment in transit, the local transit agency seems to be investing more in the agency's own facility improvements than increased service. Furthermore, the project list illustrates greater investment and prioritization for transit projects linking West Coachella Valley residents with employment options in the western portion of Riverside County (Projects RIV30506 and RIV11407) as compared to transit projects linking East Coachella Valley residents with employment options in Palm Springs, Indian Wells and other cities in the western Coachella Valley (Project RIV130505). SCAG in its RTP should include a breakdown of investment by mode by region to better illustrate the extent to which different counties and sub-regions are prioritizing alternative transportation modes. Similarly, SCAG should assess the extent that investments reflect needs and impacts identified in the EJ element and through other needs assessments. SCAG should also ensure that transportation and transit agencies provide transparent and open processes to receive feedback on proposed transportation projects. Finally, through programs and policies, SCAG should incentivize increased investment for transit in communities and regions that do not adequately serve their residents.</p>	<p>Improvements in roadway, transit, and bicycle mileage are broken down by area of concern and compared to the region as a whole in the Geographic Distribution of Transportation Investments section of the Environmental Justice Appendix. As can be seen from Tables 30-32, investments are targeted in areas that have a high concentration of low income and minority population.</p>

ID	Comment	Response
<i>Submitted by</i> Eastern Coachella Valley Coalition		Submittal 16325 Related Documents Link
16325.04	<p>Efforts to Strengthen Regional Goods Movement Must Serve Local Communities as Well</p> <p>Goods movement is a driving force behind transportation planning and investments in the Inland Empire, as 40% of the nation’s goods travel through the Inland Empire. A myopic approach to prioritizing planning and investing in the movement of objects over people has put residents in the Inland Empire at a disadvantage, where goods can pass through the region, but those who live in the region have limited neighborhood level mobility and limited transportation options. Goods movement investments target high speed trade corridors, SCAG fails to identify ample opportunities to improve resident mobility through pedestrian and bicycle retrofits. Furthermore, goods movement does and will have negative environmental and health impacts on nearby communities unless there are protections in place from emissions and other traffic impacts. SCAG should highlight opportunities for improving pedestrian, bicycling and other forms of active travel as an integral component when fixing highways to transport goods while also looking at technologies and investments designed to eliminate negative local impacts of goods movement. We urge SCAG provide policy guidance and best practices that require repair, maintenance and rehabilitation projects to include meaningful Complete Streets project components. We recommend SCAG include guidance for public participation in all of its strategies, initiatives, themes and implementation of guiding policies. The region could seize the opportunity to receive meaningful input from residents and ensure that investments serve dual purposes, fix crumbling systems, and provide improved mobility for residents.</p>	<p>Comment noted. in the Active Transportation Appendix to the 2016 RTP/SCS, (beginning on Page 69), the Plan Implementation section details various strategies for implementing active transportation, including complete streets. 2016-2040 RTP/SCS Goods Movement Environmental Strategy emphasizes coordinated strategies that support state and regional initiatives to reduce harmful pollutants from goods movement activities. The Plan continues to focus on the long-term goal of a zero-emission goods movement system where technically feasible and economically viable, while also integrating near zero-emissions technologies that serve as bridging options to continue to reduce emissions. Broad deployment of zero-and near zero-emission transportation technologies in the 2023 to 2040 timeframe is a critical and significant undertaking with technological, cost and operational challenges. In recognizing this, the 2016 RTP/SCS outlines a roadmap for developing and deploying needed technologies, along with key action steps for public sector agencies to help move the region to that objective.</p>
16325.05	<p>Create Targeted Programs and Policies to Direct Funding for Planning and Investment in Disadvantaged and Rural Communities</p> <p>Many small urban and rural communities throughout SCAG lack comprehensive multi-modal transportation plans. Without plans in place, systematic improvements to active transportation infrastructure, improved first mile/last mile access and improved transit will be incomplete and ineffective. Furthermore, SCAG’s local sustainability strategy should include best practices as well as clear and explicit guidance on planning practices to ensure rural disadvantaged community residents participate in and benefit from SCAG’s climate resilience and sustainability strategies. As noted in the Coalition letter, we recommend SCAG target Sustainability Planning Grants to disadvantaged communities, and especially rural, disadvantaged communities that lack plans, models and programs designed to secure and promote sustainable development. For example, funds could support: feasibility studies; walk and bike counts for data poor communities; travel needs assessments; and community-driven multi-modal mobility plans. Also included in the Coalition letter, we recommend SCAG create a working group and dedicate full time staff to address equity issues throughout the region. Furthermore, we recommend SCAG create an equity or disadvantaged community advisory board with broad stakeholder representation.</p>	<p>Comment Noted. The past two calls for projects for the Sustainability Grant Program (2010 and 2013) have included "need for assistance" as one scoring criterion. Additionally, SCAG intentionally keeps the application process simple and streamlined to encourage jurisdictions with constrained capabilities to apply. Finally, the program is designed to provide direct and streamlined technical assistance. This allows the jurisdictions to focus attention on managing the work, and not administering the grant.</p>

ID	Comment	Response
<i>Submitted by</i> Eastern Coachella Valley Coalition		Submittal 16325 Related Documents Link
16325.06	<p>SCAG Must Improve Transparency and Adequacy of Information to Allow for Fair and Informed Decision-Making Processes Long term transportation and land use planning requires robust involvement from impacted communities. Such involvement can only happen with access to comprehensible data and information, and access to decision-making processes. Definition of Urban Not Contextually Appropriate SCAG’s definition of "rural" communities, is inaccurate and inconsistent throughout the plan. The EJ element defines rural as communities with 2,500 residents. This definition is overly restrictive and excludes communities - like Thermal, Mecca and North Shore - that are rural by most definitions of rural used by state and federal agencies. At the same time, other sections of the RTP uses data for "rural" communities with no definition as to what constitutes a rural community. We recommend SCAG refine the definition of rural to be more consistent with state and federal programs. For example, SCAG could use the definition established by the State’s Cap and Trade Affordable Housing and Sustainable Communities (AHSC) Program as an example to inform its definition. We recommend SCAG define rural through robust public participation processed to create a definition unique and appropriate for the region.</p>	<p>Thank you for your comment. The boundary for urban and rural areas in the Environmental Justice Appendix was established by the U.S. Census Bureau in the 2010 Decennial Census and was updated by Caltrans in consultation with FHWA in 2014. Although this represents a reliable geography, SCAG recognizes that the Affordable Housing and Sustainable Communities (AHSC) Program does not utilize this same boundary. Additional consultation with stakeholders will be considered to reconcile the differences between the AHSC guidelines and the U.S. Census Bureau/Caltrans/FHWA. To clarify, the boundary for rural areas utilized in SCAG’s Environmental Justice Appendix includes all areas with population under 2,500. As such, Thermal, Mecca, and North Shore qualify as rural areas. These areas also have some of the highest concentrations of minority and low income population in the region, and therefore are included in the "Communities of Concern" geography utilized in the Environmental Justice analysis of the Plan.</p>
16325.07	<p>Limited Analysis of Job Growth in the Region The analysis presented on projected job growth lacks a sub-regional analysis or a job-sector analysis. SCAG emphasizes the differences between commute times for high wage and low wage workers and the commute times for residents of the inland regions as compared to workers in the coastal region, indicating that SCAG’s job’s growth analysis should consider jobs housing fit which, in turn, would require an analysis of job growth by section and by sub-region. SCAG’s analysis of jobs growth fails to do so. We recommend that SCAG conduct an analysis that considers job type, distribution of jobs by sub-region, and job-readiness by sub-region. That analysis will, in turn, guide policies to promote jobs housing fit and economic development.</p>	<p>Comment noted. Given the nature of the REMI model used to conduct the Economic & Job Creation Analysis of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is built on county-level analysis, the economic impacts and job creation impacts for geographic areas smaller than counties would not be technically possible. The REMI model is the most technically advanced/sophisticated and geographically-detailed economic impact model currently available. Such an analysis would also be outside of the scope of the RTP/SCS. Outside of the RTP/SCS, SCAG has conducted or commissioned a variety of economic reports. These include the County Economic Reports that are prepared for the annual Southern California Economic Summit, as well as the program booklet from the most recent Southern California Economic Summit, which provided a brief description of RTP/SCS job creation by industry and occupational category at the SCAG regional level.</p>
16325.08	<p>Lack of Long Range Transportation Plans in the Region Currently only three of SCAG’s County Transportation Commissions have a Long Range Transportation Plan (LRTP): The Los Angeles County Metropolitan Transportation Authority (LACMTA), the Orange County Transportation Authority (OCTA), the San Bernardino Associated Governments (SANBAG). Because the CTCs without an LRTP do not actively seek public input or have a transparent process for such feedback, the only chance to review projects is through the RTP/SCS review, which provides limited ground level detail. The absence of uniform planning in the region makes it difficult to assess the regional cohesion of the data presented in the Plan. Comparing data from a county with an LRTP to one lacking an LRTP does not provide clear comparable data. We recommend SCAG prioritize incentivizing LRTPs for the entire region. Clarity of Information between FTIP Project List and Financially Constrained RTP List The Project List is does not present clear information, some projects have two project IDs, (i.e. page 249, projects: 30M0701-RIV071263 and 3RL04-RIV110408). The lack of clarity makes it difficult to understand how distinct agencies prioritize their investments and project programming, calling into question accuracy and integrity of the lists.</p>	<p>Comment noted. There is no statutory requirements for the CTCs to prepare long range transportation plans. Given the scale and diversity of our region, the flexibility for each of the CTCs to chose their own path to plan and implement transportation projects is a reasonable one. Regarding the Project List, more specifically Table 2 - Financially Constrained RTP Projects, the reason projects have two project IDs is to indicate that the project is also programmed in the FTIP (Table 1) in which second project ID provided is the associated FTIP ID.</p>

ID	Comment	Response
<p><i>Submitted by</i> Eastern Coachella Valley Coalition Submittal 16325 Related Documents Link</p>		
16325.09	<p>Critical information is not included in the Plan The Plan and the appendices do not adequately present transportation system expenditures per mode by county and sub-region. Information disaggregated per mode, county and sub-region facilitates improved understanding of expenditures per mode and how residents will have access to those modes. The primary function of the RTP/.SCS is to present comprehensive growth projections for the entire region. The maps throughout the Plan are inadequate at best, they are small and do not provide enough detailed information to properly asses where new growth and growth in existing communities is targeted. We recommend SCAG present transportation expenditures broken down per COG and transportation modes (Bus, Bus Rapid Transit (BRT), Light Rail Transit (LRT), Heavy Rail, Commuter Rail, High Speed Rail, Active Transportation-bicycling and pedestrian, Transportation Demand Management-carpools, Vanpools, ridesharing) and improved, detailed growth and employment maps.</p>	<p>Comment noted. In accordance with state and federal requirements, the 2016 RTP/SCS includes a financial plan that estimates how much funding will be needed to implement transportation investment needs, as well as operate and maintain the transportation system as a whole over the life of the Plan. The Plan must demonstrate that there is a balance between the estimated costs of the projects and programs described in the Plan and revenue sources reasonably expected to be available for transportation investments. Table 6.1 details the core revenue forecast by county. The Project List Appendix details projects included in the Plan for each county. Maps of investments included in the Plan are available throughout the main document and appendices.</p>
16325.10	<p>Finally, we recommend SCAG incorporate improved quantification methods to determine actual impacts and improvements of the RTP/SCS in environmental justice communities over the life of the Plan. Current tracking methods described in the EJ analysis are not sufficient nor do they provide meaningful information to determine actual impacts of the Plan.</p>	<p>Comment noted. SCAG will continue to enhance our environmental justice efforts in the region by evaluating methods for monitoring the impacts on minority and low income communities over the life of the RTP/SCS.</p>
<p><i>Submitted by</i> Encino Neighborhood Council Submittal 16052 Related Documents</p>		
16052.01	<p>LA996425 SEPULVEDA TUNNEL REVERSE LANE. Since the new I-405 Skirball S off-ramp being moved and a new Northbound lane added from the ramp to the Skirball Bridge on Sepulveda Blvd, the congestion is gone and the need for the reversible lane is gone. Do not waste money on this project. There is no support for this project.</p>	<p>Comment noted. Since the completion of the improvements on I-405, additional improvement needs in this corridor, including Sepulveda Boulevard, are being further examined. SCAG will work with Metro and Caltrans to reflect the ultimate improvement configuration in this corridor in the future RTP/SCS amendments or updates as appropriate.</p>
<p><i>Submitted by</i> Encino Neighborhood Council Submittal 16076 Related Documents</p>		
16076.01	<p>The Encino Neighborhood Council on 4/25/2012 voted against LA996425. The new SCAG 2016 still has the same item on the books. Yesterday at the Encino Neighborhood Council Traffic/Transportation meeting another motion passed regarding the same item. MOTION:The Encino Neighborhood Council Traffic/Transportation Committee does not support LA996425, a reverse lane in the Sepulveda Blvd Tunnel under Mulholland Dr. The new Northbound lane on Sepulveda Blvd from the S 405 Skirball off-ramp to the Skirball Bridge has reduced PM congestion. Vote: 5/0/0 The new lane adds 33% more capacity on Sepulveda Blvd Northbound.</p>	<p>Comment noted. Since the completion of the improvements on I-405, additional improvement needs in this corridor, including Sepulveda Boulevard, are being further examined. SCAG will work with Metro and Caltrans to reflect the ultimate improvement configuration in this corridor in the future RTP/SCS amendments or updates as appropriate.</p>
<p><i>Submitted by</i> Encino Neighborhood Council Submittal 16176 Related Documents</p>		
16176.01	<p>LA 996425 Sepulveda Blvd. Tunnel The Encino Neighborhood Council does not support a reverse lane in the Sepulveda Blvd tunnel under Mulholland Dr. The new Northbound lane on Sepulveda Blvd from the S I-405 Skirball exit to the Skirball Bridge has reduced PM congestion significantly. This motion was passed at the January 27, 2016 meeting of the Encino Neighborhood Council with a vote of 13- yes, 1-no.</p>	<p>Comment noted. Since the completion of the improvements on I-405, additional improvement needs in this corridor, including Sepulveda Boulevard, are being further examined. SCAG will work with Metro and Caltrans to reflect the ultimate improvement configuration in this corridor in the future RTP/SCS amendments or updates as appropriate.</p>

ID	Comment	Response
<i>Submitted by</i> Endangered Habitats League		Submittal 16250 Related Documents Link
16250.01	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16250.02	<p>Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it helps pressure from the fringe but is not sufficient. Just because the pressure is relieved doesn’t mean the land then automatically becomes protected. The Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16250.03	<p>The current federal transportation bill, FAST Act, supports understanding transportation impacts on natural resources. The previous bill, MAP-21, supported restoring and maintaining environmental functions (i.e., wildlife corridors) affected by the infrastructure projects in the RTP. SCAG has even supported efforts in Los Angeles County to create a wildlife corridor over the 101 Freeway. Many efforts are underway across the region to connect landscapes to one another. This is very important to the region and its biodiversity. Wildlife corridors allow species to migrate and forage and expand genetic diversity. These corridors also allow ecosystems to maintain ecological functions, act as sources for repopulation after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan should support the enhancement of and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by infrastructure projects.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”</p>

ID	Comment	Response
<i>Submitted by</i> Environmental Coalition Support for Natural and Farmland Policies		Submittal 16255 Related Documents Link
16255.01	<p>SCAG has a tremendous opportunity with the 2016 Plan. Much of the last four years has been spent researching, gathering and vetting the data, surveying local jurisdictions, completing an assessment, and planning a comprehensive six-county wide Conservation Program. The Coalition believes SCAG has the leadership in place, the homework done, the support by the conservation community, and the interest and attention of the resource agencies to now transition to actually implementing the Conservation Program.</p>	<p>Comment noted.</p>
16255.02	<p>In 2013, funded through federal dollars made available to MTC and additional funds from the State Coastal Conservancy), 23 PCA projects were funded totaling nearly \$12 million. For use in 2018, MTC has already authorized \$16.4 million for PCA funding with an anticipated call for projects in early 2017. The PCAs are also eligible for other sources of local, regional, state, and federal funding to leverage the MTC One Bay Area Grant program dollars. SCAG with its natural lands and infill focus is uniquely situated to replicate this type of program for the Southern California region. If you do this, you will be the second region in the nation that we know of that has such a program in place. Much of the baseline work of understanding where the high value habitat areas are located has already been completed since the last RTP/SCS. While there continue to be other filters that can inform decisions, SCAG has a nearly complete Regional Conservation Plan that could be used to launch a similar program here. Additionally, the majority of development sites targeted for the anticipated population growth here are less than a mile from transit. This piece is also already in place. The 2016 Southern California Conservation Coalition wholly supports this type of unique program and funding mechanism to achieve both compact infill developments where transit and employment centers already exist, while simultaneously funding conservation work to protect greenfield sites at the fringe (where less dense, more auto-dependent and fire-prone development pressures exist).</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16255.03	<p>Existing text: "Policy #1 - Expanding on the Natural Resource Inventory Database and Conservation Framework & Assessment by incorporating strategic mapping layers to build the database and further refine the priority conservation areas. Specifically: • Further investing in mapping and habitat and farmland data tracking. • Working with County Transportation Commissions to support their county-level efforts at database building." Modify to read: "Policy #1 - Expanding on the Natural Resource Inventory Database and Conservation Framework & Assessment by incorporating strategic mapping layers to build the database and further refine the priority conservation areas. Specifically: • Further investing in mapping of habitat and farmland including data tracking and gathering. • Working with County Transportation Commissions to support their county-level efforts at database building. • Coordinate data sharing with partners and stakeholders to assist with regional conservation planning efforts. • Use the Combined Habitat Assessment Protocol data as an overlay to integrate regional land use planning and ensure that future growth avoids greenfield sites, especially those identified as high value habitat lands."</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i>	Environmental Coalition Support for Natural and Farmland Policies	Submittal 16255 Related Documents Link
16255.04	Existing text: "Policy #2 - Encouraging CTCs to develop advance mitigation programs or include them in future transportation measures. Specifically. • Funding pilot programs that encourage advance mitigation including data and replicable processes • Participating in state level efforts that would support regional advanced mitigation planning in the SCAG region • Supporting the inclusion of advance mitigation programs at county level transportation measures" Modify to read: "Policy #2 - Encouraging CTCs to develop advance mitigation programs, include them in future transportation measures, and leverage existing programs. Specifically. • Funding pilot programs for CTCs that do not have advance mitigation programs, including data gathering for Greenprint creation. • Participating in state level efforts that would support regional advanced mitigation planning in the SCAG region • Supporting the inclusion of advance mitigation programs at county level transportation measures • Provide matching dollars to CTCs with advance mitigation programs to acquire, restore, and manage natural lands."	Comment noted.
16255.05	Existing text: "Policy #3 - Aligning with funding opportunities and pilot programs to begin implementation of the Conservation Plan through acquisition and restoration. Specifically. • Seeking planning funds, such Cap-and-Trade auction proceeds that could help prepare for local action on acquisition and restoration. • Supporting county transportation commissions and other partners. • Continuing support of the State Wildlife Action Plan 2015 Update13 and its implementation." Modify to read: "Policy #3 - Aligning with and seeking funding opportunities and pilot programs to begin implementation of the Conservation Plan through acquisition and restoration. • Seeking funds, such as planning grants and Cap-and-Trade auction proceeds, that could allow for local or regional action on acquisition and restoration. • Supporting county transportation commissions and other partners. • Continuing support of the State Wildlife Action Plan 2015 Update13 and its implementation. • Seek funding for a pilot program to digitally map and quantify carbon in the vegetation and soils."	comment noted.
16255.06	Existing text: "Policy #4 - Providing incentives to jurisdictions that cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries. Specifically. • Working with stakeholders to identify incentives. • Considering providing sustainability planning grants or seeking funding that help protect habitat corridors, especially across county boundaries." Modify text to read: "Policy #4 - Providing incentives to jurisdictions that cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries. Specifically. • Working with stakeholders to identify incentives and collaboration opportunities. • Considering providing sustainability planning grants or seeking funding that help protect habitat corridors, especially across county boundaries. • Encourage projects that provide a net environmental benefit to wildlife connectivity." As you can see, our main interest focuses on actual implementation of the Conservation Program developed by SCAG. We individually and collectively offer our assistance to SCAG as this process unfolds and as the Plan gets implemented. We urge SCAG to consider implementing a program similar to the One Bay Area Grant program to get this effort moving forward.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Five Point Communities		Submittal 16315 Related Documents Link
16315.01	<p>Our concerns, as discussed below, are that the Draft 2016 RTP/SCS does not reflect our current entitlements for Great Park Neighborhoods. As a result, the Draft 2016 RTP/SCS underestimates the amount of development planned for Planning Area 51 in the City of Irvine.</p>	<p>The Policy Growth Forecast of Orange County for the 2016 RTP/SCS was developed through close collaborations with CSU-Fullerton and reviewed by the City of Irvine. The Great Park neighborhoods entitlement was fully considered at the time the forecast was developed.</p>
16315.02	<p>Heritage Fields has completed a review of the Draft 2016 RTP/SCS growth forecasts at the Traffic Analysis Zone (TAZ) level and it is not consistent with our existing, vested, entitlements, and substantially underestimates the amount of growth planned for the area, and does not capitalize on the potential for future growth consistent with the strategies in the RTP.</p>	<p>Comment noted. The TAZ level Policy Growth Forecasts for Orange County and the City of Irvine were developed using technical corrections provided by CSU-Fullerton Center for Demographic Research (CDR) and the City of Irvine. As such the Policy Growth forecasts reflects all existing and vested entitlements in Orange County as submitted to SCAG, including the Heritage Field project.</p>
16315.03	<p>In addition, there are uses planned for the Great Park itself, which do not appear to be reflected in the RTP's estimates of future land uses.</p>	<p>Comment noted. Population, housing and employment growth are based on information provided by local jurisdictions (including the City of Irvine) and other stakeholders through a transparent and collaborative process when SCAG developed the Policy Growth Forecast in 2015.</p>
16315.04	<p>Heritage Fields recommends that the 2016 RTP/SCS and all alternatives be based on the Policy Growth Forecast that includes the technical corrections provided by the Center for Demographic Research, on behalf of the City of Irvine.</p>	<p>The growth forecast, including Irvine projections for the 2016 RTP/SCS, is based on the policy growth forecast with all technical corrections from CSU-Fullerton CDR.</p>
16315.05	<p>It is our understanding that there are different levels of TAZ data (Regional TAZ, Sub-Regional [COG] TAZ, and Scenario Planning Zones) and that the Scenario Planning TAZ level demographic assumptions in the SCAG 2016 RTP Model may differ greatly from cities/counties existing and General Plan forecasts. If the SCAG 2016 RTP Model is not consistent with local forecasts at the Scenario Planning TAZ, then future projects would be consistent with a City's General Plan, but would not be consistent with the SCS, meaning that it may not achieve the SCAG's region's SB 375 targets.</p>	<p>Scenario planning zonal level data are controlled to be consistent with existing county/city and General Plan forecasts.</p>
16315.06	<p>The large margin of error between the SCAG 2016 RTP Model and local demographic forecast would be problematic with regards to future consistency findings in CEQA documents. A project that is consistent with the General Plan may not be consistent with the SCS, which is contrary to the intent of the SCS. As a result, these discrepancies between the 2016 RTP/SCS and the adopted Irvine General Plan must be corrected prior to adoption of the 2016 RTP/SCS.</p>	<p>The Policy Growth Forecast of Orange County for the 2016 RTP/SCS was developed through close collaboration with CSU-Fullerton and reviewed by the City of Irvine.</p>
16315.07	<p>We also do not understand why Exhibit 5.1 of the Draft 2016 RTP/SCS does not designate Irvine Station as a High Quality Transit Area (HQTA) in 2040. We understand that a HQTA is generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, that has a minimum density of 20 dwelling units per acre and is within a 14 mile of a well-serviced transit stop with 15-minute or less service frequency during peak commute hours. The area around the Irvine Station is designated as 8.1B Trails and Transit Oriented Development, which allows mixed-use development up to 50 units per acre and unlimited building heights within 14 mile of Irvine Station. As a result, we believe that consistent with SCAG's definition of a HQTA, Irvine Station should be designated as such in the Draft 2016 RTP/SCS for 2040.</p>	<p>Exhibit 5.1 does indicate the Irvine Station as both a rail station and HQTA in the 2016 RTP/SCS. Rail stations are considered major transit stops and are included in the definition of HQTAs (see RTP/SCS Glossary definition of HQTA). Exhibit 5.1 has been clarified.</p>

ID	Comment	Response
<i>Submitted by</i> Five Point Communities		Submittal 16315 Related Documents Link
16315.08	We would also like to note that the land around the Irvine Station provides substantial opportunities for intensification of land uses beyond that currently allowed by the Irvine General Plan due to its location near the multimodal Irvine Station.	Comment noted. Population, housing and employment growth are based off information provided by the local jurisdictions, including existing general plans.
16315.09	We would encourage coordination between SCAG and Heritage Fields so that the 2016 RTP/SCS accurately reflects population, housing, and employment growth consistent with our existing entitlements.	The Policy Growth Forecast reflects entitlements in the City of Irvine, including Heritage Fields through the coordination with City of Irvine and CSU-Fullerton Center for Demographic Research. SCAG staff will continue to collaborate with local jurisdictions and developers to develop an accurate database to reflect the entitlements as appropriate.
<i>Submitted by</i> Friends of Harbors, Beaches, and Parks		Submittal 16330 Related Documents Link
16330.01	The 2012 RTP/SCS provided an important stepping stone for the 2016 Plan. In previous Plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you isn't to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. FHBP and other coalition members would gladly assist with this implementation effort.	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.
16330.02	And as it relates to the Natural and Farmlands Appendix, there are also errors there as well. The following Plans are missing from the approved or implemented section within this document (pages 1-2): • Lower Colorado River Multi-Species Conservation Plan (approved in 2005) • West Mojave HCP (approved in 2006) • Orange County Southern HCP (approved in 2007) • City of Colton HCP (approved in 2015)	Comment noted. The list of approved or implemented projects was acquired from the California Department of Fish and Wildlife's website, which was last updated in August, 2015.(https://www.wildlife.ca.gov/Conservation/Planning/NCCP).
16330.03	The Appendix states the following Plans are approved or are in implementation, but they are not: • Desert Renewable Energy Conservation Plan (DRECP) (expected approval in March 2016) • OCTA Measure M2 NCCP/HCP (expected approval June 2016)	Comment noted. The list of approved or implemented projects was acquired from the California Department of Fish and Wildlife's website, which was last updated in August, 2015.(https://www.wildlife.ca.gov/Conservation/Planning/NCCP).
16330.04	Conservation Plans vs. Planning Areas (PEIR and Natural and Farmlands Appendix) There appears to be confusion in the Biological Resources Section 3.4 (page 3.4-52) and Appendix (pages 1-2) as to the land "afforded long term protection" under existing NCCPs and HCPs. For example, the PEIR identifies that more than 20 million acres are protected because of these plans. There is no consistent way each plan is reviewed or explained and no calculations laid out as to how the 20 million acres was reached.	Comment noted. The text in the Natural/Farm Lands Appendix has been updated.

ID	Comment	Response
<i>Submitted by</i> Friends of Harbors, Beaches, and Parks		Submittal 16330 Related Documents Link
16330.05	We agree that certain geographies are more vulnerable to development pressure than others. We also support focusing development away from the high value habitat, but strongly disagree with the statement that many "edge" lands do not have plans for conservation. What is the basis for this statement? What evidence do you have that substantiates this conclusion? What type of conservation plan is being included or excluded?	Data about habitat value was compiled using a multi-species habitat evaluation method, Combined Habitat Assessment Protocols (CHAP) for the entire SCAG region. The methodology and findings are explained in detail in the Conservation Framework and Assessment report, which was commissioned to account for impacts and improvements in a consistent manner across all habitats and landscapes. The report is available for download here: http://sustain.scag.ca.gov/Sustainability%20Portal%20Document%20Library/SCAG%20Final%20Conservation%20Framework%20%20Assessment_Feb.pdf . Exhibit 1 of the Natural/Farm Lands Appendix, the SCAG Region Habitat Evaluation Map, displays this data for the region. Information about conservation plans was acquired from the California Protected Areas Data Portal (CPAD). CPAD provides GIS data that are owned in fee and protected for open space purposes by over 1,000 public agencies and non-profit organizations. The portal can be found here: http://www.calands.org/ . Exhibit 2 of the Natural/Farm Lands Appendix, Protected Lands in the SCAG Region Map, displays this data for the region.
16330.06	This is an important reminder that NCCP/HCPs are not the end all in conserving important lands. They are voluntary and property owner driven, typically only applying to larger ownerships/geographies. Just because it isn't within an existing NCCP/HCP (a formal conservation plan) doesn't mean it isn't important to conserve. Many local, regional, state, and federal agencies may have other mechanisms, processes, programs, plans, documentation, and goals for regional conservation not captured in an NCCP/HCP. For example, the California Department of Fish and Wildlife (CDFW) has a process called the Conceptual Area Protection Plan (CAPP). CAPPs provide an initial evaluation of properties considered for acquisition and when funds are available, if the CAPP is approved, lands can be acquired through state funding. CAPPs are a formal process for CDFW, but likely do not overlap with an NCCP/HCP.	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your group is encouraged to participate in the effort.
16330.07	Many non-profits have ongoing efforts to acquire and preserve important landscapes that are also not included in a formal or informal conservation plan yet. In fact, most non-profits exist and focus their work on a specific geography. For example, using FHBP's Greenprint, called the Green Vision Map, the entirety of Orange County has been coded in a tiered system creating a wish list of properties—many of which are at the WUI. This Greenprint covers an entire county. Many non-profits, and state and federal agencies have also already done a lot of the leg work for preservation of habitat lands, but may not have publically identified lands along the urban fringe. In other words, unless the conservation plan/effort is tied to a County Transportation Commission or local land use authority (city or county) that puts the Plan forward, it appears to be dismissed by SCAG. However, the reality is conservancies (public and private) exist to protect lands in their natural state. For example, The Trust for Public Land may have an option to buy important lands that are neither in a CAPP or formal conservation plan, but agencies funding the project agree it should be protected. State and federal agencies also focus on important areas to build a reserve, connect to another reserve, protect specific species, etc. This should be seen as an opportunity to partner and work collaboratively. Therefore, the definition of "conservation plan" in the RTP/SCS statement can have a lot of implied meanings and should be clarified.	Information about conservation plans was acquired from the California Protected Areas Data Portal (CPAD). CPAD provides GIS data that are owned in fee and protected for open space purposes by over 1,000 public agencies and non-profit organizations. The portal can be found here: http://www.calands.org/ . Exhibit 2 of the Natural/Farm Lands Appendix, Protected Lands in the SCAG Region Map, displays this data for the region.

ID	Comment	Response
<i>Submitted by</i> Friends of Harbors, Beaches, and Parks		Submittal 16330 Related Documents Link
16330.08	Existing text: "Many natural land areas near the edge of existing urbanized areas do not have plans for conservation and are vulnerable to development pressure." Modify to read: ""Many natural land areas especially those near the edge of existing urbanized areas are vulnerable to development pressure. While some areas have formal conservation plans in place, other geographies rely on state and federal resource agencies and non-profits for inclusion in conservation efforts."	Comment noted.
16330.09	With an anticipated population growth of 20% (nearly 3.8 million people) by 2040 (page 47) this adds considerable pressure to our existing parkland. [Note: the Appendix states 17% on page 1 - the documents should be internally consistent.]Studies conducted by Friends of Harbors, Beaches and Parks (See Attachment 4 - FHBP Park Score Study for Orange County) and The City Project (go to: www.MapJustice.org) demonstrate our communities do not have enough parkland to meet the existing demand. Local land use authorities have an obligation to meet the Quimby Act (which aims for three acres of parkland per 1,000 residents). With an anticipated population boom of 3.8 million more people, this equates to more than 11,400 acres that should automatically be added to the local and regional park system as the growth occurs. These parks tend to be protected as turf parks or active/high intensity parks (with tennis courts, baseball and soccer fields, etc. This preservation is separate from the ongoing formal and informal conservation efforts by agencies, CTCs, and non-profits—many of which are protecting lands for entirely different reasons.	Park accessibility is an integral part of sustainable communities as it improves public health, air quality, and quality of life. Providing parks within infill areas has a different set of challenges that varies by jurisdiction. SCAG encourages jurisdictions to look at funding sources, such as the California Department of Housing and Community Development (HCD) Housing-related Parks program, to help build and maintain local parks. The Housing-related Parks program awards money to build and maintain parks based on the number of affordable housing units a jurisdiction has built, which can help increase park accessibility in traditionally underserved areas. SCAG will continue to provide jurisdictions information regarding funding opportunities and encourage jurisdictions to provide parks as part of their long-range plans. The term "Natural Lands" is used intentionally to differentiate between potentially sensitive habitat areas and urban/suburban parks that provide open space and active recreation. Specifically, "Natural Lands" refers to biologically diverse areas and landscapes that may provide ecosystem services, such as grasslands, wetlands, deserts, forests, shrublands, riparian areas, and other types of habitat lands. Natural Lands is not intended to include agricultural croplands, grazing/rangeland, other working lands, or municipal parks serving primarily recreational purposes.
16330.10	As indicated on page 13 of the RTP/SCS, infill developments promote active transportation and improve access to amenities such as parks and natural lands. While the document (page 2) indicates that residents utilize the natural lands and recreational areas as a respite from the busy life in the city, unfortunately unless new and additional parks are created for the new influx of people, the limited existing parks will suffer even more from overuse and abuse. Creating new parks lessens the impacts on existing parks and maintains the balance for recreational uses needed when housing is added. Another Land Use Policy of the Plan is to "ensure adequate access to open space and preservation of habitat" (page 69), but nowhere does it state how additional lands will be preserved to accommodate the anticipated growth without severely impacting the existing protected natural lands from recreational overuse.	Park accessibility is an integral part of sustainable communities as it improves public health, air quality, and quality of life. Providing parks within infill areas has a different set of challenges that varies by jurisdiction. SCAG encourages jurisdictions to look at funding sources, such as the California Department of Housing and Community Development (HCD) Housing-related Parks program, to help build and maintain local parks. The Housing-related Parks program awards money to build and maintain parks based on the number of affordable housing units a jurisdiction has built, which can help increase park accessibility in traditionally underserved areas. SCAG will continue to provide jurisdictions information regarding funding opportunities and encourage jurisdictions to provide parks as part of their long-range plans. The term "Natural Lands" is used intentionally to differentiate between potentially sensitive habitat areas and urban/suburban parks that provide open space and active recreation. Specifically, "Natural Lands" refers to biologically diverse areas and landscapes that may provide ecosystem services, such as grasslands, wetlands, deserts, forests, shrublands, riparian areas, and other types of habitat lands. Natural Lands is not intended to include agricultural croplands, grazing/rangeland, other working lands, or municipal parks serving primarily recreational purposes.

ID	Comment	Response
<i>Submitted by</i> Friends of Harbors, Beaches, and Parks		Submittal 16330 Related Documents Link
16330.11	The reality on the conservation-front is, that there are a lot of natural lands left to protect across the SCAG region. Furthermore, land conservation occurs for many reasons, such as: species protection, wildlife corridor enhancements, mitigation lands, NCCP/HCP lands, and even local and regional parks. Not all parkland is available for recreational use (hiking, biking, equestrian, etc.). Many lands have restrictions or managed access due to legal requirements (deed restrictions), mitigation and permit requirements, and/or conservation easements. Simply providing "more" access may have significant consequences for the land manager.	Comment noted.
16330.12	The 2012 RTP/SCS indicated 742 square miles (474,880 acres) of greenfield lands in the Baseline (business-as-usual scenario) would be converted into more urban uses, but with the 2012 Plan in place it would reduce the conversion to 334 square miles (213,760 acres). Four years later, with the 2016 Plan, the document indicates (Table 8.1 - pages 150 and 153) the 2040 Baseline (business-as-usual scenario) would result in the conversion of 154 square miles (95,860 acres) of greenfield lands into more urban uses. With the Plan in place, the document states (pages 9, 147, and 148) only 118 square miles (75,520 acres) would be converted to more urban uses. A 23.4% reduction, as proposed by the 2016 Plan, provides a solid start to improved sustainability [and conservation]. But, as page 20 indicates, current conservation efforts are underway and this reduced land conversion does NOT account for those efforts. We would anticipate the greenfield acreage converted to urban uses to be even lower.	Comment noted. The 23.4% reduction does not account for current conservation efforts that are underway. As the tool utilized to measure this reduction - Urban Footprint Scenario Planning Model - currently exists, new growth is analyzed and measured. However, as these analysis tools continue to evolve, research and development will focus on measurements that include existing growth.
16330.13	We continue to urge SCAG to promote infill developments, and encourage local and regional land use authorities to halt building at the WUI. As the survey SCAG conducted indicates (page 64), the clear majority of respondents supported development in existing urban areas rather than into our natural and farmlands. On page 63, the document also accurately notes that varying combinations of land use and transportation strategies lead to different rates of land consumption, among other things. This is exactly the type of information our decision makers need to have when making important land use decisions relating to infill and greenfield development.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Friends of Harbors, Beaches, and Parks		Submittal 16330 Related Documents Link
16330.14	<p>The Plan also notes that climate change will have impacts to natural habitats and overall biodiversity (page 56). In addition to coastlines being vulnerable to sea level rise and destructive storm surges, many of the transportation infrastructure (roads, highways, and rail lines) that already exists is vulnerable as well. A study conducted by the Pacific Institute may be helpful for SCAG in understanding what a 1.4 meter (4.6 feet) sea level rise has the potential to impact. (See Attachment 5 - Vulnerable Infrastructure) For example, with a 1.4 meter sea level rise, Ventura County has 7.7% of its roadways impacted, Los Angeles County has 18%, and Orange County has 9%. Another example, with a 1.4 meter sea level rise, Ventura has 10 miles of rail lines impacted, Los Angeles County has 14 miles, and Orange has 6.6 miles impacted. As noted in the Plan, we agree that your response to climate change impacts requires cooperation, creative thinking, and better use of limited resources (page 56). On page 13, the Plan discusses making communities more resilient to the impacts of climate change, but we also see a connection to ensuring our wildlands are more resilient to the effects as well. Guaranteeing our wildlife and plant species have the ability to reach other elevations through permanent connections between protected lands is essential to ensuring this region's biodiversity is retained and functional in the future.</p>	<p>Comment noted. SCAG has begun a process to analyze vulnerability of the regional transit system to climate change. Additionally, Caltrans is assessing vulnerability of the state highway system to climate change. These studies will likely be completed prior to the 2020 RTP/SCS and findings potentially incorporated into the 2020 RTP/SCS.</p>
16330.15	<p>Preserving natural lands comes in many forms. While, we support the general idea that as new growth is concentrated in existing urban areas (page 16) mainly concentrated at the HQTAs (per Huasha Lui at the Elected Official Briefing in OC on January 20, 2016), the pressures to develop the fringe lands are decreased. The reality remains that some mechanism (local land use plan, policy, ordinance, etc.) and entity (local, regional, state or federal or even non-profit) needs to spearhead the conservation effort. Just because you say growth will be focused in the urban areas, doesn't automatically protect the fringe areas. It likely alleviates some pressure on the fringe areas, but this may only be temporary. Often times there is significant coordination, funding and support that must be organized before natural lands are protected. For example, within the Land Use Policies (page 108) the document notes that the 2016 Plan itself leads to, among other things, "the preservation of natural lands," however the Plan fails to state exactly how that will occur. The Plan lacks a mechanism for actually protecting resource rich lands. This should be corrected and suggestions are in the revised Natural and Farmland policy language included in the Coalition letter submitted January 29, 2016. References to this concern occur on the following pages as well: 14, 16, 78, 108, and 159.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16330.16	<p>Ninety percent of the survey respondents supported protecting natural habitats (page 64). This is important information for our decision makers to have—it should be highlighted and enacted. The Plan has advanced well since 2012 and as the document states (page 111) "Building on this effort has the potential to create a regional conservation program that stakeholders such as CTCs, cities, agencies, and non-profits can align with and support." We agree. Let's work on the mechanism and funding by which land can be protected in the SCAG region and the environmental community and resources agencies will engage and support this effort.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16330.17	<p>The Plan indicates on page 70 that there are numerous benefits to focusing new growth around HQTAs. A clear benefit to focusing development at HQTAs is also a reduction in greenfield development. We believe this should be included in your list of benefits.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Friends of Harbors, Beaches, and Parks		Submittal 16330 Related Documents Link
16330.18	<p>Exhibit 2.1 (page 23) has a colorful map indicating the per acre habitat value of lands across the SCAG region. While this designation likely came from the CHAP mentioned earlier, we should note that there is a huge difference between the concrete "urban" landscape and the undeveloped "agricultural" landscape. Separating the Urban from the Agricultural layers in the map would provide a better delineation of the types of resources in the program—after all these policies address the Natural Lands and Farmlands. Furthermore, the California Department of Conservation has mapped the "prime agricultural lands" for the state and every county in the SCAG region is included in this mapping. Prime agricultural lands are defined by two important criteria. First, the land use: "has been used for irrigated agricultural production at some time during the four years prior to the Important Farmland Map date. Irrigated land use is determined by FMMP (Farmland Mapping and Monitoring Program) staff by analyzing current aerial photos, local comment letters, and related GIS data, supplemented with field verification." Second, the soil type: "The soil must meet the physical and chemical criteria for Prime Farmland or Farmland of Statewide Importance as determined by the USDA [United States Department of Agriculture] Natural Resources Conservation Service (NRCS)." Furthermore, the designation of "prime" refers to the agricultural use. (Source: California Department of Conservation, Prime Farmlands as Mapped by the FMMP http://www.conservation.ca.gov/dlrp/fmmp/overview/Pages/prime_farm_land_fmmp.aspx) Why isn't the SCAG Natural Resource Inventory Database used as the base layer for this map?</p>	<p>Commented noted. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to fully address its purpose. The various data sets each have their own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps have been clarified to properly identify the purpose of the map and the specific data source.</p>
16330.19	<p>Many efforts are underway across the SCAG region to connect the landscapes to one another. For example, efforts are underway to create a mountain lion corridor at Liberty Canyon to connect the Santa Monica Mountains in Los Angeles County to other preserved open space areas. In Riverside County, efforts are underway to connect lands in the San Jacinto Range with the San Geronio Range within the San Bernardino National Forest. Without connections for our large predators the entire ecosystem is impacted. The RTP/SCS has an opportunity to support documented wildlife corridors that are impacted by infrastructure projects. The research conducted by SC Wildlands and its South Coast Missing linkages project should be at the forefront of this effort. (See Attachment 6 - South Coast Missing Linkages Study)</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide "incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries." The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>
16330.20	<p>Greenfields are defined within the Plan's glossary. Please define "agricultural lands." (page 178).</p>	<p>"Agricultural Lands" has been added to glossary.</p>
<i>Submitted by</i> Friends of Harbors, Beaches, and Parks		Submittal 16331 Related Documents Link
16331.01	<p>The RTP/SCS promotes building on the 2012 Plan with the aim to serve as a resource for lead agencies (page 109). This is a commendable goal. That said, SCAG could offer assistance through the use of the CHAP and Natural Resource Inventory Database layers by providing the data to those agencies or even suggesting potential mitigation sites with high per acre habitat value.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Gateway Cities Council of Governments		Submittal 16266 Related Documents Link
16266.01	<p>SCAG staff has met many times with the Gateway Cities COG staff and with the Planning Directors of our member jurisdictions to discuss the methodology of plan development. We understand that, of necessity, SCAG must make certain assumptions about where growth will occur within our jurisdictions, even though these assumptions might differ from the jurisdictions' own plans, and that our jurisdictions will not be bound by SCAG's assumptions. In order to meet regional goals, the Draft RTP/SCS recommends and assumes many different approaches to "sustainable" planning to reduce GHG – including strategies such as complete streets, "complete communities," sustainable zoning codes, and neighborhood mobility areas, among others. Our concern is whether these strategies rest on a solid technical and analytical foundation. For example, the plan in some places refers to "urban/compact/suburban" development, but to the best of our understanding, these three categories do not directly correspond to the multiple place types in the Scenario Planning Model. It thus appears that different land use categories are used to underpin different analyses in the plan, rather than all categories being consistent. This analytical foundation is important because of the RTP/SCS's growing emphasis on active transportation, especially bike investments, infrastructure, and programs. It is difficult to be confident that these investments are appropriate if they are not well supported by analysis showing they can make a real difference in reaching air quality or GHG goals. As a region, we shouldn't invest in a mode unless it can pull its weight in terms of plan performance, or be appropriately funded in concert with other strategies.</p>	<p>As noted on page 20 of the RTP/SCS, 35 "Place Types" were utilized in the urban setting design tool (Urban Footprint Scenario Planning Model (SPM)) – it is the Place Types that factor into the modeling analyses. Land Development Categories (LDCs) are utilized in order to describe general conditions within areas of the SCAG region and do not play a role in the modeling analyses. The 35 Place Types were then sorted into the three LDCs. A table has been added in the Appendix: SCS Background Documentation and displays which LDC the 35 Place Types are categorized in to ensure consistency amongst the variety of land uses that represents the SCAG region.</p>
16266.02	<p>Exhibit 5.1 presents the high-quality transit areas (HQTA) projected for 2040. It appears that several of the planned light-rail corridors for the Gateway Cities are not shown as HQTA on this map, which is surprising. We believe the exhibit should be amended to include the corridors for the following projects: • West Santa Ana Branch (Eco Rapid Transit Project) • Green Line Eastern Extension (Norwalk) • Gold Line Eastside Extension, Phase II – Washington Blvd. Alignment.</p>	<p>The West Santa Ana Branch Corridor (RTP ID 1TR1011) and Metro Green Line Norwalk Extension (RTP ID 1120005) are labeled as 2040 Plan Rail Stations in Exhibit 5.1, and the Metro Eastside Transit Corridor Phase 2 (RTP ID 1TR0704) is labeled as Rail Station Alternatives (2040 Plan). Rail stations are considered major transit stops and are included in the definition of HQTAs (see RTP/SCS Glossary definition of HQTA). Exhibit 5.1 has been clarified.</p>
16266.03	<p>As you know, the Gateway Cities COG has worked closely with our member jurisdictions to develop an extensive, long-range Strategic Transportation Plan. In addition, we have worked with LA County MTA to express our priorities for major projects to be included in a potential sales tax ballot measure later this year. Due to the format in which the 2016-2040 RTP/SCS project lists are presented, it is difficult to be sure whether all of our projects are appropriately included in the regional plan. Based on our review, it appears that the SR 60/I-605 HOV direct connector project is listed only in the Strategic Plan, which indicates that it does not have any funding source identified. This project is among the Gateway Cities COG's priorities for the potential 2016 MTA ballot measure and thus should be included in the financially constrained plan.</p>	<p>Comment Noted. It is correct, the SR-60/I-605 HOV connector project is currently under the strategic portion of the Project List under RTP ID# S1120056. However, should Metro's ballot measure be approved, SCAG will work with Metro to amend the RTP/SCS to reflect newly funded projects as part of the financially constrained portion of the Plan.</p>

ID	Comment	Response
<i>Submitted by</i> Golden State Gateway Coalition		Submittal 16165 Related Documents Link
16165.01	Description of I-5 North Capacity Enhancement Project in Table 4, although a highly desirable start, is only a partial description of the planned and environmentally cleared project. Currently reads: "Add 1 HOV lane in each direction from Weldon Canyon Road to SR-14 by 2017 at a cost of \$410 million." Suggested correction: Add 1 HOV lane in each direction, auxiliary lanes, truck lanes and bridge modifications from SR-14 through Castaic by 2020 at a cost of \$785 million.	Comment noted. Table 4 of the Highways and Arterials appendix is intended for illustrative purposes only. All of the project elements as described are accounted for and reflected within the Project List appendix.
<i>Submitted by</i> Grants To You		Submittal 16024 Related Documents
16024.01.2	Planning for the most important items. This plan seems to include both critical needs and not so much. For example we have money for fixing the freeways but we also have money for a regional bike path network. How many people use the freeways and how many will use the bike paths?	Comment noted. Based on the SCAG Regional Travel Demand Model, 85 percent of all trips in the region are currently made by vehicle. Active transportation trips (e.g., walking, bicycling, etc.) account for 12 percent of all trips.
16024.01.3	We also have funding for high speed rail. How many people will abandon their cars and instead take the train and isn't this a State initiative? Why would Ventura County taxpayers be paying for any part of high speed rail? Finally, what is wrong with the current Metrolink system that it requires major funding?	The California High-Speed Rail is a State of California project, partially funded by a state-wide proposition passed by voters in 2008 (Proposition 1A). The 2016 RTP/SCS does not direct state or federal gas tax or local transportation sales tax revenues to support this project. Once in operation, it will provide an additional travel choice to the State's increasingly congested highways and airports. The 2016 RTP/SCS includes investments in Metrolink to increase service, improve safety, and operate and maintain the existing and planned system. The Metrolink system is funded through a combination of ticket fares and local funding from Metrolink's member county transportation commissions, including Ventura County.
16024.01.3	Why don't the planners decide what is the most important transportation need and fund that instead of one again burdening the middle class with more taxes. Please get off the back of the middle class.	Comment noted. The Draft 2016 RTP/SCS includes goals, policies, strategies, and project priorities that have been developed with input from the public through dozens of public engagement opportunities, local governments, county transportation commissions (CTCs), the California Department of Transportation (Caltrans), tribal governments, non-profit organizations, businesses, and local stakeholders within Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. In accordance with state and federal requirements, the Draft 2016 RTP/SCS includes a financial plan that estimates how much funding will be needed to implement recommended transportation investments, as well as operate and maintain the transportation system as a whole over the life of the Plan. The Plan must demonstrate that there is a balance between the estimated costs of the projects and programs described in the Plan and revenue sources reasonable expected to be available for transportation investments.

ID	Comment	Response
<i>Submitted by</i> Highgrove Municipal Advisory Council		Submittal 16175 Related Documents Link
16175.01	<p>We have written support from residents, business owners, civic organizations, and Senators from both Riverside and San Bernardino Counties who have supported a Metrolink station at Highgrove for the last 14 years. This includes written support from the cities of Grand Terrace, Loma Linda and Colton all of which are in San Bernardino County. Highgrove is in the un-incorporated part of Riverside County near the county line and is 7 rail miles south of the San Bernardino Metrolink station and 3.5 rail miles north of the Riverside Metrolink station. The land needed for a Metrolink station is 17.22 acres of vacant land that is owned by and under the jurisdiction of the Riverside County Transportation Commission that could easily be used for a parking lot for commuters who want to travel between San Bernardino and Riverside Counties or to Oceanside where there are connections to San Diego and Los Angeles. The 17.22 acres are already owned by the Riverside County Transportation Commission and is a pie shaped piece of vacant property that RCTC bought for a curved track to connect the new Perris Valley Line track to the BNSF main line track that is the Inland Empire/Orange County Line. The Inland Empire/Orange County Line has daily 7 day a week Metrolink trains that pass right next to the west side of RCTC's property at Highgrove that go between the two counties but RCTC has opposed this station location for the last 14 years. RCTC has constructed a curved track through this property but they only need the width of the track to connect the Perris Valley Line to the Inland Empire/Orange County Line. The remainder of this vacant property is the location needed for a Metrolink parking lot and RCTC already has \$5,347,500.00 invested in this property they do not need for the Perris Valley Line connection, but they refuse to build a parking lot on their excess property. This parking lot/station is the most efficient use of transportation funds because the IE/OC Metrolink timetable is already in place, the existing Metrolink trains go in both directions between the 2 counties every day including week-ends that is right next to RCTC's property, and all that is needed is a parking lot and station platform.</p>	<p>Comment noted. SCAG works with the county transportation commissions to develop the transportation investment strategies in the RTP/SCS. Commuter rail station locations in Riverside County are determined through a local planning process led by the Riverside County Transportation Commission.</p>
16175.02	<p>There is a paved entry road for parking on the inside of the curved track at the base of the new Iowa Ave. overpass and Villa St. is a paved road for access for parking on the outside of the curved track. Within a 2 mile radius of the Highgrove location there are over 33,000 residents and that does not include the 1,409 new homes that are being built 1 mile east of the Highgrove station location. New residents are now living in phase 1 with phase two being sold in the new Spring Mountain Ranch development. It is important to understand that a parking lot/station at Highgrove will not interfere with the Perris Valley Line because the connecting curved track is already in place. The Marlborough Ave. station on the Perris Valley Line is almost completed but RCTC also owns 17.22 acres only one mile away for the curved track at Highgrove. Also very important is that commuters from the new Marlborough Ave. Metrolink station on the Perris Valley Line will not be able to get to San Bernardino because the Perris Valley Metrolink trains will only go to Perris or Riverside. But the west side of RCTC's property at Highgrove is where the daily Metrolink trains operate between Riverside and San Bernardino Counties. Our Congressman and 3 of his staff visited this location and Congressman Takano feels that even though RCTC owns 2 properties only one mile apart, both Metrolink stations are needed because they have different destinations.</p>	<p>Comment noted. SCAG works with the county transportation commissions to develop the transportation investment strategies in the RTP/SCS. Commuter rail station locations in Riverside County are determined through a local planning process led by the Riverside County Transportation Commission.</p>

ID	Comment	Response
<i>Submitted by</i> Highgrove Municipal Advisory Council		Submittal 16175 Related Documents Link
16175.03	Please visit our website: www.highgrovehappenings and review the map; concept map of the Highgrove location where all of the area between Villa St. and the Drainage Channel is vacant land except for the curved red line which is the track that connects the two railroads (the parking lines do not exist but have been added as a concept), Supporting Docs; 8 years of comments; Station costs; uneconomic remnant (that shows RCTC is only charging 38% of the cost they paid for the Highgrove property to the Perris Valley Line (which is \$3,277,500.00 instead of \$8,625,000.00) meaning they have \$5,347,500 invested in excess vacant land at Highgrove, and; RCTC's inappropriate actions to prevent a Highgrove Metrolink Station 2004 to 2010. This project meets the requirements of the RTP/SCS because it will address the "transportation and land use challenges of the region" on both sides of the Riverside San Bernardino County line that is already connected to the Metrolink commuter rail system and is only ½ mile from the Center St. exit of the I-215 freeway.	Comment noted. SCAG works with the county transportation commissions to develop the transportation investment strategies in the RTP/SCS. Commuter rail station locations in Riverside County are determined through a local planning process led by the Riverside County Transportation Commission.
<i>Submitted by</i> Highgrove Municipal Advisory Council		Submittal 16338 Related Documents Link
16338.01	We have written support from residents, business owners, civic organizations, and Senators from both Riverside and San Bernardino Counties who have supported a Metrolink station at Highgrove for the last 14 years. This includes written support from the cities of Grand Terrace, Loma Linda and Colton all of which are in San Bernardino County.	Comment noted. SCAG works with the county transportation commissions to develop the transportation investment strategies in the RTP/SCS. Commuter rail station locations in Riverside County are determined through a local planning process led by the Riverside County Transportation Commission.
16338.02	This project [Highgrove Metrolink Station] meets the requirements of the RTP/SCS because it will address the "transportation and land use challenges of the region" on both sides of the Riverside San Bernardino County line that is already connected to the Metrolink commuter rail system and is only ½ mile from the Center St. exit of the I-215 freeway.	Comment noted. SCAG works with the county transportation commissions to develop the transportation investment strategies in the RTP/SCS. Commuter rail station locations in Riverside County are determined through a local planning process led by the Riverside County Transportation Commission.

ID	Comment	Response
<i>Submitted by</i> Hills For Everyone		Submittal 16170 Related Documents
16170.01	<p>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, Hills for Everyone is now a part of this growing coalition in 2016. Hills for Everyone has been working in Los Angeles, Orange, San Bernardino and Riverside Counties since 1977, Our mission is to protect the unique and disappearing landscapes in the Puente-Chino Hills Wildlife Corridor. We have had important successes since our inception including the establishment of the 14,100 acre Chino Hills State Park and the conservation of the Coal Canyon Biological Corridor. 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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation programs. Your group is encouraged to participate in the effort, including exploring innovative options such as the One Bay Area grant program.</p>
16170.02.1	<p>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.</p>	<p>Comment noted. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to fully address its purpose. The various data sets each have their own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps have been clarified to properly identify the purpose of the map and the specific data source.</p>

ID	Comment	Response
<i>Submitted by</i> Hills For Everyone		Submittal 16170 Related Documents
16170.02.2	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation programs. Your group is encouraged to participate in the effort.</p>
16170.03.1	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation programs. Your group is encouraged to participate in the effort.</p>
16170.03.2	<p>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 714-996-0502. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to Claire@schlotterbeck.net</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide "incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries." The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation." SCAG is committed to continuing leading the efforts in facilitating the bottom up process for a sustainable future focusing on conserving natural lands.</p>

ID	Comment	Response
<i>Submitted by</i> Imperial County Transportation Commission		
16188.01	Thank you for the opportunity to review the Draft 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We have no specific comments at this time. We believe that the Southern California Association of Governments staff has done a great job to incorporate our Imperial County planned projects, land use and sustainable community strategies. The Draft 2016 RTP/SCS meets all of our state and federal mandates for metropolitan planning and achieving greenhouse gas emission reduction goals.	Submittal 16188 Comment noted. Related Documents Link
<i>Submitted by</i> Imperial County Transportation Commission		
16351.01	Just so, you know, we're providing technical comments in writing and just appreciate the staff doing all the effort for this plan as we believe it meets the Federal requirements for air quality conformity and financial constraints as well as the SB375 requirements for meeting our greenhouse gas emissions that is, certainly, a big deal to us all. So, just appreciating that, also, expressing our appreciation for SCAG in its efforts to help us with our active transportation efforts, the planning studies and grants that our cities and ICTC is pursuing to help us move forward in that effort.	Submittal 16351 Comment noted.
16351.02	Financing those active transportation projects is a challenge for us and the assistance of SCAG has helped us with those types of grants, even at times when we were not as successful as we'd like to be with the statewide grants that are available.	Thank you for your comment. The Plan Implementation section of the Active Transportation Appendix elaborates on how SCAG will continue to collaborate with local, state and federal partners to help implement the plan.
<i>Submitted by</i> Inland Action		
16140.01	Supporting natural gas options where applicable- it is effective and uses current technology. No reason for delay on completing these options.	Submittal 16140 Comment noted. SCAG's policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition.
<i>Submitted by</i> Inland Action		
16352.01	So, one of the huge issues that we identified in Inland Action is that in 2023 under the Clean Air Act we will lose our federal funding. And all this will tell you that don't worry we won't let that happen, but the fact is that's what the law is today. We lose all federal funding if we don't meet the standard setup of the Clean Air Act. And our ability to meet those strict standards looks pretty grim. Regardless, we must address goods movement, clean technology and readily available options. And so, I just wanted to point at a couple of things that we have noticed, appreciated and want to draw attention to and, hopefully, the public will as well.	Submittal 16352 Comment noted. The South Coast State Implementation Plan (SIP) demonstrating attainment with the 1997 8-hour National Ambient Air Quality Standard (NAAQS) by 2023 has been approved by the U.S. Environmental Protection Agency. The upcoming 2016 South Coast Air Quality Management Plan is also expected to address the 2023 ozone attainment. Therefore, this region is not expected to lose federal funding in 2023 due to issues related to the Clean Air Act.

ID	Comment	Response
<i>Submitted by</i> Inland Action		Submittal 16352 Related Documents
16352.02	<p>We appreciate that allowing businesses to choose their way of getting to the clean air goals through deciding whether it is going to be through electrical, natural gas or whatever format they want to use as long as they get their allowing them that flexibility is considered a process and it also engages with the end goal so I appreciate that. A couple of things that have to do with current technology and, I think, we're going to get this done in the next 8 years, we have to use what is available now, in particular, there advocacy in the report for, without reading it altogether, but I want to say on page 7 they want to implement zero near zero emission freight systems, well, that's available now through using natural gas. It's another option and we support that. Also, more emission trucks and locomotives. In here in this part of the Inland Empire the emissions of locomotives is a huge issue. The most readily available option is going to be transferring them into natural gas. And I think that's -- we applaud doing that and doing that sooner rather than later because we need to meet this goal within 8 years. Also, to get to near zero emissions some of the gas tendered [sic] cars, the G-4 engines that can be retrofitted with diesel appropriately can be with natural gas now and we encourage them to do that.</p>	<p>Broad deployment of zero-and near zero-emission transportation technologies is a critical and significant undertaking with technological, cost and operational challenges. In recognizing this, the 2016 RTP/SCS integrates commercially available technologies to serve as bridging options to a longer-term strategy for reducing emissions.</p>
16352.03	<p>And the same thing is true with all rail locomotives. That includes -- if we scan the SCAG region they can be transformed to natural gas and this is the readily available technology to let us get to a positive output right away.</p>	<p>Comment noted. Locomotive propulsion systems decisions are the responsibility of Amtrak, Metrolink and the freight railroads in our region. Notably, Metrolink is moving to an all Tier 4 locomotive fleet in the next few years. These locomotives are over 85% cleaner than Metrolink's oldest locomotives that are still in operation. SCAG is cognizant of the need to incorporate evolving technologies with plans for new infrastructure. These include technologies to fuel vehicles, as well as to charge batteries and provide power. Chapter 5 of the RTP/SCS discusses a regional strategy for deployment of commercially available low-emission locomotives while advancing technologies toward phased implementation of zero- and near-zero emission systems.</p>
16352.04	<p>We need to meet -- we're not going to meet these goals, but if we don't make every effort to do it we're not going to have much more legal power to be able adjust federal transportation dollars. And without that, we will be, you know, that is half of our road budget now so we can hardly do with what we have. We must have with it -- I can't imagine where we would be. So, I encourage the things in this report that are readily available, particularly, the ones that incorporate natural gas because that is the technology available right now and there is no reason to hesitate in doing that.</p>	<p>Comment noted.</p>
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16138 Related Documents Link
16138.01	<p>Better standards for future projects to ensure that transit and alternative transportation are included as part of all projects, make number of people moved the highest priority.</p>	<p>Comment noted. The Active Transportation component promotes "complete streets" as a funding strategy, where projects are planned, designed and built for all roadway users (within the context of the street and land-use). This reduces the costs of implementing active transportation as separate projects.</p>

ID	Comment	Response
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16138 Related Documents Link
16138.02	Include transit as a mitigation measure to all newly developed projects.	Comment Noted. SCAG appreciate your suggestions to include transit as a mitigation measure for all newly developed projects. SCAG has recommended a performance standards-based mitigation measures approach that clearly laid out a region-wide strategy to reduce impacts from roadway congestion, improve smart use of land, and encourage alternative transit. The mitigation measures include transit and active transportation strategies with specified performance standards including targets for VMT reduction. SCAG PEIR mitigation measures have considered and incorporated strategies based on inclusion of a variety of transit and transportation options, including active transit strategies to manage travel demand and reduce sprawl from automobile congestion in the long range transportation planning horizon. Also see Master Response No. 2 and Master Response No. 4.
16138.03	Pilot VMT-based analysis to assist OPR's implementation	Comment noted. In fulfillment of provisions of Senate Bill 743, which was signed into law in September 2013, the Governor's Office of Planning & Research (OPR) is currently updating the CEQA Guidelines. Throughout this process, SCAG has been coordinating closely with OPR staff to ensure that the views and concerns of our region are known and acknowledged before the proposed updates to the CEQA Guidelines are finalized.
16138.04	Encourage active modes for shortest trips and to transit.	Comment noted. The active transportation component recommends strategies for transit integration and short trips.
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16157 Related Documents
16157.01	I would like to request a breakdown of the transportation finance per county; what county gets what RTP/SCS money and what type of projects are the counties going to spend the money on. This information is currently not included in the Draft RTP/SCS nor available on the seperate county websites. A county breakdown in the format of table 6.5 would be perfect. Thank you very much.	Table 6.1 details the core revenue forecast by county. The Project List Appendix details projects included in the Plan for each county.

ID	Comment	Response
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16239 Related Documents
16239.01	<p>Extended Pacific Surfliner to SF is good CP Benson to CP Central should be prioritized and expedited in addition to CP Lilac to CP Rancho Study potential of running Metrolink express that includes San Bernardino, Ontario by way of Colton Double-track all Metrolink stations if longer portions are problematic LAUSMP - include bikeway under station as part of widening Freight needs more slots; investments such as Alameda Corridor that use tax dollars need to increase option for passenger rail Metrolink to San Jacinto must NOT be hampered by SR-79 realignment project Include Metrolink to Temecula via SR-79 realignment project Split the CP Raymer to CP Bernson project Coachella Valley Rail Service should explore possibility of planning a connector to Redlands Rail via California St. in Redlands to provide better service/access to San Bernardino, Pomona, and San Gabriel regions Bike accessibility should be analyzed for a minimum radius of two miles, include Class IV facilities LA-CV rail should study California Street Connector in Redlands as integral part of the proposal, be willing to use money to mitigate UP elsewhere Lancaster-Bakersfield should see further study including double-tracking UP to account for potential change in HSR schedule DMU for Rosamond-Lancaster service? Rail service to Imperial Valley, possibly by extending Coachella rail Increase funding toward speed and service improvements to expedite EIS of benefits of CAHSR, build ridership to further support capacity increase</p>	<p>Comment noted. The 2016 RTP/SCS includes \$38.6 billion for passenger rail capital projects and \$15.7 billion for operations and maintenance. This investment includes capital projects to improve passenger rail infrastructure to improve speed and service levels, and safety. The operations and maintenance investment includes paying for higher train volumes allowed by these capital improvements. SCAG works with its six member county transportation commissions to develop the transportation investment strategies in the 2016-2040 RTP/SCS. Passenger rail services, including alignments, routes and station locations are determined through a bottom-up planning process led by these commissions.</p>
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16329 Related Documents Link
16329.01	<p>Our letter is in response to the Draft 2016 Regional Transportation Plan/Sustainable Communities Strategy document that has been released and available for review. We have reviewed the document and have developed comments in response to what is and is not proposed. There are several highlights to be noted, including the regional network of non-motorized paths. However, we are also disappointed by quite a lot of the proposals and are especially flummoxed to see that more is not being done to encourage the use of bicycles for commuters. As cities and regions around the world continue to provide ever-increasing amenities for bicyclists and are seeing success in achieving reductions in congestion and improved air quality due to increased use of bicycles, it is inconceivable as to why a much stronger promotion of bicycling as a solution to the region's problems is not being pursued in 2016. Such an oversight is inexcusable and represents a failure of vision and leadership at several levels.</p>	<p>Comment noted. The plan supports bicycle commuting in several ways. It invests \$2.2 billion in First/Last Mile strategies that encourage bicycling and walking to transit. It invests \$3.7 billion in local bikeways (fully building out most local bicycle plans), Regional Bikeways and Regional Greenways. This build-out of the bikeway network develops bikeway density at the local level and regional connectivity that encourages commuting as well as recreational/utilitarian bicycling. SCAG's safety and encouragement campaigns continue to focus on safety, and encouragement, including at the employer level to help increase the number of bicycle commuters. SCAG's land-use strategies include building higher density housing near major transit stations and urban centers, reducing the commute distances for many resident to that which may be walkable or bikeable, particularly with transit.</p>
16329.02	<p>The Active Transportation (AT) Appendix provides a little depth to what is otherwise a topic that receives far too little attention in the 2016 RTP/SCS. However, while the Appendix paints a picture of a blossoming and encouraging environment for active transportation and bicycling in the SCAG region, it is short on the details pertaining to planning and funding, especially for the Inland Empire.</p>	<p>Comment noted. SCAG's Active Transportation Appendix incorporates all published local active transportation plans, including those from Imperial County, Western Riverside County, Coachella Valley and San Bernardino County. The Active Transportation Appendix also notes that \$12.9 Billion can be allocated to active transportation through several categories. Local jurisdictions are responsible for implementation, and what sources of funding will be used.</p>

ID	Comment	Response
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16329 Related Documents Link
16329.03	<p>Turning to the Project List Appendix also is exceedingly light on specifics, especially of the greenway network laid out in Exhibit 12 Regional Bikeway Network of the AT Appendix. While a few trails are identified, they are absolutely dwarfed by plans to increase automobile capacity and the actual word “greenway” appears only twice in the entire Project List Appendix; Figure 1. Additionally, it’s uncertain how many of the few trails identified will provide linkages that aren’t primarily recreational in focus.</p>	<p>Comment noted. The six county SCAG region is a vast and diverse region, geographically as well as demographically. Accordingly, the 2016 RTP/SCS recognizes that a “one size fits all” approach will not work for our region. So, the plan is multi-modal and aims to address transportation needs of all segments of our society across our expansive region by expanding and enhancing travel choices. The plan creates opportunities to engage in a healthy and active lifestyle through a significant increase in investment in Active Transportation modes. At the same time, the plan also recognizes that over 90% of the trips will continue to rely on our roadways, particularly in places like Riverside and San Bernardino counties. So, strategic improvements to our roadways to improve safety and congestion must be a part of any sensible long term plan. In addition, investments to our roadways also serve to benefit other modes including transit and active transportation. Furthermore, it should be noted that many of these roadway improvement projects are part of a commitment made by the counties to their residents in the passing of local option sales tax measures that fund many of these projects. In addition, active transportation plans from local jurisdictions are included, beyond the project listings provided by the CTCs. These include the Imperial County Bicycle Plan, Western Riverside County Non-Motorized Transportation Plan, Coachella Valley Non-Motorized Transportation Plan, CVLink, and the San Bernardino County Non Motorized Transportation Plan.</p>
16329.04	<p>Other issues with the AT Appendix appear early on. Per CA Streets & Highways Code §890.3, bicyclists traveling for transportation purposes beyond just work are still considered commuters. Yet, the document attempts to split commuters into two separate groups of people going to work and people biking for other transportation-related reasons when the reality is that no division is needed. All bicyclists traveling for transportation, whether heading to work or going to a store/school/etc. on a “utilitarian” trip all have the same goal and desire from the system: to be able to travel to their destination in as direct a journey as possible with as few stops as possible. Trying to dissect commuters into two separate subgroups and is unnecessary and does a disservice to all. All wasn’t doom and gloom. We were inspired by the Level of Traffic Stress ranking and models presented in Table 1 of the AT Appendix. It serves as great model to adopt and to strive toward. SCAG policies need to be updated to include LTS2 bikeways as the default. Additionally, SCAG and the member jurisdictions must set a goal of ensuring that all residents live a maximum of a mile from a LTS2 bikeway within five years, a half mile within 10 years, and a quarter mile by the horizon year. This standard needs to also extend to new developments to ensure that they either fall within the limits or build the facility as part of construction. These facilities must also connect the communities to others surrounding and to the greater region as a whole. Cul-de-sac developments should be exploited to provide connectivity for non-motorized users by way of an off-street network that provides greater freedom of movement than driving on the road would.</p>	<p>Comment noted. It is recognized in the plan that one trip can involve several purposes and no one fits neatly into one category. The text has been updated to reflect that. As SCAG and its member communities develop implementation plans, and update local active transportation plans, various performance metrics and standards will be developed. However, local jurisdictions have final implementation authority over building LTS networks.</p>

ID	Comment	Response
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16329 Related Documents Link
16329.05	<p>We also have several other comments, grouped together below based on the page where they are found. Page 5: · more encouragement of bike boulevard treatments · Illustration of Class IV bikeways is inaccurate, would be more appropriate for use for Class IIs Page 6: · Roundabouts as an effective intersection and should be encouraged as default at all intersections, especially as part of new construction · Remove/disallow free right turn lanes · Complete Streets strategies need to go a step further beyond just "allowing" or "enabling" access by removing car-centric designs driven by LOS and establishing metrics such as people per hour to determine success Page 7-8: Land use · Cul-de-sac can be open and include connections for non-motorized users · Disincentives driving Safety (page 8-9) · Increase in injuries should be addressed, but in itself is not as problematic if participation is increasing faster · Addressing hotspots or common factors should be focus · Lack of lighting identified, is a real issue in Inland Empire, yet no concrete steps identified for addressing that problem Existing bikeways (page 15-19) · Inland Empire needs to focus on more 8-80 facilities · Greater use of Class IV facilities · Class III bikeways on arterials cannot be considered anywhere near adequate, should barely be considered bikeways · Much more attention needs to be paid toward improving connections among IE cities and especially between the two counties · Bike parking is extremely lacking, more bike corrals need to be encouraged, especially in new construction</p>	<p>Page 5 - Class IV bikeways graphic has been revised. Page 6 - Revised Intersection Treatment, new bullet added: "Roundabouts on low-speed streets (slows traffic, but can improve traffic flow)" - Local Jurisdictions have sole authority over allowing free right turn lanes. - Complete Streets Strategies. Comment noted. Changes in California Law will change how LOS is stressed. Page 7-8 - Comment noted Page 8-9 - Comments noted. Review of safety data indicates the majority of bicycle collisions occur during daylight hours. Data includes street light conditions, but does not clearly identify bicycle lighting Pages 15-19 Comments noted.</p>
16329.06	<p>The bicycle can be one of the most effective methods of dealing with congestion in the majority of the SCAG region. With a capacity that is several multiples of the hourly capacity of a vehicular lane, encouraging biking provides what is probably the best return on investment for increasing capacity. While regional work commutes may stretch longer than many people are willing to ride, bicycles should still be integral to strategies to reduce motor vehicle travel. Shorter trips to stores, appointments, and especially of parents taking children to school can be greatly reduced, freeing up roadway capacity for people driving for longer distances that are infeasible to bike. Additionally, improving connections to transit, including parking at transit, is integral to providing options for those who are traveling longer distances. Unfortunately, there is much work to be done to bring the Congestion Management Appendix up to snuff in regards to using bikes to their fullest potential. However, the good news is that a few small changes would greatly address that issue. We are identifying them below. Their inclusion in the final document will go far toward ensuring that this oversight does not continue. - MULTI-MODAL PERFORMANCE is identified as being measured, but no mention is made about it being tracked over time and is mum in regards to active transportation. It needs to be changed to explicitly identify that it will be tracked over time and that active transportation will be part of it. - Change the word "and" in TRANSPORTATION DEMAND MANAGEMENT (TDM) to "by". - Add a metric that measures Active Transportation to the Mobility and Accessibility portion of the 2016 RTP/SCS Performance Measures identified in Table 1.</p>	<p>Comment noted. SCAG's Congestion Management Process, as detailed in the Congestion Management Appendix of the 2016 RTP/SCS, includes measuring Active Transportation Measures and tracking these measures over time. These are detailed on page 7 of the appendix and include measuring and tracking modal share, and measuring and tracking the mileage of bicycle facilities (Classes 1, 2 and 3).</p>

ID	Comment	Response
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16329 Related Documents Link
16329.07.1	<p>Perhaps the most perverse of all the Appendices is the one dedicated to Highways and Arterials. Despite all the proposals and platitudes to change included throughout the RTP/SCS and this very Appendix, a closer read through it and the Project List reveal the truth: it's almost all just doublespeak for widening roads and continuing the failed strategy of attempting to build out of congestion with wider roads. This is especially true in regards to the Inland Empire, as the vast majority of the projects identified and expenditures planned for Riverside and San Bernardino counties all start with "widen", despite the Inland region already failing to even maintain a good state of repair on what exists. That must be improved before expansion occurs. While there is potential for the widenings to serve all users, it requires that strong complete streets policies that truly serve, not just accommodate, all modes be in place. Such policies would focus on making sure that moving people, not cars, is the primary concern. We have several Guiding Principles · System monitoring needs to include measurements of active transportation</p>	<p>Comment noted. The six county SCAG region is a vast and diverse region, geographically as well as demographically. Accordingly, the 2016 RTP/SCS recognizes that a "one size fits all" approach will not work for our region. So, the plan is multi-modal and aims to address transportation needs of all segments of our society across our expansive region by expanding and enhancing travel choices. The plan creates opportunities to engage in a healthy and active lifestyle through a significant increase in investment in Active Transportation modes. At the same time, the plan also recognizes that over 90% of the trips will continue to rely on our roadways, particularly in places like Riverside and San Bernardino counties. So, strategic improvements to our roadways to improve safety and congestion must be a part of any sensible long term plan. In addition, investments to our roadways also serve to benefit other modes including transit and active transportation. It should be further noted that we have more than doubled our investments in Active Transportation since the adoption of 2012 RTP/SCS to almost \$13 billion. Our investments in Passenger Rail, Transit and Active Transportation together account for more than 50% of our investments in the 2016 RTP/SCS. Furthermore, with the renewal of Deputy Directive 64-R2, Complete Streets - Integrating the Transportation System, Caltrans has placed an even greater emphasis towards the consideration of pedestrians and bicyclists throughout all phases of a project. Therefore, it is only a matter of time before complete street ideals are fully integrated as part of the capital improvement projects. It should also be noted that many of these roadway improvement projects are part of the commitment made by the counties to their residents in passing the local option sales tax measures that fund many of these projects. As SCAG and its member communities develop implementation plans, and update local active transportation plans, various performance metrics and standards will be developed. SCAG is working with partner agencies to improve measurement and documentation of active transportation trips in the region, including better documentation of active transportation in the Federal Transportation Improvement Program (FTIP) submittals, including active transportation as part of larger infrastructure or maintenance projects.</p>
16329.07.2	· Mention at least one active transportation-oriented TSM	<p>Active Transportation is considered part of a Transportation Demand Strategy (TDM), not a Transportation System Management (TSM). TDMs provide alternatives to peak period single occupancy vehicles, such as transit, walking or biking,, telecommuting and flexible work-shifts, thereby reducing the demand for automobile driving. TSMs are about reducing congestion through the transportation system. TSMs can include traffic signal synchronization, freeway on-ramp metering, eliminating bottlenecks on freeways and emergency freeway response. The 2016 RTP/SCS Active Transportation Appendix incorporates regional trip strategies, short trip strategies and transit access strategies all considered transportation demand management.</p>
16329.07.3	· All capacity increases MUST include increase in transit and active transportation as well and cannot be dependent on only occurring "where feasible". If transit and active transportation are "not feasible", there's really no reason for an expansion.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16329 Related Documents Link
16329.07.4	· ALL streets are for ALL users, complete streets CANNOT rely only on being done "where feasible and practical". They MUST be included as the guiding principle for ALL projects with robust opt-out clauses based on the design life of the facility in question.	Comment noted. SCAG recognizes the context of the roadway as a consideration for the type of complete street treatment. Some complete streets treatments may not be feasible (e.g. a bike lane on a freeway), while others may be feasible (e.g., a separated bikeway next to a freeway).
16329.07.5	Corridor Mobility and Sustainability Improvement Plans · "optimize corridor performance" needs to ensure that corridors are optimized for ALL modes · CSMPs must have a complete streets approach with strong exception clauses to ensure that easy outs can't occur Additional System Management Initiatives needs to include greater focus on transit signal priority Arterials should carry less of overall traffic, more of transit/active traffic Performance Results · Crucial error, they must NOT be solely based on vehicle-hours of delay · Performance results MUST include the currently glaringly absent measurement of delay incurred by users traveling by active transportation and transit in the analysis	Comment noted.
16329.08	We agree with the reasoning that went behind the name of this Appendix. Bicycles are by no means a new invention, but they continue to hold an extremely large potential in helping SCAG and its member jurisdictions address the mobility challenges and opportunities that face the region. We would encourage that more experimentation be included, especially of parking opportunities with transit. There should be a much greater focus on increasing access to transit all over the region as well to ensure that it is easily accessible by all.	Comment noted.
16329.09	The Performance Measure Appendix is another window into the lip service being given to alternative solutions by the RTP/SCS. Too many of the metrics proposed are car-centric and are just a continuation of flawed policies of the last half-century. Despite the passage of SB 743 in 2013 and continual work by the State on an alternative to LOS, it is apparent that trying to make sure that there's space for everyone to drive at 65 MPH and be at the front of every queue has played a large role in guiding the parts of the Plan, especially in the Inland Empire. With continued admission on all fronts and levels of government that building bigger roads only results in more people KSI, it is inexcusable to see the magnitude to which LOS-based "capacity" is being promoted by a Plan that aims to be sustainable. Introduction · Maximize mobility for people and goods · Maximize productivity of transportation system <-- arterials is not the way · Make the existing environment also provide better bike/ped · Mobility and Accessibility metric needs to address delay incurred by transit and active transportation users 2016 RTP/SCS Outcomes & Performance Measures · Reliability needs to include a metric to measure variability of travel time for transit and active transportation · Mobility MUST include a measurement of Person Delay for transit Performance Measure for On-Going Regional Monitoring · Vehicle delay and non-recurrent delay cannot be the only measures used to determine performance · Delay for travelers going by active means or transit MUST also be included · Inexcusable that Plan will only improves biking mode share by 0.2% over 25 years · Needs to include a metric measuring how many residents live within 1/2 mile of a maximum LTS2 bikeway · Exhibit 4 is laughably unrealistic without significant investments in alternative transportation far beyond what is outlined by the Plan	Comments noted. Thank you for taking the time to review and comment on the Performance Measures appendix to the draft 2016 RTP/SCS. Regarding SB 743, SCAG has been coordinating closely with the Governor's Office of Planning and Research (OPR) to ensure that the update to the CEQA Guidelines is conducted in a manner that will ensure successful implementation throughout the SCAG region. In accordance with SB 743, motor vehicle delay will no longer be considered a transportation impact under CEQA. Implementation of SB 743 is designed to encourage more transit-oriented, mixed-use development in centrally located areas, as well as promote the development of bicycle and pedestrian infrastructure and amenities within these highly accessible areas, thereby reducing regional greenhouse gas emissions. These same regional sustainability goals are a primary focus of the 2016 RTP/SCS and of the range of performance indicators that support it. We agree that enhanced performance monitoring metrics for our transit system and active transportation infrastructure are desirable to ensure we stay on track toward achieving our regional sustainability goals. SCAG will continue to work with our state, regional, and local partners to seek and incorporate improved monitoring methodologies in these areas as they become available.

ID	Comment	Response
<i>Submitted by</i> Inland Empire Biking Alliance		Submittal 16329 Related Documents Link
16329.10	<p>In conclusion, we are not confident that the current Draft SCAG 2016 RTP/SCS will be beneficial for many bicyclists of the Inland Empire. Many currently quiet roads are slated to be ballooned to outrageous proportions, degrading the LTS of the riding conditions and leaving bicyclists without reasonable alternatives. Though the Plan includes many comments and possibilities for what could occur in the future, the Inland Empire is left and decidedly stuck in the height of car-centric planning and design. This needs to be corrected and addressed by both SCAG and the member jurisdictions. As the Inland Empire continues to grow, it cannot continue to be paved over in a bid to keep cars moving. Other measures need to be explored to their fullest extent, including bicycles. With much developable opportunity still existing, the opportunity exists to provide ideal provisions from inception. We hope to see those used to their fullest extent to provide a model environment for the region, nation, and even the international community. But it requires a vision of improvement. We hope that vision can become a reality.</p>	<p>Comment noted. The Plan Implementation section of the Active Transportation Appendix (Page 69) delineates actions SCAG will take in collaboration with stakeholders and local, state and federal partners to help implement the Active Transportation component of the 2016 RTP/SCS. The Appendix also encourages local jurisdictions to incorporate active transportation into new road construction as well as maintenance. However, final implementation decisions are at the local jurisdiction level.</p>
<i>Submitted by</i> John Wayne Airport		Submittal 16219 Related Documents Link
16219.01	<p>In reviewing the Draft 2016 RTP/SCS, it appears that most of the information accurately reflects the JWA data and information provided to SCAG. However, we request correction to two items as follows: 1. In the Draft 2016 RTP/SCS Aviation and Ground Access Appendix, page 21, it is stated that John Wayne Airport has thirteen bridged gates that accommodate aircraft design group (ADG) IV aircraft, specifically the Boeing 757 aircraft. Although that is correct from a gate design standpoint, it is critical to note that currently only six of JWA's twenty bridged gates are actually used to accommodate a 757-200 aircraft. This is the result of a gradual phasing out of the aircraft by the airlines, the age of the aircraft, and the lack of future production. Therefore, it is likely that even fewer than six JWA gates will be used for this ADG IV aircraft in the future. Because of the document's assumptions related to existing and future JWA gate accommodations for the 757-200 aircraft, the JWA terminal capacity appears to be overestimated. Specifically, page 21 states that based upon the estimated maximum number of operations per gate, average seat capacity and load factors, the existing JWA terminal would have a capacity of 16 million annual passengers (MAP). However, based upon analysis done in JWA's 2014 Capacity Analysis Technical Report (AECOM 2014), which was provided to SCAG, terminal gate capacity would be exceeded at approximately 12.3 MAP. We therefore request that the JWA terminal capacity be reevaluated and corrected based upon the JWA 2014 Capacity Analysis Technical Report.</p>	<p>Comment noted. The comment is correct that the 757 aircraft is no longer in production and likely to be removed from airline fleets as the existing planes age, new ADG III aircraft such as the Boeing 737MAX-9 and the Airbus A321neo will have passenger capacities similar to or exceeding the 185 seats assumed for ADG IV aircraft in the analysis. Therefore, the estimate in the RTP is reasonable as an upper bound on the capacity of John Wayne Airport. Based on the airfield capacity, the RTP/SCS assumed an overall airport capacity of 12.5 MAP, which is only slightly greater than the 12.3 described in the comment.</p>
16219.02	<p>2. On page 34 of the Draft 2016 RTP/SCS Aviation and Ground Access Appendix, the text states, "John Wayne Airport is located in the City of Santa Ana, in Orange County, near the cities of..." Please correct this to read, "John Wayne Airport is located in unincorporated Orange County, near the cities of..."</p>	<p>Comment noted. Appropriate edit has been incorporated into the Final 2016 RTP/SCS.</p>

ID	Comment	Response
<i>Submitted by</i> La Habra 2025		Submittal 16163 Related Documents Link
16163.01	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation programs. Your coalition is encouraged to participate in the effort.</p>
16163.02	<p>The Plan outlines that the region anticipates an additional 3.8 million people by 2040 providing increased pressure on our existing parkland. Studies document that many communities in the Southern California region already do not have enough parkland as outlined by the Quimby Act (3 acres per 1,000 residents). The City of La Habra is 100 acres short of meeting its, "2.5 acres of parkland per 1000 people", General Plan requirement. Now is the time to acquire more regional open-space. In the future, these regional parks will become even more valuable. Throughout the document, the Plan promotes providing more access to these existing parks as infill projects are built, but nowhere does it state how additional parks will be created. The mechanism is missing. More importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity recreation oriented activities, like soccer and baseball fields, and are turfed. The types of land acquired as mitigation or through local conservation efforts typically are focused on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing “more” access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. The document needs to address the impacts to local parks with increased access from expanding populations. The document also needs to address how additional lands will be protected, i.e., what mechanism will be used?</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> La Habra 2025		Submittal 16163 Related Documents Link
16163.03	<p>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.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”</p>
16163.04	<p>Now is the time for a "Regional Bike Trail System Implementation Plan".</p>	<p>Comment noted. Once the 2016 Regional Transportation Plan/Sustainable Communities Strategy is approved, SCAG will work with stakeholders to begin implementation of active transportation strategies.</p>
<i>Submitted by</i> Laguna Canyon Foundation		Submittal 16280 Related Documents Link
16280.01	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16280.02	<p>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.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Laguna Canyon Foundation		Submittal 16280 Related Documents Link
16280.03	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your group is encouraged to participate in the effort.</p>
16280.04	<p>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.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide "incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries." The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."</p>
<i>Submitted by</i> Laguna Greenbelt, Inc.		Submittal 16281 Related Documents Link
16281.01	<p>It's time for SCAG to implement a regional conservation program. We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts by partnering with agencies, transportation commissions and non-profits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that should be replicated in Southern California.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your group is encouraged to participate in the effort.</p>

ID	Comment	Response
<i>Submitted by</i> Latham and Watkins LLP		Submittal 16316 Related Documents Link
16316.01	<p>Given the importance of the RTP/SCS for future planning, the designations as to the Chavez Ravine property located immediately north of downtown Los Angeles should be clarified. We understand that the Draft 2016 RTP/SCS designates much of the Chavez Ravine property as Urban land use, with portions Compact land use, and much of the property as a 2040 Plan High Quality Transit Area. Recognizing that this is an integrated site, SCAG should designate the entirety of the Chavez Ravine property as Urban land use and High Quality Transit Area. Such designations can encourage opportunities for meaningful transit to the area and Elysian Park, as well as support reinvestment in adjacent neighborhoods that have been designated as SB 535 Disadvantaged Communities.</p>	<p>Comment noted. SCAG’s SCS is built upon local input from local jurisdictions. 35 “Place Types” were utilized in the urban setting design tool (Urban Footprint Scenario Planning Model (SPM)). It is the Place Types that factor into the modeling analyses. Land Development Categories (LDCs), which "Urban" and "Compact" designations are categories of, are utilized in order to describe general conditions within areas of the SCAG region and do not play a role in the modeling analyses. LDCs and Place types are utilized because of the size of the SCAG region and the variety of land uses. The 35 Place Types were then classified into the three LDCs. The "Forecasted Regional Development Types" maps have been developed for the purpose of modeling performance. SB 375 legislation does not require that a jurisdiction’s land use policies and regulations, including its general plan, be consistent with the SCS. City of Los Angeles staff were involved in the review of land use designations utilized in the RTP/SCS.</p>
<i>Submitted by</i> Latham and Watkins LLP		Submittal 16336 Related Documents Link
16336.01	<p>We commend SCAG for its visionary leadership in developing a regional transportation plan and sustainable communities strategy, in particular the theme of “integrating strategies for land use and transportation” and focusing new housing and employment around transit. Given the importance of the RTP/SCS for future planning, the designations as to the Chavez Ravine property located immediately north of downtown Los Angeles should be clarified. We understand that the Draft 2016 RTP/SCS designates much of the Chavez Ravine property as Urban land use, with portions Compact land use, and much of the property as a 2040 Plan High Quality Transit Area. Recognizing that this is an integrated site, SCAG should designate the entirety of the Chavez Ravine property as Urban land use and High Quality Transit Area. Such designations can encourage opportunities for meaningful transit to the area and Elysian Park, as well as support reinvestment in adjacent neighborhoods that have been designated as SB 535 Disadvantaged Communities.</p>	<p>Comment noted. SCAG’s SCS is built upon local input from local jurisdictions. 35 “Place Types” were utilized in the urban setting design tool (Urban Footprint Scenario Planning Model (SPM)). It is the Place Types that factor into the modeling analyses. Land Development Categories (LDCs), which "Urban" and "Compact" designations are categories of, are utilized in order to describe general conditions within areas of the SCAG region and do not play a role in the modeling analyses. LDCs and Place types are utilized because of the size of the SCAG region and the variety of land uses. The 35 Place Types were then classified into the three LDCs. The "Forecasted Regional Development Types" maps have been developed for the purpose of modeling performance. SB 375 legislation does not require that a jurisdiction’s land use policies and regulations, including its general plan, be consistent with the SCS. City of Los Angeles staff were involved in the review of land use designations utilized in the RTP/SCS.</p>
<i>Submitted by</i> Leadership Counsel for Justice and Accountability		Submittal 16354 Related Documents Link
16354.01	<p>I represent organizations in the Inland Empire and we've noticed that a lot of the strategies of models for growth are focused on transit oriented development and high quality transit areas which are really fabulous cornerstones for good planning, but somehow don't really fit with a lot of these realities in the Inland Empire. In the Inland Empire and it is very well noted in the RTP/SCS itself that, you know, we have the worst job/housing balance in the region. Inland Empire employees have to travel the farthest distance and we'd like to see SCAG prioritize investment in transit. I know that some people think that transit doesn't work but transit doesn't work because we don't have the infrastructure in the IE. Only .5 percent of low income people in the IE actually have access to a decent and efficient transit stop. We'd like to see models for growth that can be more adaptable and appropriate for a not so-densely populated urban region like Los Angeles. We would like to see something like the neighborhood mobility areas or the high quality transit corridors, maybe, adjusted to suit the realities of less densely populated regions within SCAG. Growth models, SCAG should really uplift best practices throughout the region, specifically, in the Inland Empire that show good strategies for smart growth in a rural community like how instant in those developments is done in a less densely populated community.</p>	<p>Comment noted. In order to encourage “complete communities” that integrate land use and transportation, SCAG introduced two new concepts called “Livable Corridors” and “Neighborhood Mobility Areas.” These concepts are introduced to give local jurisdictions ideas for developing sustainably in other contexts besides dense urban High Quality Transit Areas (HQTAs). The Livable Corridors concept features land use strategies that are appropriate for lower density growth areas that are served by HQTAs bus corridors. The Neighborhood Mobility Areas concept features low impact land use strategies and low-cost transportation solutions to replace vehicle miles with low GHG travel modes. SCAG’s intention is to assist local jurisdictions by providing a framework and allowing maximum flexibility in creating “complete communities”. SCAG will continue to work with the local jurisdictions that show interest in implementing the RTP/SCS land use policies by providing information and resources to support local planning activities, such as the Sustainability Planning Grant Program and the Active Transportation Program.</p>

ID	Comment	Response
<i>Submitted by</i> Leadership Counsel for Justice and Accountability		Submittal 16354 Related Documents Link
16354.02	How different acceptabilities of ride sharing could be uplifted and folded into a more formal transit network so that when we are looking for a different funding sources that prioritize transit and development we're not excluding non-traditional forms of transit. We're also allowing for our growth models to be reactive and adaptive to the different kinds of realities throughout SCAG.	Comment noted. The 2016 RTP/SCS includes investments in a broad array of transportation strategies and improvements including traditional ridesharing such as vanpooling and carpooling, as well as newer strategies such as car sharing and bike sharing. These strategies are detailed in the Active Transportation and first/last mile sections of the plan.
16354.03	Another thing that we hear that SCAG did and I have brought this up before and I know that your team is really great at looking at different ways of qualifying and identifying communities within the subregions; but, again, I do want to bring up the point again that the definition of rural of, basically, anything of 2,500 or below is rural and 2,500 and above is urban, I think kind of limits the ability for SCAG to really predict growth in this variety of communities, right. I don't think an area like Thermal [phonetic] California which is largely a farm worker community shouldn't even be qualified as urban. But there are opportunities for smart growth, there are opportunities to look at what a neighborhood mobility area could look like in a less-densely populated. How do we promote and uplift those strategies for growth and invest in an existing communities so that we're not consistently building new communities to adapt to where there is transit and we really need better indicators to where we need to invest in gaps in our system; right.	Comment noted. The boundary for urban and rural areas in the Environmental Justice Appendix was established by the U.S. Census Bureau in the 2010 Decennial Census and was updated by Caltrans in consultation with FHWA in 2014. Although this represents a reliable geography, SCAG recognizes that the Affordable Housing and Sustainable Communities (AHSC) Program does not utilize this same boundary. Additional consultation with stakeholders will be considered to reconcile the differences between the AHSC guidelines and the U.S. Census Bureau/Caltrans/FHWA. To clarify, the boundary for rural areas utilized in SCAG's Environmental Justice Appendix includes all areas with population under 2,500. As such, Thermal, Mecca, and North Shore qualify as rural areas. These areas also have some of the highest concentrations of minority and low income population in the region, and therefore are included in the "Communities of Concern" geography utilized in the Environmental Justice analysis of the Plan. In order to encourage "complete communities" that integrate land use and transportation, SCAG introduced two new concepts called "Livable Corridors" and "Neighborhood Mobility Areas." These concepts are introduced to give local jurisdictions ideas for developing sustainably in other contexts besides dense urban High Quality Transit Areas (HQTAs). SCAG's intention is to assist local jurisdictions by providing a framework and allowing maximum flexibility in creating "complete communities."
16354.04	And we'd like to see strategies that really uplift and prioritize investment in the regions of SCAG that are kind of falling behind. I'd also like to see SCAG really address the issue of disadvantaged communities in a much flippant [phonetic] and strategic way throughout the plan. SCAG houses 68 percent of California's disadvantaged communities it shouldn't be left in appendix. Prioritizing and investing in disadvantaged communities throughout our region should be part of the plan, it should be an initiative within itself and it should be prioritized in all the different areas. And I think SCAG has a lot of jurisdictions that can really demonstrate great practices of how to prioritize investments in disadvantaged communities.	Comment noted. SCAG will evaluate potential tools to enhance local jurisdiction's competitiveness for grants that target disadvantaged communities. The inclusion of analysis in the Environmental Justice Appendix that examines demographic trends and specifically addresses impacts of the Plan on disadvantaged communities is one step in this direction.

ID	Comment	Response
<p><i>Submitted by</i> Letterly Environmental and Land Planning Management <i>Submittal</i> 16272 Related Documents Link</p>		
16272.01	<p>Cameron Ranch is a project located in TAZ 43457100 south of the City of Banning in incorporated Riverside County. The project is located on assessor parcel numbers 544-050-011 and 544-050-006 comprising approximately 630 acres. A notice of preparation to prepare an environmental impact report was issued on June 10, 2013 and is attached for your reference . An administrative draft environmental impact report is now in development. The development application includes a Tentative Tract Map (TTM # 36410) and General Plan Amendment (GPA # 996). The development application proposes the development of 154 single-family residential lots. It is our understanding that the generalized Riverside County growth projections accommodate reasonably foreseeable projects and the generalized growth projections are not allocated on a project TAZ basis. Please confirm our understanding.</p>	<p>Comment noted. While SCAG received specific TAZ level information from both Riverside County and Banning's planning departments during the development of the growth forecast, no growth information was received for this particular TAZ (43457100). This project was not included in the County's General Plan. SCAG will discuss this project with the County/City for future forecast development. We also encourage commenter to coordinate with the County and Banning to ensure the project is considered in their planning efforts.</p>
<p><i>Submitted by</i> Local Agency Formation Commission for San Bernardino County <i>Submittal</i> 16282 Related Documents Link</p>		
16282.01	<p>There are six LAFCOs within the SCAG region: Los Angeles LAFCO, Orange LAFCO, Riverside LAFCO, San Bernardino LAFCO, Imperial LAFCO, and Ventura LAFCO. The spheres of influence that have been adopted by these LAFCOs should have been considered when developing the RTP/SCS. However, neither the 2016 RTP/SCS nor the Draft PEIR takes into consideration the spheres of influence for any of the cities and/or special districts within the entire region.</p>	<p>Spheres of influence were considered in the development of the 2016 RTP/SCS land use and growth forecast in several ways. First, GIS staff collected official SOI boundary files from all SCAG region LAFCOs and produced had copy data/map books for each of the SCAG region 197 local jurisdictions. All the SOI shape files are available on SCAG's FTP site for download. Second, SCAG staff went through with each local jurisdiction on their SOI boundary and map when conducting one-on-one meetings with local jurisdictions. Finally, TAZs under SOI were given growth priority over non-SOI TAZs and those TAZ level growth forecast were also reviewed by local jurisdictions. This forecast was used for the analysis in the PEIR.</p>
<p><i>Submitted by</i> Los Angeles Area Chamber of Commerce <i>Submittal</i> 16273 Related Documents Link</p>		
16273.01.2	<p>The RTP/SCS document does a good job of developing long-range regional plans and strategies that provide practical movement of people and goods, while enhancing economic growth, facilitating international trade and improving the environment and quality of life.</p>	<p>Comment noted.</p>
16273.01.3	<p>The Chamber is pleased the RTP/SCS used a transparent, inclusive decision making approach that engaged all stakeholders impacted by the RTP/SCS.</p>	<p>Comment noted. SCAG will consider this comment in assessing its outreach activities.</p>
16273.01.4	<p>SCAG's emphasis on transportation- transit and highways, active transportation, goods movement, housing and land use, energy and environment- in addition to workforce development, education, innovation and technology address the most significant needs of the region.</p>	<p>Comment noted.</p>
16273.01.5	<p>With the goods movement sector contributing to nearly one-third of the regional economy, efficient transportation of goods through transit corridors and arterials is especially significant in the RTP/SCS to maintain competitive, thriving economy.</p>	<p>The 2016-2040 RTP/SCS identifies nearly \$75 billion necessary to continue to move freight through 2040. We agree that this is an important contributor to our economy.</p>

ID	Comment	Response
<p><i>Submitted by</i> Los Angeles Area Chamber of Commerce Submittal 16273 Related Documents Link</p>		
16273.01.6	<p>We'd like to highlight that with decreasing gas tax revenue for transportation projects, it is crucial that funding for transportation projects and revenue for all goals outlined in the RTP/SCS be attainable and innovative sources to fund projects, while addressing diverse funding streams. Closing the funding gap is paramount to achieving the goals of this plan.</p>	<p>Comment noted. We concur.</p>
<p><i>Submitted by</i> Los Angeles County - Department of Public Health Submittal 16264 Related Documents Link</p>		
16264.01	<p>In the EJ Appendix, SCAG identifies gentrification as an issue in transit oriented communities (TOCs) and states that this could cause the displacement of minority and low-income households. We applaud SCAG for including a performance measure to monitor growth in TOCs. However we recommend that SCAG track the number of very low, low and moderate income housing units available and constructed as a way of gauging progress toward implementation of the 2013-2021 Regional Housing Needs Assessment. As our regional Planning agenda we encourage SCAG to work with local jurisdictions on land use and affordable housing strategies that prevent and reduce gentrification and displacement of minority and low income residents. We encourage SCAG and the Regional Council to identify ways to do this within the RTP/SCS or in the work plan to be created upon adoption. Technical assistance programs, tools, and policies must be identified to assist member jurisdictions in maximizing the benefits of transit investments for housing and decrease the potential for displacement of minority and low-income populations. SCAG is well positioned to encourage jurisdictions to develop local affordable housing policies near transit. For example, the County of Los Angeles is currently developing a comprehensive plan to combat homelessness that includes consideration of land use strategies that could be adopted by local jurisdictions through the SCAG region. These polices include options such as: - An affordable housing benefit fee program, also known as a linkage fee, which would charge a fee on all new development to support the production of affordable housing. - An incentive zoning and "value capture" strategy based on the concept that infrastructure and planning actions such as zone changes can increase land values which can be redirected toward the public good, such as affordable housing. - A density bonus ordinance that can incentivize the development of affordable housing in exchange for greater density. SCAG could play a key regional leadership role in encouraging member jurisdictions to develop policies such as these in communities where transit investment have or will be made. SCAG could also play a roles at the State level with respect to housing policies near transit. Finally, we recommend SCAG convene a task force to assist local jurisdictions with best practice tools to address the complex issue of gentrification and displacement around transit.</p>	<p>SCAG will consider emerging and persistent regional issues, including suggestions from the comment process, and may propose new task forces/sub-committees as needed. In regard to strategies for gentrification and displacement, as part of its Environmental Justice Appendix SCAG has put together an Environmental Justice Toolbox of possible mitigation measures to address potential impacts to disadvantaged communities. On page 195 of the appendix, there is a list specifically for potential resources and strategies related to gentrification and displacement. Because many of these strategies concern local land use decisions, the toolbox strategies are voluntary but SCAG encourages communities to consider them as part of the local decisionmaking process along with traditionally identified tools, such as density bonus ordinances, to help build affordable housing. At the State level, SCAG has been meeting with the California Department of Housing and Community Development (HCD) and other stakeholder groups to encourage affordable housing near transit and remove or streamline barriers for development.</p>
<p><i>Submitted by</i> Los Angeles County - Department of Public Health Submittal 16292 Related Documents Link</p>		
16292.01	<p>We are pleased to see the inclusion of the Public Health Appendix, which describes the impact of different land use and transportation scenarios on public health outcomes such as physical activity, chronic disease, and air quality. Furthermore, the inclusion of performance measures helps demonstrate the health impacts of the RTP/SCS and measure progress as projects are implemented.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Los Angeles County - Department of Public Health		Submittal 16292 Related Documents Link
16292.02	<p>The RTP/SCS has the potential to improve health outcomes in our region by planning for transportation investments that will improve access to jobs, schools, parks, natural environments, nutritious foods, and health care. However, these same transportation investments may also create unintended negative health impacts by decreasing housing affordability and increasing displacement of minority and low-income residents.</p>	<p>A part of its Environmental Justice Appendix, SCAG has put together an Environmental Justice Toolbox of possible mitigation measures to address potential impacts to Environmental Justice communities. On page 196 of the appendix, there is a list specifically for potential resources and strategies related to gentrification and displacement. Because many of these strategies concern local land use decisions, the toolbox strategies are voluntary but SCAG encourages communities to consider them as part of the local decision-making process.</p>
16292.03	<p>In the Environmental Justice Appendix, SCAG identifies gentrification as an issue in transit oriented communities (TOCs) and states that this could cause the displacement of minority and low-income households. We applaud SCAG for identifying a gentrification and displacement performance measure in the RTP/SCS and for stating that the agency will continue to monitor growth in TOCs. However, we recommend that SCAG track the number of very low, low, and moderate income housing units available and constructed as a way of gauging progress toward implementation of the 2013-2021 Regional Housing Needs Assessment.</p>	<p>Jurisdictions are required by State housing law to submit to the California Department of Housing and Community Development (HCD) an annual progress report that tracks housing building activity by RHNA income category. SCAG acknowledges that this data is often incomplete and inconsistently report and represents only a portion of affordable housing building activity. Because of this, SCAG is developing a pilot survey to determine how to encourage jurisdictions in the region to submit this information on a more consistent basis so that there the data is more accurate than what is currently available.</p>
16292.04	<p>We also encourage SCAG, as our regional planning agency, to play a leadership role in working with local jurisdictions on land use and affordable housing strategies that prevent and reduce gentrification and displacement of minority and low income residents. We encourage SCAG and the Regional Council to identify ways to do this within the RTP/SCS or in the work plan to be created upon its adoption. Technical assistance programs, tools, and policies must be identified to assist member jurisdictions in maximizing the benefits of transit investments for housing and decrease the potential for displacement of minority and low-income populations. SCAG is well positioned to encourage jurisdictions to develop local affordable housing policies near transit. For example, the County of Los Angeles is currently developing a comprehensive plan to combat homelessness that includes consideration of land use strategies that could be adopted by local jurisdictions throughout the SCAG region. These policies include options such as:</p> <ul style="list-style-type: none"> • An affordable housing benefit fee program, also known as a linkage fee, which would charge a fee on all new development to support the production of affordable housing. • An incentive zoning and “value capture” strategy based on the concept that infrastructure and planning actions such as zone changes can increase land values which can be redirected toward the public good, such as affordable housing. • A density bonus ordinance that can incentivize the development of affordable housing in exchange for greater density. <p>SCAG could play a key regional leadership role in encouraging member jurisdictions to develop policies such as these in communities where transit investments have or will be made. SCAG could also play a role at the State level with respect to housing policies near transit. Finally, we recommend that SCAG convene a task force specifically to assist local jurisdictions with best practice tools to address the complex issues of gentrification and displacement around transit. The task force should include affordable housing experts, transit agencies, city officials, public health practitioners, and others.</p>	<p>A part of its Environmental Justice Appendix SCAG has put together an Environmental Justice Toolbox of possible mitigation measures to address potential impacts to Environmental Justice communities. On page 195 of the appendix, there is a list specifically for potential resources and strategies related to gentrification and displacement. Because many of these strategies concern local land use decisions, the toolbox strategies are voluntary but SCAG encourages communities to consider them as part of the local decisionmaking process. SCAG will consider emerging and persistent regional issues, including suggestions from the comment process, and may propose new task forces/subcommittees as needed. SCAG is also exploring ways to address social equity issues, including potential gentrification and displacement, beyond the RTP/SCS process, and will continue to work with stakeholders to discuss challenges and potential strategies for the SCAG region in affordable housing planning and production.</p>

ID	Comment	Response
<i>Submitted by</i> Los Angeles County - Department of Regional Planning		Submittal 16254 Related Documents
16254.01	<p>One of the highlights in RTP/SCS 2016 is an emphasis on development along HQTA (High Quality Transit Areas). While Transit-Oriented Development (TOD's) offers great benefits to the community and region, it often creates undesired impact, such as displacement, which could be mitigated by other policies or strategies. The Los Angeles County will be looking at value capture strategies as a way to examine and minimize the impact of displacement from TOD. Some examples include: expanding application of density bonus, establishing mandatory inclusionary zoning, or building value capture tools into community plans. Similar policies and strategies in RTP would help jurisdictions balance between development and sustainability. The County's value captures strategies are outlined in the attached Equity report as well as the Board motion on Development and Implementation of Equitable Development Tools. We are also open to sharing the process and outcome as we move forward with development of these tools.</p>	<p>Comment noted. The 2016 RTP/SCS looks into and analyzes the impacts of TOD, such as displacement. SCAG is encouraged Los Angeles County is looking into value capture strategies as a way to examine and minimize the impact of displacement from TOD. SCAG will welcome the County to share the processes and outcomes of the Equitable Development Tools. Beyond the analyses of displacement in "performance areas" (contained in the Environmental Justice Appendix), it is the direction of the Regional Council to maintain local land use authority, thus including strategies such as density bonuses, establishing mandatory inclusionary zoning or building value capture tools go beyond SCAG's authority.</p>
16254.02	<p>In terms of Environmental Justice policies, it would be helpful to prioritize grant distribution among disadvantaged communities and to provide frameworks for jurisdictional collaboration as many disadvantaged communities cross jurisdictional boundaries. It would be very helpful to see in RTP tools that identify such communities by various factors (something similar to CalEnviroscreen, but more region- or local-specific). The Los Angeles County is currently developing an 'Equity Scorecard', which would be used in identify disadvantaged communities in County areas. If RTP provides guidelines on prioritizing, or frameworks for development of such a tool, it would help reduce duplicate efforts by local jurisdictions and increase regional consistency.</p>	<p>Comment noted. SCAG will evaluate potential tools to enhance local jurisdictions' competitiveness for grants that target disadvantaged communities.</p>
<i>Submitted by</i> Los Angeles County - Metropolitan Transportation Authority		Submittal 16183 Related Documents Link
16183.01	<p>Pg. 4, column 2, bullet 2 – Reads: "Utilitarian walkers requiring easy, attractive and safe access to retail, dining and other attractions." Suggested edits: Utilitarian walkers requiring safe access to vital services including medical, grocery, public transit, child care, retail, and other key destinations.</p>	<p>Incorporated suggested edit.</p>
16183.02	<p>Pg. 4, column 2, bullet 3 Reads: "Recreation and fitness pedestrians requiring good quality infrastructure for fast walking/jogging." Suggested edits: Recreation and fitness pedestrians requiring safe and unobstructed quality infrastructure for unimpeded walking/jogging.</p>	<p>Incorporated recommended edit.</p>
16183.03	<p>Pg 15 Discussion of LA County does not recognize adopted and current efforts by Metro, e.g.: Complete Streets Policy, First/Last Mile Strategic Plan, Bike Share, LA River Bike Path Gap Closure, etc. and forthcoming Metro Active Transportation Strategic Plan. Also several cities in the San Gabriel Valley have adopted a regional bike plan. The RTP should be updated to reflect current activities for LA County.</p>	<p>Inserted language regarding various active transportation planning activities in Los Angeles County.</p>

ID	Comment	Response
<i>Submitted by</i> Los Angeles County - Metropolitan Transportation Authority		Submittal 16183 Related Documents Link
16183.04	Pg 15 Bike lockers and secure bike rooms (self-serve and attended) currently exist for long term. Need to better define/describe what bike parking stations are as some provide additional attended services to support bike commuters such as at El Monte, Long Beach and Santa Monica. Pasadena does not have a bike station. Also Burbank, Covina and Claremont have self-serve bike stations. Should note to mention that bicycle lockers also have issues with maintenance and the required space and footprint they take up. Document should also recognize education on how to properly lock a bicycle. Often time people use cable locks for locking their bike that are easily defeated. Important for people to be responsible for their own property through preventable measures.	Comment noted. Language inserted regarding definitions of racks, lockers and stations. Issues of maintenance, and bicycle lock education are beyond the purpose of this appendix.
16183.05	Pg. 18 Statement “Bicycle-racks are often located within an office building’s parking garage (providing increased security over bicycle racks on public sidewalks)...” This is not necessarily true as bike racks at the street level have more “eyes” on them. Whereas, bike racks in hidden places such as parking garages can be very susceptible to theft.	Removed language in parenthesis mentioning increased security.
16183.06	Pg. 19 Include 2014 existing LA County bikeway conditions not 2012: Facility Type as of 2014 Class 1 305.29 Class 2 835.5 Class 3 522.26 Cycle Track 4.2	Comment noted. 2012 is considered the base year for the 2016 RTP/SCS. Therefore, county bikeway totals are represented by 2012 totals.
16183.07	Pg. 18 The 2012 National Household Travel Surveys indicated that bike trips for SCAG region were calculated at 1.9%. In the 2016 draft it indicates that the bike mode share for the CA household survey is 1.12%. This is a significant reduction; please verify that the figures are accurate.	Comment noted. Both data sets are correct. The 2012 Regional Transportation Plan/Sustainable Communities Strategy used data from the 2008 National Household Travel Survey which provided the percentages referenced from the 2012 RTP/SCS. The 2016 RTP/SCS uses data from the 2012 California Household Travel Survey. The 2008 data was weighted differently (unlinked trips) when compared to the data from the 2012 California Household Survey, which was weighted internally by SCAG (linked trips). In addition, the region was impacted in 2008 by a rapidly declining economy and high gas prices, which may have temporarily spiked walking and bicycling mode share during the survey period.
16183.08	Pg. 20 Same for Pedestrian mode share 2012 NHTS CA SCAG region indicated 19.24% and now for draft 2016 it is 16.8%. Please verify accuracy of figures and/or provide discussion on reduction/change.	Comment noted. Both data sets are correct. The 2012 Regional Transportation Plan/Sustainable Communities Strategy used data from the 2008 National Household Travel Survey which provided the percentages referenced from the 2012 RTP/SCS. The 2016 RTP/SCS uses data from the 2012 California Household Travel Survey. The 2008 data was weighted differently (unlinked trips) when compared to the data from the 2012 California Household Survey, which was weighted internally by SCAG (linked trips). In addition, the region was impacted in 2008 by a rapidly declining economy and high gas prices, which may have temporarily spiked walking and bicycling mode share during the survey period.
16183.09	Pg. 25 “...has developed a bicycle to transit access plan Bicycle Transportation Strategic Plan (2006)...” (delete "bicycle to transit access plan" text from this sentence)	Rephrased bullet to read: The Los Angeles County Metropolitan Transportation Authority (Metro) developed a Bicycle Transportation Strategic Plan (2006) and is developing an Active Transportation Strategic Plan for 2016.
16183.10	Pg. 28 Verify that preliminary cost estimates are carefully identified. For example, \$194 million identified for 755 miles of “Greenways” comes out to \$256,954/mile. This is a very low estimate for Class 1 and Class 4 bikeway construction costs. Bike path projects estimated for FHWA by the UNC Highway Safety Research Center in 2013 were between \$500K to \$4.2 mil/mile (pg. 12).	Comment noted. Corrected Table to read that Greenways Cost estimate is \$2.6 Billion and Regional Bikeways cost estimate is \$194 Million (the two totals were reversed).

ID	Comment	Response
Submitted by Los Angeles County - Metropolitan Transportation Authority		Submittal 16183 Related Documents Link
16183.11	Pg. 28 Total estimate for active transportation needs seem low. Provide details on the underlying assumptions. Suggest providing clear performance metrics and benchmarks to evaluate how the region is doing to meet the goals laid out in the 2016 Active Transportation Plan.	In developing the cost estimates for active transportation needs, SCAG staff reviewed recent expenditures and planned/forecast expenditures regarding similar projects for each county within the SCAG region. SCAG estimates for 224 High Quality Rail Stations is consistent with low estimate per station laid out for the LA County Metro Draft Active Transportation Strategic Plan, for capital improvements and maintenance. Because the RTP/SCS is a fiscally constrained plan, SCAG was not able to include the high estimate per station. Metro will be proposing a more expansive first mile/last mile strategy (than what SCAG is proposing) in its Active Transportation Strategic Plan when released. Once Metro's plan is released, SCAG will work with Metro to better integrate the two plans and identify additional revenue sources. Bikeway estimates are based on costs for each county, recognizing that the cost for a Class 1 bikeway in Imperial County would be different than that in Los Angeles County. Metro's proposed annual Education and Encouragement Campaign is significantly larger than SCAG's planned outreach activities, which is focused on Safe Routes to School and SCAG safety/encouragement campaigns (not local campaigns). SCAG's Active Transportation Appendix Plan Implementation section (page 69) establishes steps SCAG will take to meet the goals of the Appendix. SCAG will develop additional metrics and benchmarks as data becomes more available.
16183.12	Pg. 55 (4th paragraph) A "plan" for bike share is cited with no reference. These appear to be general statistics for bike share programs worldwide rather than assumptions made for a specific plan and should be reflected as such. Reflect information on Metro's Countywide Bike Share Program.	Comment noted. As bike share is a new concept for Southern California, and at the time of writing the draft RTP/SCS, local plans were still in development. An overview of the bike share concept was included as well as levels of success from similar sized bike share programs. Existing language reflects benefits attributed to the similar programs and not to any specific bike share plan or project in Southern California. In the final RTP/SCS, references were made to established roll outs in Santa Monica, planned roll outs by Los Angeles County Metro and Long Beach, indicating that growth of bike share would likely expand beyond their initial plans.
16183.13	Pg. 61 Regional bikeways should include those recommended by Metro's ATSP.	Metro's draft ATSP is still in development and will not be released until mid 2016. Assuming comment is regarding the 2006 Bicycle Transportation Strategic Plan (BTSP). SCAG's regional bikeway network is consistent with the 2006 BTSP. While not specifically referencing the 10 year old BTSP, SCAGs Regional Bikeway Network and Regional Greenway network include and/or update most gap closures recommended (beginning on page 99 of the BTSP), as well as develop defined route structures. Added following language to the Active Transportation Appendix: The Regional Greenway and Bikeway Networks are developed from local existing and planned bikeways and closing gaps. As new bikeways are developed, such as through the Orange County Strategic Bikeway Network and the Los Angeles County (draft) Active Transportation Strategic Plan, they will be incorporated into the networks.
16183.14	Pg. 20, paragraph 6, last line--states that the scenarios and sensitivity tests yielded a range of airfield capacities from 82.9 to 96.6 MAP, but does not state the year(s). Please specify the year(s) for the MAP projections.	The airfield capacity range of 82.9 to 96.6 MAP referenced in the comment is an estimate of how many passengers the planned ultimate facility (according to approved plans) could accommodate. It is not a projection of demand for a future year. Therefore, there is no year associated with the MAP range.

ID	Comment	Response
<p><i>Submitted by</i> Los Angeles County - Metropolitan Transportation Authority Submittal 16183 Related Documents Link</p>		
16183.15	Pg. 5 (Exhibit 3), the I-210 east of Glendora is not included in the Final Primary Freight Network, yet SCAG’s many analyses include this stretch along I-210 to I-15 and indicate serious congestion. SCAG should address this inconsistency.	Comment noted. The Primary Freight Network is a federal designation based on data readily available to USDOT. While the segment of I-210 between SR-57 and I-15 is not included in the Federal Primary Freight Network, SCAG and its regional partners consider it as an important segment of our goods movement corridor serving both the region and the nation. To this end, SCAG will continue including this segment in on-going regional transportation system analyses. Please also note that SCAG has submitted corrections to USDOT in prior comments regarding the Primary Freight Network.
16183.16	Pg. 13, under “... Drivers”, the Air Quality subject should be expanded to a discussion of CO2 emissions concerns and reference SB2, etc., as developed on Page 40.	This section is only intended to be a short description of current issues facing the region that are explained later in the document. However, some additional clarifying language has been added.
16183.17	Pg. 44, there is no mention of Cap and Trade Program’s Greenhouse Gas Reduction Fund as a funding source for the development of vehicle prototypes and infrastructure demonstrations. This should be highlighted as an opportunity for zero-emission technology research and development.	Language has been added noting the Cap and Trade program may be a source of funding to support new clean technologies.
16183.18.1	Pg. 6 - Additional System Initiatives - Recommend adding Caltrans ATM Study on I-105 and the RIITS and IEN Data Exchange efforts.	Comment noted. Appropriate edits have been made to incorporate this comment.
16183.18.2	Overall - Comment - Recommend discussing Freight Signal Priority.	Please refer to the Goods Movement Technical Appendix as Freight ITS applications (which include Freight Signal Priority) are more broadly addressed.
16183.19	Page 7 - First/Last Mile Strategies - Recommend discussing Ride Sourcing as a potential strategy.	Comment noted. Discussion has been added.
16183.20	Page 7 - Automated/Connected Vehicles - Recommend discussing potential impact of AV/CV on age profile of licensed drivers.	Comment noted. Discussion has been added.
<p><i>Submitted by</i> Los Angeles County - Metropolitan Transportation Authority Submittal 16184 Related Documents Link</p>		
16184.01	Page 9 - ITS-Roadways - Recommend adding discussion on ATM (Active Traffic Management) strategies.	Comment noted.
16184.02	There is currently policy language supporting urban greening as a component of a larger natural lands strategy. We support this as consistent with Metro’s Urban Greening Plan and Toolkit, but would further request that SCAG include in “Strategies, Next Steps and Recommendations” a commitment to further integrate greening strategies into regional planning efforts.	Comment noted. Text has been revised to reflect the suggestion.
16184.03	Pg. 2, First paragraph under Metrolink--The South Perris connection will be in operation in 2016.	This comment has been incorporated into the Passenger Rail Appendix.

ID	Comment	Response
<i>Submitted by</i> Los Angeles County - Metropolitan Transportation Authority		Submittal 16184 Related Documents Link
16184.04	Pg. 2, Second paragraph under Metrolink--Metro owns 40% of the Ventura County Line within L.A. County. "Much of the track is owned by the the Member Agencies of Metrolink and/or the freight railroads." Suggest referring to the CTCs that are Member Agencies of Metrolink as being a Member Agency.	Comment noted. This comment has been incorporated into the Passenger Rail Appendix.
16184.05	Pg. 2, Third Paragraph--Perris Valley will begin operations in 2016. PTC will begin operations in 2016.	This comment has been incorporated into the Passenger Rail Appendix.
16184.06	Pg. 4, Second paragraph--Metrolink will be operating the efficient locomotives in 2017. Pg. 4, First paragraph under Metrolink's history--The Ventura line started in 2002.	A) This comment has been incorporated into the Passenger Rail Appendix. B) Comment noted. The Ventura County Line was one of Metrolink's inaugural lines beginning service on October 26, 1992.
16184.07	Pg. 4, Second paragraph under high speed rail--It has been almost 20 years for the development of HSR. Pg. 7, In the MOU paragraph--The language should state "\$1B from Proposition 1A and other funds" That is the language in the MOU.	Pg. 4, Second paragraph - Comment noted. Pg. 7, In the MOU paragraph - Comment noted. The text has been edited to be consistent with language in the MOU.
16184.08	Pg. 9 and throughout the document--Should state that the projects are for operational efficiency. Although ultimate capacity is a benefit, operational efficiency is the key. Under the Master Plan--SCRIP preceded the Master Plan. The Master Plan accommodates SCRIP.	Comment noted. This comment has been incorporated into the Passenger Rail Appendix.
16184.09	Pg. 11, Under the Freight paragraph include language about the agencies owning the right of way that the freights operate on as tenant railroads.	Comment note. This comment has been incorporated into the Passenger Rail Appendix.
16184.10	Pg. 13, Add two projects--Bob Hope Airport/Hollywood Way Station; and Bob Hope Airport Station Pedestrian Bridge	Comment noted. This comment has been incorporated into the Passenger Rail Appendix.
16184.11	Pg. 18, The Perris Valley Line will open for revenue service in 2016.	This comment has been incorporated into the Passenger Rail Appendix.
16184.12	Pg. 24, The pedestrian bridge at the Bob Hope Airport Station is not Phase 2 of RITC. Add language about the new Bob Hope Airport/Hollywood Way Station.	Comment noted. This comment has been incorporated into the Passenger Rail Appendix.
16184.13	Pg. 26, The Metro Orange Line is connected to SCRRA in Chatsworth.	Comment noted. This section is discussing gap closures, and the Orange Line is discussed in the context of the existing service gap between the Metro Orange Line in North Hollywood and the Gold Line in Pasadena.
16184.14	Pg. 9, Los Angeles Union Station Master Plan, 1st bullet, add "expanded multi-modal" between "new" and "passenger concourse" and replace "the current tunnel" with "currently called the "tunnel"" ("a new expanded multimodal passenger concourse (the current tunnel currently called the "tunnel") that would be widened)"	This comment has been incorporated into the Passenger Rail Appendix.
16184.15	Pg. 9, 5th bullet add "accommodating" before "future tracks"—it should read "accommodating future tracks and platforms for the CA HSR project"; Pg. 9, 7th bullet delete "new and" and replace with "3.25 million square feet of" It should read, "3.25 million square feet of improved retail and transit-oriented development (TOD) uses." Pg. 9, ADD 8th bullet: "improved pedestrian and bike network"	Pg. 9, 5th bullet - This comment has been incorporated into the Passenger Rail Appendix. Pg. 9, 7th bullet - This comment has been incorporated into the Passenger Rail Appendix. Pg. 9 ADD 8th bullet - This comment has been incorporated into the Passenger Rail Appendix.

ID	Comment	Response
<i>Submitted by</i> Los Angeles County - Metropolitan Transportation Authority		Submittal 16184 Related Documents Link
16184.16	Pg. 12: insert “SCRIP run through tracks and to incorporate the” before larger passenger concourse and replace “has been approved” with “was developed”. It should read: “An additional component of the work is to study the effects of raising the entire platform areas in order to accommodate the SCRIP run-through tracks and to incorporate the larger passenger concourse that was developed-as part of the Union Station Master Plan...	This comment has been incorporated into the Passenger Rail Appendix.
16184.17	Pg. 140, RTP ID #1TR1012, California High-Speed Rail Phase I – Env/PE, should have the Lead Agency as “California High Speed Rail Authority”. It is currently blank. The completion date is listed as 2011, and SCAG may want to update this. Pg. 147, RTP ID # 1122005, SR-138 Loop Road – this project is not in the Metro 2009 LRTP, and the Lead Agency is listed as “TBD”. This should be clarified that the project is not a Metro-funded project. Pg. 148, RTP ID #1C0401, “I-710” project, Lead Agency should read “Los Angeles County MTA”, as this is a project from Metro’s 2009 LRTP. Lead Agency is currently blank. Pg. 148, RTP ID # 1M1002, “I-710 Early Action Projects”, Lead Agency should be “Los Angeles County MTA”, as this is a project from Metro’s 2009 LRTP. “Lead Agency” is currently blank. The completion year should be “2022” and it is currently “2025”. Pg. 150, RTP ID # 1120005, Metro Green Line Extension—this is a project assumed to be funded with innovative financing, and not a constrained project in Metro’s 2009 LRTP. Pg. 150, RTP Project # 1TR1011, West Santa Ana Branch ROW Corridor -- this is a project assumed to be funded with innovative financing, and not a constrained project in Metro’s 2009 LRTP. Pg. 154., RTP #10M08D01, this is TIP #LAOG159, and is nearly complete. This should be moved into the TIP section. Pg. 157, RTP #UT101, Metro Purple Line Westside Subway Extension Section 3 – Century City to Westwood/VA Hospital—the completion year should be 2035 (12/31/2015), and the Project Cost is \$2,157,100 (YOE). Also, this listing is duplicative of a listing on page 158. Please correct and list only once. Pg. 157, RTP ID # 1TR0101 (TIP # LAOG1162), Airport Metro Connector, the completion date is 07/01/2023. Pg. 158, RTP ID #1TR1003 (EIR is TIP # LAOG642) – This appears to be a duplicate of the incorrect entry listed above on page 157. There needs to be only one “Metro Purple Line Subway Extension Section 3”, completion date of 12/31/2035 with a project cost of \$2,157,100. Please delete one of the duplicates. Pg. 158, RTP ID #1TR1017 – please delete this project. Pg., 158, RTP ID #1TR1020 – Please delete this project.	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.

ID	Comment	Response
<i>Submitted by</i> Los Angeles County - Metropolitan Transportation Authority		Submittal 16184 Related Documents Link
16184.18	<p>General – The SCS Technical Appendix provides a clear and sound description of how the 2016 RTP/SCS complies with SB 375, both from a content and process standpoint. We are confident that the Plan as presented will be approved by ARB. Metro explicitly partners with SCAG on SCS development and implementation through the SCAG/Metro Joint Resolution and Work Program, most recently adopted by the Metro Board of Directors on May 28, 2015. The Plan and Appendix could be strengthened through further discussion of Joint Work Programs, including acknowledging completed efforts and identifying future initiatives that will advance the goals of the Plan. For example, the scenario planning exercise described in the appendix prompts preliminary steps in addressing sea level rise and other climate vulnerabilities as well as habitat protection needs. Through the plan, SCAG should describe and commit future planning activities in these areas or others. Similarly, the Metro Board has adopted various sustainability policies acknowledging climate adaptation needs, and would suggest that sea level rise and climate vulnerabilities be explicitly included as priorities in the adopted plan, as opposed to a factor in a scenario exercise that does not influence policy and future activities. Also, of note, the updated SCAG/Metro Joint Work Program commits a coordinated effort on deploying future planning funding, particularly from SCAG’s Sustainability Planning Grant program. We would request that the Plan clearly acknowledge this commitment and further commit that future planning funding will be allocated in consultation with Metro such that priority activities are given consideration, and that local planning projects are structured appropriately for near term funding opportunities such as the Cap-and-Trade Affordable Housing and Sustainable Communities Program, the California Active Transportation Program, and the Metro Call For Projects.</p>	<p>Comment noted. The Regional Council supports the Joint Work Programs between SCAG and each County Transportation Commission as collaborative mechanisms for the implementation of various land use and transportation policies in the 2016 RTP/SCS. SCAG staff included sea level rise and climate vulnerabilities as a part of the scenario exercise as a way of introducing these issues to the SCAG Regional Council and Policy Committees. There is a large portion of SCAG’s region not directly affected by sea level rise, so there is a need to educate and bring these items up for discussion and consideration. Vulnerability and risk assessments at the regional level will require collaboration and commitment from a variety of stakeholders. SCAG is encouraged the Metro Board has adopted various sustainability policies acknowledging climate adaptation needs, and would like to conduct further work on these items via the SCAG/Metro Joint Resolution and Work Program.</p>
16184.19	<p>Among other items, Metro collaborates with SCAG on the development and implementation of the First/Last Mile Strategic Plan. As such, we appreciate the emphasis on first/last mile implementation (transit/active transportation integration) with the Draft RTP/SCS and the SCS Technical Appendix. The appendix could do more to acknowledge and be consistent with Metro’s recent work on this subject. In particular the estimated region-wide funding need for first/last mile, as reflected in the Active Transportation Appendix is substantially lower than our own estimates for Los Angeles County alone prepared for the current Active Transportation Strategic Plan effort. We encourage SCAG to coordinate with us on this aspect of the Plan.</p>	<p>SCAG estimates for 224 High Quality Rail Stations are consistent with low estimate per station laid out for the LA County Metro Draft Active Transportation Strategic Plan, for capital improvements and maintenance. Metro will be proposing a more expansive first mile/last mile strategy in its draft Active Transportation Strategic Plan when released. Once Metro’s plan is released, SCAG will continue to work with Metro to better integrate the two plans.</p>
16184.20	<p>We appreciate the inclusion emerging transportation technologies within the scenario planning exercises, as this is consistent with Metro’s policies and work products including the Countywide Sustainability Planning Policy, First/Last Mile Strategic Plan and emerging pilot projects. As a technical matter, we are unclear on why the use of ride share and ride hailing services would be reflected in a direct reduction in VMT. It would seem more supportable through data as well as more consistent with policy goals to reflect these travel choices through an assumed reduction in vehicle ownership.</p>	<p>Comment noted. Car sharing was analyzed using an off-model methodology developed by the Metropolitan Transportation Commission (MTC) for the Plan Bay Area 2013, refined and validated by the California Air Pollution Control Officers Association (CAPCOA), and used by the San Diego Association of Governments (SANDAG) for that agency’s “San Diego Forward: The Regional Plan.” SCAG staff developed a similar off-model methodology for ridesourcing (ride hailing). We agree that eventually these new transportation modes will be best modeled through behavioral choices made in the transportation model. There is growing evidence of correlation between urban form to household vehicle ownership and subsequent travel behavior. However at this time there is insufficient data to establish precise numerical assumptions for use in the model. We look forward to collecting more data as the next plan is developed.</p>

ID	Comment	Response
<i>Submitted by</i> Los Angeles County - Metropolitan Transportation Authority		Submittal 16185 Related Documents Link
16185.01	Pg. 10, near bottom of page (concept also applies to page 26): New Starts: “As with the FHWA sources, fuel consumption declines by 0.9 percent (in real terms) annually.” We would like to suggest it state that, “As with the FHWA sources, fuel consumption declines by 0.9 percent (in real terms) annually making it increasingly difficult for Congress to back fill with general funds.” Pg. 23, top of page: ...State Transit Assistance (STA) are included under this source (meaning Local Agency Funds for LA County). STA should be included under State sources on page 24.	Although the United States Congress has authorized \$141.1 billion in transfers from the General Fund to the Federal Highway Trust Fund to keep it solvent, the 2016 RTP/SCS does not assume that Congress will continue to make these transfers as part of the core revenue projections. Rather, the Plan includes forecasted revenues from new funding sources that are reasonably expected to be available. Reasonably available sources include short-term adjustments to gas excise tax rates and the long-term replacement of gas taxes with mileage-based user fees (or equivalent fuel tax adjustment). The language on page 23 has been revised to remove State Transit Assistance (STA).
<i>Submitted by</i> Los Angeles County Business Federation		Submittal 16286 Related Documents Link
16286.01.1	BizFed and its members are pleased to see the attention paid to the process and vision of the region’s most influential plan that affects sectors in transportation, land use and development, energy and environment, and technology and innovation and workforce development and education.	Comment noted.
16286.01.2	We want to call special attention to SCAG’s RTP/SCS vision as it relates to goods movement/freight/logistics. These sectors represent one-third of the state’s economic growth, and addressing the goods movement corridor bottlenecks are key to enabling this growth to continue.	The 2016-2040 RTP/SCS makes identification of major truck bottlenecks a priority and allocates nearly \$5 billion in the Plan to address them.
16286.01.3	Paralleled investments in transit and development will be the catalysts in reducing overall emissions and spurring economic growth throughout the region.	Comment noted.
16286.01.4	Targeting the growth in the region’s housing, transportation, and business sectors to be most beneficial to ensure a stable and thriving economy is the top priority. Then the attention paid to the “haves and have nots” in our region was excellent in showing a desire to formulate a regional plan that provides a positive economic impact for everyone.	Comment noted.
16286.01.5	Additionally, we are pleased to see the inclusion of technology neutral solutions in the plan.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Los Angeles County Business Federation		Submittal 16286 Related Documents Link
16286.01.6	<p>And finally, the extended time period that SCAG provided for stakeholder feedback was a valuable adjustment that ensured the effective input from stakeholders from around the region. While this is a strong document and we feel it addresses many important factors we want to highlight the need to seek innovative and flexible funding options to bring the RTP/SCS to fruition. This is paramount in achieving the public and business community's participation. BizFed is pleased with the effort put forth by SCAG in developing this plan and support its overall vision, especially when a diverse set of funding resources are identified and pursued. We have great confidence in the draft plan set forth by SCAG to provide a foundation of investment to improve the future of SCAG's six county region. Once again BizFed wants to commend your work and effort in developing the comprehensive Regional Transportation Plan and Sustainable Communities Strategy to address the myriad needs for a region as diverse as Southern California. BizFed and our members look forward to continued collaboration on not only the 2016 RTP/SCS, but on implementing the projects it contains so that together we can build a resilient economy to serve our great region.</p>	Comment noted.
<i>Submitted by</i> Los Angeles World Airports		Submittal 16372 Related Documents Link
16372.01	<p>In an effort to further partner with SCAG's Aviation Technical Advisory Committee, LAWA recommends SCAG convene a working group of the region's airports, transportation agencies, SCAG members, and other key stakeholders to help identify strategies and policies aimed at distributing commercial traffic and goods movement across the region. LAWA looks toward to actively participating on such a SCAG Committee.</p>	Comment noted.
<i>Submitted by</i> Los Cerritos Wetlands Land Trust		Submittal 16293 Related Documents Link
16293.01	<p>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.</p>	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.

ID	Comment	Response
<i>Submitted by</i> Los Cerritos Wetlands Land Trust		Submittal 16293 Related Documents Link
16293.02	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.	Comment noted.
<i>Submitted by</i> March Joint Powers Authority		Submittal 16210 Related Documents
16210.01	Active Transportation Exhibit 28 does not show existing and planned bikeways within the March JPA land use jurisdiction in Riverside County. Class two bike lanes are existing on Meridian Parkway, and are planned on Krameria Avenue, Van Buren Boulevard and Village West Drive within the March JPA.	Comment noted. Exhibit 28 updated to reflect existing bikeways. Krameria Ave, Street "Y" and Village Drive West do not yet appear as planned roadways in geodata and therefore cannot reflect planned bikeways in the Active Transportation Appendix. The planned bikeways will be incorporated as SCAG's geodata is updated.
16210.02	The Project List should include the Van Buren Boulevard widening project, which is on the WRCOG TUMF NW Zone TIP and is in the process of construction. The following information should be inserted for in the Riverside County section, approximate pages 61 - 68: SYSTEM: LOCAL HIGHWAY, FTIP ID: ?, ROUTE: 0, DESCRIPTION: IN WESTERN RIVERSIDE COUNTY WITHIN THE MARCH JOINT POWERS AUTHORITY: VAN BUREN BOULEVARD WIDENING: FROM I-215 TO BARTON STREET, WIDEN FROM 4 TO 6 LANDES, INCLUDING ADDITION OF CLASS 2 BIKE LANES, SIDEWALKS, LANDSCAPE MEDIAN AND TRAFFIC SIGNAL UPGRADES, PROJECT COST: \$5,200	Comment noted. The project you are referencing is FTIP ID# RIV060121 which was marked as complete under the 2015 FTIP with a completion date of 2/28/2014. Since the project is complete it is no longer listed within the Project List.

ID	Comment	Response
<i>Submitted by</i> Metro Gold Line Foothill Extension Construction Authority		Submittal 16337 Related Documents Link

16337.01 We are pleased that the Southern California Association of Governments (SCAG) is including the Foothill Gold Line from Glendora to Montclair in the Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) under the financially constrained plan. However, the RTP/SCS forecasts completion of the project in 2040, almost two decades beyond the current planned schedule while also understating the project costs. The Foothill Gold Line is a critically needed link that will connect a dozen universities, the LA County Fairplex, and LA County with San Bernardino and Riverside Counties at the Montclair TransCenter. The Foothill Gold Line will alleviate traffic on one of the most heavily congested corridors which is expected to assume the majority of the subregion's population and employment growth in the coming decades. The Glendora to Montclair segment is estimated to achieve 18,300 daily boardings by reducing Vehicle Miles Traveled (VMT) by 111,000 and reduce emission burden levels resulting in beneficial effect on CO, TOG, Nox, PM10 and PM 2.5 levels. The current forecast in the Draft RTP/SCS of completing the Foothill Gold Line in 2040 is too late and should be amended to complete this vitally needed project as soon as possible. No other rail project in Los Angeles County is as ready as this one. The project will be ready in 2017 to break ground and SCAG should find ways to include innovative sources to fully fund the \$1,216 M project sooner as they are doing with other unfunded rail projects in Los Angeles.

The funding identified in the Draft 2016 RTP/SCS for the Foothill Gold Line Extension Phase 2B is based upon innovative strategies that are not expected to be available in the near term. The earliest completion date for this project would be 2035 and the RTP/SCS has been adjusted accordingly. Should this project be advanced by Metro as it updates its Long Range Transportation Plan, the completion date can be adjusted through a future 2016 RTP/SCS amendment at the request of Metro.

ID	Comment	Response
<i>Submitted by</i> Move L.A.		Submittal 16349 Related Documents
16349.01	<p>So, the investments in transit, the investments in active transportation- very happy to see active transportation spending moved up to earlier years in the plan as compared to the last RTP/SCS. What I wanted to talk about the most, though, is the EJ analysis. Really, a very impressive document. It's really a quantum leap from the last EJ analysis. It is very thorough, covers a lot of different topics and it is giving us both maps and charts to really understand what the impact of investments are and where we are moving to. And one of the things that -- one of the findings in the EJ analysis is that in some areas nothing is ever true for the entire region; right, but in some areas we are seeing these investments lead to displacement of low income people. So, transit investments resulting in increased property values and increased rents and pushing away the people who use transit. And this is a really thorny thorny problem. And I really want to call on SCAG to work with us to work with local jurisdictions. We stand ready to work with you to get the tools and the resources that you need that is really a local government issue, it's about land use control, it's about, you know, where you build, what you tear down, what are the income levels, how much affordable housing is being built. All of those issues are really local land use and I know SCAG and we respect the land use authority as local jurisdictions, but we think together we can work to convince the legislature to take off some of the restrictions on local government around controlling demolitions, restrictions on rent control like the Ellis Act as well as resources housing resources. And the state is talking about, hopefully, it will couple to pass, but just this week or just last week they introduced, what, a 2 Billion dollar plan for affordable housing in local jurisdictions. So that needs to work its way through the legislature and through the budget process, but I think this is the first time since redevelopment was dissolved that we're seeing this kind of response from the State. At Move L.A., of course, we work to increase local resources in L.A. County, excuse me, for transportations, but we're also very very concerned that we don't have those local resources for housing as well because subsidy is a very key part.</p>	<p>SCAG will consider emerging and persistent regional issues, including suggestions from the comment process, and will work with stakeholders to encourage different strategies for building affordable housing at the jurisdictional level. SCAG is also exploring ways to address social equity issues, including gentrification and displacement, beyond the RTP/SCS process, and will continue to work with stakeholders to discuss challenges and potential strategies for the SCAG region.</p>
<i>Submitted by</i> National Trust for Historic Preservation		Submittal 16298 Related Documents Link
16298.01	<p>We commend SCAG for its focus on constructive, sustainable, regional transportation improvements, and for not explicitly including the State Route 710 Tunnel Alternative (SR-710 Tunnel) in the list of constrained projects. However, some ambiguity about the status of the SR-710 Tunnel project remains as a result of references to the SR-710 North project in the Draft PEIR. We urge SCAG to clarify references to the SR-710 North project in the Final 2016 RTP/SCS and PEIR, and confirm that the SR-710 Tunnel Alternative is not included in the RTP list of constrained projects.</p>	<p>Comment noted. The project with RTP ID 1M0101 was submitted by Los Angeles County Metro with the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)." Requests to modify projects included within the RTP/SCS must come directly from the County Transportation Commissions, in this case, Metro. SCAG modeled the SR-710 North Project Study as four toll lanes in each direction since it is the most conservative scenario with respect to environmental impacts. This does not express SCAG's preference for this alternative. SCAG also included the following footnote to describe the current status of the project, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document.</p>

ID	Comment	Response
<i>Submitted by</i> National Trust for Historic Preservation		Submittal 16298 Related Documents Link
16298.02	<p>Since a Locally Preferred Alternative has not yet been identified by Caltrans for the SR- 710 North Project, SCAG should remove all references or inferences that the project will be the SR-710 Tunnel Alternative. Specifically, RTP ID 1M0101 should be moved from the Constrained Plan to the Strategic Plan, and the language should be clarified to ensure the project description is alternative-neutral, for the following reasons: I. An SR-710 Tunnel Alternative Is Inconsistent with the Majority of SCAG’s Regional Goals Expressed in the Draft 2016 RTP/SCS. Inclusion of a freeway Tunnel Alternative in the Final RTP/SCS and PEIR would be in direct opposition to the many valid, forward-thinking, and sustainable initiatives established by the Draft 2016 RTP/SCS: • Preserving the Transportation System We Already Have (Fixing it First) • Expanding Our Regional Transit System to Give People More Alternatives to Driving Alone • Expanding Passenger Rail • Managing Demand on the Transportation System • Promoting Walking, Biking and Other Forms of Active Transportation • Focusing New Growth Around Transit II. Including a Tunnel Alternative Would Be Inconsistent with Recent California State Legislation. An SR -710 Tunnel Alternative is in opposition to the principles and goals of Assembly Bill 32 (AB 32) and Senate Bill 375 (SB 375) because the resulting project would induce demand, increase vehicle miles traveled (VMT), and increase greenhouse gas (GHG) emissions. As the Metropolitan Planning Organization for the region, SCAG should promote and implement policies that will improve regional air quality and support projects that will reduce regional VMT and GHG emissions. III. References to "SR-710 North Extension (Alignment TBD)" should be revised. We remain concerned with SCAG’s assertion in Appendix B of the draft PEIR that the alignment is "to be determined." Comments within the draft RTP/SCS and PEIR suggests that the project proposed by SCAG remains the SR-710 Tunnel and that it is not alternative-neutral.</p>	<p>Comment noted. The SR-710 project as currently described serves as a place holder until Metro decides on a locally preferred alternative. (LPA). SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
16298.03	<p>IV. The SR-710 Tunnel Alternative Should Be Removed from the Constrained Projects List. Inclusion of the SR-710 Tunnel Alternative fails to meet the federal requirement that any project listed as fiscally constrained must establish that funds for the project are "committed, available, or reasonably available." (23 C.F.R. §450.104.) The \$5.6 billion in projected project costs for the dual-bore SR-710 Tunnel Alternative are not at all "committed, available, or reasonably available."</p>	<p>Comment noted. RTP ID 1M0101 includes the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)" and includes the following footnote, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document." SCAG’s analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including “sufficient financial information for demonstrating that projects” in the plan “can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained.”</p>

ID	Comment	Response
<i>Submitted by</i> National Trust for Historic Preservation		Submittal 16298 Related Documents Link
16298.04	SCAG should remove the Tunnel Alternative from its constrained list in the Final RTP/SCS and PEIR, and invest the region's limited financial resources in transportation projects that are in alignment with the regional goals and priorities set forth in the RTP/SCS. The previous error of including the SR-710 Tunnel in the 2012 Constrained Plan should be corrected in the 2016 RTP/SCS by moving the project to the Strategic Plan to accurately reflect the lack of available funding.	Comment noted. RTP ID 1M0101 includes the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)" and includes the following footnote, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document." SCAG's analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained."
<i>Submitted by</i> Naturalist For You		Submittal 16278 Related Documents Link
16278.01	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.	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.
16278.02	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.	Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to fully address its purpose. The various data sets each have their own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps have been clarified to properly identify the purpose of the map and the specific data source.

ID	Comment	Response
<i>Submitted by</i> Naturalist For You		Submittal 16278 Related Documents Link
16278.03	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16278.04	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your group is encouraged to participate in the effort.</p>
16278.05.1	<p>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.</p>	<p>Parks which are easily accessible are an integral part of sustainable communities as it improves public health, air quality, and quality of life. Providing parks within infill areas has a different set of challenges that varies by jurisdiction. SCAG encourages jurisdictions to look at funding sources, such as the California Department of Housing and Community Development (HCD) Housing-related Parks program, to help build and maintain local parks. The Housing-related Parks program awards money to build and maintain parks based on the number of affordable housing units a jurisdiction has built, which can help increase park accessibility in traditionally underserved areas. SCAG will continue to provide jurisdictions information regarding funding opportunities and encourage jurisdictions to provide parks as part of their long-range plans.</p>
16278.05.2	<p>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?</p>	<p>Comment noted. The term "Natural Lands" is used intentionally to differentiate between potentially sensitive habitat areas and urban/suburban parks that provide open space and active recreation. Specifically, "Natural Lands" refers to biologically diverse areas and landscapes that may provide ecosystem services, such as grasslands, wetlands, deserts, forests, shrublands, riparian areas, and other types of habitat lands. Natural Lands is not intended to include agricultural croplands, grazing/rangeland, other working lands, or municipal parks serving primarily recreational purposes. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>

ID	Comment	Response
<i>Submitted by</i> Naturalist For You		Submittal 16278 Related Documents Link
16278.06	<p>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.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”</p>
<i>Submitted by</i> No 710 Action Committee		Submittal 16301 Related Documents Link
16301.01	<p>The stated cost of the \$5.6 billion for the SR 710 Tunnels at Appendix B, page 149 is a false cost estimate. This cost estimate is grossly underestimated by 1/2. I assume this number was adopted from Caltrans/Metro's DEIR for the 710 North which is drawn from Metro's LRTP. This number is for construction only and does not include the total cost of the project besides being purposely low to deceive the public, decision makers in an attempt to attract and gain support from tunnel contractors. One needs only to look no further for an accurate cost estimate than SCAG's final compilation of all matrices used during the 2008 RTP workshops between September and October of 2007 (attached) for a more realistic estimate. The SCAG staff got it right in 2007. Additionally, SCAG could have looked at the bid costs for Seattle's tunnel project which is the most comparable project in the US at this time. That estimate, based on Seattle's numbers, would be close to SCAG's \$11.8 billion. There has been a long history of attempts to estimate the tunnel costs dating back to 1992 with a \$4 billion cost estimate. From that time to date, the cost estimates for the SR 710 Freeway Toll Tunnels have been so wildly variable as to be invalid (see attached). SCAG is the region's MPO. One would hope you would act responsibly and try to build confidence with your constituents and not try to fool the public by using a number in 2016 this is 1/2 the number you used eight years before.</p>	<p>Comment noted. RTP ID 1M0101 includes the following project description, "SR-710 North Project Study Alternatives (Alignment TBD)" and includes the following footnote, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document."</p>

ID	Comment	Response
<i>Submitted by</i> Ontario Chamber of Commerce		Submittal 16355 Related Documents
16355.01	<p>Now, as the President and CEO of the Ontario Chamber of Commerce I have the distinction of saying that I am a representative of a business community that has the worst air quality in the Nation. There was the September 9th, 2015 L.A. Times Article Tony Barboza reported with the blazing headlines that people living near the 60 Freeway in Ontario breathe the worst air in our Nation. The studious distinction is not one to be proud of. California needs to improve our quality and health of our communities. As noted in the L.A. Times Article and other resources the transportation sector is the leading air polluter accounting for 80 percent of the region's smog for emitting emissions and over 40 percent of the region's greenhouse emissions. Heavy duty trucks account for the largest source of the region's air pollution. According to the Environmental Protection Agency's Air Quality Industry Report retrieved on October 14th of 2015, residents in the Riverside, San Bernardino, Ontario Metropolitan area only have the luxury of 7.5 percent of good air quality days per year. Again, leading the nation with the worst air quality following closely by 8.8 percent of good days in the L.A., Long Beach, Santa Ana Region. This means that our residents in the Ontario area only experience good air quality one out of every 12 days. This pollution contributes to health risks such as asthma, cancer and premature death. Those likely to be the most impacted are the disadvantaged communities near and around transportation quarters and ports. Poor quality also puts us at risk for failing to meet the stringent state federal air quality standards that Kenneth alluded to. California state is at critical need for the reduction of critical pollutants and greenhouse emissions in an effort to curtail smog, climate change, address first the effects of these critical health issues, if not the particular part pollution reduces reduction addresses real human needs that need to be met now.</p>	<p>Comment noted. Jointly prepared by the South Coast Air Quality Management District (SCAQMD), the California Air Resources Board (ARB), and SCAG, the upcoming 2016 South Coast Air Quality Management Plan will include additional and more stringent control measures to demonstrate attainment of all applicable health-based ozone and PM2.5 national ambient air quality standards by their respective statutory deadlines.</p>
16355.02	<p>Technologies like ultra low NOx, heavy duty engines are a viable solution in addressing California's air pollution and climate change goals. Alternate fueled vehicles can help reduce harmful emissions. But in order to put more clean vehicles on the road we need the fueling infrastructure to support them. In the Inland Empire we have less than a dozen CNG locations and of those several require keypads to access. In Aurora, Colorado Majestic Realty Company in cooperation with the City of Aurora opened a major Compressed Natural Gas fueling station at the Majestic Industrial Park in late 2014. Interestingly, this is just outside Colorado Springs which is in the top eight for cities in the Nation with the best air quality where its residents experience 86.7 percent of clean air days per year. This public private partnership is open 24/7 to all users commercial and private at a much lower price than gas or diesel. CNG can offer up to 25 percent reduction in greenhouse emissions and 20 to 45 percent reduction in NOx. SCAG should support all new alternative fueling infrastructure and the development of intermodal fueling strategies. Please take advantage of the existing infrastructure and strive to avoid these strategy offsets.</p>	<p>Comment noted. SCAG's policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition. The SCAG Clean Cities Coalition works with local jurisdictions and industry partners to encourage more access to alternative fueling stations, including CNG and LNG stations.</p>

ID	Comment	Response
<i>Submitted by</i> Orange County Bicycle Coalition		Submittal 16022 Related Documents Link
16022.01	Page 3. I am very disappointed that you've chosen to use Geller's very divisive descriptions of Bicyclists by Comfort Level as a foundation for promoting bicycling. His "Strong and Fearless" label is resented by all the competent bicyclists I know-- it is deliberately dismissive of often the largest group of loyal bicyclists in a given market. It plays to the ignorance of the general public and marginalizes behaviors that are often safer, more tested and reliable than that of Californians at large. Dividing the public into factions and playing one off against the other will NOT win the financial and political support we need in the long run. Promoting the very real benefits of bicycling for the individual will. We must not stereotype bicyclists to make them understandable by the non-bicycling majority, PLEASE focus on Behaviors. Behaviors cross Geller's stereotypical "boxes," and are easily relatable for non- or occasional bicyclists.	Comment noted. Language inserted noting that no bicyclist fits neatly into any one Comfort Level category. However, Evidence from Vancouver and Toronto indicate that installing designated bikeways and separated bikeways increases safety by 50% and 90% respectively, This increase in safety, both real and perceived changes behavior increasing the number of bicyclists as well.
<i>Submitted by</i> Orange County Business Council		Submittal 16297 Related Documents Link
16297.01	The RTP/SCS should not mandate technologies or use transit agencies as technology incubators. Instead, it should allow for any and all technologies (i.e. near-zero emission technologies) that can meet SCAG's performance goals (focus on performance metrics vs technology mandates). Near-zero emission technologies will help achieve regional air quality and climate goals, at a fraction of the cost and with more flexibility/choice for agencies.	Comment noted. SCAG's policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition. In addition, SCAG communicates with Hydrogen Fuel Cell industry partners to exchange information and knowledge. Plug-in Electric vehicles are specifically analyzed in the RTP/SCS due to the transportation/land use policy nexus regard station siting, and the role that MPOs will play in meeting the State's Greenhouse Gas Reduction targets.
16297.02	SCAG should take advantage of the best of what innovation can deliver, and shouldn't limit options, but instead welcome technology advancements that moves us towards our goals by: a) Maximizing opportunities to improve air quality and reduce GHG emissions through "near-zero" technologies. b) Emphasis Life Cycle emission analysis as opposed to simply tail pipe emissions. c) Supporting technology neutral policies	Comment noted. SCAG's policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition. In addition, SCAG communicates with Hydrogen Fuel Cell industry partners to exchange information and knowledge. Plug-in Electric vehicles are specifically analyzed in the RTP/SCS due to the transportation/land use policy nexus regard station siting, and the role that MPOs will play in meeting the State's Greenhouse Gas Reduction targets.
16297.03	OCBC does not support the growth forecast utilized in the development of the Intensified Land Use Alternative (Alternative 3) in the draft PEIR. The Intensified Land Use (ILU) Alternative does not reflect entitlements, development agreements, open space donations, projects recently completed and projects under construction (which are properly reflected in The Plan). OCBC requests that the growth forecast in the 2016 RTP/SCS and ALL alternatives be based on the technically corrected growth forecast submitted to SCAG by Orange County Council of Governments (OCCOG) in August 2015.	Comment noted. The following response is to clarify the purpose of the alternatives analysis in the Draft PEIR for the 2016 RTP/SCS. The Draft PEIR considered a range of reasonable alternatives to the Draft 2016 RTP/SCS. A range of reasonable alternatives includes those alternatives that would feasibly attain most of the basic objectives of the Draft 2016 RTP/SCS but would avoid or substantially lessen any of the significant environmental effects of the Draft 2016 RTP/SCS. Each of the alternatives in the Draft PEIR would achieve the basic objectives in relation to the goals of the Plan. Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be selected among the alternatives that were evaluated in the PEIR. The Draft PEIR found that the Intensified Land Use Alternative would be the environmentally superior alternative because of the three alternatives it has the lowest number of adverse impacts by Draft PEIR resource category. However, the environmentally superior finding is not a feasibility finding. The feasibility finding will be considered by SCAG's Regional Council at the time of proposed certification of the Final PEIR and the adoption of the 2016 RTP/SCS. Please note that the OCBC comments are also included in the matrix of the Draft PEIR comments.

ID	Comment	Response
<i>Submitted by</i> Orange County Business Council		Submittal 16297 Related Documents Link
16297.04	OCBC concurs with the comments identified by OCTA in its letter of January 11,2016. OCTA has identified policy and technical issues related to the draft 2016 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTC).	Comment noted.
16297.05	Recently the California Transportation Commission (CTC) moved to deprogram nearly \$1 Billion in transportation projects. How will the State's continued funding shortfall factor into the assumptions in the 2016 RTP/SCS.	The financial plan for the 2016 RTP/SCS employs a long-range view of available funding yet reflects recent actions to the extent that projects may be delayed or re-scoped based on the recent CTC action to reduce the estimate of projected funding available for the State Transportation Improvement Program (STIP). Each project or project phase included in the Federal Transportation Improvement Program (FTIP)—including STIP-funded projects—must be consistent with the approved RTP/SCS. Changes to FTIP projects that would be inconsistent with the approved RTP/SCS necessitate an amendment to the RTP/SCS. The Plan notes that funding for transportation improvements is currently not sustainable, given the projected needs. Projected revenues from the gas tax, the historic source of transportation funding, will not meet transportation investment needs – and gas tax revenues, in real terms, are actually in decline as tax rates (both state and federal) have not been adjusted in more than two decades while the number of more fuel efficient and alternative powered vehicles continues to grow. It’s vital that we find new ways to make transportation funding more sustainable in the long-term, and efforts are underway to explore how we can transition from our current system based on fuel taxes to a more direct system based on user fees. Recent action by the state Legislature to launch the California Road Charge Pilot Program is a critical step in this transition.
16297.06	OCBC applauds SCAG's emphasis on managed lane strategies as not only a funding source, but as a means to enhance mobility.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Orange County Council of Governments		Submittal 16296 Related Documents Link
16296.01	<p>Overall, the OCCOG supports the 2016-2040 RTP/SCS growth forecast and the adoption of the growth forecast at a geographic level no lower than the jurisdictional level. The OCCOG supports The Plan since the growth forecast accurately reflects Orange County’s Projections dataset. The Plan growth forecast reflects entitlements, development agreements, and projects recently completed or under construction in Orange County. OCCOG appreciates the ongoing coordination between SCAG and the Center for Demographic Research (CDR) at California State University Fullerton on behalf of all Orange County jurisdictions. The Orange County Projections have been used by the Orange County Transportation Authority (OCTA) in the development of its Orange County Long-Range Transportation Plan demonstrating that Orange County has integrated transportation and land use planning for decades. OCCOG representatives on the Regional Council and SCAG Policy Committees repeatedly requested that the growth forecasts in the 2016 RTP/SCS and all PEIR alternatives be based on the technically corrected growth forecast submitted to SCAG in August 2015 by the CDR on behalf of all Orange County jurisdictions. Because the draft PEIR’s Intensified Land Use Alternative (Alternative 3) does not include the technically corrected growth forecast for Orange County, the OCCOG would not support consideration of this Alternative as the preferred alternative. Growth Forecast Recommendations: OCCOG supports the adoption of the 2016 RTP/SCS growth forecast at the jurisdictional level. OCCOG does not support the use of Alternative 3 for any purposes.</p>	Comment noted.
16296.02	<p>Language throughout the draft 2016 RTP/SCS and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues such as active transportation and public health. While these issues are important, it is recommended that the document utilize a more unbiased, objective tone. For example, OCCOG recommends the removal of “Our Vision” and “Our Overarching Strategy” from the Executive Summary of the document. These two sections are highly speculative and are not necessary to the document. “Our Vision” and “Our Overarching Strategy” go above and beyond the requirements of the RTP. Additional examples of overly emphatic language are outlined in Attachment 1.</p>	Comment noted. We believe this section is important in providing the necessary background and context for the development of the rest of the Plan.
16296.03	<p>The OCCOG concurs with the comments identified by OCTA in its letter of January 11, 2016. OCTA has identified policy and technical issues related to the draft 2016 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTC). The OCTA comment letter is included for reference as Attachment 2.</p>	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Orange County Council of Governments		Submittal 16296 Related Documents Link
16296.04	<p>The Draft RTP assumes that almost no new growth will occur within 500 feet of a freeway or busy transportation corridor. The Draft RTP states that a “buffer” is consistent with the California Air Resources Board’s 2005 advisory guidance that housing be discouraged within 500 feet of high volume roadways such as freeways. It is important to note that CARB’s guidance is not a prohibition of development near high-volume roadways; nevertheless, SCAG’s “buffer” strategy eradicates growth in these areas that are otherwise rich in connections to jobs, retail and housing accessible by many transportation modes. Furthermore, the proposed “buffer” does not reflect the availability of mitigation measures to address near-roadway emissions that remain despite a dramatic reduction of diesel emissions in the last decade. At best, this strategy is a short-term response and problematic because it prevents the kind of density and proximity between land uses that actually reduce trips and associated VMT. As vehicle engines and fuels become cleaner, the “buffer” strategy will become obsolete yet will leave behind a legacy of inefficient land use patterns. Moreover, throughout the SCAG Region, the prevailing existing land use patterns include residential and sensitive receptor uses within 500 feet of a major transportation corridor. In many cases, these areas demonstrate compact development form and serve as affordable housing. Removing this substantial portion of developable land from availability for use is premature and counter to the overarching principles of SB375 to locate housing near job centers and previously urbanized areas.</p>	<p>Comment noted. The Draft RTP/SCS does not assume new growth will be prohibited within 500 feet of a freeway or busy roadway. Region-wide, projected growth within 500 feet of a freeway or busy roadway reflects local input data. The Draft RTP/SCS encourages local jurisdictions to establish their own policies to direct growth outside these areas based on factors covered in the Appendix: Environmental Justice. The use of the word “buffer” has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB’s 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day.</p>
16296.05	<p>There needs to be consistency throughout all the documents regarding the 500 foot “buffer.” To that end, OCCOG offers the following recommendations and requests for additional clarification: • The word “buffer” should not be used. • Use consistent radius/demarcation throughout the documents • Clarify where distance is measured from (e.g. centerline, edge of roadway, edge of right of way) • Clearly articulate the types of transportation corridors being identified (e.g. freeways, high quality transit corridors, high volume corridors, rail etc.) • Emphasis should be on mitigation not prohibition of development. o Resolve the conflict with discouraging development within 500 feet of transportation corridors now and future reductions in emissions and fleet changes over time which will negate the need to utilize this mitigation measure, so that the mitigation approach allows for flexibility with the changing fleet mix in the future.</p>	<ul style="list-style-type: none"> • Comment noted. The use of the word “buffer” has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB’s 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day. • Comment noted. Changes have been made where appropriate. • Comment noted. The distance measured is edge of roadway. • Comment noted. The transportation corridor being identified is a freeway. • Comment noted. The RTP/SCS does not contain a policy that prohibits development within these areas. It encourages local jurisdictions to establish their own policies to limit growth in these areas based on factors covered in the Appendix: Environmental Justice – the emphasis is on mitigation.
16296.06	<p>Throughout the 2016 RTP/SCS, PEIR, and associated appendices, there are references to “cities”. Since the SCAG region also includes counties, it is recommended that references to “city” or “cities” are changed to “jurisdiction” or “jurisdictions” where appropriate. Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.</p>	<p>Comment noted. Appropriate edits have been incorporated in the Final 2016 RTP/SCS.</p>

ID	Comment	Response
<i>Submitted by</i> Orange County Council of Governments		Submittal 16296 Related Documents Link
16296.07	Throughout the documents, there are specific examples of technology identified. It is not SCAG’s purview to pick winner and losers in technology; the marketplace will determine dominant technologies. Therefore, it should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more flexible.	Comment noted. SCAG’s policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition. In addition, SCAG communicates with Hydrogen Fuel Cell industry partners to exchange information and knowledge. Plug-in Electric vehicles are specifically analyzed in the RTP/SCS due to the transportation/land use policy nexus regarding charging station siting. Regarding mobility innovations such as carsharing, and ridesourcing, SCAG does not view these as specific technologies, but rather as emerging transportation modes. In the Mobility Innovations appendix, various new technologies are identified that show promise in meeting the goals of the RTP/SCS, and will continue to support any and all mobility innovations.
16296.08	Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval, and therefore it should not be assumed that they will be approved. Fees and Taxes Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.	Comment noted. The financial plan for the 2016 RTP/SCS does not assume any revenue from new fees included as mitigation measures. Details on all revenue sources included in the financial plan can be found in the Transportation Finance Appendix. Also, the project level mitigation measures that include fees and taxes in the PEIR are a list of example mitigation measures that SCAG does not have jurisdiction or authority to implement. They are included in the PEIR to fulfill SCAG’s responsibility as lead agency for the RTP/SCS under CEQA and to facilitate the Findings that are required at the time that SCAG’s Regional Council considers the adoption of the Plan. For a complete discussion on the performance standards-based mitigation measures, please refer to Master Response No. 4 in the Final PEIR.
16296.09	The OCCOG recognizes the immense efforts SCAG undertook to prepare the 2016-2040 RTP/SCS documents. They represent incredibly complex technical work and have important and far-reaching policy impacts for our region. However, because of this importance and complexity, we would like to express concern about the timing of the release of the documents, and our desire that the preparation of future RTP/SCS documents in future RTP/SCS cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The current timeline of document releases, public comment period, and time allowed for the response to comments results makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period through February 1, 2016, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS on April 7, 2016. With that, we look forward to working with SCAG collaboratively to achieve the schedule.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Orange County Health Care Agency		Submittal 16251 Related Documents Link
16251.01	p.1, column 1 Existing text: "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." Modify text to read: "Metropolitan Planning Organizations (MPOs) and Departments of Transportation (DOTs) across the country, have an opportunity to impact the prevalence of chronic diseases such as obesity, hypertension, asthma and heart disease through transportation planning which promotes increased physical activity."	Comment Noted. The proposed changes do not reflect the full extent to which land use and transportation affect health outcomes. The Public Health Appendix outlines seven focus areas, one of which is physical activity. Changes have been made to the Plan to clarify text.
16251.02	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. p.2, Figure 1 Please have arrows go both ways.	Comment noted. Changes have been made to the Plan.
16251.03	p.3, column 1, paragraph 2 Existing text: "Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors can play a role in supporting healthy behaviors." Modify text to read: "Evidence shows that healthier lifestyles and improved air quality can improve outcomes, and built environment factors and related conditions can play a role in supporting healthy behaviors."	Comment noted. Changes have been made to the Plan.
16251.04	p.3, column 2, paragraph 3 Existing text: "Access to healthy food environments such as grocery stores, farmers' markets and community gardens decreases food insecurity and obesity." Modify text to read: "Access to healthy food environments such as grocery stores, farmers' markets and community gardens can play an important role in food insecurity and obesity."	Comment noted. Changes have been made to the Plan.
16251.05	p.7, column 2, paragraph 3 Existing text: "...Creating infrastructure and facilities that encourage active transportation such as biking and walking provide opportunities for residents to increase their daily physical activity." Modify text to read: "...Creating infrastructure policies and community conditions and facilities that encourage active transportation such as biking and walking provide opportunities for residents to increase their daily physical activity."	Comment noted. Changes have been made to the Plan.
16251.06	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.	Comment noted. Changes have been made in the Plan.
16251.07	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.	Comments noted. SCAG plans to expand its analysis of public health data over the coming years and will incorporate these suggestions. However, SCAG believes additional outreach is necessary to identify any concerns local jurisdictions might have regarding the incorporation of smaller geographic analysis into the Plan. SCAG will incorporate newer data into the 2020 RTP/SCS, however, SCAG will continue to use the 2011 CHIS data for the 2016 RTP/SCS to be as consistent as possible in reporting base year statistics.
16251.08	p.9 Add table with data for walking.	Comment noted. Changes have been made to the Plan.
16251.09	p.10, column 2 Consider including funding as both a challenge and an opportunity.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Orange County Health Care Agency		Submittal 16251 Related Documents Link
16251.10	<p>p.10, column 2, paragraph 4 Existing text: “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. Within the region, health outcomes vary widely based on... Modify text to read: “With more than 18 million people, 191 cities, six counties and hundreds of local and regional agencies, Southern California is a diverse region. Within the region, health outcomes vary widely based on many factors.</p>	Comment noted. Changes have been made to the Plan.
16251.11	<p>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.)</p>	Comment noted. The "best practices" term in the Plan has been changed as recommended. The Complete Streets Guidelines were not available at time of plan development, but will be noted as a resource on the "living" list of local practices that SCAG provides on its public health webpage.
<i>Submitted by</i> Orange County League of Conservation Voters		Submittal 16169 Related Documents Link
16169.01	<p>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.</p>	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation programs. Your coalition is encouraged to participate in the effort.
16169.02	<p>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.</p>	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation programs. Your group is encouraged to participate in the effort.

ID	Comment	Response
<i>Submitted by</i> Orange County Public Works		Submittal 16299 Related Documents Link
16299.01	Throughout the Draft 2016 RTP/SCS, PEIR, and associated appendices, there are references to "cities." Since the SCAG region also includes counties, it is recommended that references to "city" or "cities" are changed to "jurisdiction" or "jurisdictions" where appropriate. Recommendation: Change references to "city" or "cities" to "jurisdiction" or "jurisdictions" where appropriate.	Comment noted. Appropriate edits have been incorporated in the Final 2016 RTP/SCS.
16299.02	Undevelopable/Protected Land Labeled as Vacant This continues to be an ongoing issue with data and maps produced by SCAG for use in its various projects. The County is especially concerned about this issue due to the effort its staff has expended over the last several years to ensure that protected, and therefore undevelopable, land in the unincorporated area is not depicted on any land use maps as "vacant" and therefore available for development. During the outreach process for the Draft 2016 RTP/SCS, the County received a "SCAG Data/Map Book" from SCAG which included several maps for review and comment. In this Map Book, SCAG had included its list of General Plan Land Use Categories which included the category "8888 Undevelopable." County staff applied this category to all areas that are protected open space and submitted this data and maps to SCAG for use in the RTP/SCS and PEIR. A review of the various figures (i.e., exhibits or maps) contained throughout the Draft 2016 RTP/SCS and PEIR has revealed the "8888 Undevelopable" category was not applied consistently to protected open space in the unincorporated area. For example, in the RTP/SCS Appendix titled "SCS Background Document," Exhibits 23 and 24 correctly identify the protected open space areas in the unincorporated area including the Cleveland National Forest (CNF). However, in the PEIR, Figure 3.11.2- 2 "Existing Land Uses" and Figure 3.11.2-5 "General Plan Land Use Designations" both identify CNF as open space instead of undevelopable. Just a few pages later in the PEIR, Figure 3.11.2- 7 "SCAG Region Open Space, Recreation, and Agricultural Land Uses" labels the CNF as "vacant." The CNF is not vacant land, it is protected open space and therefore undevelopable. Recommendation: Revise all figures, exhibits and maps to correctly identify protected open space in the unincorporated area as undevelopable. No undevelopable areas should be depicted as vacant, which has a connotation that it is available for future development.	Comment noted. With respect to the comment on the figures in the PEIR, it is important to note that each of the figures in the PEIR serves a distinct purpose and as such, may reference a different data set to fully address its purpose. The various data sets each have their own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. To the extent appropriate, SCAG has clarified the source of data in the legend for the PEIR figures and has made edits as described in the Clarifications and Revisions section of the Final PEIR.

ID	Comment	Response
<i>Submitted by</i> Orange County Public Works		Submittal 16299 Related Documents Link
16299.03	<p>Consistent Use of 500 Foot Buffer Reference Throughout the Draft 2016 RTP/SCS and PEIR there are references to a possible 500, or even 1,000, foot buffer. The terminology "buffer" implies that there is a negative condition that needs to be addressed and that development is prohibited within this area. There is currently no requirement from the California Air Resources Board (CARB) or the South Coast Air Quality Management District (SCAQMD) that prohibit development near high quality transit areas or major transportation corridors. There are numerous references to prohibiting certain uses (including residential and mixed use) within 500 feet of a major transportation corridor (like a freeway). This language should be eliminated or at least made more flexible and it should be indicated that additional study is pending by air quality agencies and SCAG. It should be made clear that is measure from the edge of travel lands and not the right-of-way. Precluding development within 500 feet takes a massive amount of land out of play where often times the greatest need for affordable housing exists. Furthermore, precluding development in these areas is directly contrary to the primary objectives of SB 375 to locate housing near job centers within previously urbanized areas. Recommendation: Define the word "buffer" and use it consistently throughout all documents and clarity that development is not currently prohibited adjacent to transportation corridors.</p>	<p>Comment noted. The Draft RTP/SCS does not assume new growth will be prohibited within 500 feet of a freeway or busy roadway. Region-wide, projected growth within 500 feet of a freeway or busy roadway reflects local input data. The Draft RTP/SCS encourages local jurisdictions to establish their own policies to direct growth outside these areas based on factors covered in the Appendix: Environmental Justice. The use of the word "buffer" has been omitted from the Plan. However, SCAG will continue to utilize the advisory recommendation from ARB's 2005 Air Quality and Land Use Manual to avoid siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day.</p>
16299.04	<p>Overall, the County supports the Draft 2016-2040 RTP/SCS ("The Plan") growth forecast and the adoption of the growth forecast at a geographic level no lower than the jurisdictional level. The County supports The Plan since the growth forecast accurately reflects Orange County's Projections dataset. The Plan growth forecast reflects all entitlements, development agreements, and projects recently completed or under construction in the unincorporated area. The County appreciates the ongoing coordination between SCAG and the Center for Demographic Research (CDR) at California State University Fullerton on behalf of all Orange County jurisdictions. The Orange County Projections has been used by OCTA in the development of its Orange County Long-Range Transportation Plan demonstrating that Orange County has integrated transportation and land use planning for decades. On behalf of all Orange County jurisdictions, OCCOG representatives on the Regional Council and SCAG Policy Committees repeatedly requested that the growth forecast in the Draft 2016 RTP/SCS and all PEIR alternatives be based on the technically corrected growth forecast submitted to SCAG in August 2015 by the CDR. Use of any other growth forecast could result in unrealistic land use proposals such as depicted in Attachment 2, the proposed increase in the numbers of population, dwelling units and employment in long-established single-family residential areas such as Midway City and decrease in these numbers for newly built planned communities protected by development agreements.</p>	<p>Comment noted, this comment is to support the Policy Growth Forecast.</p>

ID	Comment	Response
<i>Submitted by</i> Orange County Public Works		Submittal 16299 Related Documents Link
16299.05	<p>The PEIR itself makes the following statements as to why Alternative 3 should not be supported:</p> <ul style="list-style-type: none"> • "Alternative 3 would result in a greater chance for there to be conflicts with existing plans or regulations including local general plans as a result of the policies encouraging a much more compact land use development pattern in urbanized areas such as HQTAs." • "Additionally, there would be a greater chance for there to be conflicts with an existing plan or regulation including local general plans because of the much more compact and aggressive land use development pattern in urbanize areas such as HQTAs." • "Alternative 3 would result in somewhat more adverse impacts as The Plan from the potential to displace substantial amounts of existing housing...Alternative 3 would result in greater impacts as The Plan from the potential to displace substantial numbers of people..." • "However, Alternative 3 would have much more severe impacts on the built environment." Because the draft PEIR's Intensified Land Use Alternative (Alternative 3) does not include the technically corrected growth forecast for Orange County, the County would not support consideration of this Alternative as the preferred alternative. <p>Recommendation: The County supports the adoption of the Draft 2016 RTP/SCS 'The Plan' growth forecast at the jurisdictional level.</p>	<p>Comment Noted SCAG appreciates that the County supports the Plan and growth forecast at the jurisdictional level and that does not support that the Intensified Land Use Alternative as the preferred alternative for the Plan. This information will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS.</p>
16299.06	<p>Language throughout the Draft 2016 RTP/SCS and the associated appendices is leading and dramatic to emphasis certain key issues such as active transportation and public health. It is recommended that the document utilize an unbiased, objective tone. For example, the County recommends the removal of "Our Vision" and "Our Overarching Strategy" from the Executive Summary of the document. These two sections are highly speculative and are not necessary to the document. "Our Vision" and "Our Overarching Strategy" go above and beyond the requirements of the RTP/SCS when the focus of the document should be on the challenges we face and how the SCAG region can address those challenges through the adoption of the Draft 2016 RTP/SCS. Recommendation: The Draft 2016 RTP/SCS should only contain unbiased and objective language throughout the document and associated appendices.</p>	<p>Comment noted.</p>
16299.07	<p>Several mitigation measures indicated that local jurisdictions or other entities should implement new fees of propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval, and thus not be approved. They also represent prescriptive means to accomplish the mitigation. Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation, b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.</p>	<p>Comment noted. The financial plan for the 2016 RTP/SCS does not assume any revenue from new fees included as mitigation measures. Details on all revenue sources included in the financial plan can be found in the Transportation Finance Appendix. Also, the project level mitigation measures that include fees and taxes in the PEIR are a list of example mitigation measures that SCAG does not have jurisdiction or authority to implement. They are included in the PEIR to fulfill SCAG's responsibility as lead agency for the RTP/SCS under CEQA and to facilitate the Findings that are required at the time that SCAG's Regional Council considers the adoption of the Plan. For a complete discussion on the performance standards-based mitigation measures, please refer to Master Response No. 4 in the Final PEIR.</p>

ID	Comment	Response
<i>Submitted by</i> Orange County Public Works		Submittal 16299 Related Documents Link
16299.08	<p>The County recognizes the amount of work put into preparing these documents. They represent incredibly complex technical work and have important and far-reaching policy impacts for our region. However, because of this importance and complexity, the County would like to express concern about the timing of the release of the documents and hope that preparation of future RTP/SCS documents will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The current timeline of document releases, public comment period, and time allowed for the response to comments results in an inability to have credible discussion regarding possible changes because the timeline does not allow for recirculation or full discussion of requested changes. While the County is appreciative of the extended public comment period through February 1, 2016, there remains concern that only a few weeks are provided to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the Draft RTP/SCS on April 7, 2016.</p>	Comment noted.
<i>Submitted by</i> Orange County Transportation Authority		Submittal 16059 Related Documents Link
16059.01	<p>The draft RTP/SCS suggests that \$130.8 billion of the approximately \$200.4 billion regional shortfall can be addressed through actions at either the state or federal level. The innovative financing strategy, included in the RTP/SCS, assumes that a \$0.10 gas tax increase will be implemented by 2020. Additionally, by 2025, it assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.04 per mile, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee. OCTA cannot support an increase in fees, including the introduction of a mileage-based user fee, until a comprehensive economic impact study is completed and presented to the OCTA Board of Directors for discussion. When considering support for any kind of a new user-based fee program, the region should place an emphasis on the need for return-to-source criteria that guarantee funds generated within a county are reinvested in that county's transportation system. Moreover, any user-based fees should be indexed appropriately to provide a justifiable and sustainable source of funding. Finally, throughout the development of any new funding mechanisms, opportunities should be sought to accelerate project delivery and reduce costs, consistent with OCTA's Breaking Down Barriers initiative. While these comments are generally consistent with SCAG's guiding principles for identifying reasonably available funding in the RTP/SCS, OCTA would like to reinforce these principles, particularly in consideration of the mileage-based user fee.</p>	<p>The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes are equivalent to the what existing state and federal excise taxes would generate had they been indexed for inflation when last adjusted more than two decades ago. An analysis of the economic impacts of the Plan is provided in Chapter 7 and the Economic and Job Creation Analysis Appendix. Additionally, a comprehensive analysis of the California Road Charge Pilot Program will be available no later than June 30, 2018 in accordance with SB 1077. The 2016 RTP/SCS does not assume revenue from a mileage-based user fee prior to 2025. As noted, the Plan used the following guiding principles for identifying reasonably available revenues: establish a user fee based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds and ensures an equitable distribution of costs and benefits; promote national and state programs that include return-to-source guarantees, while maintaining flexibility to reward regions that continue to commit substantial local resources; leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of the Transportation Infrastructure Finance and Innovation Act [TIFIA]) to attract private capital and accelerate project delivery; and promote funding strategies that strengthen the federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade.</p>

ID	Comment	Response
<i>Submitted by</i> Orange County Transportation Authority		Submittal 16059 Related Documents Link
16059.02	<p>The draft RTP/SCS identifies Phase I of the California High-Speed Rail Authority (CHSRA) Project as a potential solution for improving interregional and intercity ground transportation. As described in the draft RTP/SCS, the project includes completing the first section through the San Joaquin Valley by 2018, extending to Palmdale and the Burbank Bob Hope Airport by 2022, connecting to San Jose/San Francisco by 2026, and finally reaching Los Angeles Union Station (Union Station) by 2028. This also assumes upgraded commuter rail connections between Union Station and the Anaheim Regional Transportation Intermodal Center along the Los Angeles-San Diego-San Louis Obispo corridor. This upgraded service will be achieved through a \$1 billion program of projects identified in a memorandum of understanding (MOU) between the CHSRA and nine Southern California agencies. This investment is part of a phased delivery, known as the “blended approach”, which OCTA supports through the adopted Resolution 2012-020. OCTA recommends that SCAG continue to provide regular updates to the Transportation Committee and Regional Council regarding the CHSRA business plan, financial status, implementation progress, and any changes in assumptions by the CHSRA. These updates should focus particularly on the status of the MOU.</p>	<p>Comment noted. SCAG Transit/Rail staff has provided, and will continue to provide, regular updates to the SCAG Transportation Committee and Regional Council on regional rail issues and developments, including the CA HST project and MOU.</p>
16059.03	<p>The draft RTP/SCS includes implementation of a regional express lane network. This network proposes to increase occupancy requirements from 2+ to 3+ persons per vehicle on select existing and planned high-occupancy vehicle (HOV) lanes throughout the region. Pricing for single-occupancy and dual-occupancy vehicles will then be used to increase the throughput of the corridor and reduce emissions from congestion. As a result, this concept would generate additional revenues. When combined with tolls from a new east-west freight corridor in Los Angeles County, the projected revenues would total \$23.5 billion. These funds are assumed to contribute toward the \$200.4 billion regional shortfall. The proposed Regional Express Lane Network focuses on converting specific existing and planned HOV facilities to express lanes. However, the segment of State Route 55 (SR-55), between Interstate 405 (I-405) and State Route 91 (SR-91), is noted as a potential single or dual express lane facility. The potential for a dual lane facility is inconsistent with the projects submitted by OCTA in December 2014. The submittal identifies general purpose lane additions on SR-55, between I-405 and Interstate 5 (I-5), as well as between I-5 and State Route 22 (SR-22). OCTA did not submit any new capacity enhancements on SR-55 north of SR-22. If new capacity is proposed, over and above the OCTA LRTP, new funding would be required that is likely dependent on state and federal legislative action. The 2016-2040 RTP/SCS should consistently recognize the capacity enhancements along SR-55, between I-405 and I-5, and between I-5 and SR-22, as general purpose lanes. This is consistent with how these projects are characterized in OCTA’s LRTP, OCTA’s 2006 program-level environmental document, and the current 2012-2035 RTP/SCS. Furthermore, the 2016-2040 RTP/SCS should clearly recognize that the proposed express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility before any final decisions on implementation can be made.</p>	<p>References to State Route 55 operating as a dual express lane facility have been removed from the Plan. The constrained express lane segments in Orange County may be adjusted or changed to reflect the new findings and recommendations from SCAG’s Express Travel Choices Study and Caltrans District 12’s Managed Lane Network Study in subsequent amendments to the Plan. Both studies are expected to be completed in the summer of 2016.</p>

ID	Comment	Response
<i>Submitted by</i> Orange County Transportation Authority		Submittal 16059 Related Documents Link
16059.04	OCTA recognizes that it is within SCAG’s purview to plan for regional strategies that enhance transportation; however, it should be noted that OCTA is committed to delivering the projects within the LRTP. The 2016-2040 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies. OCTA will only consider additional investments after new revenues are realized and identified to account for these additional improvements.	Comment noted. Descriptions for projects in the Project List Appendix have been revised to provide more clarity as applicable.
<i>Submitted by</i> Port of Hueneme		Submittal 16180 Related Documents Link
16180.01	Page 4 of Executive Summary- the Goods Movement section –Port of Hueneme is not mentioned as Environmental Steward, its Green Initiatives are: • The Port, and every port tenant, is proactive about reducing emissions by using cleaner burning fuels in the vessels and equipment used to move cargo • Clean energy at The Port includes using energy efficient utilities and alternative fuels • Replacing conventional diesel with low emission propane-fueled trucks, and electrifying cargo handling equipment to reduce on-dock emissions • The Port actively monitors water quality to mitigate impacts to marine life and provides shoreside power for vessels and air quality improvement (over the 30 year life of the project) o 92% reduction in Particulate Matter o 55% reduction in Greenhouse Gases o 98% reduction in NOx • In 2010, the Port developed a Non-compliant Truck Reporting System (NCTRS) to document and report all trucks not in compliance with the California Air Resources Board (CARB) drayage truck regulation • In 2009, the Port voluntarily prepared an Air Emissions Inventory (EI) to quantify the air quality impacts associated with maritime operations • Implementing Phase I of a Stormwater Improvement Plan • LED Lighting Project to reduce energy consumption • In 2015 Port of Hueneme became the First California Port to join Green Marine • Partnered with the US Navy and U.S. Army Corps of Engineers (USACE) to construct and monitor a Confined Aquatic Disposal Cell to dispose of contaminated sediment Please find more information on Port of Hueneme’s Green Program in case you would like to reference them as an example: http://www.portofhueneme.org/community/environment/ http://www.greenport.com/news101/Projects-and-Initiatives/hueneme-joins-green-marine http://yosemite.epa.gov/opa/admpress.nsf/6424ac1caa800aab85257359003f5337/95d492f5d48c36a985257cb400541364!OpenDocument	SCAG recognizes the substantial efforts made by the Port of Hueneme as an environmentally conscious port. Given that this is an executive summary, a full list of information would not be consistent with the abbreviated verbiage called for in this section. Moreover, this section is intended to highlight major accomplishments since the 2012-2035 RTP/SCS. However, SCAG has updated the existing section on the Port of Hueneme in the Goods Movement Appendix to discuss the port’s green initiatives.
16180.02	Page 7 of Executive Summary- Strengthening the Regional Transpiration Network for Goods movement-Ventura County projects are not added and there are several of them, please see link to the VCTC 2035 plan. http://www.goventura.org/?q=final-comprehensive-transportation-plan-ctp	Please note that this list is not an exhaustive list of all goods movement projects in the region. It is simply a snapshot of some of those projects. The entire list of goods movement projects is included in the 2016-2040 RTP/SCS Goods Movement Appendix and includes the Ventura County projects referenced.
16180.03	In Section-Our Progress Since 2012, Goods Movement Section- the Port of Hueneme Shore Side Power Clean Air Project that was done since then is not listed.	Our Progress Since 2012 lists mobility projects that are realized since 2012. Since the Port of Hueneme Shore Side Power Clean Air Project is not a mobility project, it will not be included in this graphic. However, SCAG added a discussion of this project in the goods movement appendix under Port of Hueneme section.

ID	Comment	Response
<i>Submitted by</i> Port of Hueneme		Submittal 16180 Related Documents Link
16180.04	<p>In Section-Challenges in a Changing Region- the Draft Plan is missing a section on Seaports, perhaps right before Rail, there is segment on Seaports, the increase of cargo volumes since 2012 and how that affects the rest of the infrastructure-rail, highway, and intermodal corridors. If possible, please include reference to the Port of Hueneme 2020 Strategic Plan in the Draft Plan for RTPSCS. Here is the link to the plan. Thank you. http://www.portofhueneme.org/2020-strategic-business-plan/</p>	<p>We added a reference to Port of Hueneme in "Continued Growth in International Trade" as a growing port for specialized cargo. Further, the Goods Movement Appendix of the 2016 RTP/SCS includes a section focused on the Port of Hueneme's work, including the 2020 Strategic Business Plan.</p>
<i>Submitted by</i> Port of Los Angeles		Submittal 16164 Related Documents Link
16164.01.1	<p>ACTIVE TRANSPORTATION APPENDIX Page 48: "Assist the Cities of Los Angeles and Long Beach in providing a continuous pedestrian and bicycle access across the replacements for the Vincent Thomas Bridge and Gerald Desmond Bridge linking San Pedro to Long Beach." - Consistent with the final City of Los Angeles 2015 Mobility Plan, remove Seaside Avenue on Terminal Island as part of the active transportation plan related to the California Coastal Trail. > Seaside Avenue is a high-speed (45 mph posted) expressway by function. It is also a major truck route and a federally designated National Highway System Intermodal Connector route, Countywide Strategic Truck Arterial Network (METRO CSTAN), and the Strategic Goods Movement Arterial Plan. Truck volumes will increase substantially over time. When the Gerald Desmond Bridge replacement is completed, the entire segment of Ocean Boulevard/Seaside Avenue between the I-710 and the State owned Vincent Thomas Bridge will be relinquished to Caltrans, and not suitable for bike lanes. > The Harbor Department has plans to eventually remove the last signal on Seaside Avenue, which will thus result in higher prevailing speeds on this major expressway, and not safe for bikes. > This area is an isolated segment in which there are not existing, planned, or proposed bike lanes easterly and westerly thereof. > Placing bike access through this area is not in line with the RTP goals and objectives for "Connectivity (pg. 48)," "Integrity (pg. 48)," and "Support and seek opportunities to promote safety" (pg. 73). • Add the following two projects: - Alameda Corridor Terminus/California Coastal Trail Extension Grade Separation (Pedestrian/Class I Bicycle Path bridge) - Consistent with the final City of Los Angeles 2015 Mobility Plan: California Coastal Trail Ports O' Call Promenade (30-foot wide public promenade/Class I bike path) • Alameda Corridor Terminus/California Coastal Trail Extension Grade Separation (Pedestrian/Class I Bicycle Path bridge): \$15 million (assume POLA funds for RTP purposes; POLA will be seeking State and possibly METRO ATP funds) • California Coastal Trail Ports O' Call Promenade (30-foot wide public promenade/Class I bike path) (assume POLA funds for RTP purposes; POLA will be seeking State and possibly METRO ATP funds)</p>	<p>The plan assumes a physically separated bicycle/pedestrian path across the Vincent Thomas Bridge replacement connecting to the planned Mark Bixby Bike Path (which is part of the Gerald Desmond Bridge replacement). Wording in the appendix has been updated to reflect separation. Alameda Corridor Terminus added. California Coastal Trail Ports o" Call Promenade added.</p>

ID	Comment	Response
<i>Submitted by</i> Port of Los Angeles		Submittal 16164 Related Documents Link
16164.02	<p>GOODS MOVEMENT APPENDIX Rail Infrastructure Outside Marine Terminals • Add: “Port of Los Angeles Rail Efficiency Program (Alameda Corridor - West Basin Area Gap Closures): \$20 million (assume included in total POLA cost for rail per Table 20.F in Goods Movement Appendix)” - This project will eliminate two short gaps in trackage between the West Basin area of the Port of Los Angeles and the Alameda Corridor (increasing the number of tracks from one to two in this area). This doesn’t change any on-dock railyard capacity assumptions, and thus doesn’t change any projections of train or truck volumes in the RTP. The project however does reduce train delays and idling. San Pedro Bay Ports Access Projects • SR 47/V. Thomas Bridge/Front St. Harbor Boulevard Interchange: Add to the description, “The Project also includes realigned eastbound and westbound SR 47 on-ramps.”</p>	<p>Comment noted. This project has been added to the list of projects under Rail Infrastructure Outside Marine Terminals section for Port of Los Angeles, and the project description for SR 47/V. Thomas Bridge project has been added.</p>
<i>Submitted by</i> PTS Staffing Solutions		Submittal 16067 Related Documents Link
16067.01	<p>Comments on the RTP SCS draft. To continue our efforts to minimize the world’s greenhouse gases, we need to work with the Oil Infrastructure that serves the 38 million on the California’s “energy island”. The unintended consequences of CARB’s over regulations on the oil infrastructure industry are that when other states or countries opt to make the California boutique fuels, we would have an option to import our crude oil, transportation fuels, and jet fuels from other states or countries that have significantly less environmental controls. Thus, Imports would increase, not decrease, the world’s greenhouse gas emissions, and further raise the costs to deliver our transportation fuels from afar. The report should reference the 2016 ASCE Infrastructure Report Card that is due for publication around April 2016.</p>	<p>Comment noted. The California Air Resources Board and local air districts have jurisdiction over the oil infrastructure industry.</p>

ID	Comment	Response
<i>Submitted by</i> Public Health Alliance of Southern California		Submittal 16230 Related Documents Link
16230.01	<p>The 2016-2040 DRAFT RTP/SCS and the plan scenario point our region in the right direction, and represent important progress for considering the public’s health when planning for our region’s future. We are pleased that the plan does the following:</p> <ul style="list-style-type: none"> • Puts the region on target to meet our AB 32 Greenhouse Gas Reduction goals of 8% by 2020. Climate change is a threat to public health in our region, our Alliance strongly supports the climate change mitigation actions included in this plan. • Includes increased investment in transit and more active modes of transportation, particularly in Los Angeles County. Transportation and built environment structures that support increased physical activity will significantly improve our region’s health. • Includes performance measures that will help us understand the health impacts of the plan, and measure our progress toward implementation. • Includes a more robust Environmental Justice analysis than prior plans, setting the stage for increased commitment to equity in our region. • Includes a framework for operationalizing the ongoing consideration of health in our regional planning, as detailed by the Public Health Work Program in the Public Health Appendix. • Is supported by data efforts, including the REVISION tool and the Urban Footprint Scenario Planning Module, which will allow us to project and understand trends in our region and plan impacts at a more granular level. • Includes targeted land use strategies to help meet plan goals, including intensification of land use in high quality transit areas, complete streets strategies, and the livable corridor strategies. We encourage SCAG members to work to implement these strategies within their local plans. 	Comment noted.
16230.02.1	<p>Recommendations for the Project List and Performance-Based Planning</p> <ul style="list-style-type: none"> • Consider a performance-based cost/benefit analysis of the largest projects as a way of building authentic public engagement around funding decisions included in plan. 	Comment noted. For clarification, a performance-based systems level cost/benefit analysis is conducted and reported.
16230.02.1	<ul style="list-style-type: none"> • Consider setting aside a portion of funding for a public discussion/ referendum on the types of projects to be included in the plan as a way of building public engagement. At this time there is no clear mechanism for public input on the project list. 	Comment noted. SCAG has conducted an extensive public outreach effort soliciting public input before and after the release of the Draft RTP including the Project List.
16230.02.2	<ul style="list-style-type: none"> • Performance measures in general, and the public health and environmental justice measures in particular should include numeric targets rather than a simple directional goal/presentation of data. • Include a performance monitoring measure in the RTP/SCS tracking the number of very low, low, and moderate income housing units available and constructed as a way of gauging progress towards the 2013 Regional Housing Needs Assessment by 2021. • Maintain an updated public data porthole that allows the public to measure the implementation of the plan based on the performance measures used for plan selection. 	<p>Comment noted. The majority of the 2016 RTP/SCS performance measures include a target of providing a measurable improvement over the no-project Baseline result. The targets for the air quality performance measures are defined by Federal and/or State requirements. Criteria pollutant emissions must meet Federal Transportation Conformity mandates and greenhouse gas emission levels must meet State defined reduction targets. Similarly, targets for the Environmental Justice performance measures are defined by Federal requirements in that there should be no unaddressed disproportionately high and adverse effects for low income or minority communities. Regarding the tracking of the availability of low and moderate income housing units, this is a performance area that SCAG recognizes as critical to the future of our region. We will continue to work with our state, regional, and local partners to identify a reliable and meaningful methodology for evaluating progress toward housing affordability improvement in in our region. In response to the recommendation for a public data porthole, SCAG has been working on the development of a web-based application that will be accessible to the public for evaluating implementation of sustainable communities strategies at the local level. This online planning tool, known as 'REVISION', is expected to be online by Spring, 2016.</p>

ID	Comment	Response
<i>Submitted by</i> Public Health Alliance of Southern California		Submittal 16230 Related Documents Link
16230.02.2	<ul style="list-style-type: none"> In the PEIR, clarify which (if any) of the Strategic Projects are being modeled in the plan scenario. It is not clear from the existing documentation which projects were included at which stage in the modeling process. 	<p>Comment noted. As stated in Section 2.0, Project Description, of the PEIR, this PEIR for the 2016 RTP/SCS does not analyze strategic projects because their lack of funding indicates that implementation is speculative at this point. If these projects become reasonably foreseeable, they will be included in the future RTP/SCS updates, and their impacts will be addressed in the PEIRs for future Plans. The documentation of RTP projects is the 2016 RTP/SCS Project List. It is these project that are included for the technical and modeling process for the Plan and associated environmental analysis in the PEIR.</p>
16230.03	<ul style="list-style-type: none"> Consider a performance-based cost/benefit analysis of the largest projects as a way of building authentic public engagement around funding decisions included in plan 	<p>Comment noted. Please refer to the performance measure section of the Plan for a systems level cost/benefit analysis.</p>
16230.04	<ul style="list-style-type: none"> We applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the “Daily amount of walking and biking related to work and non-work trips” and the “Collision rates by severity and mode.” We encourage SCAG members to collaborate with SCAG, Public Safety, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts/ benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes. We also encourage SCAG to update the data analysis and performance measures included in the public health appendix, where possible, provide this data at a granular level through the REVISION tool and other public data portals. This will facilitate the development of strategies and projects to advance public health supportive built environments while making it easier for member jurisdictions to incorporate public health analyses in their plans. 	<p>Comment noted. SCAG will take these suggestions into consideration when implementing the Plan.</p>

ID	Comment	Response
<i>Submitted by</i> Public Health Alliance of Southern California		Submittal 16230 Related Documents Link
16230.05	<ul style="list-style-type: none"> • We commend the integration of Public Health into the development of the 2016-2040 RTP/SCS. In particular, we strongly support the new Public Health Appendix to the plan, and appreciate the hard work that went into the creation of this document. • SCAG’s Public Health Working Group has created a forum for public health professionals to engage with the plan and to advance work on the RTP, and the broader goals of the Public Health Work Program. SCAG’s staff participation on the Alliance’s Healthy Transportation Working Group has further built constructive engagement between transportation planning and public health and we commend and look forward to this continued participation. • The Public Health appendix provides a primer explaining the Social Determinants of Health pathways through which planning and the RTP impact public health. We encourage SCAG to maintain the appendix as a living document and to include it in future RTP/SCSs to ensure future members and users understand these links. • We applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the “Daily amount of walking and biking related to work and non-work trips” and the “Collision rates by severity and mode.” We encourage SCAG members to collaborate with SCAG, Public Safety, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts/ benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes. • We appreciate the inclusion of healthy food access on page 4 of the Public Health Appendix. Given the importance of this topic to health, we recommend integration of healthy food systems discussions into the broader RTP/SCS. An example would be to consider the impact of the food system on goods movement; i.e., how can preservation of local agriculture and development of urban agriculture in the region reduce the greenhouse gas emissions from that sector? 	Comment noted.
16230.06	<ul style="list-style-type: none"> • We appreciate the effort on the part of the Strategic Growth Council, SCAG and others to develop the Urban Footprint Scenario Planning Model (SPM) Public Health Module as a tool for helping evaluate the health impacts of proposed scenarios. • While there is room for the refinement of this tool both in terms of including a risk exposure pathway and in addressing member’s concerns related to the land use codes, we think the Urban Footprint SPM Health Module is useful in providing a ballpark assessment of some of the health benefits that may come from the plan. • We are encouraged by the estimated health benefits of the plan scenario, which projects a 2.5% decrease in the regional obesity rate, 3% reduction in share of population with high blood pressure and a 13% reduction in total annual health costs for respiratory disease. • We encourage SCAG and its member agencies to capture the value of our investments in active transportation by purchasing bicycle and pedestrian counters, and investing in National Household Transportation Survey (NHTS) oversample for active modes for the entire region. Detailed tracking of the physical activity increases resulting from the plan are key to understanding health impacts as well as how injury rates are related to exposure. • In future years as data investments such as automated counters improves the granularity of our bike and walk mode share and trip length data, we encourage SCAG to analyze health co-benefits by using a relative risk assessment tool such as the ITHIM model. 	Comment noted. SCAG will continue to refine its modeling processes around these issues and will consider using new tools when appropriate.

ID	Comment	Response
<i>Submitted by</i> Public Health Alliance of Southern California		Submittal 16230 Related Documents Link
16230.07	<ul style="list-style-type: none"> We are encouraged by the estimated health benefits of the plan scenario, which projects a 2.5% decrease in the regional obesity rate, 3% reduction in share of population with high blood pressure and a 13% reduction in total annual health costs for respiratory disease. We encourage SCAG and its member agencies to capture the value of our investments in active transportation by purchasing bicycle and pedestrian counters, and investing in National Household Transportation Survey (NHTS) oversample for active modes for the entire region. Detailed tracking of the physical activity increases resulting from the plan are key to understanding health impacts as well as how injury rates are related to exposure. In future years as data investments such as automated counters improves the granularity of our bike and walk mode share and trip length data, we encourage SCAG to analyze health co-benefits by using a relative risk assessment tool such as the Integrated Transportation Health Impact Model (ITHIM). 	<p>Comment noted. Added action step under Plan Implementation (Page 70) to encourage local jurisdictions to purchase automated counters as part of infrastructure development. Health benefits of the plan from physical activity are currently measured using the Public Health Module of the UrbanFootprint Scenario Planning Model. SCAG will improve upon modeling processes for active transportation in future years. SCAG plans to improve data collection through the expansion of the current Bicycle Data Clearinghouse into an Active Transportation Database and partnerships with county and local jurisdictions.</p>
16230.08	<ul style="list-style-type: none"> The Environmental Justice (EJ) outreach process and analysis is significantly more robust in this 2016-2040 RTP/SCS than in prior years. Thank you for incorporating the feedback we provided through the workshops and focus groups, and including the “Active Transportation Hazard” and “Climate Vulnerability” measures. Displacement and gentrification are particularly important areas for action in the coming years. We appreciate the analysis of this issue in the EJ appendix, and its brief treatment in the Environmental Justice toolbox, however given the enormous affordable housing deficit in our region, and the trend of the displacement of transit-captive populations from the most transit-accessible urban core, more action on displacement will be necessary in order to realize the VMT-reductions promised by our transit investments. We encourage SCAG members to convene a task force specifically dedicated to this issue. Because transit investment is a proven driver of displacement, this task force should seek to develop a fiscal structure for ensuring that the added land value of transit investment is captured for the development of affordable housing, with the minimum goal of achieving a ‘no net loss’ of affordable units within High Quality Transit Areas. The 2015 County of Riverside Community Health Assessment, which involved community forums and surveys, both homelessness and housing affordability surfaced as high priorities for residents. The fear of displacement is also a concern for residents of San Bernardino County. Strategies to address housing affordability should take the entire region into account. 	<p>SCAG will consider emerging and persistent regional issues, including suggestions from the comment process, and may propose new task forces/sub-committees as needed. SCAG is also exploring ways to address social equity issues, including gentrification and displacement, beyond the RTP/SCS process, and will continue to work with stakeholders to discuss challenges and potential strategies for the SCAG region. SCAG acknowledges that progress on affordable housing has been insufficient in meeting the needs of the region. The language of the draft 2016 RTP/SCS has been edited to draw more attention to the dire need of affordable housing in the region. As a regional planning agency, SCAG encourages jurisdictions to consider different strategies to utilize at the local level to promote the development of affordable housing, and SCAG has included an affordable housing strategy toolbox for jurisdictions as part of the affordable housing section in chapter 3. We are committed to working with our local jurisdictions to ensure that their housing elements are in compliance with State housing law and offer technical assistance for affordable housing grant programs such as the Affordable Housing & Sustainable Communities (AHSC) program, California Department of Housing and Community Development Transit-Oriented Development (TOD) grant, and establishing community revitalization and investment agency or enhanced infrastructure financing districts.</p>
16230.09	<ul style="list-style-type: none"> The EJ analysis should explicitly align the discussion with the Social Determinants of Health and the Public Health appendix, as there is no mention of the concept throughout. Consider using the California Planning Roundtable’s Social Determinants of Health paper as a resource to explain the connection between these two appendices for newcomers to the field. Given the pressing nature of inequity, displacement, and poverty in our region, we recommend greater integration of the performance measures and mitigation actions included in the Environmental Justice appendix within the main body of the RTP/SCS. 	<p>Comment noted. SCAG will enhance our analysis by integrating the Public Health Alliance’s California Health Disadvantage Index in the coming years, which will increase the linkage between the Environmental Justice and Public Health programs as this dataset touches specifically on the "Social Determinates of Health" approach. As part of its Environmental Justice Appendix, SCAG also put together an Environmental Justice Toolbox of possible mitigation measures to address potential impacts to Environmental Justice communities. On page 195 of the appendix, there is a list specifically for potential resources and strategies related to public health, along with gentrification and displacement. Because many of these strategies concern local land use decisions, the toolbox strategies are voluntary but SCAG encourages communities to consider them as part of the local decision making process. Chapter 3 of the final RTP/SCS also includes a reference to the EJ Appendix.</p>

ID	Comment	Response
<i>Submitted by</i> Public Health Alliance of Southern California		Submittal 16230 Related Documents Link
16230.10	<ul style="list-style-type: none"> The Environmental Justice (EJ) outreach process and analysis is significantly more robust in this 2016-2040 RTP/SCS than in prior years. Thank you for incorporating the feedback we provided through the workshops and focus groups, and including the “Active Transportation Hazard” and “Climate Vulnerability” measures. We particularly appreciate SCAG’s inclusion of multiple methods of identifying EJ communities. Due to the complex and localized nature of the issues EJ communities face, we would encourage SCAG to provide the detailed community-level analysis that is presented in aggregated form in the EJ appendix through a public data portal for use by individual communities. The Public Health Alliance has developed the “California Health Disadvantage Index” as a tool for identifying community disadvantage from a ‘Social Determinants of Health’ perspective. We encourage SCAG to consider the use of this tool for future EJ analysis, and as a layer for inclusion in future publicly available datasets on this topic. 	Comment noted. SCAG will continue to enhance our environmental justice efforts in the region and will evaluate the potential of providing localized analysis through a web portal.
16230.11	<ul style="list-style-type: none"> Page 5 and page 39: Please update this sentence: In Riverside County, the Healthy Riverside County Initiative is working to have healthy cities resolutions adopted by a minimum of 15 cities. To read: In Riverside County, the Healthy Riverside County Initiative has formed a Healthy City Network to continue to successfully work with the county’s 28 cities to enact Healthy City Resolutions and Health Elements into their General Plans. Page 16, #2: Collaborating with Member Agencies, Jurisdictions and Stakeholders: Please explicitly mention public health departments as one of the key stakeholders, modifying the fifth sentence in that section to read: The Agency will also have to work with key stakeholders including local public health departments to ensure... Page 20, Categorizing Land Use: Rural development, which is neither suburban nor natural lands, does not fall into any of the listed categories. We would appreciate either a clarification of which of the categories rural land uses fall under, or a new, separate category addressing rural development. 	p.5 and 39 Comment noted. Changes made to Plan. p.16 Comment noted. Changes made to Plan. p.20 Comment noted. As noted on page 20, 35 “Place Types” were utilized in the urban setting design tool (Urban Footprint Scenario Planning Model (SPM)). It is the Place Types that factor into the modeling analyses. LDCs are utilized in order to describe general conditions within areas of the SCAG region and do not play a role in the modeling analyses. The 35 Place Types were then sorted into the three Land Development Categories (LDCs). Place Types that have a “rural” category are included in the Standard LDC and have a distinct travel behavior and housing and commercial mix.
<i>Submitted by</i> Puente-Chino Hills Task Force of the Sierra Club		Submittal 16168 Related Documents Link
16168.01	<p>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.</p>	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation programs. Your coalition is encouraged to participate in the effort.

ID	Comment	Response
<i>Submitted by</i> Puente-Chino Hills Task Force of the Sierra Club		Submittal 16168 Related Documents Link
16168.02	<p>We have reviewed the RTP/SCS and PEIR and offer the following comments and suggestions for inclusion in the Plan with the intent to clarify/strengthen the language, as well as link the goals of the RTP and SCAG’s mission with the Natural and Farmland policies. Identify a Conservation Mechanism for the Natural and Farmlands Preservation Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it likely relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved doesn’t mean the land then automatically becomes protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16168.03	<p>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.</p>	<p>Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”</p>
<i>Submitted by</i> Redlands Tea Party Patriots		Submittal 16055 Related Documents
16055.01	<p>Can we solve these problems in ways that increase freedom rather than decrease freedom?</p>	<p>Comment noted. We believe the plan enables greater freedom through expanded mobility choices that meets the needs of all segments of our society. There is nothing in the plan that takes away anyone's ability to choose where they live, work, and how they choose to move around.</p>

ID	Comment	Response
<i>Submitted by</i> Riverside County Transportation Commission		Submittal 16244 Related Documents Link
16244.01	The effort SCAG undertook in developing the regional demographic forecast to reflect general plans and local input allows the jurisdictions and agencies to uphold established goals and policies at the local level and maintain consistency with regional goals and policies. We are also pleased that the document indicates capacity projects are supported in the SCAG region. Given the 40 percent population growth expected in Riverside County over the life of the plan, it is essential that we continue increasing capacity for all modes, including lane additions, new corridors, and increased transit options.	Comment noted.
16244.02	The draft 2016 RTP/SCS states that the shortfall in funding over the life of the plan can be filled through actions at the state and/or federal levels. We agree with this notion and urge SCAG to advocate for such actions, including the need to require federal participation in reducing criteria pollutants that are outside the region's control (e.g. regulating ships, trains, and planes). It is imperative that all emissions sources are addressed by the responsible entity in order to maximize emissions reductions.	Comment noted.
16244.03	We are requesting that the actions and strategies for additional funding and regional projects, such as the Regional Bikeway Network and Regional Express Lane Network, be clearly delineated as to which projects are planned and included in county long range plans, and which projects are part of SCAG's strategic plan and are not included in county long range plans. The draft 2016 RTP/SCS should clearly distinguish the costs associated with these regional networks and that these networks are above and beyond what is identified in current county transportation plans.	RTP ID 7120004 and 7120013 identify the cost of additional active transportation and regional express lane network investments, respectively, that are beyond what was submitted by the county transportation commissions. The description for RTP ID 7120013 in the Project List Appendix has been revised to provide more clarity.
16244.04	Existing text: Pg. 4 – Under “Passenger Rail”, revise 2nd sentence “Metrolink is nearing completion on the Perris Valley Line;” Modify text to read: Under “Passenger Rail”, revise 2nd sentence “Riverside County Transportation Commission is nearing completion on the Metrolink Perris Valley Line;” The above change also needs to occur in Chapter 2 – Where We Are Today, Under “Passenger Rail”	This comment has been incorporated into the Passenger Rail Appendix and Chapter 2.
16244.05	Existing text: Pg. 4 – Under “Highways”, Revise last sentence “...and the Interstate 215 Bi-County project in Riverside and San Bernardino Counties,…” Modify text to read: Pg. 4 – Under “Highways”, Revise last sentence “...and the Interstate 215 Bi-County HOV project in Riverside and San Bernardino Counties,…” In addition, the 215 Bi-County HOV project should be included in the following section – “Regional High-Occupancy Vehicle (HOV) and Express Lane Network”. The above changes should also be reflected in Chapter 2 – Where We Are Today, Under “Highways” and “Regional HOV and Express Lane Network” sections.	Comment noted. Appropriate edits have been made to incorporate this comment.
16244.06	Pg. 4 - Under “Regional HOV and Express Lane Network”, revise 2nd sentence to include SR-91 HOV lanes. The 91 project added HOV lanes from the 60/91/215 Interchange to Adams Street, which is nearly complete and should be reflected as such in this section.	Comment noted. The text has been revised to reflect State Route 91 HOV lanes.
16244.07	Pgs. 40 & 41, Under “Our Progress Since 2012 – Mobility Projects in the SCAG Region”, the map and project listing should include the SR-91 HOV project, from the 60/91/215 interchange to Adams Street, which will be open to traffic early 2016.	Comment noted. Appropriate edits have been made to incorporate this comment.
16244.08	Pg. 60 – Under Goals and Guiding Policies section, recommend adding “FAST ACT” federal transportation bill recently approved.	Comment noted. Appropriate edit has been incorporated in the Final 2016 RTP/SCS.

ID	Comment	Response
<i>Submitted by</i> Riverside County Transportation Commission		Submittal 16244 Related Documents Link
16244.09	Pg. 62 – Existing text: Under “Our County Transportation Commissions” 1st paragraph, 1st sentence, “...allocating locally-generated transportation revenues, and, in some cases,...” Modify text to read: Under “Our County Transportation Commissions” 1st paragraph, 1st sentence, “...allocating locally-generated transportation revenues, state and federal funding, and, in some cases,...” Pg. 62 – Existing text: Under “Our County Transportation Commissions” 1st paragraph, 3rd sentence, “...to receive (or already receiving) federal funds.” Modify text to read: Under “Our County Transportation Commissions” 1st paragraph, 3rd sentence, “...to receive (or already receiving) federal and state funds.”	Comment noted. Appropriate edit has been incorporated in the Final 2016 RTP/SCS.
16244.10	Pg. 97 – Under Freeway to Freeway HOV Connectors, the SR-91/71 Interchange improvement will construct a freeway to freeway connector, however, it does not include HOV lanes. This project should be removed from this listing.	Comment noted. Appropriate edits have been made to incorporate this comment.
16244.11	Pg. 109 – Throughout this page and other pages MAP-21 is mentioned, which should be updated to reflect FAST ACT.	Comment noted. Appropriate edit has been incorporated in the Final 2016 RTP/SCS.
16244.12	Pg. 111 – Under Conservation Planning Policy, Riverside County has had in place a Multi-Species Habitat Conservation Plan (MSHCP) in Western Riverside County and a separate plan that covers Coachella Valley. Therefore, these plans could be mentioned in this section to inform the public of the plans that currently exist in the SCAG region. Pg. 116 – Under Mineral Resources, editing comment on 1st sentence, remove repeated words “as well as well”.	Comment noted. Page 1 of the Natural/Farm Lands Appendix recognizes and references the Coachella Valley and Western Riverside Multiple Species Habitat Plans (MSHCPs). The sentence on page 116 has been edited to reflect this comment.
16244.13	It isn’t clearly delineated what areas of the plan are funded with Core Revenues, Reasonably Available Revenues, and New Revenue Sources and Innovative Financing Strategies. For example, do all of the Strategic Plan projects or strategies require New Revenue Sources and Innovative Financing Strategies? As an example, since the Active Transportation Program’s Regional Greenway Networks are identified in the Strategic Plan, it could be construed that the majority of this strategy is unfunded and would require a new revenue fund source and/or an innovative financing strategy. The Plan states \$356.1 billion is from Core Revenues and \$556.5 billion equates to the revenue and expenditures of the Plan. How much of each project category (highways, transit, ATP, etc.) is considered Core Revenues and Reasonably Available Revenues versus New Revenue Sources and Innovative Financing Strategies? The Plan should clearly address what areas are “unfunded” requiring New Revenue Sources and Innovative Financing Strategies.	Each expenditure category in the Plan is subject to funding shortfalls that cannot be fully met with core revenue sources. System preservation needs—maintaining and preserving our roads, highways, bridges, transit and bicycle and pedestrian facilities—in particular, require a considerable additional reasonably available new sources of transportation funding over the next 25 years to reach a state of good repair. The Strategic Plan is unconstrained and no funding assumptions have been made for the projects and programs identified therein. The Plan includes an estimated \$2.6 billion for the Regional Greenway Network as part of the financially constrained Plan. The Active Transportation Appendix Table 12 has been modified to reflect it as part of a constrained plan. The discussion of the Expanded Regional Greenway Network in the Strategic Plan is considered to be beyond the Regional Greenway Network included in the financially constrained Plan. In accordance with state and federal requirements, the 2016 RTP/SCS financial plan estimates how much funding will be needed to implement transportation investment needs, as well as operate and maintain the transportation system as a whole over the life of the Plan. The Plan demonstrates that there is a balance between the estimated costs of the projects and programs described in the Plan and revenue sources reasonably expected to be available for transportation investments.

ID	Comment	Response
<i>Submitted by</i> Riverside County Transportation Commission		Submittal 16244 Related Documents Link
16244.14	<p>Pg. 147 – Under Vehicle Miles Traveled (VMT) Per Capita – this section should mention that VMT is a significant metric, however, with the increased usage of electric or alternative fueled vehicles reducing VMT will become less significant in achieve greenhouse gas emissions reductions. Pg. 160 – Under SB 375 and Greenhouse Gas Emission Reductions, this section should reflect the importance of requiring other emissions sources, specifically from freight locomotives and rail yards and airplanes, to take on its fair share of GHG reduction measures. Pg. 165 – Under Performance Measure 15: Rail-related Impacts, last sentence, suggest adding “...and examines environmental justice concerns that may potentially be alleviated by grade separation projects</p>	<p>Comments noted. The VMT per capita performance measure is included in the 2016 RTP/SCS in recognition of the urgency for monitoring progress toward reduction of greenhouse gas emissions in the SCAG region to meet State emissions reduction targets in a timely manner. While it is understood that a growing market share over time for electric and alternative fueled vehicles will eventually impact the influence that VMT has on greenhouse gas emissions, for the timeframe of the 2016 RTP/SCS it is recognized that the per capita VMT metric is a very useful tool for measuring progress toward meeting greenhouse gas reduction goals in the SCAG region. The proliferation of alternative fueled vehicles is itself a very valuable strategy in combatting greenhouse gas emissions, and SCAG will continue working with our state, regional, and local partners toward identifying a reliable and meaningful performance measure for evaluating the impact of electric and alternative fueled vehicles for possible future use to supplement the current VMT per capita measure. It is acknowledged that greenhouse gas emissions from railroad and aviation sources need to be addressed as part of an integrated transportation segment strategy toward achieving our regional greenhouse gas reduction targets. However, the context of the referenced section of the Performance Measures chapter is confined to the contribution made by automobiles and light duty trucks to regional greenhouse gas emissions. These transportation modes are estimated to account for 50 percent of air pollution in the state and 70 percent of statewide petroleum consumption. The suggested text edit under the Rail Related Impacts Environmental Justice performance measure has been incorporated into the document.</p>
16244.15	<p>Pg. 24 – Under “4. Encourage development of local plans” – include Riverside Transit Agency is developing a first/last mile study. Pg. 28 – Table 12 does not indicate whether the strategies are constrained or unconstrained. In addition, the footnote indicates all projects were provided by County Transportation Commissions and local active transportation plans. However, the strategies are not reflective of CTC submittals, at least in the case with Riverside County, and include above and beyond what RCTC submitted. Please distinguish SCAG’s Regional Trip Strategies are above and beyond what the CTCs have submitted. Pg. 29 – Under Regional Trip Strategies, the 1st sentence states that the ATP invests \$2.8 billion in the Regional Trip Strategy. Is the Regional Trip Strategy Constrained or Unconstrained or both? If both, how much is Constrained and Unconstrained/Strategic Plan? Pg. 62 – Exhibit 28 Riverside County, is the network considered in the Unconstrained/Strategic Plan? Should be a footnote explaining this. Pg. 69 – Under “Plan Implementation” – Include a bullet indicating that SCAG will advocate for state and federal funds to implement the SCAG Regional Bikeway Network and Regional Greenway Network.</p>	<p>Page 24 - Added reference to Riverside Transit Agency Page 28 - Constrained. Reference has been added to the table. Page 28 - Footnote changed to "Includes all projects provided by County Transportation Commissions, Local Active Transportation Plans and Regional Strategies." Page 29 - Constrained. Reference added to table. Page 62 - Constrained. Reference added. Page 69 - Comment noted. Existing bullet states "SCAG will support regulatory and legislative solutions that can increase funding for active transportation safety, infrastructure and education" which applies to all portions of the active transportation component of the 2016 RTP/SCS.</p>
16244.16	<p>Pg. 31 – Under “Ground Access Projects Currently Under Construction (or in Design)” – The I-215 North HOV project has not started design and should be removed from this listing, or indicate that it is a “future planned” project. Pg. 32 – “Under 2016 RTP Ground Access Projects” – are these projects in the constrained plan? It should clearly highlight whether they are constrained or not.</p>	<p>Comment noted. Staff have made appropriate adjustments to address this comment.</p>

ID	Comment	Response
<i>Submitted by</i> Riverside County Transportation Commission		Submittal 16244 Related Documents Link
16244.17	<p>Pg. 2 – Under “County Congestion Management Programs”, 1st sentence states that “Under California Law, urbanized areas must prepare a Congestion Management Program”. Under Section 65088.3 of the Govt code allows counties to opt out of adopting a CMP. Therefore, this sentence needs to be revised to reflect Section 65088.3. It is our understanding that if a county opts out of the State CMP requirements that federal Congestion Management Process must be adhered to. Pg. 3 – Under “Roles and Responsibilities of Partner Agencies”, 1st sentence, suggest revising: “Currently, five of the six counties in the SCAG region (all but Imperial County) have adopted CMP’s that generally fall under the state congestion management requirements...” Also, last sentence in this paragraph misspelled “SCAG”. Pg. 7 – Under “Roadways”, 2nd sentence, add word: “...-defined roadway network that is monitored for LOS approximately every two years.” Pg. 10 – Under “County Congestion Management Program Trends”, 3rd paragraph, last sentence, revise wording “...in RCTC’s Capital Improvement Program (CIP) where were and are expected to improve the LOS to E or better”. Pg. 27 – Under “According to GlowbalWorkplaceAnalysitcs.com:”, 3rd bullet, minor edit: “...the size of the overall the (delete preceding "the") non-self-employed workforce” Pg. 28 – Under “Bike Share”, paragraph should emphasize that Bike Share programs are successful in certain areas (e.g. HQTAs,) with biking infrastructure planned or in place. Pg. 29 – Under “Short Trip Strategies”, 3rd paragraph, revise sentence to: “The SCAG Region is investing \$12.9 billion in active transportation projects...” Pg. 29 – Under “Regional Bikeway Network”, add bullet stating that SCAG will advocate for additional federal and state funding sources for Active Transportation projects. Also, it would be helpful if SCAG could identify which bullets are short versus long term goals. Pg. 31 – Under “The Federal Transportation Improvement Program (FTIP) – Single Occupancy Vehicle (SOV) Capacity-Enhancing Projects”, 1st paragraph, last sentence, “Under federal law, the FTIP must be updated every two years for funding”. I could not find this reference in the federal Congestion Management Process Guidebook. It does not mention a timeframe only recommends when planning documents are updated such as the RTP. Therefore, I suggest removing this sentence unless staff finds the specific reference.</p>	<p>Page 2. Comment noted. This comment has been incorporated into the Congestion Management Appendix. Page 3. Comment noted. The typo has been corrected. Page 7. Comment noted. This comment has been incorporated into the Congestion Management Appendix. Page 10. Comment noted. This comment has been incorporated into the Congestion Management Appendix. Page 27. Comment noted. This comment has been incorporated into the Congestion Management Appendix. Page 28. Comment noted. As bike share is a new concept for Southern California, and at the time of writing, local plans were still in development, an overview of the bike share concept was included as well as levels of success from similar sized bike share programs. Existing language reflects benefits that are attributed to the similar programs and not to any specific bike share plan or project in Southern California. Inserted references in the Active Transportation Appendix to established roll outs in Santa Monica, planned roll outs by Los Angeles County Metro and Long Beach, indicating that growth of bike share would likely expand beyond their initial plans. Page 29. Short-Trip Strategies. Comment noted. This comment has been incorporated into the Congestion Management Appendix. Page 29. Regional Bikeway Network. Comment noted. In the Active Transportation Appendix, SCAG includes an action "SCAG will support regulatory and legislative solutions that can increase funding for activetransportation safety, infrastructure and education" which applies to all portions of the active transportation component of the 2016 RTP/SCS. Page 31. FTIP. Comment noted. This sentence has been deleted from the paragraph.</p>
16244.18	<p>Pg. 31- Under “Monitoring Projects for Compliance With the CMP”, 2nd bullet under 4, minor edit: “Environmental Impact Statement/Environmental Impact Statement Report (EIS/EIR)” Pg. 32 – Under “Congestion Management Under MAP-21”, should be updated to reflect FAST ACT.</p>	<p>Page 31. Comment noted. This comment has been incorporated into the Congestion Management Appendix. Page 32. Comment noted. Text in this section has been updated to reflect adoption of the FAST ACT.</p>
16244.19	<p>Pgs. 122-130, the maps don’t cover the DACs/Areas of Concern in the Eastern Coachella Valley. Although the cities are listed further in the appendix it would be helpful if SCAG could widen the map to include this area.</p>	<p>Maps included on pages 122-130 of the draft Environmental Justice Appendix include an inset for the Eastern Coachella Valley and Imperial County.</p>

ID	Comment	Response
<i>Submitted by</i> Riverside County Transportation Commission		Submittal 16244 Related Documents Link
16244.20	<p>Pg. 2 – Under “Primary Freight Network”, 1st sentence, spell check “...for Progress in the 21st Century...” Pg. 6 – Table 2, Adding up the columns for “All Goods Movement Dependent Industries” it shows that it is off by one. May be due to rounding. Pg. 7 – Table 3, when you add “Percent of Total” column, you get 99%. May be due to rounding. Pg. 8 – Under “Retail Supply Chains”, 2nd paragraph, 3rd sentence states: “...GDP contribution was \$106.87 billion for manufacturing and \$53.66 billion for retail (Table 4)”. However, these amounts cannot be found in the referenced Table 4. Pg. 12 – paragraph above “Technology and Consumer Behavior Impacting Goods Movement”, last sentence “...a combined \$545 billion to regional GDP by 2040 (FIGURE 4)”. Can’t relate or find the \$545 billion in Figure 4. Pg. 21 – Under “Benefits of the East-West Freight Corridor”, 5th bullet, “Reduction of Truck-Involved Accidents” – East-West Freight Corridor is referred to as EWFC many times in prior bullets on this page. Suggest referencing it as EWFC to be consistent. Pg. 22 – 7th paragraph, last sentence: missing “to”, “...issues are anticipated to be monitored...” Pg. 22 – bullets, suggest removing “Interstate”, “State Route” after colons. For example: Interstate 5: At 210, between 2 and 710, South of 605, between 22 and 55. Pg. 22 – Last paragraph, 2nd sentence “...the Corridor System Management Plan (CSMP)..” The abbreviation is already included in the 1st paragraph of this page, therefore, continue referencing CSMP in the last paragraph as well. Pg. 25 – Table 9, missing “-“ in front of 215, 57, and 23 should read “I-15/I-215”, etc. Pg. 25 – Table 9, “SR-91 Fast Forward” project is located in what county? Description does not indicate location. Pg. 31 – Under “On-Dock/Near-Dock Rail Capacity Enhancements”, 1st paragraph, 1st sentence, “...36.6 percent of the Ports’...” - For consistency, the full name of the ports have been referenced. Pg. 52 – Table 18, correct the Auto Center Dr grade separation and show as “Complete”. Pg. 53 – Table 18, correct the Riverside Ave grade separation and show as “Complete”. Pg. 53 – Table 18, correct the Avenue 52 grade separation and show as “Complete”.</p>	<p>We have corrected the spelling error in the first sentence as noted. This is a rounding error. The percentage of other goods movement is less than 1 percent. The Percent of Total in Table 3 is also a rounding error. The GDP reference should be to Figure 4. The \$545 billion is an estimate for the regional GDP of the manufacturing, construction, and retail industries in 2040, but there is no corresponding graphic. The wording has been fixed. Bullet has been updated to EWFC. The word "to" has been inserted on page 22. The use of "Interstate" and "State Route" is correct within the APA style guide used for the 2016-2040 RTP/SCS. CSMPs has already been referenced and text has been revised. Table 9 has been changed. Update made to San Pedro Bay Ports. Tables updated to show Auto Center Drive, Riverside Ave., and Avenue 52 as complete.</p>

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<i>Submitted by</i>	Riverside County Transportation Commission	Submittal 16245 Related Documents Link
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16245.01 Pg. 4 – Under “Riverside County”, recommend revising to: “In Riverside County, fixed route bus service is primarily operated by RTA and SunLine Transit. RTA’s service area is the western portion of Riverside County and SunLine’s service area is the Coachella Valley. RTA’s jurisdiction is among the largest transit systems in the nation, and SunLine has led the industry by being the first public agency to convert all of its vehicles to CNG. RCTC funds the county’s participation in the regional commuter rail service via Metrolink, and the cities of Riverside and Corona operate demand response and local circular service. The cities of Banning and Beaumont also provide service via the Pass Transit service brand, and Desert Roadrunner service is provided by the Palo Verde Valley Transit Agency covering the City of Blythe and unincorporated eastern Riverside County. Rural transit service in southwestern Riverside County is provided by the Reservation Transportation Authority, a collaborative of 18 federally recognized tribal groups.” Pg. 12 – Under “Transit and Mobility in the SCAG Region”, 1st paragraph, 1st sentence - revise to “in addition to 388 route miles of rail...”. (delete miles) Pg. 33 – Under “Historical Investments”, 2nd paragraph, 1st sentence - revise to “ ...for fixed route bus service,. Nearly 6 percent...”. (add the period after service and take out comma) Pg. 45 – last paragraph, 2nd sentence, delete extra period at the end of the sentence. Pg. 64 – Under “Riverside County”, 2nd part of first paragraph, first sentence, “.local Measure I” should be “local Measure A”. Pg. 66 – 4th paragraph, 2nd sentence, “This list includes bur...”, change bur to bus. Pg. 85 – 2nd complete sentence found on the page, “...in the last years twenty often...” revise to “...in the last twenty years often...” Pg. 89 – 3rd paragraph, last sentence, “...funding shortfalls in the due to these...” remove “in the”. Pg. 89 – 1st bullet found within the “Volunteer Driver Program” section, “Passengers are enabled choose and recruit...” revise to “Passengers are enabled to choose and recruit...”. Pg. 90 – under “Growing Older Cohort”, 1st paragraph, 2nd sentence, add “of” before 65. Pg. 90 – under “Growing Older Cohort”, 3rd paragraph, 1st sentence, revise “cost effect” to “cost effective”. Pg. 91 – 4th paragraph, 2nd sentence, correct spelling of “form” to “from”. Pg. 91 – 3rd bullet, “Graduated Driver’s License Regulations” section b – add “with” after “associated”.

The text on page 4 of the transit appendix has been revised to read “In Riverside County, fixed route bus service is primarily operated by RTA and SunLine Transit. RTA’s service area is the western portion of Riverside County and SunLine’s service area is the Coachella Valley. RTA’s service area is among the largest transit systems in the nation, and SunLine has led the industry by being the first public agency to convert all of its vehicles to CNG. RCTC funds the county’s participation in the regional commuter rail service via Metrolink, and the cities of Riverside and Corona operate demand response and local circulator service. In addition, the cities of Banning and Beaumont also provide service via the Pass Transit service brand, and Desert Roadrunner service is provided by the Palo Verde Valley Transit Agency covering the City of Blythe and unincorporated eastern Riverside County. Rural transit service in southwestern Riverside County is provided by the Reservation Transportation Authority, a collaborative of 18 federally recognized tribal groups.” In addition, the typographical errors identified have been addressed.

<i>Submitted by</i>	Rural Canyons Conservation Fund	Submittal 16236 Related Documents Link
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16236.01 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.

Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.

ID	Comment	Response
<i>Submitted by</i> Rural Canyons Conservation Fund		Submittal 16236 Related Documents Link
16236.02	<p>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.</p>	Comment noted.
16236.03	<p>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.</p>	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.
<i>Submitted by</i> Saddleback Canyons Conservancy		Submittal 16227 Related Documents Link
16227.01	<p>The 2012 RTP/SCS provided an important stepping-stone for the 2016 Plan. In previous plans, natural lands and farmlands were handled under the banner of "land use." In this new Plan, however, they are their own category. This is a great milestone in conservation planning for the region and SCAG. Additionally, the creation of a Natural and Farmlands Appendix provides important opportunities for SCAG that shouldn't be overlooked. We believe the opportunity before you is not to "plan for" the future of open space in the region—as that's what you've been doing since the 2012 Plan. Instead, we believe SCAG can now start "implementing" a regional conservation program. We strongly urge SCAG to take a more serious leadership role by actively seeking funding to implement conservation efforts by partnering with agencies, transportation commissions, and nonprofits to see that the Plan created in 2012 comes to fruition through the 2016 Plan. The One Bay Area Grant Program in Northern California is a program that we believe can be replicated in Southern California. We and other coalition members would gladly assist with this implementation effort.</p>	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.

ID	Comment	Response
<i>Submitted by</i> Saddleback Canyons Conservancy		Submittal 16227 Related Documents Link
16227.02	<p>We are pleased to see an Appendix devoted directly to natural and farmlands protection in the 2016 Plan and that the Plan contains specific strategies addressing natural land and farmlands issues. This is certainly a step in the right direction. The culmination of the work from the last RTP/SCS is clearly visible in this draft Plan. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership. Our organization supports the idea that as new growth occurs it should focus on the existing infill areas. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the wildland-urban interface. When developments are built in infill areas, it likely relieves pressure on the fringe lands. However, the Plan does not outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Numerous organizations, including ours, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy, and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process, or plan on how the greenfield lands will be protected.</p>	Comment noted.
16227.03	<p>SCAG focused many sections of the document on formal conservation plans, in the form of Natural Community Conservation Plans and Habitat Conservation Plans (NCCP/HCP), as the conservation method most identified by the agency. However, NCCP/HCP programs are only one conservation mechanism and they have limitations. For example, they are voluntary, property-owner driven, and generally only apply to larger land ownerships. Efforts underway by local, regional, state, and federal agencies outside of these formal plans should not be discounted and must be included. Furthermore, many conservation organizations help facilitate, coordinate, and find funding for land conservation transactions. We believe the conservation approach promoted by SCAG should include all of the ways land can be protected, including those less regulated methods of conservation outside of NCCP/HCP programs.</p>	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your group is encouraged to participate in the effort.
16227.04	<p>The current federal transportation bill, the FAST Act, supports understanding transportation impacts on natural resources. The previous bill, MAP-21, supported restoring and maintaining environmental functions (i.e., wildlife corridors) affected by the infrastructure projects in the RTP. SCAG has even supported efforts in Los Angeles County to create a wildlife corridor over the 101 Freeway. Many efforts are underway across the region to connect landscapes to one another. This is very important to the region and its biodiversity. Wildlife corridors allow species to migrate and forage and expand genetic diversity. These corridors also allow ecosystems to maintain ecological functions, act as sources for repopulation after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement and/or protection of documented and regionally significant wildlife corridors, especially those that are impacted by infrastructure projects.</p>	Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide “incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries.” The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to “Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.”

ID	Comment	Response
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16321 Related Documents Link
16321.01	Outside of LA County the RTP/SCS is still primarily about funding highways. While transit investments in capital, operations and maintenance make up significantly more than 50% of the regional plan, most of these investments are happening in LA County and not in the other five counties that could really benefit from greater investments in transit service.	The 2016 RTP/SCS includes substantial transit investments outside of Los Angeles County. These include twelve major capital investments, three operations and maintenance (O&M) line items over \$500 Million, and thirteen productive bus corridor service enhancements, as displayed in Tables 5.1 and 5.2 of Chapter 5: The Road To Greater Mobility & Sustainable Growth, and in exhibit 18 of the Transit Appendix. The plan also includes two transit centers in Imperial County, and a multimodal transportation center and the implementation of new interagency transit partnerships in Ventura County.
16321.02	Active transportation, while up from last time, still makes up less than 2% of the RTP/SCS funding amount, yet almost 20% of trips in the region are by walking and bicycling. Given that SCAG is home to 68% of the State of California’s Disadvantaged Communities and that by 2040, nearly one in five people in the region will be seniors, we need to ensure that these communities are mobile and can participate in everyday life through more transportation choices. The region needs a more balanced, multimodal plan to provide everyone in the region with more transportation options, as well as to meet the SB 375 greenhouse gas emission reduction goals and to realize the many co-benefits that the RTP/SCS identifies. Moreover, approximately 78% of trips in the region are less than three miles but are taken by car. More funding for active transportation can shift many of these trips to more sustainable modes, help reduce greenhouse gas emissions and promote public health.	Comment noted. The 2016 RTP/SCS is a fiscally constrained multi-modal transportation plan. Because of the fiscal constraints, no one mode is funded to meet all of its needs. The Plan Implementation section of the Active Transportation Appendix includes actions (See page 70) that SCAG will take in collaboration with local, state and federal partners to help increase funding for active transportation in the SCAG region.
16321.03	The investment in active transportation is low compared to the need. In LA County alone, Metro has estimated unmet needs of between \$11 and 29.5 billion according to the soon-to-be-released Active Transportation Strategic Plan, and our own estimates for LA County calculate approximately \$20 billion in unmet needs (Best Practices for Funding Active Transportation with County Transportation Sales Taxes). Thus we feel that \$12.9 billion for the whole region is too low compared to the need for walking and bicycling infrastructure in the entire six-county region.	Comment noted. The 2016 RTP/SCS is a fiscally constrained multi-modal transportation plan. Because of the fiscal constraints, no one mode is funded to meet all of its needs. The Plan Implementation section of the Active Transportation Appendix includes actions (See page 70) that SCAG will take in collaboration with local, state and federal partners to help increase funding for active transportation in the SCAG region.
16321.04	The active transportation strategies’ goal that half of all jurisdictions in the SCAG region would have a Safe Routes to School plan by 2040 is too low. Given that approximately 37% of communities have a plan now or are in the processing of creating one, and that the Policy B scenario calls for 75% of communities having such a plan by 2040, there seems to be a greater opportunity to increase this number over the next twenty-five years.	Comment noted. The 2016 RTP/SCS is a fiscally constrained multi-modal transportation plan. A 50% goal for Safe Routes to School is reasonable and achievable within the available budget.
16321.05	SCAG does not adequately link RTP/SCS transit and active transportation funding to its environmental justice obligations. The lack of transit and active transportation funding disproportionately affects immigrant, lower-income and communities of color because these neighborhoods have greater barriers to physical activity and transit access, higher numbers of busy regional arterials, poor pedestrian and bicycle infrastructure, safety concerns, and lack of safe storage for bicycles and safe crossings. Thus, these neighborhoods would benefit from an increase in funding allocations (in order for SCAG to meet its Title VI obligations) and from a detailed strategic plan. (see links: Do All Children Have Places to Be Active, Active Living Research; Low Income Resource Guide, Safe Routes to School National Partnership)	SCAG has fulfilled its environmental justice obligations by showing that the Plan does not result in any unaddressed adverse disproportionately negative impacts to low income and minority communities. Improvements in transit and bicycle mileage are broken down by area of concern and compared to the region as a whole in the Geographic Distribution of Transportation Investments section of the Environmental Justice Appendix. As can be seen from Table 31 and Table 32, investments are targeted in areas that have a high concentration of low income and minority population.

ID	Comment	Response
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16321 Related Documents Link
16321.06	<p>Accessibility and proximity to many destinations such as schools, jobs and parks does not improve for many disadvantaged communities in the region, according to the EJ analysis. The RTP/SCS touts the many benefits of tying land use and transportation investments together, but the EJ analysis reveals that even with these investments, the region will fall short in improving accessibility and proximity to many destinations. This includes jobs and schools, two fundamental places that people need safe, convenient access to in order to economically succeed in the region.</p>	<p>Accessibility to jobs, schools, and parks improves for all Environmental Justice groups and areas of concern as a result of the Plan when considering the impact of transportation improvements on travel time and distance. There are some communities that lack high quality transit areas, however, that may see a reduction of destinations within close proximity due to the concentration of growth in areas well served by transit. This is demonstrated in the Environmental Justice and discussed on page 109.</p>
16321.07	<p>There is no sense of scale in the EJ Appendix. Most of the metrics are described as “improve” or “does not improve,” so it is hard to quantify the adverse impacts that some of the transportation investments in the RTP/SCS will create. This is especially critical for metrics where no data are given, just a paragraph description of the potential impacts. Often, the appendix reports that both disadvantaged communities and other communities would “improve.” Without quantification, readers cannot know whether the plan would worsen or shrink the gap between the haves and have-nots.</p>	<p>Table 3 provides a quick summary of Environmental Justice impacts for minority and low income population at the regional level as well as for all population in a given area of concern. It is meant to be a quick guide, whereas more detailed analysis, including quantitative findings, is included in each performance area's section of the Appendix.</p>
16321.08	<p>The environmental justice analysis, while more robust than the 2012 RTP/SCS, identifies gentrification and displacement as major impacts of making the transportation investments and land use changes identified in the RTP/SCS. Affordable housing is a major issue in Southern California and the RTP/SCS overlooks the magnitude of the challenge this region faces. Recommending development in High Quality Transit Areas, Livable Corridors, Neighborhood Mobility Areas and other compact development patterns without a strategy to provide affordable housing in these areas, will result in higher-income people moving into these areas, and research shows that higher-income populations living near transit typically drive twice as many miles and own more than twice as many vehicles as extremely low-income households living within a ¼ mile of transit (California Housing Partnership Corporation & TransForm, 2014). We also fear that gentrification and displacement are happening in the region at a rate faster than the data can capture. SCAG is uniquely positioned to foster coordination across the six-county region and create frameworks for collaboration on issues that impact the region as a whole. SCAG must work diligently to provide regional analysis and leadership by better tracking trends in displacement and illustrating the repercussions of these trends, as well as connecting the dots between compliance with the Regional Housing Needs Allocation (RHNA) and its effect on GHG reduction.</p>	<p>SCAG is committed to serving as a leader in research and analysis of regional trends, including issues relating to environmental justice and displacement. Because many of our regional plans and programs are inter-related, SCAG will review programs such as RHNA to look for ways for better integration of policies and goals, along with compliance standards.</p>

ID	Comment	Response
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16321 Related Documents Link
16321.09	<p>The RTP/SCS relies on anticipated revenues from sales taxes, which have a record of success in the region, but also on mileage-based user fees and other future sources of revenue that have no track record and may not come to fruition during this timeframe, or that have equity implications for low-income households if they are implemented. While the EJ analysis identifies the equity impacts of anticipated revenues, additional analysis is needed to truly understand how major shifts to a mileage-based user fee or other cost structure for driving would impact low-income and minority communities in the region. With two sales taxes under consideration in the region, and gas and excise taxes under consideration by the state, additional analysis would make help clear the extent to which EJ populations would be adversely affected</p>	<p>Comment noted. We agree that additional work is needed including but not limited to potential phasing, governance, accountability and approaches for protecting privacy as well as addressing income and geographic (e.g., urban vs. rural) equity impacts before the mileage-based user fee (or road charge) would become effective—which why the Plan does not assume revenues from this source before 2025. SCAG, in collaboration with local, regional, state and federal stakeholders, will continue to actively participate in efforts to make transportation funding more sustainable in the long-run. An EJ analysis was conducted for the Plan, including a focused analysis of impacts from funding through a mileage-based user fee. The findings of that analysis indicate, "there is no disproportionate impact. The proposed mileage-based user fee system is deemed more equitable to low income groups than both the gasoline tax and sales tax, which are highly regressive. Under the current structure, low income households pay more per mile in gasoline tax than their higher earning counterparts due to their lower adoption rates of new (more fuel efficient) vehicles. With the mileage-based user fee system, all households will pay in proportion to their usage of the transportation system."</p>
16321.10	<p>The selection of the preferred scenario simply meets but does not exceed the targets for 2020 as it did in the 2012 RTP/SCS. It appears from the PEIR Table 4.3-1 on page 4-4 that SCAG has selected a hybrid scenario between local input and Policy A, which meets the 8% GHG emissions reduction target required by 2020. However, in 2012, SCAG expected to exceed the 2020 target by one percentage point and hit 9%. We need greater reductions to both stem the impact of climate change and to meet future targets which are likely to be higher. If the region is already slipping behind, it foreshadows trouble meeting future targets. If the region is already slipping behind, it foreshadows trouble meeting future targets as well.</p>	<p>Comment noted.</p>
16321.11	<p>There is no local accountability to implementing the RTP/SCS. We are concerned that there are big disparities between the RTP/SCS and the plans adopted by the SCAG region's cities and counties, and we recommend that local governments reconsider their plans for growth and bring them into alignment with the regional plan. Otherwise, its many benefits, including more housing and transportation choices, public health benefits and reducing greenhouse gases, may never come to life. These land use changes must be approved at the local level, and many jurisdictions will need to change their zoning codes, general plans and development regulations to facilitate more mixed-use and compact development. Without these changes, the benefits of an expanded transit system and more opportunities for walking and bicycling will be minimal.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16321 Related Documents Link
16321.12	<p>The RTP/SCS' Goods Movement Appendix underscores the need to complement SCAG's focus on funding the expansion and maintenance of highways with a concomitant commitment to clean vehicles. The Goods Movement Appendix breaks down the total miles of freight traveled within the Primary Freight Network by County. Los Angeles and San Bernardino account for 60 percent of total miles traveled. The PFN is a component of the National Freight Network, and was designed to "assist states in strategically directing resources towards the improved system performance for the efficient movement of freight on the highway portion of the nation's freight transportation system." But without a parallel and significant effort to deploy clean truck and rail vehicles the expansion of roads and highways to support increased demand by the goods movement industry conflicts with our ambitious greenhouse gas emission reduction goals. While the Goods Movement Environmental Strategy and Action Plan seeks to advance zero-emission technology, it needs targets as well as funding to promote the prioritization and incorporation of emerging technologies into daily operations.</p>	<p>Comment noted. Funding is critical to achieving the objectives outlined and as such, the 2016 RTP/SCS includes \$3 billion to facilitate RD&D for zero-emission goods movement technologies.</p>
16321.13	<p>The RTP/SCS promotes the idea that supporting vibrant, well-planned, urban developments means natural lands are protected simultaneously is inaccurate. Mechanisms and funding must be in place at the local and regional level to accommodate natural lands preservation. Furthermore, many conservation non-profits and regional/state agencies have identified important lands to conserve that aren't covered by the sweeping generalizations made in the RTP/SCS about what lands need to be protected. Finally, no real plan exists for actual conservation of lands, it is mentioned as a byproduct of the infill approach.</p>	<p>Comment noted.</p>
16321.14	<p>Invest greater amounts in active transportation. We applaud SCAG and local jurisdictions for increasing active transportation investments in recent years, but we should go further. With approximately one-fifth of trips in the region by foot or bike, we should match that with greater investments in active transportation. Even with a doubling of funding compared to the last RTP/SCS, the region still need to do more to meet the needs. As mentioned above, in LA County alone, the estimated need for active transportation investments is close to \$20 billion. Moreover, many of the traditional sources of funding for active transportation are oversubscribed. The state's Active Transportation Program received over \$1 billion in requests for funding in each of the last two cycles, with only \$120 million per year available. The region needs to identify not only new sources, but also shift around existing funding, to invest in pedestrian and bicycle infrastructure that makes it safer and more convenient for people to get around using these modes.</p>	<p>Comment noted. The 2016 RTP/SCS is a fiscally constrained multi-modal transportation plan. Because of the fiscal constraints, no one mode is funded to meet all of its needs. The Plan Implementation section of the Active Transportation Appendix includes (see page 70) action steps SCAG will take in collaboration with local, state and federal partners to help increase funding for active transportation.</p>
16321.15	<p>It is critical to find a way to expand public transportation in all of the counties in the SCAG region and not just LA County -- where according to the Transit Appendix 21% of all residents have access to frequent transit service compared to 5% in Orange County and only 2.5% in San Bernardino and Riverside counties. Public transit as well as first-last mile connections to transit are essential to achieving state goals for reductions in VMT, GHGs and petroleum use.</p>	<p>The 2016 RTP/SCS includes substantial transit investments outside of Los Angeles County. These include twelve major capital investments, three operations and maintenance (O&M) line items over \$500 Million, and thirteen productive bus corridor service enhancements, as displayed in Tables 5.1 and 5.2 of Chapter 5: The Road To Greater Mobility & Sustainable Growth, and in exhibit 18 of the Transit Appendix. The plan also includes two transit centers in Imperial County, and a multimodal transportation center and the implementation of new interagency transit partnerships in Ventura County.</p>

ID	Comment	Response
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16321 Related Documents Link
16321.16	<p>Include a target goal for complete streets components of highway projects. The Active Transportation element of the RTP/SCS identifies complete streets as a strategy to incorporate more pedestrian and bicycle improvements into transportation projects, and while it identifies about one-third or \$4.8 billion of active transportation improvements on regionally significant local streets, we feel that this is not enough on its own to guarantee that money is spent on walking and bicycling infrastructure. We recommend setting a goal for a percentage of projects that will have complete streets components, much like the percentage goal for communities having a Safe Routes to School plan.</p>	<p>Comment noted. The Plan Implementation section of the Active Transportation Appendix includes six actions for Complete Streets. SCAG is committed to working with local, state and federal partners in implementing the Active Transportation component of the 2016 RTP/SCS with a focus on Complete Streets.</p>
16321.17	<p>Include a target goal for integrating active transportation into transit projects through a first/last mile strategy. Much like the above recommendation, we urge SCAG to set a goal for the number of transit projects that include active transportation components. The majority of people taking transit do not own cars, and thus are walking and/or biking to the station. Providing them a safe, convenient route is critical and should be done as part of transit planning projects.</p>	<p>Comment noted. One of the performance goals for the 2016 RTP/SCS is to increase the share of regional commuters traveling by transit. We agree that first/last mile connectivity improvements are essential to increasing the transit mode share in the SCAG region. In addition, these same kinds of connectivity improvements will serve our goal of increasing the active transportation mode share. We will continue to work with our state, regional, and local partners to evaluate improved methodologies, as they become available, for monitoring the implementation of first/last mile transit connectivity improvements.</p>
16321.18	<p>Commit to completing active transportation planning efforts before the 2020 RTP/SCS. During the 2012 RTP/SCS cycle, the National Partnership advocated for creating several regional active transportation plans: an Active Transportation Finance Strategic Plan, Regional Complete Streets Plan and Regional Safe Routes to School Plan. We commend the work that has been done since 2012 to increase staff devoted to active transportation and strengthen its place in the 2016 RTP/SCS. Yet investments in active transportation still comprise a paltry percentage of the RTP/SCS, partly because many communities do not have active transportation plans that would make them eligible for ATP funding. SCAG could play a key role in creating a regional plan and providing a guidebook for local jurisdictions to create their own plans at a low cost. A good example is the Orange County Council of Governments' (OCCOG) Complete Streets Guidebook, which will identify complete streets templates, sample language and typologies for each jurisdiction in the county to incorporate a complete streets policy into their general plan. SCAG could do something similar at a regional level for complete streets, Safe Routes to School and active transportation in general. We recommend having these plans in place before Cycle 4 of the ATP, which is expected in early 2018.</p>	<p>Comment noted. Beginning on page 69 of the Active Transportation Appendix, the Plan Implementation section delineates steps SCAG will take, in collaboration with local, state and federal partners, to implement key strategies in the 2016 RTP/SCS Active Transportation Appendix.</p>
16321.19	<p>Bolster the Safe Routes to School Goal to 75%. The RTP/SCS states a goal of 50% of communities having a Safe Routes to School plan by 2040. Given that 37% of communities currently have one or are planning to create one, we recommend going with the Policy B recommendation of 75% by 2040. This can be more easily achieved by completing the Regional Safe Routes to School Plan identified above.</p>	<p>The 2016 RTP/SCS is a fiscally constrained multi-modal transportation plan. Because of the fiscal constraints, the 50% goal is a realistic achievable goal within the constraints of the plan.</p>

ID	Comment	Response
<i>Submitted by</i> Safe Routes to School National Partnership Submittal 16321 Related Documents Link		
16321.20	Identify policies, strategies and investments to increase access to transit and active transportation in less urban areas. SCAG should identify strategies, best practices and policy guidance that support increased opportunities for active transportation, access to transit (such as first mile / last mile strategies expanded service, vanpools and ridesourcing) that improve resident connectivity to education, employment, healthcare and other basic goods and services throughout this diverse region. We appreciate SCAG's commitment to increasing access to transit and active transportation but don't see policies in the SCS that will benefit much of the region, such as the more rural and suburban areas of Imperial, San Bernardino and Riverside.	SCAG's existing goals/policies related to active transportation are delineated on pages 24 and 25 of the Active Transportation Appendix, as well as how SCAG is carrying out/implementing these policies. Included in this is SCAG developing sustainability joint work programs with each of the six counties that include active transportation throughout the region (urban, suburban, rural).
<i>Submitted by</i> Safe Routes to School National Partnership Submittal 16322 Related Documents Link		
16322.01	Disaggregate transportation mode choice at smaller geographies. Mode choice varies considerably by neighborhood and depends on multiple factors. SCAG should explore doing a deeper analysis of transportation mode choice, which would help identify gaps in the regional system and prioritize projects, plans and investments by addressing limited usage of modes of transportation such as transit and active travel.	Comment noted. The 2016-2040 RTP/SCS did analyze mode usage by geographic areas, and addressed and place appropriate transit and active transportation investments where projects and land use yields the most benefits to the region.
16322.02	Commit to creating a Regional Gentrification and Displacement Strategy. While SCAG does not have local land use control to regulate the location of affordable housing, it can conduct a regional study of gentrification and displacement pressures that face particular parts of the region, including areas that are most vulnerable, as well as where people go when they are displaced. Much like the planned Regional Complete Streets and Safe Routes to School Plans, SCAG has an important role to play in creating a regional vision and strategy to address displacement proactively, and provide local communities the tools they need to combat the impacts of it. We also encourage SCAG to convene a task force specifically dedicated to this issue.	SCAG will consider emerging and persistent regional issues, including suggestions from the comment process, and may propose new task forces/sub-committees as needed. SCAG is also exploring ways to address social equity issues, including gentrification and displacement, beyond the RTP/SCS process, and will continue to work with stakeholders to discuss challenges and potential strategies for the SCAG region.
16322.03	Create a standing Environmental Justice/Disadvantaged Communities Working Group. Given some of the unavoidable impacts of the plan on Environmental Justice Communities, we encourage SCAG to establish an ongoing process for elucidating and addressing these challenges in the region. A standing Environmental Justice/Disadvantaged Community workgroup could provide guidance for the integration of environmental justice/disadvantaged community prioritization processes in county and city-level transportation planning, ensuring that the project lists included in future RTP/SCSs have been developed with an eye toward more equitable transportation investment. Greater investment in environmental justice/disadvantaged communities' readiness will have the added benefit of increasing the competitiveness of the SCAG region in state funding competitions subject to SB 535 requirements.	SCAG will consider emerging and persistent regional issues, including suggestions from the comment process, and may propose new committees as needed. SCAG is also exploring ways to address social equity issues, including gentrification and displacement, beyond the RTP/SCS process, and will continue to work with stakeholders to discuss challenges and potential strategies for the SCAG region.
16322.04	Target Sustainability Planning Grants to Disadvantaged Communities. Many small urban and rural communities lack comprehensive multi-modal transportation plans. Without plans in place, systematic improvements to active transportation infrastructure, improved first mile/last mile access and improved transit will be incomplete and ineffective. We recommend SCAG target Sustainability Planning Grants to disadvantaged communities, and especially rural, disadvantaged communities that lack plans, models and programs designed to secure and promote sustainable development.	Comment Noted. The past two Sustainability Grant Program calls for projects (2010 and 2013) have included "need for assistance" as one scoring criterion. Additionally, SCAG intentionally keeps the application process simple and streamlined to encourage jurisdictions with constrained capabilities to apply. Finally, the program is designed to provide direct technical assistance. This allows the jurisdictions to focus their sometimes limited resources on managing the work, and not administering the grant.

ID	Comment	Response
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16322 Related Documents Link
16322.05	<p>Include target industry goals and include non-industry stakeholders into the Goods Movement Environmental Strategy and Action Plan. The Goods Movement Environmental Strategy and Action Plan is comprised of four phases as a means to incorporate technological solutions. However, phases of the action plan do not include goals of how the plan can assist industries nor does the plan incorporate non-industry stakeholders into the process. Phase two of the plan includes the creation of a Logistics Working Group with many geographic representations. We recommend that the Working Group be expanded to include public health advocates from all regions, so this process has a larger perspective to address public health concerns. Although energy security, energy cost security, climate protection and green-sector job development are identified as important roles for the convening to address, public health is not. An important role for these partners should also be the consideration of health inequities from environmental justice communities as a result of emissions. Furthermore, Phase three and four address deployment and operational demonstration but it is unclear how industries will participate in development and deployment efforts since there are no industry goals attached to the plan.</p>	<p>The SCAG Goods Movement Environmental Strategy and Action Plan offers a framework for the eventual deployment of clean technologies going forward. The Plan may be updated as appropriate.</p>
16322.06	<p>Track implementation of the RTP/SCS between update cycles. ClimatePlan has a new report that monitors the implementation of the 2012 RTP/SCS, and the region is falling short. SCAG should continually monitor how the region's land use and transportation investments are complying with the RTP/SCS. We need tools to better understand where investments from cap-and-trade, ATP and disadvantaged communities are going. We especially urge SCAG to track the efforts of CTCs to update their long-range transportation plans to align with the RTP/SCS, as ultimately it is at the local and county level that transportation projects are approved and then sent up to SCAG for inclusion in the RTP/SCS. Only by continually monitoring local efforts will SCAG be able to identify where our region is succeeding and even exceeding the SB 375 goals, and where it is falling short in meeting the SB 375 goals and where it needs to make changes to land use and transportation investments. We recognize SCAG is already doing this with the new REVISION tool, and hopefully that will help address some of these implementation challenges.</p>	<p>Comments noted. SCAG recognizes the critical need to continually monitor implementation of the 2016 RTP/SCS at the local level throughout our region. The Performance Measures chapter and appendix of the 2016 RTP/SCS feature two separate sets of performance indicators. The first evaluates the performance of the Plan relative to how the region would fare under various alternative planning scenarios, including the continuation of current trends without intervention (no Plan). The second set includes a list of performance indicators to be used for on-going regional monitoring. These measures will be used to support our continuous monitoring of implementation of the regional Sustainable Communities Strategy (SCS) throughout the Plan period. We agree with your assessment that continuous regional performance monitoring is crucial to ensuring the success of the Plan and for achieving our greenhouse gas reduction targets. We also agree that close coordination and on-going communication with each of our County Transportation Commissions is an important element of the performance monitoring effort. The web-based 'REVISION' application, which will be released later this year, will provide a significant new tool for planners and decision-makers at all levels of government in our region to both track progress toward achieving local and regional sustainability objectives, and inform the planning decision-making process itself.</p>
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16356 Related Documents
16356.01	<p>According to some estimates L.A. -- the City of L.A. or its L.A. Metro has the second highest bus ridership in the country so there is not an insignificant amount of people that are taking transit and many of these people are disadvantaged communities which as a previous speaker mentioned we have about two-thirds of the states, so making investments in transit is a good idea for the region.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16356 Related Documents
16356.02	We do, you know, have some concerns that the funding is primarily still about roads and highways and we recognize that most of the region still drives. But we do think with a significant amount of people that walk, bike and take transit that we could do even more to link our investments within ways that people actually get around and, especially, make it safer for people to get to their schools, their jobs and parks around the region.	Comment Noted.
<i>Submitted by</i> Safe Routes to School National Partnership		Submittal 16359 Related Documents
16359.01	Today, I would like to highlight two specific recommendations that I think could strengthen the RTPSCS: First, in bolster the safe routes to school goal to 75 percent. The RTPSCS states a goal of 50 percent of communities having a safe route to school plan by 2040. Given that 30 percent of communities currently have one or plan to create one we recommend going with Policy B recommendation of 75 percent by 2040. And this could be easily achieved by completing the Regional Safe Back to School Plan.	Comment noted. The 2016 RTP/SCS is a fiscally constrained multi-modal plan. The 50% goal for Safe Routes to School represents a realistic goal of what can be achieved with the limited budget available.
16359.02	Second, we recommend creating an environmental justice disadvantaged communities working group. As a standing environmental justice and disadvantaged community work group we could provide guidance for integration in EJ and disadvantaged community per our presentation process and County and City level Transportation Planning. We can also ensure that the project list included in the future RTPSCS's have been developed with an eye towards equitable transportation investment. Greater investment in EJ and disadvantage community readiness will have the added benefit of increasing the competitiveness of the SCAG region in other statewide funding competitions that are subject to SB535 requirements. Furthermore, as a Riverside native I'm particularly concerned about Riverside and San Bernardino disadvantaged communities and the impact of carbon emissions from the goods movement.	SCAG will consider emerging and persistent regional issues, including suggestions from the comment process, and may propose new task forces/sub-committees as needed. SCAG is also exploring ways to address social equity issues, including gentrification and displacement, beyond the RTP/SCS process, and will continue to work with stakeholders to discuss challenges and potential strategies for the SCAG region.
16359.03	Furthermore, as a Riverside native I'm particularly concerned about Riverside and San Bernardino disadvantaged communities and the impact of carbon emissions from the goods movement.	Please refer to the Environmental Justice Appendix (page 177), which looks at the breakdown of population by income group and race for residents who live in close proximity to rail roads and planned grade separations in the SCAG Region.
16359.04	The RTPSCS is still primarily about funding highways and we want to look toward transportation. While doubled this last year, it still makes up less than two percent of RTPSCS's funding amount, yet, 20 percent of trips in the region are by walking and biking and 78 percent of trips are under three miles driven. Overall, the draft of the RTPSCS envisions a region where people have more transportation choices they can walk, bike, take transit and, of course, drive. It has been said by SCAG's executive director that people aren't going to stop driving but they will drive differently. By investing in active transportation and transit as well as bringing in new shared use systems and technologies we give everyone in this region a variety of options to get around safely, efficiently and sustainably.	Comment noted. More than 50% of total funding in the 2016 RTP/SCS is dedicated to transit and active transportation.

ID	Comment	Response
<i>Submitted by</i> San Bernardino Associated Governments		Submittal 16181 Related Documents Link

16181.01 SANBAG recently completed its Countywide Transportation Plan (CTP) and provided it to SCAG as background and input to the RTP/SCS. The CTP analyzed two future scenarios: a “baseline scenario” that assumed traditional revenue sources (generally consistent with what the RTP/SCS defines as “core revenues”) and an “aggressive scenario” (generally consistent with RTP/SCS “Plan” revenues, including the innovative sources identified in the Plan). The projects and programs in the aggressive scenario of SANBAG’s CTP are consistent with the lists in SCAG’s 2016 RTP/SCS. In addition, the jurisdiction-level growth forecasts for the CTP are consistent with the jurisdiction-level growth forecasts for the RTP/SCS. SANBAG has provided SCAG with technical corrections to the San Bernardino County portion of the RTP/SCS project list in a separate communication so that the changes can be incorporated into the modeling for the final RTP/SCS. It should be noted that agreement was reached in 2015 for the Los Angeles World Airports to transfer control of Ontario International Airport (ONT) to the Ontario International Airport Authority (OIAA). SANBAG and our partner agencies appreciate the regional support that has been provided by SCAG and other agencies around the region. We look forward to continuing local and regional efforts to make ONT a truly regional asset.

Comment noted.

ID	Comment	Response
<i>Submitted by</i> San Bernardino Associated Governments		Submittal 16181 Related Documents Link
16181.02	<p>Although the SCAG innovative revenue sources are projections of “reasonably available” revenue under the federal definition, much is unknown about how these will play out in the long run. In terms of project implementation, SANBAG bases its programs and budgets on the core revenues, but will be working with SCAG, the State, and federal agencies on options to 1) derive the most benefit from the funds that have been entrusted to us by the public, 2) seek additional State and federal funding for projects that are of statewide and national significance (e.g. expansion of highway facilities that serve international goods movement), and 3) work with policy makers to determine if and when additional funding is needed and ways to provide that funding so as to minimize taxpayer burdens and fairly distribute project funding. Transportation infrastructure is fundamental to our competitiveness as a county and as a region. Infrastructure represents an asset that needs to be protected and invested in to sustain our economy, a significant portion of which is logistics-based. At the same time, it must be acknowledged that support for the overall RTP/SCS financial plan does not imply support for any individual piece of legislation related to the funding of transportation projects. Fixing America’s Surface Transportation Act (FAST Act) recently passed by Congress is an opportunity to continue to upgrade our transportation infrastructure, as it provides a stable source of federal revenue and includes a revenue stream for freight projects that are critical to San Bernardino County’s economy. We believe that the regional freight collaboration that has worked so well for our regional project funding through the State’s Trade Corridor Improvement Fund (TCIF) program should be re-invigorated to craft a program of projects that can be most competitive for these new federal freight program funds. As highlighted in the RTP/SCS, a future funding mechanism based on vehicle miles of travel (VMT) is viewed to be one of the most significant innovative funding sources for the future. SANBAG has provided comments to the California Transportation Commission related to the SB 1077 “Road Charge” pilot program. One of our comments was that, depending on the results of the pilot, the State should consider phasing in this program, beginning with alternative fuel vehicles. We recognize that the State has accelerated the schedule for the Road Charge pilot, but it should not be at the expense of taking shortcuts or skipping steps that are important to designing an ultimate program that has a high probability of success. This is potentially a very complex program, and it is more important to do it right than to do it fast. SCAG can play an important role in suggesting ways to make this transition successful and acceptable to the public if, in fact, the pilot program concludes that replacement of the gas tax with a road charge is a viable path forward.</p>	<p>Comment noted. We agree that additional work is needed including but not limited to potential phasing, governance, accountability and approaches for protecting privacy as well as addressing income and geographic (e.g., urban vs. rural) equity impacts before the mileage-based user fee (or road charge) would become effective—which is why the Plan does not assume revenues from this source before 2025. SCAG, in collaboration with local, regional, state and federal stakeholders, will continue to actively participate in efforts to make transportation funding more sustainable in the long-run.</p>

ID	Comment	Response
<i>Submitted by</i> San Bernardino Associated Governments		Submittal 16181 Related Documents Link
16181.03	<p>As highlighted in Attachment 1, SANBAG and our partner agencies are investing heavily in passenger rail and premium bus services. Capital investments for premium transit, including rail and bus rapid transit (BRT) projects in the San Bernardino Valley will exceed \$600 million in the decade beginning in 2012. This will enable the planning and implementation of more transit- oriented development in the Valley subarea of the County. This is a bold step for San Bernardino County, and we look forward to partnering with SCAG to encourage the State to invest in the suburban portions of the transit system, not just the more urban portions. San Bernardino County jurisdictions are supportive of TOD, but need additional flexibility from the State if we are to be able to compete for funding under the Affordable Housing/Sustainable Communities (AHSC) program and related cap-and-trade programs. SANBAG and the County of San Bernardino have been involved in commenting on the AHSC grant guidelines which, unfortunately, are not friendly to TOD in suburban areas such as the Inland Empire, even though densities are increasing. Transit headways and density requirements for the TOD portion of the AHSC program are still too stringent for the Inland Empire market, even around passenger rail stations. That said, several of our local jurisdictions have built and are pursuing TOD projects around Valley transit stations at densities the market can support. Our jurisdictions also need enabling tools to lay further groundwork for TOD, in light of the dissolution of redevelopment agencies (RDAs) several years ago. In summary, we are highly supportive of transit/TOD development, but need additional help if our local jurisdictions are to be successful.</p>	<p>Comment noted. SCAG will continue to work with the local jurisdictions that show interest in implementing the RTP/SCS land use policies, including TOD, by providing information and resources to support local planning activities, such as the Sustainability Program and the Active Transportation Program. As the AHSC program and related cap-and-trade programs continue to grow, SCAG will continue to offer assistance and advocate for the local jurisdictions in the SCAG region to ensure all jurisdictions can compete for funding.</p>

ID	Comment	Response
<i>Submitted by</i> San Bernardino Associated Governments		Submittal 16181 Related Documents Link
16181.04	<p>The 2016 RTP/SCS demonstrates that the SB 375 GHG reduction targets for the region are met for 2020 and 2035. SANBAG has been aggressively working on greenhouse gas reduction strategies and implementation within San Bernardino County through our Regional Greenhouse Gas Reduction Plan (now being implemented through individual city climate action plans), the Home Energy Renovation Opportunity (HERO) program, truck retrofit programs, and other energy/GHG-related initiatives. As highlighted in Attachment 1, we are being very proactive on sustainability and GHG reduction initiatives. At the same time, it is important to recognize that we need a robust highway network to remain competitive from a logistics standpoint. A strong economy is required for both the private and public sectors to afford the technology needed to meet air quality standards and achieve the requisite GHG reductions. It should also be understood that a thriving economy in a growing county like San Bernardino can result in an increase in vehicle miles of travel (VMT). While we understand that reductions in VMT can be helpful to GHG reduction, it should be noted that VMT has steadily increased in southern California at the same time that air quality has been dramatically improved over the last several decades. The same thing could be true with our GHG reduction strategy if we do it right. We can achieve both GHG reduction and mobility/economic development goals, even if VMT should increase in some of the faster growing areas of the State like San Bernardino County. The GHG analysis in the draft 2040 California Transportation Plan demonstrated that vehicle and fuels technology will be the primary way in which GHG reduction goals will need to be met. VMT reduction is an appropriate goal, but technology will be the principal path to long term GHG reduction. See SANBAG's comments on the draft 2040 California Transportation Plan, previously provided to SCAG. We make this point because individual transportation projects may increase VMT, but these projects are very necessary from a mobility standpoint. In terms of GHG reduction, it is the net result at the regional and statewide level that is most important, not the effect of an individual project. In other words, because SB 375 GHG reduction is evaluated at the regional level, individual transportation projects should not be held to a GHG reduction or VMT reduction standard. We request that SCAG keep that in mind in ongoing discussions with the air districts, the California Air Resources Board, and other state agencies. SANBAG strongly supports initiatives to advance vehicle and fuels technology and to see that technology penetrating into the fleets of light duty and heavy duty vehicles. This is the path to success in GHG reduction for mobile sources.</p>	<p>Comment noted. SB 375 GHG reduction is evaluated at the regional level, and individual transportation projects are not be held to a GHG reduction or VMT reduction standard. SCAG applauds SANBAG's efforts/initiatives to address GHG and criteria pollutant emissions and appreciates our close collaboration. SCAG is also committed to supporting advanced vehicle and fuel technology, and technology-based mobility solution. SCAG looks forward to continue working with SANBAG and other transportation and air quality partners to attain the health-based federal and state air quality standards, to meet the SB 375 GHG reduction targets, and other regional goals of the 2016 RTP/SCS.</p>
16181.05	Page 22 - It would be useful to provide the definition that SCAG uses to distinguish single family vs. multi-family	Clarification has been provided with the revised figure 2.1 to define single family and multi-family.
16181.06	Page 23, Exhibit 2.1 - Putting county boundaries on the map would be helpful for geographic perspective	Comment noted. County lines have been added to the map.
16181.07	Page 40 - Legend - The blue dot may be better labeled "Transit Centers"	Comment noted. Within the map legend, transit centers are classified under "transit capital improvements."
16181.08.1	Page 41 - For I-10 widening, add the word "westbound" to the description;	Comment noted. Edits have been made to incorporate this comment.
16181.08.2	for Downtown San Bernardino Transit Center, add "and Metrolink extension" since the text mentions the extension.	Comment noted. The text will be added.

ID	Comment	Response
<i>Submitted by</i> San Bernardino Associated Governments		Submittal 16181 Related Documents Link
16181.08.3	Also, under Omnitrans E Street sbX state: "A 16-mile bus rapid transit project ..."	The text has been changed to read: "Omnitrans E Street sbX: A 16-mile bus rapid transit project including 6-miles of dedicated bus lanes on E Street, providing service between California State University San Bernardino and the City of Loma Linda."
16181.09	Page 43, grant no. 50 - add "and Safe Routes to School Study" to the description.	Comment noted. Project title has been revised.
16181.10	Page 48 - it would be helpful to add definitions of "distressed," "failed condition," "functionally obsolete," and "structurally deficient" in the text or on the graphic.	Comment noted. Distressed lane miles reflect multiple types of pavement distress (i.e. minor distress, major distress, and poor ride). Similarly, structurally deficient bridges can reflect a number of conditions related to bridge decks, superstructure, substructure or culvert deficiencies or waterway adequacy. Therefore, single definitions for these terms are not commonly used.
16181.11	7. Page 50 - Preserving our Transportation System - SANBAG agrees with stressing the importance of system preservation. The statement on Page 50 says: "Moving forward, the region needs to continue to make "fixing it first " a top priority - that is, focusing its funds on preserving the existing transportation network prior to investing in system expansions. Failing to adequately invest in the preservation of Southern California's roads, highways, bridges, railways, bicycle and pedestrian facilities and transit infrastructure will only lead to further deterioration, which has the potential to worsen our congestion challenges." Page 79 further references the consideration of life-cycle costs beyond construction. However, it should be noted that "prior to investing in system expansions" does not mean that capital projects can be put on hold while maintenance funding catches up to a defined state of good repair. Both need to proceed in parallel. A possible re-phrasing could be: "focusing the necessary funds on preserving the existing transportation network while strategic investments are made in system expansions"	Comment noted. Appropriate edits have been made to incorporate this comment.
16181.12	In addition, identification of a regional need for system preservation funding does not imply that a regional or sub-regional entity will be responsible for raising the funds needed for system preservation. Responsibility for system preservation funding will still need to rest with the facility owner except in cases where maintenance/operations costs are explicitly identified in agreements between the owner and a third party (e.g. an operator of express toll lanes). Caltrans needs to remain responsible for the funding of maintenance and operation of state highways, and local jurisdictions need to remain responsible for local roads. It is suggested that this clarification be added to the text.	Comment noted. Appropriate edits have been made to incorporate this comment.
16181.13	Page 50 - Logistics Epicenter - The last paragraph on the page states that 750 million of the 1.2 billion square feet of industrial space is occupied. This seems like a low percentage of occupied square feet. Please clarify.	Comment noted. 750 million square feet of occupied space was limited to facilities larger than 50,000 square feet, whereas 1.2 billion total facility space is in reference to all facilities combined. To make it consistent, we have updated that section to clarify that nearly 1.1 billion square feet out of 1.2 billion was occupied.

ID	Comment	Response
<i>Submitted by</i> San Bernardino Associated Governments		Submittal 16181 Related Documents Link
16181.14	<p>9. Page 95 - The first paragraph under Highways and Arterials states: “Active transportation has grown in recent years, but the majority of trips in our region today is still made on our region’s highways and arterials. Yet, the expansion of our highways and arterials has slowed down over the last decade. Revenue from traditional sources to fund transportation improvements is declining and costly expansions to address congestion are no longer financially feasible. However, given that critical gaps and congestion chokepoints still exist within the network, improvements beyond TSM and TDM strategies need to be considered. Closing these gaps to complete the system will allow residents and visitors alike to enjoy improved access to opportunities such as jobs, education, recreation and healthcare.” Please change “are no longer financially feasible” to “may not always be financially feasible” or similar language. Many transportation improvements are costly, but they are also important to regional mobility and the economy and are also financially feasible.</p>	Comment noted. Appropriate edits have been incorporated in the Final 2016 RTP/SCS.
16181.15	<p>10. Page 95 near the bottom of the page states: - “The 2016 RTP/SCS highways and local arterials framework and guiding principles are summarized here: a. Focus on achieving maximum productivity through strategic investments in system management and demand management. b. Focus on adding capacity primarily (but not exclusively) to: i. Close gaps in the system; and ii. Improve access where needed. c. Support policies and system improvements that will encourage the seamless operation of our roadway network from a user perspective. d. Any new roadway capacity project must be developed with consideration and incorporation of congestion management strategies, including demand management measures, operational improvements, transit and ITS, where feasible. Focus on addressing non-recurring congestion with new technology. e. Support complete streets opportunities where feasible and practical.” SANBAG concurs with this language. While we are aggressively pursuing sustainability initiatives, as described earlier, highway capacity improvements are also needed particularly to support the mobility improvements required to sustain economic growth. This is particularly important for the movement of freight, as the logistics sector supports about one third of San Bernardino County’s economy.</p>	Comment noted.
<i>Submitted by</i> San Gabriel Valley Council of Governments		Submittal 16232 Related Documents Link
16232.01	<p>(1) The Plan intentionally does not pre-suppose the adoption of proposed 1/2 cent transportation sales tax measure being considered for the Los Angeles County ballot in November 2016. If such a sales tax measure is put to the voters and adopted, the funding and implementation outlook for transportation projects in Los Angeles County and our sub-region will significantly improve. We anticipate working with SCAG staff on a subsequent Plan Amendment that will reopen project lists and incorporate and/or revise the schedules for the priority transportation projects and programs in the San Gabriel Valley identified in the ballot measure expenditure plan and other projects identified in the Subregional Mobility Matrix for the San Gabriel Valley prepared in 2015 for Los Angeles County Metro.</p>	Comment noted. The Plan does not assume funding from a potential additional sales tax measure or an extension of Measure R within Los Angeles County. If such an additional sales tax measure is approved by Los Angeles County voters, it can be incorporated into the Plan through subsequent amendments.
16232.02	<p>(2) A transit accomplishment important to the San Gabriel Valley is the latest extension of the Foothill Gold Line Phase 2A to Azusa which completed construction in late 2015 and is being prepared for passenger traffic this spring. This significant accomplishment warrants inclusion in the sections of the Plan discussing transit projects progress on page 4 and page 38.</p>	The Metro Foothill Gold Line Extension Phase 2a (RTP ID LA29212XY-LA0G558) was not in revenue service at the time of the Draft RTP/SCS release. It has been included in the Final RTP/SCS on the map of completed projects on page 38.

ID	Comment	Response
<i>Submitted by</i> San Gabriel Valley Council of Governments		Submittal 16232 Related Documents Link
16232.03	(3) The "Fixing America's Surface Transportation Act" or FAST Act signed into law in December 2015 authorizes federal transportation project and program funding for the next five fiscal years, including two new freight programs that will provide significant funding. Discussion of the FAST Act should be included in the federal transportation initiatives section on page 60.	Comment noted. Appropriate edit has been incorporated in the Final 2016 RTP/SCS.
16232.04	(4) The current and projected 2040 train volumes identified for regional rail segments on page 53 shows a decline in future passenger train volumes and insignificant growth in future freight train volumes on the Union Pacific Railroad (UPRR) Los Angeles & Alhambra Subdivisions in the San Gabriel Valley. The modest growth in freight trains is contrary to our understanding and UPRR's plans to double-track the Alhambra Subdivision, which is noted elsewhere in the Plan, and to expand the capacity of the LA Subdivision. Regarding future passenger train volumes, we have not been informed of any planned future reductions of Metrolink or Amtrak service on these subdivisions. We request that the basis for these projections be re-examined in light of this information and adjusted accordingly.	Comment noted. The graphic on page 53 has been updated to correct misrepresentations of the train volumes for both passenger and freight.
16232.05	(5) SGVCOG continues to have concerns about the designation by SCAG of State Route 60 as part of a proposed network of truck-only lanes due to the potential for obstructing the alignment of the proposed SR 60 light rail extension and potential displacement of future long-haul truck traffic by shorter haul on this regional corridor. We are concerned that the demand for such a facility has not been conclusively defined. Trucking demands are rapidly changing as product delivery to the end user is being redefined by technology and consumer demands. For example "Uber" type services are becoming more common to deliver goods from local manufacturers and the ports to local and regional distribution centers. This may result in a decline of the traditional long haul truck trips along the SR 60 and will make a truck-only facility less viable along this corridor. We request that SCAG work closely with the SGVCOG and the staffs of communities adjacent to the proposed East-West Corridor to create a truck mobility plan for the SR 60 corridor which takes into account the proposed alignment of the SR 60 light rail project and that will address the changing needs of the trucking industry.	Comment noted. SCAG acknowledges the need for continuing analyses and dialogue with stakeholders. Please note that the inclusion of the East-West Freight Corridor in the 2016 RTP/SCS allows for further analyses to be conducted. Specific costs, refined user demand, accessibility concerns, designs, and alternative alignments would be identified through a project level Environmental Impact Report (EIR) . Further discussion of project mitigation concerns would also be addressed through upcoming processes.

ID	Comment	Response
<i>Submitted by</i> Sea and Sage Audubon Society		Submittal 16225 Related Documents Link
16225.01	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16225.02	<p>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.</p>	<p>Comment noted.</p>
16225.03	<p>Identify a Conservation Mechanism for the Natural and Farmlands Preservation Our organization supports the idea that as new growth occurs it should focus on the existing infill areas, where it is appropriate and sustainable. This is consistent with the finding in the SCAG surveys where respondents preferred to see existing urban areas built upon before greenfields are targeted for development, especially those at the Wildland-Urban Interface. When developments are built in infill areas, it has the possibility to relieve pressure from the fringe. However, the Plan fails to outline exactly how (or with what mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved doesn’t mean the land then automatically becomes protected. Numerous organizations, ours included, focus their work on preservation of important habitat lands. A lot of time, energy, political will, strategy and other efforts combine to create a successful conservation transaction that leads to permanently conserved lands. SCAG must identify the mechanism, process or plan on how the greenfield lands will be protected.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>

ID	Comment	Response
<i>Submitted by</i> Sequoyah School		Submittal 16268 Related Documents
16268.01	<p>On behalf of Sequoyah School, which is situated within the SR 710 corridor, I commend SCAG for its focus on constructive, sustainable, regional transportation improvements, and for not explicitly including the State Route 710 Tunnel Alternative (SR-710 Tunnel) in the list of constrained projects. However, I urge SCAG to clarify references to the SR-710 North project in the Final 2016 RTP/SCS and PEIR, and confirm that the SR-710 Tunnel Alternative is not included in the RTP list of constrained projects. Since a Locally Preferred Alternative has not yet been identified by Caltrans for the SR-710 North Project, and environmental review is incomplete, SCAG should remove all references or inferences that the project will be the SR-710 Tunnel Alternative. The Draft 2016 RTP/SCS and DRAFT PEIR should remain alternative neutral. Leaving these references in the documents presupposes, and promotes, the selection of the freeway tunnel alternative in advance of the conclusion of the public process. That process has so far raised serious issues with the quality of the environmental analysis. As a steward of the public's interest in sustainable transportation improvements, SCAG should wait to consider whether the selected alternative aligns with its own goals and priorities.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
<i>Submitted by</i> Sherman Oaks Homeowners Association		Submittal 16160 Related Documents Link
16160.01	<p>Sherman Oaks Homeowners Association Comment 1 – The Sepulveda Pass Corridor is the greatest rapid transit challenge facing Southern California). The corridor connects the San Fernando Valley to Los Angeles' Westside, coastal areas, LAX, and new LA Rams stadium complex. There is essentially zero rapid transit through the corridor. More appallingly, current transportation plans for the corridor project completion dates in the 2030-2040 timeframe. This is ludicrous, especially because rapid transit in the corridor is the critical missing link in an otherwise fairly well integrated transit network. The SCAG Draft 2016 RTP/SCS and PEIR ignore rapid transit in the Sepulveda Pass Corridor. The RTP/SCS notes already completed improvement works in the corridor only twice (RTP page 84, and RTP Transit Appendix page 52 in Table 19). These are I-405 freeway improvements and not rapid transit improvements. The RTP/SCS lists the Sepulveda Pass Transit Corridor only once in the Project List Appendix (page 162 as RTP ID 1160001). This same list entry appears in the PEIR (Table 3.17.1-1 on page 3.17-15). The entry identifies a transit project through the Sepulveda Pass Corridor, from the Metro Orange Line Van Nuys station (in the Valley) to the Metro Expo Line, with a completion date of 2039 and a project cost of approximately \$2.4 billion. To our knowledge, the noted project is inconsistent with LA Metro's latest transportation planning, first that it is too late and second that the cost is too low (we have seen Metro estimates ranging from \$8 to \$20 billion). The listed project is completely inconsistent with the first sentence in the RTP/SCS: "In our vision for the region in 2040, many communities are more compact and connected seamlessly by numerous public transit options, including expanded bus and rail service." Rapid Transit in the Sepulveda Pass Corridor is the cornerstone of integrated rapid transit in Los Angeles County and an absolute near-term necessity, yet the Draft RTP/SCS relegates the project to a single listing in a table and no discussion. SOHA recommends that SCAG develop a mandatory rapid transit project list that integrates with and fulfills their vision. This list should obviously include a near-term rapid transit project through the Sepulveda Pass Corridor, probably as the highest-priority entry. The project should be complete in the early 2020 timeframe and funded at realistic levels consistent with LA Metro's latest projections.</p>	<p>SCAG works with the county transportation commissions to develop the transportation investment strategies in the RTP/SCS. The details for RTP# 1160001, the Sepulveda Pass Transit Corridor, were submitted to SCAG by Metro staff in the spring of 2015. The project details submitted include project termini, stations locations, project cost assumptions, and completion year assumptions. The 2039 completion year and \$2.468 billion cost estimate are consistent with Metro's board adopted 2009 Long Range Transportation Plan (LRTP), as displayed in Figure N on page 30 of that plan. Should the project details change due to voter approval of a new sales tax measure and due to Metro updating its LRTP, then SCAG will work with Metro to update the RTP/SCS accordingly.</p>

ID	Comment	Response
<i>Submitted by</i> Sherman Oaks Homeowners Association		Submittal 16161 Related Documents Link
16161.01	<p>Sherman Oaks Homeowners Association (SOHA) Comment 2 – The Draft RTP/SCS includes a discontinued project in the Sepulveda Pass that should be eliminated, as it is no longer needed and not currently being considered by LADOT. The installation of a reversible lane on Sepulveda Boulevard through the Mulholland Tunnel was once considered a quick fix to traffic alleviation (RTP ID LA996425 from RTP/SCS Project List Appendix Table 2 on page 124, and also Program Environmental Impact Report Appendix B Table 1 on page 18). Sepulveda Boulevard comprises three lanes through the Mulholland Tunnel – two southbound lanes and one northbound lane. The project would convert the central southbound lane to a reversible lane, thereby providing two lanes in each direction at certain times of the day. Because of improvements to the I-405 freeway in this area, including addition of the new Skirball on- and off-ramps, recent observations have confirmed that there is no longer significant evening rush-hour northbound traffic on Sepulveda Boulevard. Two northbound traffic lanes and the reversible lane project are no longer necessary.</p>	<p>Comment noted. Since the completion of the improvements on I-405, additional improvement needs in this corridor, including Sepulveda Boulevard, are being further examined. SCAG will work with Metro and Caltrans to reflect the ultimate improvement configuration in this corridor in the future RTP/SCS amendments or updates as appropriate.</p>
<i>Submitted by</i> Skirball Cultural Center		Submittal 16172 Related Documents
16172.01	<p>Re: RTP LA996425 Proposed project to create reversible lane in Mulholland Tunnel on Sepulveda Blvd. The traffic on the 405 and Sepulveda Blvd. affects our workers and visitors to our educational, museum, cultural and other programs. We have a posted crossing guard on at the Bergreen/Sepulveda intersection during commuting times. We monitor traffic patterns closely so we can advise our visitors. While southbound Sepulveda traffic continues to be problematic in the morning - though there are two lanes in the tunnel for southbound cars - northbound traffic in the evening has not been a problem. We therefore see no potential value to investing further effort into a reversible tunnel lane.</p>	<p>Comment noted. Since the completion of the improvements on I-405, additional improvement needs in this corridor, including Sepulveda Boulevard, are being further examined. SCAG will work with Metro and Caltrans to reflect the ultimate improvement configuration in this corridor in the future RTP/SCS amendments or updates as appropriate.</p>
<i>Submitted by</i> South Bay Cities Council of Governments		Submittal 16343 Related Documents Link
16343.01	<p>1. We appreciate that the 2016 RTP/SCS introduced the Neighborhood Mobility Area (NMA) concept. Like the land use component of the South Bay’s Sustainable Strategy, NMA's have the potential to provide jurisdictions an opportunity to develop without reliance on high quality transit areas. (HQTAs) We would like to see SCAG further develop the concept with criteria and implementation options.</p>	<p>Comment noted. With SB 375, SCAG is tasked with integrating land use and transportation. The land use policies listed in Chapter 5, under the “Our Strategies for Transportation and Land Use” section, are the foundational policies that guided the development of the RTP/SCS land use strategies. In order to encourage “complete communities” that integrate land use and transportation, SCAG introduced two new concepts called “Livable Corridors” and “Neighborhood Mobility Areas.” These concepts are introduced to give local jurisdictions ideas for developing sustainably in other contexts besides dense urban High Quality Transit Areas (HQTAs). The Livable Corridors concept features land use strategies that are appropriate for lower density growth areas that are served by HQTAs bus corridors. The Neighborhood Mobility Areas concept features low impact land use strategies and low-cost transportation solutions to replace vehicle miles with low GHG travel modes. SCAG’s intention is to assist local jurisdictions by providing a framework and allowing maximum flexibility in creating “complete communities”. SCAG will continue to work with the local jurisdictions that show interest in implementing the RTP/SCS land use policies by providing information and resources to support local planning activities, such as the Sustainability Planning Grant Program and the Active Transportation Program.</p>

ID	Comment	Response
<i>Submitted by</i> South Bay Cities Council of Governments		Submittal 16343 Related Documents Link
16343.02	2. Carrying Capacity: The policy of increasing density in the built-out counties and preserving open space in the outer counties doesn't appear to consider the carrying capacity of the already built-out areas. The idea of preserving green fields as a strategy to avoid building costly infrastructure on the edge does not take into account the potential to exacerbate infrastructure issues in the core. For example, landfills, sewers and utility infrastructure in many built-out jurisdictions are overloaded and in need of repair; open space per capita has been declining, roads and sidewalks are in disrepair, and so forth. We believe that such an analysis should be undertaken so that the true cost of the infill density. Transit Oriented Development (TOD) and HQT strategy is understood.	Comment noted. The Urban Footprint Scenario Planning Model utilized for the 2016 RTP/SCS is routinely refined and further developed to enhance its capabilities to reflect capacity concerns and costs. The Plan encourages jurisdictions to explore and implement innovative and emerging financing options such as Enhanced Infrastructure Finance Districts (EIFDs) to address capacity issues.
16343.03	3. Vehicle Miles Traveled (VMT): Reducing VMT is the key metric of success in the draft 2016 RTP/SCS and may be consistent with state requirements; however, it is too coarse a measure to actually guide carbon reduction in the region. Going forward, SCAG should distinguish between electric VMT and carbon VMT. Focusing only on total VMT binds the plan to transit, cycling and walking which will have very minimal impacts on either total VMT or zero emission VMT.	Comment noted. Reduction of VMT per capita is a major component in our strategy to reduce regional greenhouse gas emissions and promote a more sustainable growth pattern in Southern California. Clearly the growing market share of electrically powered vehicles will contribute to total VMT, while not producing carbon emissions. SCAG will continue to work with our state, regional, and local partners to evaluate strategies, as they become available, to refine methodologies for monitoring and reducing greenhouse gas emissions in our region.
16343.04	4. Alternate Vehicles: Page 7 of the RTP states that SCAG has focused on Plug-In Hybrid Electric Vehicles. With the market getting larger for PEVs with more range, this plan should not focus just on hybrids. This document should be a realistic vision of how the region can meet state goals as well as regional needs. Since it takes 15 to 25 years to turnover a fleet, it is vitally important to increase the number of all Plug-in Electric Vehicles on the road each year.	Comment noted. SCAG, through its Plug-in Electric Vehicle (PEV) Readiness Planning support all types of zero emissions passenger vehicles. The Regional Electric Charging Station Rebate program will greatly benefit all plug-in electric vehicles. However, for the purposes of achieving mandated Greenhouse Gas (GHG) Reduction targets, the proposed strategy measures only the increased use of electric drive by Plug-in Electric Hybrids (PHEVs).
16343.05	5. The SBCCOG is concerned that there are policies and strategies proposed in the Appendices that are not included in the main body of the RTP/SCS or are included in a general way. All of the recommendations for specific actions should be in the main document or in one place in an Action Document. It is possible that some of the strategies and policies have already been adopted by SCAG but the document doesn't say that is the case. If they have already been approved, that should be stated. If they have not, does voting for this plan constitute agreement with all of the recommendations going forward? Please see the following appendices: o Mobility Innovation - pages 2 - 5 of the Appendix include Policy Recommendations. Page 106 of the main document does state: "These mobility innovations are discussed further in the Mobility Innovations Appendix". At a minimum, this sentence should be revised to state that the appendix contains policy recommendations,	Sentence has been changed from "These mobility innovations are discussed further in the Mobility Innovations Appendix" to "Please see the Mobility Innovations Appendix for policy recommendations and additional information."
16343.06	o Natural and Farm Lands - pages 6 and 7 of the Appendix have Strategies and Next Step Recommendations. Page 111 of the main document states: "Please see the Natural and Farm Lands Appendix for additional detail". At a minimum, this sentence should be revised to state that the appendix contains policy recommendations	Sentence has been changed from "Please see the Natural and Farm Lands Appendix for additional detail" to "Please see the Natural/Farm Lands Appendix for policy recommendations and additional information."

ID	Comment	Response
<i>Submitted by</i> South Bay Cities Council of Governments		Submittal 16343 Related Documents Link
16343.07	o Public Health - Page 19 of the Appendix contains the Public Health Work Program. It is not clear from the text whether the SCAG Board has adopted this work program already or whether it is being adopted with the passage of the RTP/SCS.	Comment noted. In 2013, the SCAG Regional Council adopted the recommendations of the Public Health Subcommittee to "Provide robust public health data and information, as feasible, to better inform regional policy, the development of the 2016-2040 RTP/SCS, and support public health stakeholder participation," and to "Promote and seek ongoing partnerships with regional partners, local public health departments and other stakeholders." The strategies and actions in the Public Health Appendix incorporate the Subcommittee recommendations and will be adopted as part of the Plan. The title of this section has been changed to Plan Implementation to align with other Plan components.
16343.08	o Transportation Safety and Security - Page 33 of the Appendix has Policies and Recommendations which are more detailed than the main document. At a minimum, the main document should include a sentence which states that there are more specific recommendations in the Appendix.	Comment noted. The Draft 2016 RTP/SCS has been updated to include a specific reference to the additional safety and security policies detailed within the Transportation Safety and Security Appendix.
<i>Submitted by</i> Southern California Gas Company		Submittal 16295 Related Documents Link
16295.01	As a preliminary matter, SoCalGas appreciates SCAG's ongoing focus on public health and air pollution, specifically the challenges of ozone reduction for Southern California, which is reflected in the RTP/SCS. At SoCalGas we also remain focused on the end goal - emission reduction - whether it be reducing ozone for public health or reducing greenhouse gas ("GHG") emissions for global health. At the same time, we believe SCAG should take advantage of the best of what innovation can deliver, and welcome technology advancements that move us toward our collective goals.	Comment noted. SCAG's policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition.
16295.02	SoCalGas emphasizes the importance of natural gas to the California environment and economic health. We continue to work with our customers and technology developers to identify clean technology solutions through energy efficiency programs, customer education and outreach initiatives, and by supporting near-term and long-term technology development that can reduce both GHG and criteria pollutant emissions and better meet our customers' changing energy needs. SoCalGas seeks to meet a range of customer needs, including serving traditional and new uses such as heating, power generation and transportation fueling, as well as continuing to leverage natural gas resources to deploy industry leading energy efficiency, conservation and emerging technology programs.	SCAG's policies are technology neutral with regard to supporting zero and/or near-zero emissions vehicles. SCAG will continue to support natural gas fleet vehicles by hosting and administering the Southern California Clean Cities Coalition.
16295.03	Diversity in the State's energy portfolio is also important for prudent risk management to support resiliency in the energy infrastructure as a climate adaptation strategy and should be a factor in the overall analysis of future pathways. As weather becomes more extreme from droughts, wildfires, hurricanes and El Nino events, there are risks to overreliance on one source of energy. Hurricane Sandy provided an example where every system dependent on electricity was jeopardized, from the refueling pumps at gasoline stations to the water pumps for putting out fires. Developing micro-grids supported by natural gas distributed technologies can operate for a limited timeframe separate from the grid; they can create more diversity in the electric grid since the natural gas system is mostly underground and relatively immune to extreme weather events.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Southern California Gas Company		Submittal 16295 Related Documents Link
16295.04	<p>Further, the natural gas energy sector continues to create jobs and grow our economy. In California, the existing natural gas energy industry supports (directly and indirectly) more than 250,000 jobs and adds over \$36 billion to the State’s economy. Future natural gas infrastructure improvement projects offer significant job opportunities and contribute to the local and State economy. Additionally, the manufacturing, industrial, and building sectors rely on natural gas as a low-cost energy source to run profitable operations. SoCalGas alone employs more than 8,000 Southern Californians and, in 2014, spent \$571.4 million with diverse suppliers encompassing 48.4 percent of SoCalGas’ procurement. SoCalGas’ natural gas energy efficiency programs have created approximately 8,000 jobs in California.</p>	<p>Comment noted. Promoting natural gas and biomethane projects would seemingly be more appropriate for an economic development strategy. The Economic & Job Creation Analysis of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy examines the impact that the Plan will have on the region's economy.</p>
16295.05	<p>We appreciate that the RTP/SCS includes a clear, recognized role for near-zero emission natural gas vehicles in both the near term and long term, especially in the goods movement sector. The RTP/SCS allocates \$74.8 billion in goods movement strategies, which include “reducing environmental impacts by supporting the deployment of commercially available low-emission trucks and locomotives; and in the longer term advancing technologies to implement a zero- and near-zero emission freight system” (page 7). Supporting the deployment of commercially ready technologies that significantly reduce criteria pollutants and greenhouse gas emissions is critical to meet SCAG’s regional goals. With the recent California Air Resources Board (“CARB”) certification of the Cummins Westport Innovations (“CWI”) near-zero emissions engine, California has the opportunity to reduce NOx emissions by 90% from heavy duty trucks. The RTP/SCS should include a discussion on this near-zero emission CWI engine, which was certified recently with lower NOx and methane emissions. CARB established an Optional Low NOx Standard to incent engine development of trucks with emissions in the range of 0.02 to 0.1 grams of NOx per brakehorse power (“g/bhp”). The SCAQMD refers to 0.02 g/bhp as power plant equivalent emissions because electric vehicles may have zero tailpipe emissions but if full life cycle emissions are considered they are not zero emission. The near-zero CWI engine actually certified to emissions of 0.01 g/bhp, which means a natural gas truck or bus would have lower overall emissions than an equivalent battery electric truck.</p>	<p>SCAG will further review opportunities for integrating discussion of recent certification actions as may be appropriate.</p>

ID	Comment	Response
<i>Submitted by</i> Southern California Gas Company		Submittal 16295 Related Documents Link
16295.06	<p>The commercialization of this game changing technology for heavy-duty trucks and buses is a vital step in meeting our air quality goals and improving health in disadvantaged communities along Southern California’s transportation corridors. CWI’s first near-zero 8.9L engine can be utilized by transit fleets, waste haulers and some regional goods movement trucks. This provides an opportunity for transit and waste hauling fleets in Southern California to continue using compressed natural gas (“CNG”) buses with even greater environmental benefits- achieving emission levels below electric buses and trucks. Commercialization of this technology also provides opportunities for transit districts in the northern and eastern portions of SCAG’s region to transition to cleaner fleets today, as many of Southern California transit agencies have already done. All of these fleets can move to near-zero levels with the acquisition of the new CWI engine. Further, with the use of increasing volumes of renewable natural gas (RNG), the transit sector has the potential to drive the carbon intensity of its emissions below electric buses. We can do this in the next several years and not wait 20 years - a generation - before we begin to realize these emission reductions. In addition, CARB has included deployment of low emission, low-carbon fueled trucks, such as low NOx, RNG fueled trucks as part of their 2014 Scoping Plan Update on how to meet the AB32 2020 GHG reduction goals. The 2016 RTP/SCS should clearly articulate this pathway. In addition to the certified 8.9L engine, CWI is also working on applying the same technologies to a larger engine, which can be commercialized for the goods movement sector in the next twelve to eighteen months. Goods movement is an important economic driver in Southern California. Maintaining cost effective solutions for long-haul drayage truckers will help the region remain competitive and meet stringent emissions goals. The Goods Movement Environmental Strategy quotes, “the regional strategy supports the deployment of commercially available low emission trucks and locomotives while centering on continued investments into improved system efficiencies. For example, the region envisions increased market penetration of technologies already in use, such as heavy-duty hybrid trucks and natural gas trucks.” (pg. 101). We look forward to partnering with SCAG and membership organizations to making this a reality.</p>	<p>Comment noted. SCAG looks forward to continuing opportunities to work with the Southern California Gas Company.</p>

ID	Comment	Response
<i>Submitted by</i> Southern California Gas Company		Submittal 16295 Related Documents Link
16295.07	<p>SoCalGas supports that the RTP/SCS recognizes the role of natural gas in locomotive sector. The Long- Term Emission-Reduction Strategies for Rail quotes, “Opportunities for near-zero emissions include incorporating liquid natural gas tender cars and after treatment systems. Tier 4 engines and earlier engine types can be retrofitted to operate with natural gas.” (pg. 170). The Goods Movement Appendix quotes, “Liquid natural gas has also been considered as a fuel for rail locomotives. It is estimated that use of LNG with a Tier 4 locomotive would lead to NOx and PM reductions of 70 percent beyond the Tier 4 locomotive”. Beyond heavy-duty truck engines, LNG is an ideal choice to replace diesel and bunker fuel for the goods movement industry, especially for marine and rail operators. Using LNG to reduce GHG and criteria pollutant emissions has been discussed by the rail and marine industries as well as the ports. This is not required through regulation- it is being driven by the fuel price differential between natural gas and diesel. Nationally and internationally, we have seen an increase in the number of LNG-fueled vessels in the marine sector, as well as LNG-fueled engine pilot programs by railroads. SoCalGas has had discussions with the Ports of Long Beach and Los Angeles about the possibility of utilizing LNG as a multi-sector transportation fuel, and natural gas as an energy source, at the ports. The Port of Long Beach identified this as a potential strategy in their Energy Island proposal. This opportunity is only marginally addressed in the RTP/SCS and we request that the plan should more clearly include a focus on reducing NOx emissions by investing in natural gas transportation technologies and fueling infrastructure at the ports.</p>	SCAG will further review opportunities for integrating discussion as appropriate.
16295.08	<p>SCAG’s goods movement strategies should also consider the advantages that switching from diesel to natural gas can have in the off-road and marine sectors will have for improvement of cancer risk in nearby communities affected by goods movement-related emissions. The Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Risk Assessment Guidelines Version 8.0 published in March 2015, shows natural gas has a significant advantage over diesel. SoCalGas calculated two examples of the difference between cancer risk from just switching from diesel to natural gas. In the case of a marine engine transiting near a port terminal, the calculation of the change in absolute residential cancer risk from just fuel switching (diesel to natural gas) shows that the diesel risk is 314 times the natural gas risk. In the case of locomotives, using an example of arrival and departure trains (ltrain/day; 4 hours/train at 50% load), the calculation of the change in absolute residential cancer risk from fuel switching (diesel to natural gas) shows that the diesel risk is 107 times the natural gas risk. We wish to point out that no specific facility was examined in our sample calculations, and no inference about actual risk at a specific facility can be derived from just this tier 2 screening level analysis information.</p>	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Southern California Gas Company		Submittal 16295 Related Documents Link
16295.09	<p>SoCalGas supports SCAG’s inclusion of renewable natural gas (“RNG”) as an alternative transportation fuel in the Goods Movement Appendix. Reducing emissions and petroleum use within the transportation sector is critical to meeting both air quality and climate change policy goals for California. We believe supporting the development and deployment of RNG in the transportation sector should be included as a key strategy to achieve emission reduction goals. Meeting the federal ozone and particulate matter standards in Southern and Central California are the most significant air quality challenges for the state. Natural gas vehicles (“NGVs”) that can meet the optional low-NOx standard and run on renewable fuels can help California meet its GHG reduction and petroleum displacement goals, and should be included as a key pathway, especially in the heavy-duty vehicles sector. The transportation sector can also be an important catalyst for building an RNG market and encouraging the utilization of methane resources. CARB’s Low Carbon Fuel Standard identifies RNG from existing organic sources, such as dairy waste, landfills, and waste water treatment as the lowest carbon intensity standard pathway available, even lower than the current electricity mix and hydrogen. Today, due largely to this policy, RNG is already being used in California’s transportation sector. For example, Waste Management, Inc., uses RNG produced at its Altamont Landfill and Resource recovery Facility to fuel its waste hauling fleet in that region. Clean Energy Fuels Corporation offers RNG at their CNG and LNG stations throughout California. A review of the CARB’s Low Carbon Fuel Standard reporting tool shows that RNG, as a percentage of total natural gas used in the transportation sector, has increased from approximately 10% to 40-60% in the past year. SCAG needs to look at policies and incentives to promote more development of RNG in the region. Support for heavy-duty natural gas vehicles is a key to this development. The transportation sector can be an important catalyst for building the renewable natural gas market.</p>	<p>SCAG acknowledges different technology paths that have the potential for broad commercial deployment in the region for goods movement activities.</p>
16295.10	<p>In addition, renewable natural gas creates jobs. The Renewable Natural Gas Coalition estimates that biomethane projects in California have resulted in the creation of more jobs per year average (11.5) than any other renewable energy technology. According to Renewable Natural Gas Coalition’s California Biofuels Cap and Trade Initiative, developing biomethane projects at 200 candidate sites throughout the state (located at landfills, waste water recovery facilities, and agricultural sites) would create more than 20,000 direct and indirect jobs in 42 California counties. Also, as many as 100 temporary construction jobs could be created as a result of each project (page 8).</p>	<p>Comment noted. Promoting natural gas and biomethane projects would seemingly be more appropriate for an economic development strategy. The Economic & Job Creation Analysis of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy examines the impact that the Plan will have on the region's economy.</p>

ID	Comment	Response
<i>Submitted by</i> Southern California Gas Company		Submittal 16295 Related Documents Link
16295.11	<p>In the long term, and as transportation options evolve, more RNG can be injected into the pipeline and redirected to traditional natural gas end-uses, like cooking, space and water heating, achieving our Governor’s goal announced in this year’s State of the State speech to “clean our heating fuels.” We need to re-think methane. Capture and management of methane emissions (primarily from agriculture, dairies, landfills, etc.) will have a proportionately greater impact than efforts to control CO2 emissions because of the higher global warming potential of methane. Combustion of methane, i.e. conversion to CO2, reduces its global warming potential by a factor of greater than 20 times. Other management techniques, e.g. sequestration, are untested and still have significant issues to resolve, e.g. the ability to sequester the methane for long periods without leakage. Therefore, combustion of captured and recovered methane emissions will play an important role in current and future plans to reduce global warming.</p>	<p>SCAG acknowledges different technology paths that have the potential for broad commercial deployment in the region for goods movement activities.</p>
16295.12	<p>Conclusion We applaud SCAG’s effort in creating a technology neutral, performance-based RTP/SCS that looks to take advantage of the best that technology can offer. SoCalGas looks forward to working with SCAG and membership communities over the coming years to develop clear and actionable strategies to take advantage of and invest in opportunities to utilize natural gas’ potential as a clean energy solution. Decisions today are defining the course of our clean energy future in all sectors of our economy. Simply put, Southern California has the unique challenges and opportunities presented by its comprehensive environmental targets that cannot be met by staying on the current course. There will always be ongoing regulatory initiatives that are being undertaken by various agencies in the state, but this should not deter SCAG from taking the lead in affirming natural gas’ role in the long-term energy mix as a clean and affordable way to reduce smog and greenhouse gas emissions and improve the health of all Californians.</p>	<p>SCAG acknowledges different technology paths that have the potential for broad commercial deployment in the region for goods movement activities.</p>
16295.13	<p>SoCalGas supports expanded research, development and deployment agendas for natural gas technologies. We are pleased SoCalGas’ progress was noted in the Goods Movement Appendix, “Southern California Gas Company (SoCalGas) has also been involved in several technology development projects and has worked with Original Equipment Manufacturers to develop and test several engines and vehicles. These projects have been funded by partners including the CEC, DOE, SCAQMD, in addition to funding invested by SoCalGas” (page 48). We believe the next step will be to prioritize these research opportunities and identify specific action plans to advance strategies for realizing the benefits of natural gas. We appreciate the opportunity to provide comments and input on the 2016 Regional Transportation Plan/Sustainable Communities Strategy. Southern California is our home and we share SCAG’s goals to strive at the highest levels to preserve and take care of it. We embrace a big picture view and shall continue to work diligently to provide safe, clean, reliable and affordable service to 21 million people. We believe natural gas offers an affordable, clean and practical way to meet California’s goals and look forward to continuing to work together to develop action plans to align state and regional policies and identify funding resources to advance cleaner natural gas technologies to meet the state’s environmental goals, improve the health of our local communities through NOx, particulate matter and ozone emissions reductions, as well as global health through GHG reductions.</p>	<p>SCAG acknowledges different technology paths that have the potential for broad commercial deployment in the region for goods movement activities.</p>

ID	Comment	Response
<i>Submitted by</i> Southern California Leadership Council		Submittal 16290 Related Documents Link
16290.01	Our group is particularly focused on assuring that the RTP/SCS will provide positive economic impacts and job creation. With that in mind, we applaud SCAG's commitment to providing thorough economic analysis, including an evaluation of the plan's impact on jobs and job creation. The economist's analysis of the plan has produced some very positive data, projecting that the benefits of the RTP/SCS, in terms of job creation and economic growth in the region, will exceed the costs of the plan. Our group is encouraged by this analysis and will continue to work with SCAG and other stakeholders to assure that these projected benefits are brought to fruition through the plan's effective implementation.	Comment noted.
16290.02	In a very few instances, the proposed SCS was analyzed using population and development forecasts that are below both the densities included in existing General Plan designations and the densities forecasted by the respective local jurisdictions. Fortunately, these deviations are relatively small in number and extent. However, in order to abide by the planning principles that were expressly adopted prefatory to the draft documents, these should be corrected.	Comment noted. SCAG cannot accommodate request for corrections. TAZs showing densities below existing General Plan designations are consistent with base year conditions and projections provided by local jurisdictions.
<i>Submitted by</i> SR 60 Coalition		Submittal 16288 Related Documents Link
16288.01	The SR60 Coalition Cities have been advocating for the SR60 Light Rail Alternative since 2007. Our coalition has been successful in having the SR60 Light Rail Alternative selected as one of the two alternatives selected for further study. In November of 2014, the Metro Board voted to move our alternative to the next phase of technical study and analysis.	The 2016 RTP/SCS recognizes that a final alignment decision on the Metro Eastside Transit Corridor Phase 2 (RTP ID 1TR0704) is yet to be made, and does not preclude any final decision to be made by the Metro Board of Directors.
16288.02	Our Coalition is very concerned about the proposed dedicated truck lanes on the SR60 Highway as proposed in the 2016 RTP/SCS . We have stated that SR60 Highway can not be the solution to all the transportation needs in the region. There are plans for the highway expansion and possible HOV lanes. The SR60 Coalition is concerned that many of these proposals, especially the dedicated truck lanes will be in direct conflict with the SR60 Light Rail Project. We ask that further discussion on transportation proposals on the SR60 State Highway be addressed with our SR60 Coalition and San Gabriel Valley Council of Governments.	Comment noted. SCAG acknowledges the need for continuing analyses and dialogue with stakeholders. Please note that the inclusion of the East-West Freight Corridor in the 2016 RTP/SCS allows for further analyses to be conducted. Specific costs, refined user demand, accessibility concerns, designs, and alternative alignments would be identified through a project level Environmental Impact Report (EIR) . Further discussion of project mitigation concerns would also be addressed through upcoming processes.

ID	Comment	Response
<i>Submitted by</i> Transportation Corridor Agencies		Submittal 16187 Related Documents Link
16187.01	<p>Pp 57, Table 1: FTIP Projects, Project 111207 We wish to clarify that project 111207 is a distinct and separate project from any other TCA project included within the FTIP. The SR 241/91 connector project has always had its own project description, schedule, budget and unique ID number. This project was first introduced in the 2008 RTP as 2T01135. The project ID was updated to ORA084403 when the project was added to the 2008 FTIP in August 2010. The project ID was updated to ORA111207 when the project was included in the 2011 FTIP. The project has since been carried over into all subsequent FTIPs as project 111207. Copies of these FTIP listings are attached to this letter as documentation of the project's separate identity. Page 174, Table 2, Financially-Constrained RTP Projects Consistent with our comment above on the FTIP listing for 111207, we request that the reference to "parent project ORA050" be struck from the project description. The SR 241/91 connector project is not part of ORA050. This will have no effect on the project content, schedule or budget. As noted in the previous comment for 111207 in Table 1, the SR 241/91 connector project has always had its own unique project description, schedule, budget, and project ID and has never been part of ORA050. Therefore, we request that the reference to "parent project ORA050" be struck from the project description, as the SR 241/91 connector is not part of ORA050. This clarification will have no effect on the project content, schedule or budget.</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. As part of that process, modifications to FTIP ID #111207 has been addressed.</p>
16187.02	<p>Pp. 173 and 174, Table 2: Financially-Constrained RTP Projects TCA's four main toll road project descriptions are correctly listed in this table for project numbers, 10254, ORA050, ORA051 and ORA052. However, Table 2 also lists specific components of the toll road projects as "projects" with unique RTP ID numbers. For example, in addition to 10254 (Route 73/ San Joaquin Hills Transportation Corridor), the Glenwood Drive/Pacific Park Drive on/off ramps are listed as a separate TCA project (RTP ID 2M0726). There is no reference to the ramps being a subset of 10254, and the project actually precedes the San Joaquin Hills Transportation Corridor listing. Similarly, a series of SR 241 interchanges and improvements are called out on page 174, with no reference that they are subsets of a larger toll road project that is also included in Table 2. Further, the opening dates for these pieces of the four main toll road projects should be 2020, consistent with the main project listings. TCA requests that SCAG work with our agency to remove any duplication or inconsistencies among the TCA project listings in Table 2, and that all completion dates be updated as needed to reflect the correct completion dates identified in the FTIP project descriptions.</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. As part of that process, modifications to RTP ID# 2M0726, 2120003, 2160002, 2160003, 2160004, 2160005, and 2160006 have been made.</p>

ID	Comment	Response
<i>Submitted by</i> United States Environmental Protection Agency		Submittal 16285 Related Documents Link
16285.01	<p>The 2016 RTP/SCS contains a strong focus on the long-term goal of a zero emission goods movement system where technically feasible and economically viable, while also integrating near-zero emissions technologies that serve as bridging options to continue to reduce emissions. EPA strongly supports these efforts to move towards zero emission goods movement, and is available to assist SCAG in meeting this goal. Well-planned and executed zero-emission freight corridors will contribute to improved air quality and reduce public health impacts for the already heavily burdened, low income and minority communities along these corridors and throughout the Southern California Air Basin. The Draft RTP/SCS uses the term clean trucks. For example, page 99 states “The East-West Freight Corridor would carry between 58,000 and 78,000 clean trucks per day that would be removed from adjacent general-purpose lanes and local arterial roads.” There are also several references to the San Pedro Bay Ports Clean Truck Program. However, there is no definition provided for “clean trucks”. Recommendation: EPA suggests defining the term “clean truck” in relation to current vehicle emissions standards. One possible criteria for defining “clean truck” could consist of meeting the EPA exhaust emission standards for model year 2010 and newer heavy-duty on-highway engines, or the CARB optional low NOx emission standards for on-road heavy-duty engines.</p>	<p>Comment noted. SCAG uses the term "clean trucks" to capture potentially new technologies that may emerge and contribute tremendously to reducing vehicle emissions in the future as our plan is long-range in scope. At the same time, we recognize the benefit of developing a plan to get to the zero-emission future and include Goods Movement Environmental Strategy And Action Plan in the Goods Movement Appendix. Further, SCAG recognizes a need for a collaborative relationship with our partner agencies at the regional, state, and Federal level in defining these terms and looks forward to the opportunity to work with the EPA on further defining them.</p>
16285.02	<p>The Environmental Justice Appendix to the Draft RTP/SCS provides a thorough Environmental Justice Analysis which includes five different geographies (Environmental Justice Areas, SB 535 Disadvantaged Communities, Communities of Concern, Urban Areas, and Rural Areas) and eighteen different performance areas. The analysis of impacts along freeways and highly traveled corridors is an especially important performance criteria because vulnerable populations (such as older adults, children, and those with pre-existing cardiovascular and respiratory conditions), and people with “low socioeconomic status” are particularly susceptible to PM2.5-related health impacts. EPA supports the recommendation in the Environmental Justice Toolbox (RTP/SCS Environmental Justice Appendix, page 194) to conduct corridor-level near roadway environmental justice analyses for proposed projects in areas where air quality impacts may be concentrated among Environmental Justice communities. Please consider the following recommendations in order to facilitate effective analysis and mitigation of the impacts that communities with Environmental Justice concerns may experience from the proposed plan and future projects. Recommendations: Please consider making the underlying Environmental Justice Toolbox data and analyses accessible for project proponents to use as a starting point for corridor and project level analyses. In addition, please consider which of the other 17 performance areas would be useful for a corridor or project level analysis, include those as recommendations in the Environmental Justice Toolbox, and make the data easily accessible. Please consider highlighting the use of the recently published EPA-guidance document titled “Best Practices for Mitigating Near Roadway Pollution at Schools (November 2015)” which could serve as a useful resource for mitigating Environmental Justice Impacts. EPA strongly supports the following advanced technology deployment measures included in this section and recommends SCAG discuss strategies to incentivize their implementation: 1) zero emission heavy-duty trucks; 2) Tier 4 marine engine repowers and replacements; and 3) Tier 4 and zero emission railyard equipment.</p>	<p>SCAG has amended the Environmental Justice Toolbox to highlight potential strategies to reduce corridor and project specific impacts for EJ groups (including the EPA-guidance document, "Best Practices for Mitigating Near Roadway Pollution at Schools"). SCAG will also work to make available to project proponents the underlying Environmental Justice Toolbox data and analyses.</p>

ID	Comment	Response
<i>Submitted by</i> United States Environmental Protection Agency Submittal 16285 Related Documents Link		
16285.03	<p>In the Climate Vulnerability Chapter, include a discussion about how global warming affects ozone formation. Please also include a discussion about the possible health threats from dust storms related to extended drought conditions, which could be a concern for vulnerable populations at risk for Valley Fever. Please update Exhibit 39 to describe areas at risk from inland flooding, in addition to the information describing coastal areas at risk for sea level rise in 2100. This information is available from national flood maps, and would more holistically communicate potential flood risks to Environmental Justice communities. Please provide a reference for the statement in Table 94 that states, "Increased greening may increase gentrification/ housing cost pressures."</p>	<p>SCAG has expended the Climate Vulnerability section of the Environmental Justice Appendix to account for ozone impacts from climate change, potential dust storms related to extended droughts, and potential impacts from inland flooding. Table 95 looks at the possible impacts from certain climate adaptation policies on low income and minority groups. Infrastructure investments, such as shade trees, may increase the overall attractiveness of a neighborhood and could impact housing prices, as discussed in recent studies from WRCOG and the City of Chula Vista and noted in the table.</p>
<i>Submitted by</i> United States Environmental Protection Agency Submittal 16371 Related Documents Link		
16371.01	<p>The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to provide feedback on the 2016-2040 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (PEIR). EPA supports the Southern California Association of Government (SCAG) goal of incorporating environmental and community considerations in the regional transportation planning process. Early integration of comments from regulatory and resource agencies results in greater opportunities to avoid sensitive resources and receptors and minimize impacts associated with future transportation projects. We note that Title 23 USC 134 states that a long-range transportation plan "shall include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan" and that the discussion of mitigation "shall be developed in consultation with Federal, State, and tribal wildlife, land management, and regulatory agencies." EPA is available to coordinate with SCAG as the development of the RTP and SCS continues in order to provide feedback on mitigation activities and assist in meeting consultation requirements. EPA provides the following comments following our limited review of plan elements related to Environmental Justice, Air Quality, and Climate Change.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Ventura County		Submittal 16235 Related Documents Link
16235.01	<p>In September 2015, the Ventura County Board of Supervisors adopted a comprehensive update to the Saticoy Area Plan. The Saticoy community is defined as a "severely economically disadvantaged community". The Saticoy Area Plan has a 20-year time horizon that extends from 2015 to 2035. Within the Saticoy Area Plan, project objectives are called "guiding principles" that must be used when evaluating future Area Plan amendments. The four guiding principles developed for the Saticoy Area Plan update 1) sustainable development that supports a healthy community, 2) economic revitalization, 3) improved housing opportunities and, 4) improved infrastructure systems. The Area Plan update was primarily funded through a combination of Compass Blueprint Program Grant and the Strategic Growth Council Sustainable Communities Planning Grant Program. Significant planning efforts were focused on reducing vehicle miles travelled. One of the unavoidable, significant impacts that was identified in the Saticoy Area Plan Program EIR, includes traffic impacts on State Route 118 (SR118) in the Saticoy Community. One potential mitigation measure that was identified includes the widening/re-striping of SR118 in the Saticoy community (e.g., generally between Vineyard Avenue to Darling Road). Although the Board of Supervisors adopted a statement of overriding considerations for this impact, the following implementation program (highlight added) was included in the Area Plan to help mitigate the impact in the future. (SEE ATTACHED LETTER) As indicated in the adopted Saticoy Area Plan program, it is critical for implementation of the recently adopted Saticoy Area Plan and future development in the Saticoy community that the re-striping project be included as a prioritized project in the 2016 RTP/SCS (FTIP Projects). The Saticoy Area Plan guiding principles are consistent with the RTP/SCS overarching strategy that calls for "more compact communities in existing urban areas". The Saticoy Area Plan includes a land use plan with more compact development and improved mobility in an existing urban area. Peak-hour traffic impacts are already significant in this area and will impede future revitalization of this disadvantaged community if improvements to SR118 are not constructed. As such, we respectfully request that the re-striping and any other critical intersection improvements in the Saticoy area be included in the RTP/SCS or FTIP Projects list as necessary, to make this a priority project</p>	<p>Comment noted. Widening improvements to SR-118 within the Saticoy area are included in the Project List under RTP ID# 5160008. Any additional improvement projects that are identified in the Saticoy Area Plan, but not included in the 2016 RTP/SCS at present, may be submitted to SCAG via VCTC for future consideration for inclusion in the RTP/SCS through an amendment or update to the Plan.</p>

<i>Submitted by</i> Ventura County 350 HUB		Submittal 16274 Related Documents
16274.01	<p>The Ventura County 350 Climate Hub, a coalition of organizations with an interest in climate change mitigation, transition from fossil fuels to renewable energy, and community resilience, just learned of the opportunity to comment on the SCAG 2016 RTP-SCS (Regional Transportation Plan - Sustainable Communities Strategy). Based on quick study, our comment at this time focuses on a desire for higher targets for reductions in Greenhouse Gas (GHG) emissions, along with more clear assurance of efforts to stop burning fossil fuels near predominately low income people of color. We also want a relevant Climate Action Plan for Ventura County which is informed by, and is used to inform, the Regional Transportation Plan (RTP).</p>	<p>There is a continuing emphasis on reducing greenhouse gas emissions, even after the adoption of SB 375. On April 29, 2015, Governor Brown issued Executive Order B-30-15, which establishes a California greenhouse gas reduction target of 40 percent (below 1990 levels) by 2030. Because the transportation sector is the largest contributor to California's greenhouse gas emissions (more than 36 percent), SCAG anticipates updated and more stringent regional emissions reduction targets. SCAG encompasses six counties and 191 cities, and the RTP/SCS policies and strategies reflect the diversity in the region. It is not in SCAG's mission to plan for specific areas/jurisdictions in the region – any plans to specific areas/jurisdictions will and should come from the respective jurisdiction(s).</p>

ID	Comment	Response
<i>Submitted by</i> Ventura County 350 HUB		Submittal 16274 Related Documents
16274.02	<p>More Public Input and Engagement is Crucial to Success of Timely Emissions Reductions</p> <p>We would like to request an extension of 45 days so that we can learn and study more and engage more of our members and partner organizations studying the plan. We did not hear about the workshop in Camarillo last summer. It appears no NGOs whose primary concern is climate change were sufficiently engaged with SCAG to receive notice of the 60 day comment period. That 60 day period spanned the holidays, during which time we were paying attention to COP21 and other critical climate-related issues, such as the consequences of the massive gas leak at Porter Ranch. The Ventura County Transportation Commission has no money, no sales tax revenue. It is considering a ballot measure this year to add a half cent sales tax. Such a measure has failed twice because there is not a perceived traffic congestion problem here. There is skepticism about it getting a ⅓ vote. Regional plans that support greater awareness and engagement about reducing our carbon footprint are urgently needed. When the problem of climate change is presented with concrete, workable, high-tech, fun solutions that significantly boost the local economy, using real life examples and case studies, people can overcome what is otherwise a potentially hopeless view of the future that leads to denial. A community with concrete options is alert and empowered. Your Fundamental Assumptions Need to be Based on Fully Meeting State and Federal Policy Goals Rather Than Guided First and Foremost by the Consumer Choice Model The RTP seems to take pride in being consumer driven, which may explain why targets are not high or explicit enough. A comment was submitted by SCE Docket # 15-IEPR-10 on December 8, 2015. It suggests that Transportation Energy planning should model two scenarios for on-road / train and off-road segments: (1) a mid-case scenario incorporating all regulations and incentives, and (2) a high-case scenario based on achievement of all “federal air quality requirements under a variety of fuel and technology mixes, including a high-electrification case in most market segments.” This comment is relevant for SCAG’s plan, exemplifying the bold leadership to plan and act in the community’s best short and long-term interest. There is no time left to allow public input to be dominated, particularly in Ventura County, by those more engaged consumers, labor, and Chamber leaders misled by oil industry propaganda.</p>	<p>Comment noted. SCAG provided a 60 day public review and comment period beginning December 4, 2015, and concluding on February 1, 2016, for the Draft 2016 RTP/SCS and the PEIR. SCAG provided advance notice of elected official workshops and public hearings on the Draft 2016 RTP/SCS including publication in newspapers throughout the region such as the Ventura County Star to give as many interested parties as possible the opportunity to attend and provide input. There are additional opportunities to provide comment, including speaking at upcoming meetings of the Regional Council and Policy Committees or speaking with your Regional Council representative. To find your SCAG board representative, please visit SCAG's website, www.scag.ca.gov</p>

ID	Comment	Response
<i>Submitted by</i> Ventura County 350 HUB		Submittal 16274 Related Documents
16274.03	<p>GHG Emissions Reduction Goals and Targets Transportation Plans Should Parallel Climate Action Plans Developed with Public Input The recently published draft Climate on the Move (concerning Ventura County’s carbon footprint and vision for GHG reductions) documents the amount of GHG pollution from mobile sources as 53% (p. 14-21). It says that half of that is due to vehicles emitting GHGs on state highways, (e.g. 101, 118, 23 and 126). In comparison, for the SCAG region, mobile sources contribute only 37%. Therefore, our first concern is that Ventura County should be strongly encouraged by SCAG to adopt a more ambitious set of targets than are reflected in the transportation plan targets currently specified in the SCAG RTF. There is little county by county breakdown; the projects and resources in the SCAG plan seem less applicable to Ventura County. The VC Transportation Commission needs you to model more ambition to help it create a sense of urgency for revenue generation. Ventura County’s carbon footprint is 53% transportation, 36% energy and 11% "other" (mostly wastewater and landfill). SCAG’s carbon footprint, by contrast, is 37% transportation (per the RTP). An overall GHG emissions inventory from SCAG would be helpful for context. Statewide, the emissions from transportation are reported in the 2015 EIPR as 37%, from the industrial sector including oil refineries 27%, residential and commercial sectors 26%, and agriculture 9%. Consistency among agencies in making emissions source pie charts and a detailed breakdown by county would be helpful to inform county Climate Action Plans and, hence, county transportation plans. We can only assume that the carbon footprint for SCAG is similar to that for the state. Assuming that LA County’s soon-to-launch Community Choice Energy (CCE or CCA) will boost early reductions in the energy sector (i.e. hopefully 50-70% below 1990 emissions by 2030), maybe higher targets in the energy sector and “other” sources make up for the low target in the transportation sector. Considering the potential for CCE to speed electrification of the transportation system with energy from 70+% preferred resources, this parallel development seems like a glaring omission that would support significantly higher targets for the transportation sector.</p>	<p>Comment noted. Pursuant to SB 375, the 2020 and 2035 regional GHG reduction targets apply to the entire SCAG region and there are no county specific targets.</p>
16274.04	<p>GHG Emissions Reduction Goals and Targets - Part 2 SCAG Does Not Appear to Align with US Pledges to the UN Climate Agreement The US has pledged to reduce emissions 24-31% below 2005 levels by 2025 and 32% below 2005 levels by 2030. Those goals are uncertain and do not assure that the US can do its minimum fair share. The larger economies of Europe have goals of 40% below 1990 levels by 2030 and analysts say more ambition than that is required to prevent warming above 1.5 degrees Celsius. SCAG’s 2016 RTP-SCS targets are only 8% below 2005 levels by 2020, 18% by 2035 and 22% by 2040! If SCAG aims to do its part in the family of nations, the 2016 RTP-SCS would likely need to at least double these targets. We therefore demand a target of 28-35% (not 14%) below 2005 levels by 2030. The first five years of the plan are crucial to help slow climate feedbacks. We further request a timetable of project choices by lead time and emissions ROI (target intensity) by stated completion times. Our national pledge is a moral imperative that must be a minimum operational guide right now for every state, regional, and local government. With a federal price on carbon (in the form of a revenue-neutral Carbon Fee and Dividend, which also includes a border fee adjustment), the world’s largest economy will trigger a global gradually rising price on carbon to speed achievement of adequate local targets.</p>	<p>Comment noted. SCAG’s regional targets require a reduction in greenhouse gas emissions (GHG) per capita from automobiles and light trucks, while the US Pledges apply to total GHG reductions from all GHG emission sources. In other words, the GHG reduction percentages are not directly comparable.</p>

ID	Comment	Response
<i>Submitted by</i> Ventura County 350 HUB		Submittal 16274 Related Documents
16274.05	<p>GHG Emissions Reduction Goals and Targets - Part 3 SCAG Also Does Not Appear to Meet Governor Brown’s Executive Orders If SCAG prefers to be guided strictly by state laws and regulations as opposed to international norms, then the RTP-SCS targets as proposed would be inadequate: proposed targets would achieve only a third of the reductions that are specified in CARB regulations. Executive Order S-03-05 sets the statewide target at 80% below 1990 levels by 2050. Executive Order B-30-15 of last year then requires interim 40% GHG reductions below 1990 levels by 2030 to ensure the 2050 target. Using this 1990 target, SCAG would only achieve 32% reductions below 1990 levels by 2040. Again, by any standard, this seems “too little, too late”. Attorney General Kamala Harris submitted comment on September 16, 2011 on the Draft EIR for the SANDAG 2016 RTP-SCS, concerning the San Diego Association of Governments (SANDAG) failure to mitigate climate change impacts, air pollution impacts, and impacts to public health and communities already impacted by air pollution (see attachment). SANDAG is being sued for lack of ambition and lack of priority concerning clean emission public transit in urban centers, among other issues. SANDAG’s defense that the Executive Orders are not legally binding is legally suspect and ethically unconscionable. We urge SCAG to respect CARB’s and Governor Brown’s reasonable and useful rules for regional GHG reductions. At the very least, SCAG needs to revisit its goals and targets to ensure compliance with AB32.</p>	<p>Comment noted. The Executive Order calls for all the relevant sectors to contribute to its fair share. The Draft 2016 RTP/SCS meets and exceeds its regional GHG emission reduction targets which demonstrates SCAG’s overachievement in fulfilling its responsibility. SCAG staff has been working with ARB staff in setting the next round of regional GHG emission targets. We are committed to setting and meeting ambitious and achievable regional GHG reduction targets pursuant to SB 375. As the Draft 2016 RTP/SCS meets and exceeds its regional GHG emission reduction targets required for light and medium duty vehicles, if other sectors also meet their share of GHG reduction, the SCAG region will also meet or exceed the goals set by AB 32 and the Executive Orders.</p>
16274.06.1	<p>SCAG’s Vision Needs Concreteness for Transparency and Public Engagement - Part 1 It is difficult to locate and discern the scope and comparative impact of proposed projects in this report. We see that the descriptions of plans trail off toward 2040 in vague 'scenarios'. Details are needed to enable the public to comprehend the SCAG vision.</p>	<p>SCAG first generated four preliminary scenarios for our region’s future – each one representing a different vision for land use and transportation in 2040. These four preliminary scenarios are described and analyzed in full detail in the Appendix: SCS Background Documentation. More specifically, each scenario was designed to explore and convey the impact of where the region would grow, to what extent the growth would be focused within existing cities and towns, and how it would grow — in other words, the shape and style of the neighborhoods and transportation systems that would shape growth over the period. SCAG’s ‘Preferred Scenario’ is described in full detail in Chapter 4: Creating a Plan for Our Future (page 65).</p>

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16274.06.2	<p>Descriptions of innovative projects that would engage people. The CA Energy Commission (CEC) 2014 IEPR (Integrated Energy Policy Report) Chapter 3 in its description, for example, of statewide EV rollout refers to SCAG’s EV readiness plan and atlas for 200 cities to meet demand for EV charging, including removing barriers to installing chargers at multi-unit dwellings (MUDS) and parking facilities and completion of the West Coast Green Highway with DC fast chargers. CEC’s 2014 Fact Sheet Advancing Statewide Plug-In Electric Vehicle Infrastructure details goals, incentives, barriers, and opportunities with a focus on home charging as “the greatest opportunity for growth in the next few years.” These are just some of the exciting projects reported by the CEC that we would also like to see featured as phase one projects in the RTP-SCS! Governor Brown’s ZEV (Zero Emission Vehicle) Action Plan. Chapter 4 of 2014 IEPR covers next generation alternate renewable fuel / electric vehicles and hybrids and how to win acceptance. In particular, it states “hydrogen fuel vehicles will play a key role in fulfilling the Governor’s ZEV Action Plan goals of 1.5 million zero-emission vehicles in 2025 [nine years from now!]....They can travel...300 miles on a tank of hydrogen and can be refilled in 5 to 10 minutes....Fuel cell electric drivetrains can be scaled up and used in larger sedans, vans, SUVs, and light trucks, which will create more...options than...with battery-electric vehicles.” We read that California is doing a demonstration infrastructure for hydrogen fuel cell vehicles in Irvine. The Mayor of Camarillo recently reported from the dais of the Ventura County AQCD Board meeting that state transportation planners expect hydrogen fuel cells to far outpace solar electric within a rapid ZEV mobilization. Projected costs are not more than 35% higher than comparable vehicles run by other forms of energy. A rising price of carbon will nullify the higher purchase price.</p>	<p>Comment noted. The RTP/SCS includes the regional electric vehicle charging station rebate program, which is a proposed strategy to increase access for plug-in electric vehicles to level 1 and level 2 charging. In addition, SCAG is active in encouraging the deployment of hydrogen fuel cell vehicles.</p>
16274.07.1	<p>SCAG’s Vision Needs Concreteness for Transparency and Public Engagement - Part 2 Also, we read that SCE was awarded funding to build out EV fast chargers around Los Angeles with an apparent prioritization of EV charging stations at businesses and multi-family dwellings. We would also like to see in the RTP-SCS about progress reported in 2015-IEPR-01 for EV-smart grid integration, such as the two million dollar demonstration completed by UCLA.</p>	<p>Comment noted. SCAG partners with Southern California Edison on planning for the deployment of electric vehicle charging stations throughout the region.</p>
16274.07.2	<p>SCAG’s 2016 RTP-SCS mentions an ambitious goal for emissions reductions in transportation of goods but no specifics. It appears aligned with developments reported in 2015-IEPR for medium and heavy-duty alternate fuel vehicles. Examples will reassure and inspire businesses.</p>	<p>The 2016-2040 RTP/SCS identifies numerous strategies in reducing emissions from goods movement sources as outlined in the Goods Movement Environmental Strategy and Action Plan section of the Goods Movement Appendix.</p>
16274.07.3	<p>Below are some further examples of innovations that might be listed: electric buses, trucks and delivery vans, government fleets, and plug-in electric and battery garbage trucks charged by solar panels at fleet yards. We are particularly interested in seeing a current inventory of buses and a plan for transitioning to electric, hydrogen, or renewable fuel hybrids (methane captured from the garbage). Such ideas jump-start discussion of how to speed up the greening of the transportation system.</p>	<p>Comment noted. SCAG, through its Clean Cities Coalition, encourages local jurisdictions in replacing existing fleet vehicles with zero and near-zero emissions vehicles.</p>

ID	Comment	Response
<i>Submitted by</i> Ventura County 350 HUB		Submittal 16274 Related Documents
16274.08	<p>Unwise to plan fleets that run on natural gas. The SCAQMD reportedly plans to transition to natural gas fuels for heavy-duty trucks. We suggest that you request economic forecasting based upon an inevitable rise in the price of carbon. SCAQMD seems to be planning for short-term savings and fails to anticipate the inevitable upstream tax on fossil fuel carbon that will obviously shift the economics of natural gas fuels. Even CEC (in IEPR 2015) still does not make plans based on a scenario in which society finally compels producers to fully internalize all the social and environmental costs of fossil fuels, such as the climate destabilization costs associated with the massive release methane currently occurring due to the blown-out gas storage well in Aliso Canyon. Governments and industries that anticipate a rapidly rising price on carbon will be more secure and successful within a few years. They will be competitive leaders and will help speed the transition to a renewable, low carbon (and perhaps, carbon-free economy) when they invest in EV, hydrogen, and alternate fuel Hybrid EV heavy-duty vehicles, buses, and trucks. The risks from natural gas extraction and storage are no longer justifiable. Potential natural gas-related catastrophe threatens both our atmosphere and those who live nearby. Well-documented devastation of communities and water supplies at fracking sites only adds to the long-term unsustainability of a natural gas dependent economy that we do not want to support. Major corporations, including oil companies like Shell, use a shadow price around \$40 per ton of CO2 equivalent. An additional tax must be put on release of unburnt methane that takes into account its short-lived but intense atmospheric heat-trapping effect. Climate activists are lobbying for legislation to put an appropriate price on leaking methane and a gradually-rising price on fossil fuels, up to \$100 per ton CO2 equivalent within ten years. We urge you to join us and plan for this new, more ecologically-sustainable regulatory environment of the near future.</p>	<p>Comment noted. The Plan does not assume funding from a carbon tax. However, the Plan notes that funding for transportation improvements is currently not sustainable, given the projected needs. Projected revenues from the gas tax, the historic source of transportation funding, will not meet transportation investment needs – and gas tax revenues, in real terms, are actually in decline as tax rates (both state and federal) have not been adjusted in more than two decades while the number of more fuel efficient and alternative powered vehicles continues to grow. It’s vital that we find new ways to make transportation funding more sustainable in the long-term, and efforts are underway to explore how we can transition from our current system based on fuel taxes to a more direct system based on user fees. Recent action by the state Legislature to launch the California Road Charge Pilot Program is a critical step in this transition.</p>

ID	Comment	Response
<i>Submitted by</i> Ventura County 350 HUB		Submittal 16274 Related Documents
16274.09	<p>GOVERNOR BROWN'S EXECUTIVE ORDER B-30-15 PART 1 WHEREAS climate change poses an ever-growing threat to the well-being, public health, natural resources, economy, and the environment of California, including loss of snowpack, drought, sea level rise, more frequent and intense wildfires, heat waves, more severe smog, and harm to natural and working lands, and these effects are already being felt in the state; and WHEREAS the Intergovernmental Panel on Climate Change concluded in its Fifth Assessment Report, issued in 2014, that "warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia" and that "continued emission of greenhouse gases will cause further warming and long-lasting changes in all components of the climate system, increasing the likelihood of severe, pervasive and irreversible impacts for people and ecosystems;" and WHEREAS projections of climate change show that, even under the best-case scenario for global emission reductions, additional climate change impacts are inevitable, and these impacts pose tremendous risks to the state's people, agriculture, economy, infrastructure and the environment; and WHEREAS climate change will disproportionately affect the state's most vulnerable citizens; and WHEREAS building on decades of successful actions to reduce pollution and increase energy efficiency the California Global Warming Solutions Act of 2006 placed California at the forefront of global and national efforts to reduce the threat of climate change; and WHEREAS the Intergovernmental Panel on Climate Change has identified limiting global warming to 2 degrees Celsius or less by 2050 as necessary to avoid potentially catastrophic climate change impacts, and remaining below this threshold requires accelerated reductions of greenhouse gas emissions; and WHEREAS California has established greenhouse gas emission reduction targets to reduce greenhouse gas emissions to 1990 levels by 2020 and further reduce such emissions to 80 percent below 1990 levels by 2050; and WHEREAS setting an interim target of emission reductions for 2030 is necessary to guide regulatory policy and investments in California in the midterm, and put California on the most cost-effective path for long term emission reductions; and</p>	Comment noted.

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<i>Submitted by</i> Ventura County 350 HUB		Submittal 16274 Related Documents
16274.10	<p>GOVERNOR BROWN'S EXECUTIVE ORDER B-30-15 - PART 2 WHEREAS all agencies with jurisdiction over sources of greenhouse gas emissions will need to continue to develop and implement emissions reduction programs to reach the state's 2050 target and attain a level of emissions necessary to avoid dangerous climate change; and WHEREAS taking climate change into account in planning and decision making will help the state make more informed decisions and avoid high costs in the future. NOW, THEREFORE, I, EDMUND G. BROWN JR., Governor of the State of California, in accordance with the authority vested in me by the Constitution and statutes of the State of California, in particular Government Code sections 8567 and 8571 of the California Government Code, do hereby issue this Executive Order, effective immediately IT IS HEREBY ORDERED THAT: 1.A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. 2.All state agencies with jurisdiction over sources of greenhouse gas emissions shall implement measures, pursuant to statutory authority, to achieve reductions of greenhouse gas emissions to meet the 2030 and 2050 greenhouse gas emissions reductions targets. 3.The California Air Resources Board shall update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent. 4.The California Natural Resources Agency shall update every three years the state's climate adaptation strategy, Safeguarding California, and ensure that its provisions are fully implemented. The Safeguarding California plan will: -Identify vulnerabilities to climate change by sector and regions, including, at a minimum, the following sectors: water, energy, transportation, public health, agriculture, emergency services, forestry, biodiversity and habitat, and ocean and coastal resources; -Outline primary risks to residents, property, communities and natural systems from these vulnerabilities, and identify priority actions needed to reduce these risks; and -Identify a lead agency or group of agencies to lead adaptation efforts in each sector.</p>	Comment noted.

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<i>Submitted by</i> Ventura County 350 HUB		Submittal 16274 Related Documents
16274.11	<p>GOVERNOR BROWN'S EXECUTIVE ORDER B-30-15 - PART 3 5.Each sector lead will be responsible to: -Prepare an implementation plan by September 2015 to outline the actions that will be taken as identified in Safeguarding California, and -Report back to the California Natural Resources Agency by June 2016 on actions taken. 6.State agencies shall take climate change into account in their planning and investment decisions, and employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives. 7.State agencies' planning and investment shall be guided by the following principles - Priority should be given to actions that both build climate preparedness and reduce greenhouse gas emissions; -Where possible, flexible and adaptive approaches should be taken to prepare for uncertain climate impacts; -Actions should protect the state's most vulnerable populations; and -Natural infrastructure solutions should be prioritized. 8.The state's Five-Year Infrastructure Plan will take current and future climate change impacts into account in all infrastructure projects 9.The Governor's Office of Planning and Research will establish a technical, advisory group to help state agencies incorporate climate change impacts into planning and investment decisions. 10.The state will continue its rigorous climate change research program focused on understanding the impacts of climate change and how best to prepare and adapt to such impacts. This Executive Order is not intended to create, and does not, create any rights or benefits, whether substantive or procedural, enforceable at law or in equity, against the State of California, its agencies, departments, entities, officers, employees, or any other person. I FURTHER DIRECT that as soon as hereafter possible, this Order be filed in the Office of the Secretary of State and that widespread publicity and notice be given to this Order. IN WITNESS WHEREOF I have hereunto set my hand and caused the Great Seal of the State of California to be affixed this 29th day of April 2015. _____ EDMUND G. BROWN JR. Governor of California</p>	Comment noted.
16274.12	<p>The well documented and serious deficiency in the SANDAG RTP-SCS may inform what we need to see addressed by SCAG's plan. To that end we refer you to: https://oag.ca.gov/news/press-releases/attorney-general-kamala-d-harris-filed-motion-intervene-lawsuit-seeking http://www.climateplan.org/wp-content/uploads/2011/05/CA_AG_comments-to-SANDAG.pdf</p>	Comment noted. SCAG has been monitoring the litigation related to the challenge of SANDAG's 2011 RTP/SCS and related PEIR since its inception. SCAG has taken into account the issues raised in the SANDAG litigation in developing the mitigation strategies in the 2016 RTP/SCS and PEIR.
<i>Submitted by</i> Ventura County Air Pollution Control District		Submittal 16257 Related Documents
16257.01	<p>Table 1 FTIP Projects-Ventura County: The following Projects appear to be TCMs but are not on the Transportation Conformity Analysis Table 81 Ventura County TCMS Subject To Timely Implementation: VEN120403 Sidewalks longer than ¼ mile, VEN141201 Bike lanes longer than 1 mile, VEN140804 Sidewalks longer than ¼ mile, VEN140805 Bike lane 1 mile long, VEN130401 Bike lanes longer than 1 mile, VEN93017 Regional Rideshare Projects should be considered TCMs, VEN131001 Purchase more than 5 CNG Buses,</p>	Comment noted. Project-specific responses are as follows: VEN120403 is not a committed TCM because no right-of-way or construction fund programmed in the first two years of the 2015 FTIP; VEN141201 is not a committed TCM because no right-of-way or construction fund programmed in the first two years of the 2015 FTIP; VEN140804 is included in the Table 81 (page 77); VEN140805 is not a committed TCM because no right-of-way or construction fund programmed in the first two years of the 2015 FTIP; VEN130401 is a Class III bike lane project and thus not a committed TCM per Final 2015 FTIP Guidelines; VEN93017 is included in the Table 81 (page 77); and VEN131001 is a bus replacement project and thus not a committed TCM per Final 2015 FTIP Guidelines.

ID	Comment	Response
Submitted by Ventura County Air Pollution Control District		Submittal 16257 Related Documents
16257.02	<p>Summary of Regional Emissions Analysis for SCCAB Table 21: It is important to note that the RTP emission forecasts shown for both ROG and NOx are significantly lower than the motor vehicle emission (MVE) budgets from the February 27, 2008 Air Resources Board Early Progress Plans (EPP) submitted for the Ventura County portion of the South Central Coast Air Basin (SCCAB). The SCCAB EPP MVE budgets for 2009, found adequate by EPA on May 20, 2008, for conformity purposes, were based on the older EMFAC 2007 model and 2008 January SCAG motor vehicle activity. U.S. EPA did not take action on the Ventura County 2007 State Implementation Plan (SIP) because of issues related to Reasonable Further Progress regulations. Thus, MVE budgets for milestone years in the 2007 SIP, could not be used for conformity purposes. The Ventura County Air Pollution Control District (District) is currently updating its Air Quality Management Plan that will include updated MVE budgets to adopt and submit to ARB for transmittal to U.S. EPA as the Ventura County portion of SCCAB SIP. We anticipate a narrower gap between the MVE Budgets and the RTP/SCS emission forecasts once the new MVE budgets are approved or found adequate for conformity purposes.</p>	Comment noted.
16257.04	<p>Transit and mobility in the SCAG Region: Table 4 shows a low percentage of transit trips, however, it is good to know that the bike trips, in terms of percentage of total trips, is the highest in the region. Transit buses with bike racks or bike storage are an important amenity to keep this positive trend in bike use growing in Ventura County. Table 5 shows that the journey to work in Ventura County by carpools, walking, transit buses, and bicycles were a bit better than the other counties, while working at home was above average. The District is committed to increasing or, at the very least, maintaining the use of alternative transportation modes other than solo driving during peak work-commute hours by continuing Rule 211-Transportation Outreach Program and supporting the efforts of the Ventura County Transportation Commission's Rideshare Program.</p>	Comment noted.
16257.05	<p>2012 RTP/SCS Implementation and Developments between 2012-2016: We support the ongoing planning processes and efforts among the transit agencies and other stakeholders to more effectively deliver efficient transit services throughout Ventura County with the goal of increasing transit trips and reducing drive alone trips.</p>	Comment noted.
Submitted by Ventura County Public Works		Submittal 16369 Related Documents Link
16369.01	<p>The intersection improvement project at Pleasant Valley Road and Fifth Street in Table 1 on Page 95 (VEN 130104) has a Total Project Cost (TPC) of \$2.96 million (not \$1.76 million).</p>	<p>Comment noted. The FTIP projects included within the RTP/SCS Project List incorporates the adopted 2015 FTIP and Amendments 1 – 7, and 12. Regarding FTIP ID# VEN130104, the project costs have been updated to \$2.96 million through a subsequent amendment and will be reflected in the 2017 FTIP list of projects.</p>
16369.02	<p>It is our understanding that bicycle lane and pedestrian improvement projects that are not specifically listed in the tables would be grouped in the Call for Projects listings in Table 2 on Page 136 (RTP IDs 101007 and 101008). If this is not true, then the following two (2) CMAQ and locally funded pedestrian/safe-routes-to school improvement projects in Camarillo Heights and El Rio should be added to the appropriate table. i. Camarillo Heights Elementary School Pedestrian Improvements - TPC of \$452,000. ii. Rio Real Elementary School Pedestrian Improvements - TPC of \$365,000.</p>	<p>The referenced call for project listings (RTP IDs 101007 and 101008) in Table 2 on Page 136 of the Project List Appendix are not applicable for the Camarillo Heights Elementary School Pedestrian Improvements or the Rio Real Elementary School Pedestrian Improvements projects as these lump sums are specific to Los Angeles County. However, RTP ID 500703 (Page 320) may be applicable if confirmed by the Ventura County Transportation Commission. Additionally, RTP ID 7120004 would be applicable as it covers the entire SCAG region.</p>

ID	Comment	Response
Submitted by Ventura County Public Works		Submittal 16369 Related Documents Link
16369.03	The following two (2) HSIP and locally funded road/bicycle improvement projects in Casitas Springs should be added to the appropriate table. i. Santa Ana Road Pavement Widening and Bike Lanes (MP 0.05 to MP 1.7) - TPC of \$980,000. ii. Santa Ana Road Pavement Widening and Bike Lanes (MP 3.81 to MP 5.81) - TPC of \$1.3 million.	Comment Noted. Most of the projects featured in the Plan's Project List Appendix were provided by the six County Transportation Commissions (CTCs), in which decisions to add projects must come through the CTCs in this case VCTC. Therefore, we suggest you work with VCTC towards incorporating the projects in a future RTP and/or RTP amendment.
16369.04	The following two (2) unfunded road improvement projects in the Oxnard Plain and Oxnard Beach Areas should be added to the appropriate table. i. Hueneme Road Widening Project - Rice Road to Las Posas Road - TPC of \$22.34 million. ii. Harbor Boulevard Widening Project-Oxnard City Limits to Ventura City Limits - TPC of \$58.7 million.	Comment Noted. Most of the projects featured in the Plan's Project List Appendix were provided by the six County Transportation Commissions (CTCs), in which decisions to add projects must come through the CTCs in this case VCTC. Therefore, we suggest you work with VCTC towards incorporating the projects in a future RTP and/or RTP amendment.
16369.05	The following two (2) projects are listed in two tables in Appendix B (Table I, Page 95; Table 2,Page 319): i. Hueneme Road (VEN 011202 for \$6.953 million ii. Pleasant Valley Road at Fifth Street (RTP ID 5A0709 / VEN 130104) for \$1.76 million.	Comment Noted. Regarding VEN011202 and VEN130104, the reason the projects are listed within both the FTIP and financially constrained RTP portion of the Project List is because it is not fully programmed in the FTIP.
Submitted by Ventura Hillside Conservancy		Submittal 16344 Related Documents Link
16344.01	The 2012 RTP/SCS was 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, 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.	Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.
16344.02	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.	Comment noted. The RTP/SCS describes (in Chapter 5) next steps for further developing a habitat conservation strategy. Included in the steps is the recommendation to provide "incentives for jurisdictions to cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries." The Natural/Farm Lands Appendix further supports wildlife corridors in its recommended policies, with the specific recommendation to "Encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation."

ID	Comment	Response
<i>Submitted by</i> Ventura Hillside Conservancy		Submittal 16344 Related Documents Link
16344.03	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your group is encouraged to participate in the effort.</p>
16344.04	<p>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.</p>	<p>Comment noted. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.</p>
16344.05	<p>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?</p>	<p>Park accessibility is an integral part of sustainable communities as it improves public health, air quality, and quality of life. Providing parks within infill areas has a different set of challenges that varies by jurisdiction. SCAG encourages jurisdictions to look at funding sources, such as the California Department of Housing and Community Development (HCD) Housing-related Parks program, to help build and maintain local parks. The Housing-related Parks program awards money to build and maintain parks based on the number of affordable housing units a jurisdiction has built, which can help increase park accessibility in traditionally underserved areas. SCAG will continue to provide jurisdictions information regarding funding opportunities and encourage jurisdictions to provide parks as part of their long-range plans. The term "Natural Lands" is used intentionally to differentiate between potentially sensitive habitat areas and urban/suburban parks that provide open space and active recreation. Specifically, "Natural Lands" refers to biologically diverse areas and landscapes that may provide ecosystem services, such as grasslands, wetlands, deserts, forests, shrublands, riparian areas, and other types of habitat lands. Natural Lands is not intended to include agricultural croplands, grazing/rangeland, other working lands, or municipal parks serving primarily recreational purposes.</p>

ID	Comment	Response
<i>Submitted by</i> Ventura Hillside Conservancy		Submittal 16344 Related Documents Link
16344.06	<p>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.</p>	<p>Commented noted. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to fully address its purpose. The various data sets each have their own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps have been clarified to properly identify the purpose of the map and the specific data source.</p>
<i>Submitted by</i> Western Riverside Council of Governments		Submittal 16324 Related Documents Link
16324.01	<p>WRCOG has two requests of SCAG pertaining to the Draft 2016 RTP/SCS which are intended to help maximize the impact of the final document and the resources that went into preparing the document. First, WRCOG asks that SCAG compile a distinct listing of all commitments explicitly made of SCAG and/or others in the document that could affect WRCOG and/or our member agencies. Several examples of these occurrences are listed below: (Page 70) The 2012 RTP/SCS discussed strategies to combat gentrification and displacement, a continuing challenge that we discussed in Chapter 3. Jurisdictions in the SCAG region should continue to be sensitive to the possibility of gentrification and work to employ strategies to mitigate its potential negative community impacts. WRCOG asks that commitments such as these be called out in a separate document and that SCAG denote an action plan to fulfill such commitments.</p>	<p>As part of its Environmental Justice Appendix, SCAG has put together an Environmental Justice Toolbox of possible mitigation measures to address potential impacts to Environmental Justice communities. On page 196 of the appendix, there is a list specifically for potential resources and strategies related to gentrification and displacement. Because many of these strategies concern local land use decisions, the toolbox strategies are voluntary but SCAG encourages communities to consider them as part of the local decisionmaking process.</p>
16324.02	<p>(text that follows copied/pasted for clarity) First, WRCOG asks that SCAG compile a distinct listing of all commitments explicitly made of SCAG and/or others in the document that could affect WRCOG and/or our member agencies. Several examples of these occurrences are listed below: (Page 88) To accommodate the growth in walking, biking and other forms of active transportation regionally, the 2016 Active Transportation Plan also considers new strategies and approaches beyond those proposed in 2012. Among them: • Better align active transportation investments with land use and transportation strategies to reduce costs and maximize mobility benefits: • Expand regional understanding of the role that short trips play in achieving RTP/SCS goals and performance objectives and provide a strategic framework to support local planning and project development geared toward serving these trips; and • Expand understanding and consideration of public health in the development of local plans and projects. WRCOG asks that commitments such as these be called out in a separate document and that SCAG denote an action plan to fulfill such commitments.</p>	<p>The Plan Implementation section of the Active Transportation Appendix (Page 69) delineates actions or commitments SCAG will take in collaboration with local, subregional, state and federal partners to help implement the Active Transportation component of the 2016 RTP/SCS. The Appendix also encourages local jurisdictions to incorporate active transportation into new road construction as well as maintenance. However, final implementation decisions are made by the local jurisdictions.</p>

ID	Comment	Response
<i>Submitted by</i> Western Riverside Council of Governments		Submittal 16324 Related Documents Link
16324.03	(text that follows copied/pasted for clarity) First, WRCOG asks that SCAG compile a distinct listing of all commitments explicitly made of SCAG and/or others in the document that could affect WRCOG and/or our member agencies. Several examples of these occurrences are listed below: (Page 111) Consistent with the provisions of Section 15091 of the State CEQA Guidelines and review of county and city general plans and Caltrans designated scenic vistas, aesthetics performance standards-based mitigation measures may include, but are not limited to: • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replacing compromised native vegetation and landscape. WRCOG asks that commitments such as these be called out in a separate document and that SCAG denote an action plan to fulfill such commitments.	Comment noted. The request that SCAG compile a distinct list of all commitments made of SCAG and/or others in the document that could affect WRCOG, such as MM-AES-3(b), in a separate document is fulfilled by the Mitigation Monitoring and Reporting Program (MMRP) in the Final PEIR. The MMRP providing a table that lists each impact, mitigation measure, the implementing agency, and the implementing date. West Riverside Council of Governments and/or its member agencies are identified as “Lead Agency” in the “Implementing Agency” column of the table for project-level mitigation measures, as SCAG has authority only for SCAG’s mitigation measures. For a complete discussion on the performance standards-based mitigation measures, please see Master Response No. 4 of the Responses to Comments in the Final PEIR.
16324.04	Second, in recognition of the extensive research and data collection efforts of SCAG to prepare the document, WRCOG requests that all data be made publicly accessible. Further, WRCOG requests that SCAG widely promote the availability of the data, particularly among jurisdictions within the region, to ensure the information’s use and ongoing benefit to the region.	Comment noted. Data will be made available to local jurisdictions upon request. Data at the smaller geographic levels below the local jurisdiction level is only advisory - the RTP/SCS will be adopted utilizing local jurisdiction level data.
<i>Submitted by</i> XpressWest		Submittal 16320 Related Documents Link
16320.01	Although XpressWest is included as a Strategic Plan project, request adding a discussion of the XpressWest project in the passenger rail section of the RTP since it is a federally licensed interstate passenger railroad that will be interoperable with the California High Speed Rail system and interface with Metrolink at Palmdale.	Comment noted. Strategic Plan projects are discussed in Chapter 9 of the RTP/SCS document. The XpressWest project is also discussed in detail in the Unserved Markets and Strategic Plan sections of the Passenger Rail appendix. The High-Speed Rail sections in the RTP/SCS and Passenger Rail appendix focus on the CA HST Phase One project which is a fiscally constrained project of the 2016 RTP/SCS.

ID	Comment	Response
<i>Submitted by</i> XpressWest		Submittal 16320 Related Documents Link
16320.02	<p>Existing text: In addition to the California High-Speed Train system, our region has other important high-speed rail projects in development. XpressWest is a high-speed rail service that will connect Victorville and Las Vegas along the I-15 corridor and connect via the High Desert Corridor to Palmdale and California High-Speed Train Phase One. It will use “steel wheel on steel rail” technology, with electrical propulsion to speeds of up to 150 miles per hour (mph). That would result in a trip between Victorville and Las Vegas lasting only 80 minutes. XpressWest has secured federal environmental reviews and in September 2015, China Railway International and XpressWest entered into a \$100 million agreement to implement the project. XpressWest continues to seek additional funding and required regulatory approvals. Modify to read: In addition to the California High-Speed Train system, our region has other important high-speed rail projects in development. XpressWest is a high-speed rail service that will connect Victorville and Las Vegas along the I-15 corridor and connect via the High Desert Corridor to Palmdale and California High-Speed Train Phase One. It will use “steel wheel on steel rail” electric multiple unit train technology, at speeds of up to 150 miles per hour (mph). That would result in a trip between Victorville and Las Vegas lasting only 80 minutes. XpressWest has secured federal environmental Records of Decision and authorization to construct and operate. In November 2015, XpressWest was awarded the franchise to construct and operate high speed rail service between Southern California and Las Vegas by the Nevada High Speed Rail Authority.</p>	Comment noted. This comment has been incorporated into the Passenger Rail Appendix.
16320.03	Request adding a discussion of XpressWest in the High Speed Rail section.	Comment noted. The XpressWest project is discussed in detail in the Unserved Markets and Strategic Plan sections of the Passenger Rail appendix. The High-Speed Rail section of the appendix focuses on the CA HST Phase One project which is a financially constrained project of the 2016 RTP/SCS.

ID	Comment	Response
<i>Submitted by</i> XpressWest		Submittal 16320 Related Documents Link
16320.04	<p>Existing text: "Passenger service was last provided between Los Angeles and Las Vegas by Amtrak on its Desert Wind interstate service that ceased operations in 1997. Currently, XpressWest is a high-speed rail service under development connecting Victorville and Las Vegas along the current I-15 corridor. It will use steel wheel on steel rail technology with electrical propulsion operating at speeds of up to 150 mph to make the trip between Victorville and Las Vegas in 80 minutes. The tracks will largely be within I-15's ROW. It will run daily, with peak departures up to every 20 minutes. XpressWest estimates 5 million passengers during its first year of operation with one-way fares of \$50.00 and round-trip fares of \$89.00. XpressWest has been completely permitted since 2011. XpressWest had applied for a \$5.5 billion loan through FRA's Railroad Rehabilitation & Improvement Financing program, however the loan was indefinitely suspended in July 2013 due to the failure of the application to meet the federal "Buy America" policy. It is estimated to cost \$6.9 billion, with \$1.4 billion coming from private investors." Modify to read: "Passenger service was last provided between Los Angeles and Las Vegas by Amtrak on its Desert Wind interstate service that ceased operations in 1997. Currently, XpressWest is a high-speed rail service under development connecting Victorville and Las Vegas along the current I-15 corridor. It will use steel wheel on steel rail electric multiple unit train technology operating at speeds of up to 150 mph to make the trip between Victorville and Las Vegas in 80 minutes. The tracks will largely be within the I-15 ROW. It will run daily, with peak departures up to every 20 minutes. XpressWest has been completely permitted since 2012. XpressWest had applied for a loan through FRA's Railroad Rehabilitation & Improvement Financing program, however the loan was indefinitely suspended in July 2013 due to the failure of the application to meet the federal "Buy America" policy. In November, 2015, XpressWest was awarded the franchise to construct and operate high speed rail service between Southern California and Las Vegas by the Nevada High Speed Rail Authority."</p>	Comment noted. This comment has been incorporated into the Passenger Rail Appendix.
16320.05	Suggest inserting the map from the FRA Southwest Multi-State Planning Study that identifies the Core Express Service corridors.	Comment noted. The Core Express Service corridors in the SCAG region are discussed on p. 20 of the Passenger Rail appendix.

ID	Comment	Response
<i>Submitted by</i> XpressWest		Submittal 16320 Related Documents Link
16320.06	<p>Existing text: "The XpressWest would connect Las Vegas to Victorville using steel wheel on steel rail technology with a top speed of 150 mph. There are no intermediate stops between Victorville and Las Vegas and the running time is estimated to be approximately 80 minutes. The project has completed the environmental process and the FRA issued a record of decision (ROD) on July 8, 2011. XpressWest Enterprises had applied to the FRA's Railroad Rehabilitation Improvement Financing (RRIF) program for a loan to start and complete construction of the project however the loan application was denied in 2013 due to the application not meeting Buy America requirements. In addition to the RRIF loan, private debt and equity are expected be included in the project financing. In September 2015, China Railway International and XpressWest entered in to a \$100 million agreement to begin construction on the project. Phase Two of this project would connect Victorville to Palmdale along the High-Desert Corridor, thereby providing a connection with the CA HSR system and the Metrolink Antelope Valley Line. Phase Two was not included in XpressWest's environmental process, nor was it part of their FRA loan application." Modify to read: "The XpressWest would connect Las Vegas to Victorville using steel wheel on steel rail technology with a top speed of 150 mph. There are no intermediate stops between Victorville and Las Vegas and the running time is estimated to be approximately 80 minutes. The project has completed the environmental process with the Records of Decision from the Federal Railroad Administration, Bureau of Land Management, Federal Highway Administration, and Certificate of Public Convenience and Necessity issued by the Surface Transportation Board. XpressWest had applied to the FRA's Railroad Rehabilitation Improvement Financing (RRIF) program for a loan to start and complete construction of the project however the loan application was suspended in 2013 due to the application not meeting Buy America requirements. Phase Two of this project would connect Victorville to Palmdale along the High-Desert Corridor, thereby providing a connection with the CA HSR system and the Metrolink Antelope Valley Line. Phase Two was not included in XpressWest's environmental process, nor was it part of their FRA loan application. In November, 2015, XpressWest was awarded the franchise to construct and operate high speed rail service between Southern California and Las Vegas by the Nevada High Speed Rail Authority."</p>	Comment noted. This comment has been incorporated into the Passenger Rail Appendix.
<i>Submitted by</i> 5-Cities Alliance		Submittal 16339 Related Documents Link
16339.01	<p>Because the SR-710 North Project is flawed and unnecessary and because the RTP/SCS PEIR fails to adequately disclose or mitigate the environmental impacts from this Project, the 5-Cities Alliance respectfully requests that SCAG eliminate the Project from the 2016 RTP/SCS (including the transportation model and project list).</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>

ID	Comment	Response
<i>Submitted by</i> 5-Cities Alliance		Submittal 16339 Related Documents Link
16339.02	In any event, SCAG should eliminate the SR-710 North Project from the RTP/SCS.	Comment noted. The 710 project is included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan, as well as in previous SCAG RTPs. SCAG understands that a project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.
16339.03	The Freeway Tunnel Alternative would further impede the RTP/SCS's goals for sustainability because it would increase highway capacity, vehicle miles traveled ("VMT") and induce travel. According to Nelson Nygaard, the reduction of VMT per capita is the most important metric for sustainability because it identifies a shift from dependence on personal vehicles and a reduction of stress on the region's congested arterial and highway networks. See Nelson Nygaard Report at 2. Conversely, any increase in highway capacity, such as that which would occur with the Freeway Tunnel Alternative, will increase VMT because it would induce travel.	Comment noted.
16339.04	In the event that SCAG does not eliminate the SR-710 North Project from the RTP/SCS altogether, as the 5-Cities Alliance recommends, it must revise the RTP/SCS (and the PEIR's Project Description) to give equal weight to each SR-710 North Project alternative.	Comment noted. The 710 project is included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan, as well as in previous SCAG RTPs. SCAG understands that a project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.
16339.05	In summary, the 5-Cities Alliance respectfully requests that SCAG eliminate the SR-710 North Project from the 2016 RTP/SCS. First, the Freeway Tunnel Alternative is flawed and unnecessary, failing to provide a real solution to the region's transportation needs. Second, the Freeway Tunnel would be inconsistent with the RTP/SCS's goal that transportation projects be sustainable and environmentally protective. Third, there are viable alternatives to the Freeway Tunnel that improve mobility and expand transportation options while limiting dependence on personal vehicles.	Comment noted. The 710 project is included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan, as well as in previous SCAG RTPs. SCAG understands that a project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.

ID	Comment	Response
<i>Submitted by</i> Assael, Margarita		Submittal 16056 Related Documents
16056.01	Why are you so excited to change this country to a COMMUNIST country????? I am an AMERICAN and no one is going to get me out of MY CAR!!!!!!!!!!!!!! I live in a FREE country and I cannot believe that this is your agenda: To push us into COMMUNES; make me give up my car; track where and how much I drive. I am NOT going to RIDE a BIKE or take the BUS!!!! Leave us alone!!!!!!!!!!!!!! You are not in CHARGE of us!!!!!!!!!!!!!!!!!!!!!!	Comment noted. The 2016 RTP/SCS will not change how everyone chooses to get around the region, but the Plan is designed to offer residents more choices so that we can experience regionwide benefits, such as improved air quality. The Plan will provide people with more options for transportation and mobility, offering numerous alternatives to driving alone. This will be accomplished by enhancing public transit capacity and increasing its viability by making it more accessible; completing critical road connections; providing greater opportunities for biking and walking, particularly for short trips; exploring how people might use alternative fuel vehicles within their neighborhoods and beyond; incentivizing telecommuting and flexible work schedules; encouraging new mobility innovations; and improving safety. In addition, Transportation Demand Management (TDM) strategies will help us better manage the demand we place on the roadway network by reducing the number of people who drive alone and encouraging them to use alternative modes of travel. At the same time there is nothing in the plan that will take away anyone's right to drive their private vehicles.
<i>Submitted by</i> Ayala, Enrique		Submittal 16050 Related Documents
16050.01	Metrolink is a better service than Amtrak cause Amtrak is way to expensive	Comment noted. Metrolink operates commuter rail service involving relatively shorter trip distances than Amtrak and more frequent riders. Amtrak operates interstate and interregional services involving longer trip distances than commuter rail, thus having higher operating costs and higher fares to cover those costs. Therefore, when both Amtrak and Metrolink operate between the same stations, Amtrak's fare is required to be higher than Metrolink.
<i>Submitted by</i> Bautista, Fabricio		Submittal 16209 Related Documents
16209.01	I wonder What is the possibility of a creating of an on/off ramp on the I-10, between Sierra Avenue and Alder Ave. There is a 2 mile gap in between both exits and the traffic on both is heavy at peak times. Specially on Alder Avenue, since the bridge has not been reconditioned.	Comment noted. A proposed interchange on I-10 at Alder Avenue is included within the Project List appendix please refer to RTP ID# 4120200.

ID	Comment	Response
<i>Submitted by</i> Boddula, Keshav		Submittal 16141 Related Documents Link
16141.01	<p>There are different tendencies, or natures, of people including tendencies to control Nature more. This nature seems to have lead to mechanistic processes toward the best, quality products, which is then reproduced and made efficient; then strategically scaled and streamlined in an economic growth sense. This dominant activity has then been implicitly understood as akin to the following for various people (for examples): value (businessmen), “success” or how to improve our G.D.P./“Economy” (politicians), desirable activity or goals (the majority of the population who unsalmonly take the path of least resistance to make a living and survive). Perhaps in a similar way to SCAGs' acknowledgment that “compact communities are not for everyone”, also it may be balancingly helpful to consider the following unconventional2 hypothesis: natural flows of our environment's “basic” elements (earth, water, fire, air) more undesirably flow (i.e. the phenomena of “climate change”) in accord with the amount of “impact” of human-produced machines/computers have in that environment. Generally, I see this greater impact machines/computers have on humans and our thinking about our environment and our relationship to it in a longer context of History/Time, and thus more as an ephemeral fad that will wean in the generally near future from the currently greater emphasis on static, human/machine-controlled processes of life, to more dynamic, natural flows of life. This insight may be helpful in considering “a growing population with shifting priorities and desires”. Rather than being “prepared to confront and cope with the inevitable consequences of climate change (more downstream)”, let's shift more upstream by recognizing symptoms and causes of our degraded environment to then prevent the imbalanced impacts of unnatural, machine-like processes to begin with (similar to that traditional, more downstream “biomedical” approach vs. a smarter, more upstream “human systems” approach to health and wellness.) After a “deeper understanding of all contextual elements beginning with watershed and ending with architectural detail,” developmend with Nature/ecologically.</p>	<p>Comment noted. The SCAG 2016 RTP/SCS supports a balance between "upstream" and "downstream" strategies as you have referred to them. Upstream strategies include policies such as encouraging sustainable land use patterns that reduce resource consumption, and integrating transportation, energy, and water infrastructure. Downstream strategies include facilitating climate adaptation studies, and efforts to incentivize short to mid-term locational and transportation behavior choices. As noted it is important to remember that SCAG values local control and works with all of its member jurisdictions as well as public and private partners to achieve a long term vision of a sustainable region.</p>
<i>Submitted by</i> Butler, Lana		Submittal 16125 Related Documents
16125.01	<p>You are aN UNELECTED, hughly funded organiization trying to mandate us out of our cars. I oppose your views and all your tactics to do this.</p>	<p>Comment noted. SCAG’s is governed by an 86-member Regional Council, which is comprised of duly elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. These elected officials meet monthly as members of SCAG’s Regional Council and Policy Committees, and they have discussed the proposed Draft 2016 RTP/SCS at regular and special meetings and will consider the Final Plan for adoption at their April 7, 2016 meeting. The roster of Regional Council members can be found on SCAG's website at http://scag.ca.gov. The 2016 RTP/SCS will not change how everyone chooses to get around the region, but the Plan is designed to offer residents more choices so that we can experience regionwide benefits, such as improved air quality. The Plan will provide people with more options for transportation and mobility, such as transit, walking, and bicycling.</p>

ID	Comment	Response
<i>Submitted by</i> Cahn, Michael		Submittal 16021 Related Documents Link
16021.01	<p>on table 12 d2016RTPSCS_ActiveTransportation.pdf some additions and % look a bit odd: Education and Encouragement Strategy \$1.1 Billion 2% I think the total would be more like 8 % and also, the 8 million for education campaigns looks oddly low on page 50 under LA County #5 talk is about "Extend the pedestrian/bicycle path from Washington Street to the north jetty of Marina Del Rey and support the seasonal ferry service for pedestrians and cyclists across the channel to Playa del Rey." apart from a little lack of logic of del / Del capitalization, I think the road is properly called Washington Blvd, not Street BTW the same error occurs in http://www.wearemdr.com/bm~doc/marina-del-rey_major-lip-amendment.pdf under # 22.46.1050, but it has been corrected on page 25 of that document. Anyhow, where is all these billions coming from? and how does it compare with money for motor infrastructure?</p>	<p>The referenced Table 12 has been corrected. \$8 million is for education campaigns as explained in the text. Safe Routes to School which includes both education and engineering totals \$280 million. Combined, the Education and Encouragement Strategy totals \$288 million. On Page 50, Washington Street has been changed to Washington Blvd. The county transportation commissions in the SCAG region submitted approximately \$1.7 billion worth of capital costs for active transportation investments (exclusively—not accounting for portions of larger multi-modal projects that include active transportation elements). The Plan includes approximately \$6.4 billion in capital costs, which includes the State Active Transportation Program which funds Safe Routes to School and capital active transportation projects. In addition, the Plan notes that \$4.8 billion in Regionally Significant Local Streets and Roads Operations and Maintenance is associated with active transportation expenditures, such as sidewalk repair. These expenditures are funded in the plan through short-term gas tax increase and long-term transition to mileage-based user fees. Combined, these expenditures total \$12.9 billion for active transportation investments. This represents 2.3% of the plan.</p>
<i>Submitted by</i> Capps, Tressy		Submittal 16303 Related Documents Link
16303.01	<p>As a member of TOLL Free IE in San Bernardino County I can tell you that the public outreach for the TOLL lane project is just as bogus as SCAG's public outreach for this plan. The public is clueless and that is by design. The way SANBAG votes on the project without each member city getting input from the other council members or the community is fraudulent and criminal in nature. The way SCAG has conducted the public outreach on the plan is scandalous and demands an investigation. I attended all 4 public hearings and there was no real engagement. At one of the public hearings, the Riverside office did not even attend. What happened there and how do you plan on correcting that situation?</p>	<p>Comment noted. SCAG has provided significant opportunities for input to the Draft 2016 RTP/SCS. This included, but was not limited to, the SCAG RTP/SCS website, policy committee meetings, a series of twenty-three open houses held during Summer 2015, and nineteen additional workshops and public hearings held following the release of the Draft 2016 RTP/SCS. As required by law, SCAG provided advance notice of public hearings on the Draft 2016 RTP/SCS, including publication in newspapers throughout the region, to give as many interested parties as possible the opportunity to attend and provide input. These hearings and workshops were held in every county in the region to solicit input from various interests such as residents, elected officials, representatives of public agencies, community organizations, and environmental, housing and business stakeholders. To provide greater time accommodations, SCAG held public hearings in the evenings, weekend, as well as weekdays. In reference to the public hearing at the Riverside office on Tuesday, Jan. 12, SCAG is required to hold three (3) public hearings on the Draft 2016 RTP/SCS. In order to ensure many additional opportunities to participate, SCAG hosted four (4) public hearings, three (3) of which were video-conferenced to satellite locations. In total, this strategy provided 17 opportunities for the public to participate at the Public Hearings, significantly exceeding our statutory requirements. At the January 12, 2016 Public Hearing, the Riverside County office hosting the video-conference opened 30 minutes after the scheduled start time. It was confirmed that one person attempted to participate during this time frame. This person participated at the subsequent January 13, 2016 Elected Officials' Briefing and provided testimony.</p>
16303.02	<p>Shame on all for you for the way you are top down conducting this process all the while engaging in your bogus outreach that only the stakeholders participate in.</p>	<p>Comment noted. SCAG will consider this comment in assessing its outreach activities.</p>

ID	Comment	Response
<i>Submitted by</i> Capps, Tressy		Submittal 16303 Related Documents Link
16303.03	Regional government is unconstitutional and SCAG needs to be abolished. 50 years and the public is weary of these schemes that serve only to line the pockets of your stakeholders and does very little to actually facilitate traffic movement. Hasan Ikhtrata may have been a planner in the Soviet Union but his methods are not welcome here in the United States. Americans do not need to be coordinated. Hasan needs to stop running around Southern California using false statistics and population data in an effort to deceive the public and swindle taxpayers.	Comment noted.
16303.04	I testified regarding the plan at 3 of the 4 public hearings and want a transcript of my statements to ensure they are part of the report.	Comment noted. Any verbal comments made at public hearings were recorded by a court reporter and submitted as formal comments. Your comments have been reflected in the final summary of comments.
<i>Submitted by</i> Capps, Tressy		Submittal 16350 Related Documents
16350.01	I think that plan -- I don't like the plan. I think what you are attempting to do is to transform the West Coast into the East Coast and, I think, it would be a lot easier if people want to live like that back and pack and bikes and buses, if people want to live like that they could just move to the East Coast or they can move to Europe. But to try to transform the West Coast and to try to get people out of their cars is an exercise in futility and you're wasting a half a trillion tax dollars doing things that people don't want. And I have an article right here from the Wall Street Journal, "Car sales still have room to grow" this is the January 4th, "Cars are selling like crazy." The West Coast people love their cars. But you've done this whole plan and it is based on a fantasy that people will somehow leave their cars and share bikes and take a train. And a good example of the whole train concept not working is ARTIC in Anaheim that place is deserted and, now, Anaheim the City of Anaheim is going to be left holding the bag on that. So, you know, I realize you guys have these ideas, but they are concepts that aren't based on reality.	Comment noted.
16350.02	And so, instead of for tax payers because as you can see from this meeting there is nobody from the public here it's just SCAG's staff and stakeholders and myself and there is a few people who have figured out what is going on with the vehicle mileage tax and toll lanes. What you are going to do is you're trying to price people out of their cars so the only choice they have is to use public transit because they are not going to be able to afford driving their cars which is what they like to do now.	Comment noted. All formal comments received have been responded to and will be presented to SCAG policymakers to be considered as part of the final RTP/SCS. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes are equivalent to the what existing state and federal excise taxes would generate had they been indexed for inflation when last adjusted more than two decades ago. An analysis of the economic impacts of the Plan is provided in Chapter 7 and the Economic and Job Creation Analysis Appendix. Additionally, a comprehensive analysis of the California Road Charge Pilot Program will be available no later than June 30, 2018 in accordance with SB 1077. The 2016 RTP/SCS does not assume revenue from a mileage-based user fee prior to 2025. Regarding the mileage-based user fee, we agree that additional work is needed including but not limited to potential phasing, governance, accountability and approaches for protecting privacy as well as addressing income and geographic (e.g., urban vs. rural) equity impacts before the mileage-based user fee (or road charge) would become effective—which why the Plan does not assume revenues from this source before 2025. SCAG, in collaboration with local, regional, state and federal stakeholders, will continue to actively participate in efforts to make transportation funding more sustainable in the long run.

ID	Comment	Response
<i>Submitted by</i> Capps, Tressy		Submittal 16350 Related Documents
16350.03	And you have Hasan Ikhata running around saying that millennials do not want to drive cars that they do not want to get their driver's licenses and that is just a flat out lie.	Comment noted.
16350.04	Now, this thing the Constitution of The United States, perhaps, you guys should brush up on it because what SCAG is is regional government, it's shadow government and this is not -- when the Founding Fathers established our Nation Regional Government is not what they had in mind. And this is how you people -- you should all be ashamed of yourself what you're participating in. You are all a bunch of traitors and I can't even understand why this is allowed to go on.	Comment noted. SCAG's is governed by an 86-member Regional Council, which is comprised of duly elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. These elected officials meet monthly as members of SCAG's Regional Council and Policy Committees, and they have discussed the proposed Draft 2016 RTP/SCS at regular and special meetings and will consider the Final Plan for adoption at their April 7, 2016 meeting. The roster of Regional Council members can be found on SCAG's website at http://scag.ca.gov .
16350.05	And as far as the review period for this plan that is so big to have it be two months of time, you did it in December and January so right in the holidays. There is no way that the public can -- even knows about this plan much less can review all of those pages. I doubt any of you have even read that whole thing so to -- minimally, you need to give -- you need to do real outreach.	Comment noted. SCAG has provided significant opportunities for input to the Draft 2016 RTP/SCS. This included, but was not limited to, the SCAG RTP/SCS website, policy committee meetings, a series of twenty-three open houses held during Summer 2015, and nineteen additional workshops and public hearings held following the release of the Draft 2016 RTP/SCS. Details on the outreach performed, including presentations at organizational meetings, email campaigns, community events and flyer distributions and media outreach, are highlighted in the Public Participation and Consultation Appendix.
16350.06	You know, if people really knew what you were planning with vehicle mileage tax and toll lanes they'd be protesting in the streets. But they don't have a clue because this outreach that you are doing is completely bogus and, again, you should all be completely ashamed of yourself.	Comment noted. All formal comments received have been responded to and will be presented to SCAG policymakers to be considered as part of the final RTP/SCS. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes are equivalent to the what existing state and federal excise taxes would generate had they been indexed for inflation when last adjusted more than two decades ago. An analysis of the economic impacts of the Plan is provided in Chapter 7 and the Economic and Job Creation Analysis Appendix. Additionally, a comprehensive analysis of the California Road Charge Pilot Program will be available no later than June 30, 2018 in accordance with SB 1077. The 2016 RTP/SCS does not assume revenue from a mileage-based user fee prior to 2025. Regarding the mileage-based user fee, we agree that additional work is needed including but not limited to potential phasing, governance, accountability and approaches for protecting privacy as well as addressing income and geographic (e.g., urban vs. rural) equity impacts before the mileage-based user fee (or road charge) would become effective—which why the Plan does not assume revenues from this source before 2025. SCAG, in collaboration with local, regional, state and federal stakeholders, will continue to actively participate in efforts to make transportation funding more sustainable in the long run.

ID	Comment	Response
<i>Submitted by</i> Capps, Tressy		Submittal 16353 Related Documents
16353.01	<p>I do agree with things that were said today about natural gas. I, actually, drive a natural gas vehicle and I've been. So, I know that here at SANBAG we're developing this Redlands Rail and I don't think those are natural gas. I don't think that train is going to be natural gas. Anyways, I think that natural gas is a good technology and it is clean so I would fully support anything like that that would actually be a solution versus some of the things that are in this plan that are somewhat ridiculous and so I'll go through some my thoughts about that.</p>	<p>Comment noted. Locomotive propulsion systems decisions are the responsibility of Amtrak, Metrolink and the freight railroads in our region. Notably, Metrolink is moving to an all Tier 4 locomotive fleet in the next few years. These locomotives are over 85% cleaner than Metrolink's oldest locomotives that are still in operation. SCAG is cognizant of the need to incorporate evolving technologies with plans for new infrastructure. These include technologies to fuel vehicles, as well as to charge batteries and provide power. Chapter 5 of the RTP/SCS discusses a regional strategy for deployment of commercially available low-emission locomotives while advancing technologies toward phased implementation of zero- and near-zero emission systems.</p>
16353.03	<p>I have an article here that just was in the paper yesterday. It was written by Thomas Elias and it's entitled -- the Commentary it's entitled Worst Bottleneck Stalled Traffic In Spite of Nearby Transit Lines. And it's a very well written commentary and it makes the point that "One lesson here, then, is that mass transit doesn't solve all congestion." Just look at the 10 between Downtown Los Angeles and the City of West Side where commuters sit and wait while trains dis-unmolested [sic] along the almost parallel mostly completed Metro Express Line. So, I think, the problem I have with this plan is that it is an exercise in a fantasy. SCAG is assuming, assuming, that people are going to abandon their cars and they're going to take public transit, and it's just not going to happen, like I spoke about before.</p>	<p>Public transportation is an important part of a suite of mobility solutions. It provides an important alternative to driving, and is a necessary lifeline for those who cannot provide their own mobility. The 2016 RTP/SCS contains a wide variety of strategies, tailored to meet the needs of a variety of communities, jurisdictions, subregions, and the region as a whole. Public transportation is one of those solutions.</p>
16353.04	<p>And so, now, I've got -- I've been examining the plan, I have some specific comments about that. First of all, you start out the plan with this picture here, as you can see there is no cars. So, clearly, the gist of this plan is to get people out of their cars for their health or, however, you want to justify it. The next big picture that I wanted to show is this picture of this bus tying up traffic in Los Angeles and I've, actually, videotaped down by the SCAG office this exact same area. So, what is going on is a bunch of empty buses are running around Downtown L.A. an they're actually I don't think those buses are solving much of anything other than creating traffic. Some buses are necessary but a lot of the lines are empty and we've documented that on videotape. Okay, my next comment is about trains. So, here you've got the train and all these happy people, that's nice that works in some places the East Coast, perhaps. It is not going to work here on the West Coast and my example for that is ARTIC and that was a SCAG boom-dawdle that cost a bunch of money and Anaheim will be paying for that for a very long time. And if anyone wants to go check that out that big snow globe on the side of the 57 Freeway, no one is using and it is a complete failure and that was SCAG's bright idea. Good job at bombing.</p>	<p>Public transportation is an important part of a suite of mobility solutions. It provides an important alternative to driving, and is a necessary lifeline for those who cannot provide their own mobility. The 2016 RTP/SCS contains a wide variety of strategies, tailored to meet the needs of a variety of communities, jurisdictions, subregions, and the region as a whole. Public transportation is one of those solutions. Transit vehicles operate at a variety of passenger loads throughout the region, and throughout the day. In FY2011-12, residents of the region took 710 million transit trips, during 19 million hours of transit service. The project sponsor and implementing agency for the Anaheim Regional Transportation Intermodal Center was the City of Anaheim. SCAG does not engage in capital construction. And, while ARTIC may not be operating at capacity today, it was built partly to accommodate the future, which includes full operation of the California High Speed Train by 2029.</p>
16353.05	<p>So SCAG imagines that everybody is going to get on a bike and Hasan claims that millennials, I brought my little Minion here millennials, that they like to travel in packs on bikes to the movies. Now, I have never witnessed this phenomena anywhere so, maybe, if I saw a video of it, you know, I mean here in the Inland Empire my niece goes to Etiwanda High School and I see all the young kids driving their cars to school or their parents are driving them to school or they come on the bus. But I do not see a lot of people on bikes, there is a lot of traffic, it would be very dangerous and they'd probably end up at Stanley if they were to take a bike so.</p>	<p>Comment Noted. Active transportation is part of a multi-modal transportation plan</p>

ID	Comment	Response
<i>Submitted by</i> Capps, Tressy		Submittal 16353 Related Documents
16353.06	So, anyways, so again natural gas sounds like a good solution, I don't know if that is somewhere here in the plan, but the parts of the plan that I have seen involve, like I said, pricing people out of their cars and so they plan on using -- doing that through a series of things. Toll lanes is one of the ways that SCAG wants to price people out of their cars. Another way that SCAG plans to do that is vehicle mileage tax and that is just going to be tea bagging the people in California. I'm not sure if you guys have noticed but in other states gas is like 80 cents a gallon but here in California we're still paying 2-something a gallon, I don't know because I drive a natural gas car, but I know it's not anywhere close to 80 cents a gallon. So, here you just want to tax, tax, tax us so -- or SCAG does, so that we have -- Hasan will tell you it's so we have choices. But I will tell you, my opinion, it is to make sure that people are priced out of their cars and forced to these choices and, I think, that that is wrong. So, let see what else.	Gas tax revenues, in real terms, are actually in decline as tax rates (both state and federal) have not been adjusted in more than two decades while the number of more fuel efficient and alternative powered vehicles continue to grow. The Plan identifies several new funding sources that are reasonably expected to be available and are included in the financially constrained plan. These sources include adjustments to existing state and federal gas tax rates and a long-term replacement of state and federal gas taxes with a mileage-based user fee to maintain the historical purchasing power of the gas tax.
16353.07	So, again, it is a fantasy to envision that people are going to be biking around. It sounds like a third world country not anywhere I want to live and so, I think, this plan is awful, I think the outreach is completely bogus and fake.	Comment noted.
16353.08	At the last public hearing Riverside didn't even show up so I don't know how you are going to address that, but I would say that that last public hearing you had is invalidated [sic] because the Riverside County Office wasn't even participating so you better do that public hearing over again is my suggestion.	SCAG is required to hold three (3) public hearings on the Draft 2016 RTP/SCS. In order to ensure many additional opportunities to participate, SCAG hosted four (4) public hearings, three (3) of which were video-conferenced to satellite locations. In total, this strategy provided 17 opportunities for the public to participate at the Public Hearings, significantly exceeding our statutory requirements. At the January 12, 2016 Public Hearing, the Riverside County office hosting the video-conference opened 30 minutes after the scheduled start time. It was confirmed that one person attempted to participate during this time frame. This person participated at the subsequent January 13, 2016 Elected Officials' Briefing and provided testimony.
<i>Submitted by</i> Capps, Tressy		Submittal 16361 Related Documents
16361.01	This entire plan is based on climate change which is, in fact, a false religion and so the whole plan is based on something that is not even real. So, of course, I don't agree with the plan.	Comment noted.
16361.02	And I'll give you an example with our Toll lanes flight why this regional thing is such a bad setup for We the People. So in San Bernardino County the Toll lane process has been going on since December of 2013, the public is largely clueless and that's by design.	Comment noted. San Bernardino Associated Governments (SANBAG) initiated study of potential Interstate 10 improvements in 2007. In 2011, SANBAG started a study of express lanes. In 2012, SANBAG began final technical studies and extensive public outreach, including public scoping meetings, for the I-10 Project and began preliminary technical studies and public outreach for the I-15 Project. In 2014, the SANBAG Board selected express lanes as the locally preferred alternative for the I-10 Project and SANBAG started final technical studies for the I-15 Project. Final environmental approval for the I-10 Project is anticipated for late 2017 and early 2018 for the I-15 Project. A regional network of express lanes was included in the adopted 2012 RTP/SCS. The network was refined over the last four years through various efforts, including the I-10 and I-15 Projects described above. The segments of the regional express lane network in San Bernardino County included in the 2016 RTP/SCS are consistent with those in being considered by SANBAG.

ID	Comment	Response
<i>Submitted by</i> Culp, Bruce		Submittal 16252 Related Documents
16252.01	<p>i believe as you look into the future on how citizens are going to move around, there should be thought on how to assist autonomous vehicles. There will be a revolution in vehicles. Today's kids are now used to Uber and being driven around. those companies will partner (they already have) with auto manufacturers to create fleets of autonomous vehicles that people will pay a monthly subscription to be driven everywhere. Insurance companies will make it cost prohibitive to own a vehicle, since human driven vehicles will be the most dangerous form of transportation. With that in mind, future infrastructure should revolve around centrally located "hubs" for these vehicles to park and recharge themselves. Overall, there will be less vehicles on the road, however, there will need to be locations where these vehicles can centrally locate in order to maximize their efficiency in picking up and dropping off people and then re-charge.</p>	<p>Comment noted. SCAG is aware that automated and connected vehicles will be available within the timeframe of this RTP/SCS. However there is still significant uncertainty regarding the timeframe for deployment, and the ownership model for these vehicles. Automakers plan their vehicles years ahead of deployment, and existing vehicles will remain in operation for decades. Therefore the challenge facing SCAG and other MPOs will be to forecast a mixed vehicle fleet for the next plan and into the future. The RTP/SCS section on mobility innovations does not endorse any single technology, or business model, however the plan recommends that regional leaders advocate for policies to encourage that future automated vehicles rely on zero or near zero emissions drivetrains.</p>
<i>Submitted by</i> Culp, Bruce		Submittal 16260 Related Documents
16260.01	<p>the Montclair transit center is one of only a few unique transit centers that services several types of transit options (i.e., bus, rail, class 1 bike path and soon, light rail (gold line)). In addition, it is located near both the higher populated southwest corner of San Bernardino county and Los Angeles county. It also serves bus lines from 3 different counties. There are also two major freeways within a mile of the transit center. The pacific electric trail also connects to the north end of the transit center. Lastly, Montclair plaza is located within walking distance. With all of these features, the Montclair Transit Center, in my opinion, is one of the most valuable transit centers in the entire region. Serving 3 counties, with multiple transit options, located to major freeways, and next to major colleges and shopping, i believe that this transit center deserves top priority funding for any transit related projects. the city of Montclair itself is investing in TOD. Please consider priority funding for this important transit center when looking at future plans and funding.</p>	<p>Comment Noted. The 2016-2040 RTP/SCS includes rail and bus service improvements to and from Montclair Transit Center, including the Foothill Gold Line light rail transit extension to Montclair (RTP ID 4120222).</p>
<i>Submitted by</i> Dhahbi, Sally		Submittal 16062 Related Documents
16062.01	<p>Please, give us groceries stores and building supplies stores close to wood road and jahalco r9oad. we are far from perris and riverside and population has been increasing since 1999 and no commercial buildings close to home.</p>	<p>Comment noted. The actions and strategies contained in Chapter 5 of the 2016 RTP/SCS do encourage various components of "livable streets" (Livable Corridors and Neighborhood Mobility Areas). Working with local jurisdictions, SCAG's land use and transportation strategies support expanding choices including better bicycling and pedestrian infrastructure, compact neighborhoods, and transit access. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, local jurisdictions maintain local land use authority.</p>

ID	Comment	Response
<i>Submitted by</i> Dillard, Joyce		Submittal 16312 Related Documents Link
16312.01	The DRAFT POLICY GROWTH FORECAST does not match amongst the POPULATION, HOUSEHOLDS and EMPLOYMENT. LOS ANGELES COUNTY has a POPULATION growth for cities/unincorporated of 10% and more at 1,226,100 or 10.65% of the total. That is 77.01% growth in 10 cities. Cities/unincorporated with the largest expected growth comprise of 12.10% of the total with a population increase of 1,393,000. LOS ANGELES COUNTY HOUSEHOLD increase is at 17.46%. LOS ANGELES COUNTY EMPLOYMENT is at 18.73%. As with the other counties, we see no consistency in the model used, and therefore, no reality of real growth.	Comment noted. SCAG staff is unable to confirm accuracy of cited growth figures for the Los Angeles County. According to SCAG data, Los Angeles County growth forecasts of population, household and employment between 2012 and 2040 are as follows: Population: 1,591,000, or 16% Household: 689,000, or 21% Employment: 980,000, or 23%
16312.02	You have no substantiation for the following statements: Like the 2012 RTP/SCS, the proposed land use strategies included in the 2016 RTP/SCS continue to focus new growth in HQTAs, existing suburban town centers, and more walkable, mixed-use communities: • Identify regional strategic areas for infill and investment; • Structure the plan on a three-tiered system of centers development;11 • Develop “Complete Communities”; • Develop nodes on a corridor; • Plan for additional housing and jobs near transit; • Plan for changing demand in types of housing; • Continue to protect stable, existing single-family areas; • Ensure adequate access to open space and preservation of habitat; and • Incorporate local input and feedback on future growth.	Comment noted. SCAG staff utilized these established land use policies in developing the 2016 RTP/SCS. With SB 375, SCAG is tasked with integrating land use and transportation. The SCS and SB 375 do not require a jurisdiction’s land use policies and regulations be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority.
16312.03	You have no substantiation for the following statements: In support of the foundation policies and guiding principles, the RTP/SCS includes six proposed land use strategies: • High Quality Transit Areas (HQTAs) • Livable Corridors • Neighborhood Mobility Area • Zero-Emission Vehicles and Electric Vehicle Charging Stations • Natural Lands Preservation • Balancing Growth Distribution between 500 Feet of Freeways and HQTAs	Comment noted. SCAG's Regional Council approved utilizing these land use strategies in developing the 2016 RTP/SCS. With SB 375, SCAG is tasked with integrating land use and transportation. The SCS and SB 375 do not require a jurisdiction’s land use policies and regulations be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority.
16312.04	Infrastructure needs to be analyzed. All Elements of all Cities/Unincorporated should be analyzed for General Plan consistency.	Comment noted. With SB 375, SCAG is tasked with integrating land use and transportation. SCAG’s SCS is based on general plans from local jurisdictions, and other local input from communities, cities and other local jurisdictions across the SCAG region. The SCS and SB 375 does not require a jurisdiction’s land use policies and regulations be consistent with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, it is clear that local jurisdictions maintain local land use authority. Regarding transportation infrastructure, the County Transportation Commission (CTCs) provided input regarding the list of projects to be included as part of the RTP/SCS. Through a bottom-up approach, the CTCs solicited input from their respective sub regions regarding local transportation priorities. Such priorities are in turn reflected within Project List appendix. Therefore, infrastructure improvements within the RTP/SCC should be consistent with local General Plans.
16312.05	Material presented at the Southern California Economic Summit are not consistent with the DRAFT POLICY GROWTH FORECAST.	Comment noted. Recent figures indicate the region and its counties have regained all the lost jobs during the Great Recession by December 2015, which are consistent with the assumptions and trends under the 2016-2040 RTP/SCS policy growth forecast.

ID	Comment	Response
<i>Submitted by</i> Fung, Hank		Submittal 16020 Related Documents
16020.01	Remove SR-241 extension from Cow Camp Road to I-5 from the RTP baseline and remove SR-241 Tesoro extension as a Transportation Control Measure for 2021 conformity. This project is extremely controversial and the Regional Water Quality Control Board rejected providing permits for the Tesoro extension. While it may be reasonable to overcome this objection for the Tesoro extension prior to the 2040 baseline year, I do not believe the project sponsor, Foothill/Eastern Transportation Corridor Agency, can overcome objections to completion by 2040, given that the United States Marine Corps and California State Parks oppose the project, and the project was not approved by either the California Coastal Commission or National Oceanic and Atmospheric Administration. F/ETCA should comply with the NOAA ruling and implement one of the other alternatives in the EIR, with proper mitigation to the residents affected by the project, rather than spoiling one of the last remaining sections of wilderness in Southern California.	Comment noted. SCAG recognizes that SR-241 Extension no longer meets the timely implementation requirements of a Transportation Control Measure (TCM) under the Conformity rules pursuant to the Clean Air Act. As a result, TCM substitution has been initiated to rescind the committed TCM designation of the SR-241 project. However, removal of the TCM designation does not automatically result in the deletion of the project from the RTP/SCS. The decision to change, replace or remove a project submitted to SCAG by the implementing agency (TCA) via a county transportation commission (OCTA) lies with the submitting agencies.
<i>Submitted by</i> Fung, Hank		Submittal 16238 Related Documents
16238.01.1	FTIP project list, ORA052: The TCA has had the project disallowed by the State Coastal Commission and the Federal NOAA between Cow Camp Road and I-5. Is it realistic that this project would be delivered by 2021, and that the section from Oso Parkway to Cow Camp Road would be delivered (or even started) by 2017 given that the Transportation Corridor Agencies has re-initiated the environmental analysis project from scratch? RTP project list, ORA052 - Same. There are hurdles with state and federal permitting agencies not to mention environmental groups. This project, by enabling longer distance, regional trips, would not reduce climate change nor meet the goals of SB 375 nor AB 32. This project should not be used for air quality conformity purposes and should be removed from the financially constrained plan. NOAA indicated that other options should be studied for a connection to I-5 which would reduce impacts to sensitive resources. RTP project list, 1M0101 - Support the inclusion of SR-710 as a mode-neutral corridor, consistent with the alternatives identified in the draft EIR.	Comment noted. Regarding ORA052) SCAG recognizes that SR-241 Extension no longer meets the timely implementation requirements of a Transportation Control Measure (TCM) under the Conformity rules pursuant to the Clean Air Act. As a result, TCM substitution has been initiated to rescind the committed TCM designation of the SR-241 project. However, removal of the TCM designation does not automatically result in the deletion of the project from the RTP/SCS. The decision to change, replace or remove a project submitted to SCAG by the implementing agency (TCA) via a county transportation commission (OCTA) lies with the submitting agencies. Regarding 1M0101) SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.
16238.01.2	Overall - indicate as a disclaimer that these RTP projects may be subject to individual environmental review and the programmatic EIR is not a substitute for project level environmental analysis.	Commented noted. Both the 2016 RTP/SCS and the PEIR make clear that RTP projects require project or site-specific environmental analysis to assess impacts at the project level and the consideration of appropriate mitigation measures. See Master Response No. 2 in the Response to Comments in the Final PEIR.
16238.02	One of the challenges that SCAG has is managing regional challenges in a way that is sensitive to local communities, while still meeting the state and federal mandates regarding climate change, air quality, and transportation conformity. I would like to see SCAG take a more robust role in coordinating between counties and, if necessary, imposing policies on recalcitrant agencies in order to preserve our region's conformity with these state and federal laws and regulations. SCAG is doing so with projects such as the West Santa Ana Branch study and Express Lane Choices study, but I would like to see a greater role in this regard, and an acknowledgment that although different counties have different priorities, as expressed through their county transportation plans and self help sales tax measure breakdowns (when available), that the region is required as a whole to meet these laws and regulations, and we all share in the costs much like we do the benefits.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Fung, Hank		Submittal 16238 Related Documents
16238.03	<p>Chapter 2, Chapter 5 - Acknowledge the adoption of "Vision Zero" in the City of Los Angeles and other jurisdictions, and that other agencies in the SCAG region are considering it. Vision Zero "is a road safety policy that promotes smart behaviors and roadway design that anticipates mistakes so that collisions do not result in severe injury or death." (City of Los Angeles Vision Zero subsite) The City of Los Angeles's goal is to achieve Vision Zero by 2025, well within the time frame of this plan. Many of the pedestrian and bicycle improvements proposed in the plan are for safety purposes and should be highlighted in the plan.</p>	<p>Comment noted. SCAG has incorporated information regarding the local Vision Zero initiatives into the Plan.</p>
16238.04	<p>TSM/TDM - Although SCAG, as noted, is not an implementing agency, they can and should use their funding powers to help the region standardize on a single fare card system - the TAP card used in Los Angeles County. It is my understanding that Metro staff have presented this card system to other county transit agencies. Ventura County has also discontinued their previous obsolete smart card system. SCAG should not submit for Federal funding separate smart card projects that compete with the TAP card, as we need to facilitate regional cooperation. Mobile ticketing options are currently being developed by multiple agencies with multiple vendors, which has the potential of creating confusion between riders traveling through the region, if Metrolink, LADOT, and OCTA have different providers each with different apps. I regularly bring up the specter of the Inland Empire counties having a different 511 system than Los Angeles, Orange, and Ventura counties, but it is instructive, since people cross county lines regularly to go to work, school, social, or recreational activities, and have to deal with separate systems when they cross county lines. As a regional body, SCAG should monitor the development of these projects and ensure that, at some point, that a regional solution is adopted to avoid confusion for transit riders, which could hurt usage of transit and the emissions reductions planned for in the RTP.</p>	<p>The 2016 RTP/SCS calls for implementing inter-jurisdictional fare agreements and media to make transit and rail more attractive and accessible to users. While SCAG encourages interagency collaboration, the selection of vendors and other procurement issues are ultimately the responsibility of the lead agency for any particular project. SCAG recognizes that local agencies should have the ability to respond to their own particular needs in any given ITS procurement.</p>
16238.05	<p>Unfortunately, agencies such as OCTA are reducing the footprint of fixed route service, as with the OC Bus 360 plan, due to fiscal constraints. While fixed route service is expensive to operate, it also is likely to generate more spontaneous trips and support seniors and the disabled compared to alternatives such as taxis or app-based ride services. In many of these suburban areas which are seeing transit service reduced, such as in South Orange County, seniors and the disabled will also no longer have dial-a-ride/Access service. This has tremendous impacts for public health for those individuals who previously were able to take local bus service, albeit infrequently, and are now isolated. In addition, SCAG notes correctly that the population is aging, and seniors aging in place without adequate transportation is an issue that needs to be addressed. SCAG should acknowledge the reduction of the area of its region served by public transit, and implement policies to support development of services which may be better able to meet the needs of seniors and the disabled. The South Bay COG has advocated Neighborhood Electric Vehicles as one way to address this concern. It is mentioned as a greenhouse gas emission solution, but also should be mentioned as a means to improve first mile/last mile to stations and transit.</p>	<p>The decision to add or cut fixed route service is ultimately the responsibility of the operating agency. In this case, that is the Orange County Transportation Authority (OCTA). The impacts of the Recession of 2008-09, and the subsequent period of slow growth, are still being felt by local providers of public transportation, and it may be some time before service levels stabilize. Specific strategies to identify and meet mobility needs of older adults, persons with disabilities, and persons of low income were produced in the 2015 update to the Coordinated Public Transit – Human Services Transportation Plan for Orange County. This plan outlines strategies to address specialized mobility needs including innovative mobility management programs, expanding specialty and beyond the ADA transportation services including door-through-door service, regulating access to taxis, promoting senior and disabled friendly complete streets, and providing online and travel training resources to mobility challenged communities.</p>

ID	Comment	Response
<i>Submitted by</i> Fung, Hank		Submittal 16238 Related Documents
16238.06	MAP-21 calls for "reliability" as a measurement. In addition to traditional highway system reliability (i.e. travel time), transit reliability is important. Metrolink on time performance is dropping. LACMTA's on time performance goal for buses is 80% and is usually not met. Reliability is especially important for low wage workers who have shift-based schedules that require showing up on time to help customers or manufacture products. Poor reliability impacts people shifting trips to transit, since they perceive that a car trip is more reliable, especially if transfers are involved. Policies such as dedicated bus lanes, smart cards, and off board fare payment can improve reliability.	Comment noted. First, the MAP-21 performance measures rule-making is still in progress by the US DOT. Transportation system reliability is included in the 2016 RTP/SCS as one of the outcomes to be used for on-going regional performance monitoring. The importance of transit system reliability is recognized in the 2016 RTP/SCS, and one of the sustainability goals of the Plan is to increase the mode share for transit. Staff will work with our transit partner agencies to explore the transit reliability measures. It is very important to make commuting by transit a more attractive option than driving alone in an automobile. Reliability, mobility, transfer, and first/last mile improvements are all critical ingredients toward achieving the goal of greater transit mode share in our region.
16238.07	SCAG should also acknowledge the San Joaquin train service, managed by the San Joaquin Joint Powers Authority. Although the rail corridor is outside of the SCAG region, many riders transfer in Bakersfield for bus service to destinations throughout all counties in the SCAG area (except Imperial). The bus between Los Angeles Union Station and Bakersfield regularly fills multiple buses daily. It is a key route serving passengers to destinations in Central and Northern California. While it may be replaced by high speed rail during the duration of this plan, it is a key route today used by thousands of passengers annually.	Comment noted. This comment has been incorporated into the Passenger Rail Appendix.
16238.08	Although not an "innovation" per se, electric bicycles and similar devices have a potential of increasing first mile/last mile options, especially in hilly areas poorly served by transit. They can be carried on buses and trains similar to pedal-powered bicycles and also help increase the range of riders to go longer distances, especially in hot weather. Similarly, self balancing electric scooters, i.e. "hoverboards", are currently seen as a toy and are dangerous due to their poor construction. However, over the course of the RTP, they are a potential first mile/last mile option which should be monitored for possible inclusion in future RTPs.	Comment noted. Electric bicycles are discussed in the mobility innovations appendix. Hoverboards, as well as electric skateboards, are anticipated as first/last mile transportation options.
16238.09	Model reliability among different ethnic groups, including transit reliability. The expansion of rail will enable transit riders to have a more reliable commute, but this impact might be distributed inequitably. Also, although this is outside of SCAG's control, different transit agencies in the region have different reliability standards, such as permissible percentage of buses early/late. How does that impact environmental justice?	Transit reliability was not included in the analysis for the 2016 RTP/SCS due to lack of data tools, but can be evaluated for future efforts.
<i>Submitted by</i> Fung, Hank		Submittal 16348 Related Documents
16348.01	But in terms of the process, I think, it is great that SCAG is doing the regional process with all the different regional offices, although, I do see that very few people seem to be at the outlying offices, but certainly, having the times available on evenings and on Saturday for a hearing is much better than the process when we were collecting public input where the City of Los Angeles was omitted as a location and, also, when the majority of the meetings were held during the daytime with the only evening meeting in the Los Angeles Basin at the Gateway City's Hall which I was disappointed at. They later did add more meetings but only when I complained to the member of my regional council, my Regional Council Member Sam Pedroza. So, I do compliment SCAG on that.	Comment noted. SCAG will consider these comments in its assessment of outreach activities. Thank you.

ID	Comment	Response
<i>Submitted by</i> Fung, Hank		Submittal 16348 Related Documents
16348.02	In relationship to the plan itself, generally, I think that SCAG needs to be taking a much more robust role regionally. For example, in the presentation just one items they mentioned was the Tap Card and we need to see that not just in L.A. County but we need to see that regionally.	The 2016 RTP/SCS calls for implementing inter-jurisdictional fare agreements and media to make transit and rail more attractive and accessible to users. While SCAG encourages interagency collaboration, the selection of vendors and other procurement issues are ultimately the responsibility of the lead agency for any particular project. SCAG recognizes that local agencies should have the ability to respond to their own particular needs in any given ITS procurement.
16348.03	We need to see the Greenhouse Gas Emission reductions which the plan proposes. So, we need to see more of these active transportation project out in the San Bernardino, Riverside and the Inland areas so that they are also pulling their fair share of greenhouse gas reductions, as it is mandated by SB375 that we reduce our greenhouse gas emissions and the voters voted for that when they turned down the oil companies' attempt to delay implementation. So, the voters have spoken, we want greenhouse gas emission reductions and we want these projects throughout the region.	Comment noted. Final analysis of Greenhouse Gas Emissions have been provided in the Transportation Conformity Analysis Appendix. Active Transportation projects in Riverside and San Bernardino Counties are taken from local and county active transportation plans and gap closures. Active Transportation is but one part of a comprehensive multi-modal strategy in the Regional Transportation Plan/Sustainable Communities Strategy to help reduce Vehicle Miles Traveled and Greenhouse Gas Emissions.
16348.04	L.A. County is doing a great job with Measure R and with the different tax measures in the past, but I'd like to see some of the other counties do the same as well with their tax measures as they move forward so that's all.	Comment noted. Imperial, Los Angeles, Orange, Riverside and San Bernardino counties currently have sales tax measures dedicated to transportation expenditures. Ventura County is the only county in the region without an existing dedicated sales tax for transportation. However, Ventura County is in the process of seeking voter approval on a half-cent sales tax, which is reflected as part of the reasonably available revenues.
<i>Submitted by</i> Gar, Victor		Submittal 16126 Related Documents
16126.01	We cannot allow you to make driving so expensive that we have to walk an bike places like in a third world country. You cannot tax us per mile! Would like to walk or bike to work when is raining or when it is a 110 degrees in summer time? How about when its 60 mph winds in fontana? These ideas are are not right, I live in redlands,ca an as a construction worker I have different job locations every day. one day i will be in Los angeles the next in temecula an the next in burbank, i carry with me a lunch box and many heavy tools. It is impossible for me to commute in mass transit. we paid for the carpool lanes to be built an now we are getting charged to use them. Now you want to use them for your own financial gain. That is theft an me and my family and neighbors are against this metropolis you want to build at the cost of our freedoms and tax dollars.	Comment noted. It should be clarified that gas tax revenues, in real terms, are actually in decline as tax rates (both state and federal) have not been adjusted in more than two decades. At the same time, the number of more fuel efficient and alternative powered vehicles continue to grow. The Plan identifies several new funding sources that are reasonably expected to be available. These sources include adjustments to existing state and federal gas tax rates and a long-term replacement of state and federal gas taxes with a mileage-based user fee to maintain the historical purchasing power of the gas tax.
<i>Submitted by</i> Garcia, John Paul		Submittal 16360 Related Documents
16360.01	I do echo with what Vivian Romero who just came up to say, I would also like to request that the SR60 corridor in the Montebello area be considered in the RTP. I believe, that an HOV or a carpool lane be considered on the SR60 from the 710 to the 605.	Comment noted. Upon review of the Project List Appendix, financially constrained RTP projects as related to SR-60 between I-710 and SR-605 were not identified. However, as part of the strategic portion of the Project List, specifically RTP ID# S1120044 proposes an HOV lane on SR-60 between I-710 and US-101. As funding becomes available in the future, it is possible that this project could move to constrained list through future update or amendment to the RTP/SCS.

ID	Comment	Response
<p><i>Submitted by</i> Garg, Om Submittal 16346 Related Documents Link</p>		
16346.01	Please inform the requirements for getting a new Interchange on I-15 in SB County included in RTP. Thanks!	Comment noted. We believe your first step in identifying potential improvement projects on I-15 should be to understand what projects are already recommended in this corridor in the applicable planning and programming documents, including the Project List Appendix of the 2016 RTP/SCS, Transportation Concept Report (TCR) prepared by Caltrans etc. Based on your initial research if you still feel strongly that the corridor needs are not adequately addressed, we suggest you contact your county transportation commission with your suggestions and ideas for their consideration in their future plans and programs.
<p><i>Submitted by</i> Giba, Jeffrey Submittal 16347 Related Documents</p>		
16347.01	1. The RTPSCS on pages 6 and 14 define both major initiatives as well as major themes. In both as well as the Ex Summary the higher/highest priority is given to "Preserving and Protecting our existing trans infrastructure" or Fixing It First yet in Riverside County there is no mention in the RTP for completing and fixing the E/W 60 freeway between the 15 and 10. Instead there is a focus on going around and building a new corridor to the South. If we are to Fix it First then we should Fix it First.	Comment noted.
16347.02	Good Economic Opportunities - The approval of a logistics plan in East Moreno Valley of 40.6 mil ft squared is off the 60 freeway corridor. Again, a reason to be included to repair and preserve.	Comment noted.
16347.03	3. One way to decrease time on the roads is to reserve transportation to jobs from East to West instead from the West to the East and shorter distance to jobs. The Moreno Valley majority council considered this by approving the 40.6 mil ft squared WLC in East Moval potentially creating 20,000 jobs. Keeping jobs closer to home and reducing average daily vehicle miles, reducing pollutants and improve Air Quality while creating greater economic opportunities. This is not in the RTP.	Comment noted. SCAG's SCS is built upon local input from local jurisdictions including the City of Moreno Valley, so the approved projects are included in the data utilized in the SCS. The "Forecasted Regional Development Types" maps have been developed for the purpose of modeling performance. SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. The goal of SB 375 is to integrate transportation and land use by reducing average vehicle miles traveled, reducing pollutants and improve air quality.
<p><i>Submitted by</i> Gilbert, Whitley Submittal 16053 Related Documents</p>		
16053.01	I am a 24 year old full time college student who was born and raised in the region. I would like to make it clear that I am a broke college student! I do not own a car and have student debt and credit card debt and am unable to buy a car at the moment. I attend school in the San Francisco bay area where I can easily access public transportation. I can take a bus to the Emeryville BART station where I can then catch the AMTRAK and ride with ease all the way to Sacramento. Public transportation in Northern California makes living so much easier for the broke car-less college student like myself. Here at home, it is not that easy. I live in Perris, Ca and have been trying to visit a friend in Rancho Cucamonga for the last 4 days. Niether of us own a car and the lack of public transit options make it impossible to meet up. This is in sharp contrast from the systems of the bay area. I should not have to move out of my home region to be able to live a lifestyle that is a reality for me as a broke car-less college student.	Comment noted. The 2016 RTP/SCS includes a significant expansion of rail and transit services across the region through 2040. Notably, Metrolink is opening its new Perris Valley Line in 2016, which will provide a connection between Perris and Rancho Cucamonga on high-quality rail service.

ID	Comment	Response
<i>Submitted by</i> Goller, Terry		Submittal 16224 Related Documents Link
16224.01	This Federal Reginal SCAG plan would be a grandiose state endeavor to further burden the taxpayer and their individual rights. With a \$556 billion expenditure and a \$275 billion operating and maintenance cost, there would be a \$200 billion difference resulting in tax increases. Allowing the state and cities to solve their own transportation problems and working with Cal Trans is a more feasible solution. Even curtailing the rail plans would be a monetary benefit as there are existing construction impossibilities. This would free up funds to improve California needs and not federal mandates and more taxes.	In accordance with state and federal requirements, the 2016 RTP/SCS includes a financial plan that estimates how much funding will be needed to implement transportation investment needs, as well as operate and maintain the transportation system as a whole over the life of the Plan. The Plan must demonstrate that there is a balance between the estimated costs of the projects and programs described in the Plan and revenue sources reasonably expected to be available for transportation investments.
16224.02	Yes, we have transportation issues. This can be solved with more park and ride-share incentives along with rewards for car-pooling and using bus services that are not utilized.	Comment noted. The 2016 RTP/SCS includes a wide variety of transportation strategies and investments, recognizing that improvements to all transportation modes are necessary in order to reduce congestion and improve the transportation system in the SCAG region. These include transportation demand management, transportation systems management, active transportation investments, land use strategies and multi-modal capital and operating improvements.
16224.03	The DMV should be made more aware of enforcing legal valid drivers with more stringent retail auto sales verifications.	Comment noted. Improper licensing continues to be a critical issue within California. SCAG supports efforts that the State of California is taking to improve driver licensing, including: - Assess and improve policies for managing unlicensed drivers, negligent operators and suspended/revoked drivers. - Improve data systems, including quality control measures, for driver and vehicle records, citations issued, court adjudication reporting and DMV license actions. - Improve training of law enforcement and related local agencies regarding licensing, DMV license actions and DMV data systems. - Create a public awareness campaign addressing the consequences of driving without a valid license. - Examine the reasons why some individuals choose to drive without a proper license rather than reinstate licensing privileges when eligible and based on this information, propose ways to increase the reinstatement rate.
16224.04	When the state mandates housing to live near transportation, this differs from the American Way. Such regional living borders on the sci-fi "Hunger Games" mentality. Living near railroad stations with increased walking and biking to work with untold restrictions are not a priority.	Comment noted.
16224.05	Like the Obama Plan, this has too many mandates and loop-holes with the benefits siding with the provider companies. This tact can be seen as a forcible way to eliminate the American "know-how" of entrepreneurship. I commend the designers of this document as it contains all legal-binding, freedoms and taxes that would restrict the California citizen. If the draft is predominately from an environment persuasion, then it is not reflecting a balanced voice. Since SCAG is a voluntary association, I recommend that Southern California does not participate in this Federal plan. Our state should not accept assistance with regional housing, energy, transportation or the environment. Voting for 86 more government officials to implement this would restrict California from making their own decisions. Please do not accept this draft.	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Gutierrez, Ezequiel		Submittal 16314 Related Documents Link
16314.01	As a result, redraft of the document is compelled with greater efforts at inclusion of the several HD communities than evident. Without engaging in extensive review of the DRAFT which is substantially if not completely exclusive of the HD communities and environment, two regional maps in Chapter 5 of the DRAFT startling reveal the omission.	Comment noted. Please refer to SCAG's Environmental Justice Appendix for a detailed breakdown of the Plan's impacts on disadvantaged communities, urban areas, rural areas, and communities of concern.
16314.02	Exhibit 5.2, 2040 Transit Network Planned and Existing, reveals the absence of the HD in any transit future for the SCAN region. It is indeed a picture worth a 1000 words, only Palmdale/Lancaster are included.	Exhibit 5.2 depicts local and express bus service in the Antelope Valley, the Victor Valley, the City of Barstow, and in the Morongo Basin.
16314.03	Similarly, Exhibit 5.4, Major Highway Projects, does not show an adequate highway scheme for the HD. The only significant infrastructure represented is the High Desert Corridor (HDC) which after considerable planning forums has been admitted not to include any on and off points between Highway 14 in the Antelope Valley and Highway 15 to the east of the Adelanto/Victorville communities. As such, it will not serve nor is it planned to serve HD communities. Its only apparent purpose is to drain dollars away from the SCAG region (and California, generally) to Vegas. It will be a toll road so any benefit to HD communities will have to be purchased.	Comment noted. Exhibit 5.4 is intended for illustrative purposes only. Please refer to the Project List Appendix for a complete list of projects. Regarding the HDC project, the proposed build alternatives carried forth as part of the Draft HDC EIR/EIS includes a total of 18 interchanges between SR-14 and SR-15. The following website provides a map of the proposed interchange locations along the HDC corridor: https://d1akjheu06qp1r.cloudfront.net/projects_studies/hdc/images/map_corridor_hdc_ramps_eng.pdf
16314.04	The High Desert has enormous potential to accomplish any of the objectives of the DRAFT. Its relatively undeveloped areas represents, in essence, a blank slate in which to plan and develop nodal transit oriented communities (the High Quality Transit Areas (HQTA's) of the DRAFT.	Comment noted. HQTAs in the 2016 RTP/SCS are designated based on existing and planned transit service. The transit service input is from the local County Transportation Commission (CTC) - any desired transit service not included in the 2016 RTP/SCS needs to be requested by the local CTC.
16314.05	As with the coming METROLINK Perris Valley Line reviewed in the DRAFT, a similar METROLINK line can be developed eastward from its Palmdale station toward Hesperia, using and expanding the existing right of way freight line of the Union Pacific railroad.	The 2016 RTP/SCS includes the High-Desert Corridor connecting the Antelope Valley to the Victor Valley in the financially constrained plan. This transportation facility includes a highway/tollway, bike lanes and high-speed rail.
16314.06	Such a commuter transit line could be developed with periodic HQTA nodes, creating the type of living environments for people envisioned in the DRAFT while protecting the natural environment of the HD. It would help link HD commuters with employment opportunities "down the hill," thus, mitigating the growing traffic load in the Cajon Pass and its adverse environmental impacts.	Comment noted. HQTAs in the 2016 RTP/SCS are designated based on existing and planned transit service. The transit service input is from the local County Transportation Commission (CTC) - any desired transit service not included in the 2016 RTP/SCS needs to be requested by the local CTC.
16314.07	Such a METROLINK line would serve to economically integrate the HD to the greater economy of the region, as a whole. It would serve to channel and direct population growth into new HQTA's along the new METROLINK line, away from the haphazard pattern which based on current building would otherwise develop.	The 2016 RTP/SCS includes the High-Desert Corridor connecting the Antelope Valley to the Victor Valley in the financially constrained plan. This transportation facility includes a highway/tollway, bike lanes and high-speed rail.
16314.08	Further review and planning of the DRAFT document is requested to create a truly inclusive and integrated SCAG region.	Comment noted.

ID	Comment	Response
<p><i>Submitted by</i> Harris, Eileen Submittal 16216 Related Documents</p>		
16216.01	<p>I am highly concerned with regard to the proposal for re-zoning the Armstrong Nursery Property (17552 Goldenwest) to RH Zoning. We have had so many apartments built in the city already that the traffic in the streets as well as crime has increased tremendously. Wouldn't it make logical sense to build something that can benefit the community as a whole? This location would be perfect for seniors who want to eat or shop near the new community center or possibly a YMCA for kids who want to use the park. Huntington Beach already has numerous high-density apartment complexes. The safety of our neighborhood, parks and the seniors are pertinent. Studies have shown that bringing in a low-income facility destroys communities and schools. I strongly oppose this proposition. Eileen Harris, Esq. - 6901 Rook Dr., Huntington Beach, CA</p>	<p>Comment noted. SCAG's SCS is built upon local input from local jurisdictions and SB 375 legislation does not require a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. For the purposes of SB 375, and reducing Greenhouse Gas (GHG) emissions and Vehicle Miles Traveled (VMT), SCAG, in some cases, altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. The "Forecasted Regional Development Types" maps have been developed for the purpose of modeling performance. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, local jurisdictions maintain local land use authority.</p>
<p><i>Submitted by</i> Hearst, Patricia Bell Submittal 16228 Related Documents Link</p>		
16228.01	<p>As a resident of Brentwood, I travel through the Sepulveda Pass - using Sepulveda Boulevard to conduct business in the San Fernando Valley and points north. For 15 years I have reviewed studies, reports and opinions amounting to 10 file boxes regarding the 1-405 Sepulveda Pass Improvement Project. After reviewing the Draft 2016-RTP/SCS regarding a Reversible Lane (LA-RTP-996425) through the Mulholland Tunnel, please be advised that: - There are no studies or evidence to support the need for a reversible lane within the Mulholland Tunnel. - The 1-405 Sepulveda Pass Improvement Project provided an additional North Bound Lane from the new Skirball Ramps on Sepulveda - to the new Skirball Center Bridge. - This new North Bound lane provides great ease in North Bound traffic movement during peak hours of traffic, thereby eliminating any need of a reversible lane in the Mulholland Tunnel</p>	<p>Comment noted. Since the completion of the improvements on I-405, additional improvement needs in this corridor, including Sepulveda Boulevard, are being further examined. SCAG will work with Metro and Caltrans to reflect the ultimate improvement configuration in this corridor in the future RTP/SCS amendments or updates as appropriate.</p>
<p><i>Submitted by</i> Helgeson, Richard Submittal 16326 Related Documents Link</p>		
16326.01	<p>I join with a growing number of people, organizations and public entities in requesting that SCAG act responsibly in the preparation of the 2015-2040 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) and remove all references which could be construed to support inclusion of the SR-710 Freeway Tunnel Project from that instrument. Even though the 710 North Project alternatives are undergoing environmental review and no alternative should have yet been selected pursuant to the current EIR process it is obvious that SCAG has already "pre-determined" the SR-710 Tunnel alternative. This patently illegal action by SCAG unfortunately opens the door to the very type of "post hoc rationalization" under the California Environmental Quality Act which California appellate courts have uniformly condemned. (See for example Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal. 3rd 376). A number of references which point solely to the tunnel still remain in the RTP/SCS.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>

ID	Comment	Response
<i>Submitted by</i> Helgeson, Richard		Submittal 16326 Related Documents Link
16326.02	<p>Given the circumstances of the Seattle SR 99 Alaskan Way Viaduct project in the State of Washington, any attempt to carry forth the SR-710 North Freeway Tunnel would represent the very height of local governmental irresponsibility. As I will demonstrate subsequently, the Washington Alaskan Way Viaduct Project is the only other project in the world in which the proposed tunnel boring technology which is contemplated for the SR-710 Freeway Tunnel has ever been attempted. The catastrophic consequences which have followed from that project provide every reason for concluding that the SR-710 Tunnel Project should never be seriously considered or pursued. The State of Washington, of course, rues the day it ever gave thought to attempting to construct the Alaskan Way Viaduct tunnel.</p>	<p>Comment noted. A project specific environmental analysis is underway by the lead agency, which will consider project impacts including construction-related impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.</p>
16326.03	<p>Given all of this and given the current status of the CalTrans SR-710 North EIR/EIS process, the only reasonable transportation solution now posed for the SCAG RTP/STS is to reject all 710 tunnel alternatives. Any further transportation matters associated with this ill-conceived and controversial tunnel project should be carried forth by examining the community based alternatives which have been submitted within the currently pending CalTrans EIR/ EIS process which seek to address transportation issues in the West San Gabriel Valley without the tunnel.</p>	<p>Comment noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
16326.04	<p>The 710 North tunnel has a dark and tumultuous history which has been fueled in no small part by the pressures of special interests. As a preliminary matter I would ask that SCAG bear in mind the loud public outcry and the fierce public opposition which has characterized the 710 North project for more than fifty years, as well as the bitter enmity which this project has often evoked in Southern California in the past. This opposition has occurred in no small part because of the devastating environmental degradation which this project would have wreaked upon a significant geographic area of Los Angeles County. I am hopeful that, with appropriate reflection, SCAG will have the vision to free itself from the irrational tunnel vision, which over and over creates more congestion on this region's freeway systems and that SCAG, as a more progressively responsible organization, will instead work to help develop a responsible transportation paradigm which can better serve the region in the generations to come.</p>	<p>Comment noted. SCAG understands that a project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.</p>
16326.05	<p>While the ballot initiative contained some references to freeway traffic flow improvements which might have been directed at improvements in off-ramps and on-ramps, and in freeway flow and freeway interchanges, it was not understood by the average voter to contemplate construction of a whole new freeway. Measure R's purpose, in the mind of the average voter, was to improve mass transit. To the average voter it was intended to free us of the irrational over-congestion of the region's freeway systems and to develop a responsible mass transit paradigm which would serve Los Angeles for generations to come. It's passage represented the hope and the vision of the electorate to free our children and our children's children from the obstructive gridlock and air pollution of congested freeways. SCAG, however, needs to take irresponsible projects such as the SR 710 North tunnel off the table altogether if this hope and this vision is ever to become a reality.</p>	<p>Comment noted. The 710 North project was included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan, as well as in previous SCAG RTPs. A project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.</p>

ID	Comment	Response
<i>Submitted by</i> Helgeson, Richard		Submittal 16326 Related Documents Link
16326.06	<p>In 2011 the Second Appellate District of the California Court of Appeal handed down a decision which explained that Measure R did not necessarily commit Metro to those items listed as “potential projects” in Attachment A of the Metro ordinance passed in advance of Measure R. (See City of South Pasadena et. al. et al., Plaintiffs and Appellants, v. Los Angeles County Metropolitan Transportation Authority, Defendant and Respondent; California Department of Transportation, Real Party in Interest. California Court of Appeals, Second District, Division Six, 2d Civil No. B221118 (2011). In light of this SCAG should be guided by the reality that construction of a 710 tunnel through the West San Gabriel Valley would represent a project fraught with substantial uncertainty and danger, and that there are wiser and more compelling transportation solutions to which our limited resources should appropriately be devoted.</p>	<p>Comment noted. A project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.</p>
16326.07	<p>The numerous traffic studies compiled by Susan Handy and Marion Boarnet illustrate that little will be accomplished in terms of reducing induced demand or traffic congestion by the proposed expansion of the 710 Freeway through the SR-710 Tunnel Project. And if one seriously considers the enormous environmental and financial risks this project poses, there are far better solutions to traffic congestion in Los Angeles County which are represented in extensions of the Gold Line, the Purple Line, the Crenshaw Line and other mass transit projects that would better serve our twenty-first century transportation needs, than to burrow a freeway tunnel through the bowels of the West San Gabriel Valley. Given the environmental consequences of the SR-710 Freeway Tunnel our limited transportation resources should be better used for worthwhile twenty-first century Los Angeles County transportation projects and not the SR-710 Freeway Tunnel.</p>	<p>Comment noted. The 710 North project was included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan, as well as in previous SCAG RTPs. SCAG understands that a project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.</p>
<i>Submitted by</i> Hvidston, Robin		Submittal 16222 Related Documents
16222.01	<p>I strongly oppose this plan! It is overreaching and TAKES THE MONEY FROM THE PEOPLE without transparency and oversight. This is an outrage!!!</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Jaiswal, Anna		Submittal 16128 Related Documents
16128.01	<p>The vast majority of the projects listed for San Bernardino County are highway widening / capacity expansion projects. Since it's been well-documented in the research that capacity expansion has a long-term effect of increasing traffic because of the induced demand principle, I do not understand why we are still adding highway capacity in San Bernardino County. It additionally doesn't make sense because, according to the CMP appendix of the document, San Bernardino County has relatively low levels of traffic congestion (only one of the top 100 congested intersections in the SCAG area); so even if I believed that highway capacity expansion would relieve congestion, it wouldn't make sense to invest billions of dollars toward it in San Bernardino County. Furthermore, this draft document has a resounding theme and goals of providing transportation options in the SCAG region, and puts a lot of emphasis on Active Transportation, complete streets, and transit. That is commendable, but yet the sheer amount of highway widening projects in the Project List does not fit the goals of the overall plan. Besides the issue of the widening itself, I am also very disappointed in the fact that the project descriptions for most of these projects do not mention anything about whether complete streets considerations will be made in the design of these projects. So I assume most likely they will not. It typically is near impossible to track down the status of these projects or find an avenue to give input on the design until the engineers say it is "too late to accept input to change the design." So I am still at a loss as to how to ensure that complete streets consideration will be given to highway projects as they're designed. This should be the role of regional agencies such as SCAG and SANBAG - to facilitate a conversation and an input process to ensure that all road users are considered in the design of these projects before it's too late.</p>	<p>Comment noted. The six county SCAG region is a vast and diverse region, geographically as well as demographically. Accordingly, the 2016 RTP/SCS recognizes that a "one size fits all" approach will not work for our region. So, the plan is multi-modal and aims to address transportation needs of all segments of our society across our expansive region by expanding and enhancing travel choices. The plan creates opportunities to engage in a healthy and active lifestyle through a significant increase in investment in Active Transportation modes. At the same time, the plan also recognizes that over 90% of the trips will continue to rely on our roadways, particularly in places like Riverside and San Bernardino counties. So, strategic improvements to our roadways to improve safety and congestion must be a part of any sensible long term plan. In addition, investments to our roadways also serve to benefit other modes including transit and active transportation. Furthermore, with the renewal of Deputy Directive 64-R2, Complete Streets - Integrating the Transportation System, Caltrans has placed an even greater emphasis towards the consideration of pedestrians and bicyclists throughout all phases of a project. Therefore, it is only a matter of time before complete street ideals are fully integrated as part of the capital improvement projects. It should also be noted that many of these roadway improvement projects are part of the commitment made by the counties to their residents in passing the local option sales tax measures that fund many of these projects. In addition, active transportation plans from local jurisdictions are included as part of the Plan and are beyond the project listings provided by the CTCs. These include the Imperial County Bicycle Plan, Western Riverside County Non-Motorized Transportation Plan, Coachella Valley Non-Motorized Transportation Plan, CVLink, and the San Bernardino County Non Motorized Transportation Plan.</p>
<i>Submitted by</i> Jatich, Thomas		Submittal 16127 Related Documents
16127.01	<p>I do not approve the Mileage-Based User Fee to provide additional funding. This will result in additional infrastructure cost to determine the distances traveled by each motor vehicle. It is much cheaper to just raise the gasoline tax. The amount of gasoline/diesel fuel used is directly proportional to the amount of wear and tear caused to our roads. Heavy vehicles use more fuel and should pay their fair share. Taxing by miles subsidizes these inefficient vehicles. Raise the gas tax and adjust it for inflation.</p>	<p>Given the potential complexities associated with a transition from gas taxes to a mileage-based user fee, the 2016 RTP/SCS does not assume revenue from a mileage-based user fee prior to 2025. The Plan also does not assume a specific mileage recording method. A number of mileage recording method alternatives were recommended by the California Road User Charge Technical Advisory Committee (TAC) for consideration as part of the Road Charge Pilot Program. Additionally, the TAC recommended that the pilot evaluate the cost of administration and fee collection. The TAC adopted goals for the pilot evaluation addressing equity and fairness, noting: "All Californians should pay their fair share for using the transportation system – just like they pay their fair share of use for water or electricity. A fair system may account for vehicle type and size (e.g., fuel efficiency and weight) and consider incentives for lower income and disadvantaged Californians." Solely raising the gas tax does not address the long term revenue challenges. Current corporate average fuel economy (CAFE) standards call for a increase from 29 miles per gallon to 54.5 miles per gallon by model year 2025. This will approximately double vehicle fuel efficiency and cut gas tax revenues in half. In order to meet California greenhouse gas emission reduction goals, the California Air Resources Board indicates that the new vehicle fleet will need to be primarily composed of advanced technology vehicles such as such as electric and fuel cell vehicles by 2035 in order to have nearly an entire advanced technology fleet – that is, both new and used vehicles – by 2050.</p>

ID	Comment	Response
<i>Submitted by</i> Jatich, Thomas		Submittal 16127 Related Documents
16127.02	<p>The OCTA is violating the intent of Measure M2 by constructing the high-occupancy toll (HOT) lanes on the 405 and using the toll revenue as a never-ending source of funding. When the voters approved Measure M2 in 2006, they were told that the funding would add one additional general-purpose lane in each direction on the 405. Nothing was said about building a toll road. There was no mention in the ballot language of “toll lanes” as an eligible project to receive funding. In fact, while “toll lane” language was once considered to be included, it was removed for fear that Measure M2 would not pass. The OCTA knew that the voters would not approve a toll road. They intentionally hid this information from the voters because they knew that Measure M2 would not pass if it were included. The OCTA claims that Caltrans is forcing them to build the toll road, but this is not true. In October 2013, the OCTA recommended Alternative 3 that would add one general-purpose lane and convert the existing one-lane car pool to a two-lane toll road. After the uproar from the citizens of Orange County and the mayors of Costa Mesa, Fountain Valley, Huntington Beach, Westminster, Los Alamitos, and Seal Beach, the OCTA changed their recommendation in December 2013 to Alternative 1 that would add one general-purpose lane. Subsequently Caltrans granted the OCTA’s original recommendation by approving the toll road in Alternative 3. On April 27, 2015 the OCTA Board of Directors voted to take the lead on implementing both the general-purpose lane and the HOT lanes. Instead of funding from Caltrans, the additional cost for the HOT lanes will be financed by the tolls. Carpools of two or more will only remain free for three years. By building the toll road, the OCTA will be collecting tolls forever. After the toll road cost is covered, the OCTA will be using this revenue for other purposes. Maybe this was the OCTA’s plan all along? When the voters approved Measure M2, they did not approve a never-ending source of funding for the OCTA. Per the Renewed Measure M Transportation Investment Plan, “voter approval [is required] for any major changes to the Plan.” Constructing a toll road and creating this new source of revenue for the OCTA is a violation of Measure M2.</p>	<p>Comment noted. A recent OCTA Board report dated October 12, 2015 indicates that Measure M2 funds will be used for the mixed-flow lanes additions, that both OCTA and Caltrans will seek additional state and federal discretionary grant funding for the tolled portion of the project, and that Caltrans will provide \$82 million toward the construction of the project. The report also indicates that net excess toll revenues (after payment of operations and maintenance on the express lanes including toll collection costs, debt service for obligations payable from tolls, funding of debt and project reserves, and required repayment of TIFIA loan) will be used in accordance with an expenditure plan developed by Caltrans and OCTA. In addition to other stipulations, the expenditure plan terms include restricting the use of net excess revenues for projects that maintain or improve the safety, operation, or travel reliability of any transportation mode in the corridor, or provide for improved travel options in the corridor.</p>
<i>Submitted by</i> Jolles, Mark		Submittal 16199 Related Documents
16199.01	<p>I am concerned that the verbiage in the RTP document has almost a "spin" tone to it, oftentimes sugarcoating what are some very serious issues. It is my understanding that the document is supposed to provide an objective perspective without such a heavy promotional bias. It is not supposed to be a sales document but rather an objective analysis. I suggest that the SCAG staff review the text for language that may not be construed as objective and edit it for a less bias tone. Specifically, if one surveys those that pay for and use the regional transportation system, SCAG may find their viewpoints quite different and far more critical than what is presented in the RTP text.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16200 Related Documents
16200.01	Some illustrations in the SCAG document portray one third of street capacity used for vehicle storage (parked cars) while high capacity transit vehicles are stuck in mixed traffic. This may not be a good model to provide as an example of smart streets or improved mobility.	Comment noted. The RTP/SCS encourages our partner County Transportation Commissions to pursue Bus Rapid Transit (BRT), BRT Lite, and designated bus only lanes where appropriate. The images that you refer to, accompany the Livable Corridors Concept. This is a concept that is meant to support High Quality Transit Areas served primarily by bus transit. These corridors cross large portions of the region, many of which still rely heavily on passenger cars. The strategies are meant to leverage improved bus service, increased active transportation investment, and more sustainable land uses.
16200.02	Some illustrations in the SCAG document portray one third of street capacity used for vehicle storage (parked cars) while high capacity transit vehicles are stuck in mixed traffic. This may not be a good model to provide as an example of smart streets or improved mobility.	Comment noted. This comment pertains to the visuals displayed in Chapter 5, which, accompany the Livable Corridors Concept. This is a concept that is meant to support High Quality Transit Areas served primarily by bus transit. These corridors cross large portions of the region, many of which still rely heavily on passenger cars. The strategies are meant to leverage improved bus service, increased active transportation investment, and more sustainable land uses.
<i>Submitted by</i> Jolles, Mark		Submittal 16201 Related Documents Link
16201.01	The SCAG discussion about BRT (Bus Rapid Transit Technology) and LRV (Light Rail Vehicle Technology) is not accurate. Light rail technology was developed prior to pavement and rubber tires, only steel on steel was an existing option. Since the implementation of efficient paving methods, development of rubber tires, development of the internal combustion engine, and increases in vehicle ownership, LRV lost much of its benefit and became obsolete. "True" BRT is a technology that replaces LRV at about one third the cost. It is faster, safer, more nimble, higher capacity, with less noise and vibration, and avoids the costly maintenance of rail and catenary systems. Please include along with my comment, the attached photos with examples of "true" BRT as a competitive replacement to LRV at about 1/3 the cost. Please also include the following links to provide accurate information about BRT (Bus Rapid Transit) Technology - Social Environmental Economic Impacts, People Oriented Sustainable Urban Mobility, Best Practices. WHAT IS BRT? - INSTITUTE FOR TRANSPORTATION & DEVELOPMENT POLICY https://www.itdp.org/library/standards-and-guides/the-bus-rapid-transit-standard/what-is-brt/ NATURAL RESOURCES DEFENSE COUNCIL - SWITCHBOARD http://switchboard.nrdc.org/blogs/kbenfield/how_bus_rapid_transit_is_clean.html WORLD RESOURCES INSTITUTE - ROSS CENTER - http://www.wricities.org/media/video/bus-rapid-transit-social-environmental-and-economic-impacts	Comment noted. Chapter 1 does not discuss the relative cost effectiveness of transit capital investment strategies, technologies, or propulsion systems. Final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor and determined through a project-specific planning and environmental analysis process.

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16201 Related Documents Link
16201.02	<p>The SCAG discussion about BRT (Bus Rapid Transit Technology) and LRV (Light Rail Vehicle Technology) is not accurate. Light rail technology was developed prior to pavement and rubber tires, only steel on steel was an existing option. Since the implementation of efficient paving methods, development of rubber tires, development of the internal combustion engine, and increases in vehicle ownership, LRV lost much of its benefit and is considered obsolete. "True" BRT is a technology that replaces LRV at about one third the cost. It is faster, safer, more nimble, higher capacity, with less noise and vibration, and avoids the costly maintenance of rail and catenary systems. Please include along with my comment, the attached photos with examples of "true" BRT as a competitive replacement to LRV at about 1/3 the cost. Please also include the following links to provide accurate information about BRT (Bus Rapid Transit) Technology - Social Environmental Economic Impacts, People Oriented Sustainable Urban Mobility, Best Practices. WHAT IS BRT? - INSTITUTE FOR TRANSPORTATION & DEVELOPMENT POLICY</p> <p>https://www.itdp.org/library/standards-and-guides/the-bus-rapid-transit-standard/what-is-brt/ NATURAL RESOURCES DEFENSE COUNCIL - SWITCHBOARD</p> <p>http://switchboard.nrdc.org/blogs/kbenfield/how_bus_rapid_transit_is_clean.html WORLD RESOURCES INSTITUTE - ROSS CENTER - http://www.wricities.org/media/video/bus-rapid-transit-social-environmental-and-economic-impacts</p>	<p>Comment noted. Chapter 2 does not discuss the relative cost effectiveness of transit capital investment strategies, technologies, or propulsion systems. Final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor and determined through a project-specific planning and environmental analysis process. A brief discussion of the economic benefits of investing in public transportation occurs on page 26, but the discussion does not analyze these benefits by propulsion technology or mode.</p>
<i>Submitted by</i> Jolles, Mark		Submittal 16202 Related Documents Link
16202.01	<p>The SCAG discussion about BRT (Bus Rapid Transit Technology) and LRV (Light Rail Vehicle Technology) is not accurate. Light rail technology was developed prior to pavement and rubber tires, only steel on steel was a viable option. Since the implementation of efficient paving methods, development of rubber tires, development of the internal combustion engine, and increases in vehicle ownership, LRV lost much of its benefit and became obsolete. "True" BRT is a technology that replaces LRV at about one third the cost. It is faster, safer, more nimble, higher capacity, with less noise and vibration, and avoids the costly maintenance of rail and catenary systems. Please include along with my comment, the attached photos with examples of "true" BRT as a competitive replacement to LRV at about 1/3 the cost. Please also include the following links to provide accurate information about BRT (Bus Rapid Transit) Technology - Social Environmental Economic Impacts, People Oriented Sustainable Urban Mobility, Best Practices. WHAT IS BRT? - INSTITUTE FOR TRANSPORTATION & DEVELOPMENT POLICY</p> <p>https://www.itdp.org/library/standards-and-guides/the-bus-rapid-transit-standard/what-is-brt/ NATURAL RESOURCES DEFENSE COUNCIL - SWITCHBOARD</p> <p>http://switchboard.nrdc.org/blogs/kbenfield/how_bus_rapid_transit_is_clean.html WORLD RESOURCES INSTITUTE - ROSS CENTER - http://www.wricities.org/media/video/bus-rapid-transit-social-environmental-and-economic-impacts</p>	<p>Comment noted. Chapter 3 does not discuss the relative cost effectiveness of transit capital investment strategies, technologies, or propulsion systems. Final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor and determined through a project-specific planning and environmental analysis process.</p>

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16203 Related Documents Link

16203.01 LRV COST BENEFIT ANALYSIS Regarding the LRV systems that SCAG discusses in the RTP, I am concerned that these systems are incurring cost without a comparative benefit. The "benefit", as described in the attached FTA and FHWA documents is what attracts ridership (primarily discretionary) and additional associated economic development to transportation facilities. Without this "benefit", the LRV discussed in the SCAG document imposes investment and operational costs on the public without a mobility or economic advantage. Specifically with the Expo Line LRV discussed in the attachments, the local agency, METRO, turned down a \$2.5 billion %50 federal match and developed the project without a "benefit". The ridership of existing LRV lines without this "benefit", is equal to what prior bus service provided. I suggest that future transportation improvement projects provide a verifiable calculated "benefit", as is the industry standard, in order to obtain and leverage significant federal matching funds and meet economic development goals. As an additional note, "true" BRT (Bus Rapid Transit Technology) developed correctly, provides a higher mobility "benefit" than LRV (Light Rail Vehicle Technology) at one third the cost. It is my understanding that a benefit is a "calculated" improvement in travel time, cost, and convenience, as compared to alternatives.

User benefit, as referenced in the correspondences attached to this comment, was a project level SAFETEA-LU era performance measure used as a project selection criteria by the Federal Transit Administration (FTA) as part of applications for grant funds awarded per 49 U.S.C. 5309 (b), the New Starts program. This program funds major capital investments for public transportation. The measure was one of about 12 used during this period, and consisted of projected travel time savings divided by projected passenger miles travelled on the corridor in question. A further cost effectiveness measure consisted of the proposed project cost divided by the quotient of the above measure. These measures were employed throughout the SAFETEA-LU era. After the passage of MAP-21, the FTA began a rulemaking process, culminating with the changes to 49 C.F.R. Part 611, effective April 9, 2013. The newly adopted project level performance measures include mobility improvements, environmental benefits, congestion relief, economic development, land use, and cost effectiveness. These measures each account for approximately 8.33% of the quantitative scoring of a New Starts grant application. The cost effectiveness measure used for rating grant applications per the new FTA rulemaking no longer employs the previous user benefits model; instead capital and operating and maintenance costs are divided by annual linked trips. The mobility measure also no longer employs user benefits, instead employing a weighted measure of projected total linked trips by discretionary and dependent passengers. The previous user benefit measures are no longer applicable to project development, as part of the grant application process. Additionally, as is discussed in the correspondence from FTA's Dwayne Meeks attached by the commenter, dated January 23, 2007, the SAFETEA-LU era performance measures used in the New Starts process were intended to measure the benefits of interventions to a particular corridor, usually by means of a particular fixed guideway project. When off-corridor feeder bus network service changes were implemented in the cited forecast, they interfered with the ability of the forecasters to determine the independent benefits of the project in question. The 2016 RTP/SCS is an integrated, system level package of strategies and investments, so it is not possible to use these kinds of corridor level measures to ascertain the performance of any particular project or strategy in the plan. Similar to the earlier findings of Mr. Meeks, it would be impossible to discern the impacts of one project or strategy from a neighboring project or strategy. Furthermore, final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor.

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16204 Related Documents Link
16204.01	<p>LRV COST BENEFIT ANALYSIS Regarding the LRV systems that SCAG discusses in the RTP, I am concerned that these systems are incurring cost without a comparative benefit. The "benefit", as described in the attached FTA and FHWA documents is what attracts ridership (primarily discretionary) and additional associated economic development to transportation facilities. Without this "benefit", the LRV discussed in the SCAG document imposes investment and operational costs on the public without a mobility or economic advantage. Specifically with the Expo Line LRV discussed in the attachments, the local agency, METRO, turned down a \$2.5 billion 50% federal match and developed the project without a measured "benefit". The ridership of existing LRV lines without this "benefit", is equal to what prior bus service provided. I suggest that future transportation improvement projects provide a verifiable calculated "benefit", as is the industry standard, in order to obtain and leverage significant federal matching funds and meet economic development goals. As an additional note, "true" BRT (Bus Rapid Transit Technology) developed correctly, provides a higher mobility "benefit" than LRV (Light Rail Vehicle Technology) at one third the cost. It is my understanding that a benefit is a "calculated" improvement in travel time, cost, and convenience, as compared to alternatives.</p>	<p>User benefit, as referenced in the correspondences attached to this comment, was a project level SAFETEA-LU era performance measure used as a project selection criteria by the Federal Transit Administration (FTA) as part of applications for grant funds awarded per 49 U.S.C. 5309 (b), the New Starts program. This program funds major capital investments for public transportation. The measure was one of about 12 used during this period, and consisted of projected travel time savings divided by projected passenger miles travelled on the corridor in question. A further cost effectiveness measure consisted of the proposed project cost divided by the quotient of the above measure. These measures were employed throughout the SAFETEA-LU era. After the passage of MAP-21, the FTA began a rulemaking process, culminating with the changes to 49 C.F.R. Part 611, effective April 9, 2013. The newly adopted project level performance measures include mobility improvements, environmental benefits, congestion relief, economic development, land use, and cost effectiveness. These measures each account for approximately 8.33% of the quantitative scoring of a New Starts grant application. The cost effectiveness measure used for rating grant applications per the new FTA rulemaking no longer employs the previous user benefits model; instead capital and operating and maintenance costs are divided by annual linked trips. The mobility measure also no longer employs user benefits, instead employing a weighted measure of projected total linked trips by discretionary and dependent passengers. The previous user benefit measures are no longer applicable to project development, as part of the grant application process. Additionally, as is discussed in the correspondence from FTA's Dwayne Meeks attached by the commenter, dated January 23, 2007, the SAFETEA-LU era performance measures used in the New Starts process were intended to measure the benefits of interventions to a particular corridor, usually by means of a particular fixed guideway project. When off-corridor feeder bus network service changes were implemented in the cited forecast, they interfered with the ability of the forecasters to determine the independent benefits of the project in question. The 2016 RTP/SCS is an integrated, system level package of strategies and investments, so it is not possible to use these kinds of corridor level measures to ascertain the performance of any particular project or strategy in the plan. Similar to the earlier findings of Mr. Meeks, it would be impossible to discern the impacts of one project or strategy from a neighboring project or strategy. Furthermore, final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor.</p>

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16205 Related Documents Link
16205.01	<p>FORECAST CONCERNS. I think that the SCAG RTP uses constrained forecasts that are obscuring a significant amount of forecasted regional travel demand. This seems to be most apparent as a capacity shortage in the region's core. The result I think is congestion being pushed outward toward suburban communities and economic development going elsewhere. While it may be a bit embarrassing, I strongly urge the SCAG staff to provide local decisionmakers both constrained and unconstrained forecasts in the RTP. In the planning performed by other MPO's the two forecasts are often compared. This makes it possible for decisionmakers to measure the effectiveness of varying constrained plans to meet long range need. Moreover, this approach provides local governments the ability to strategically capture more economic growth and the resultant tax base benefits region wide can be significant.</p>	<p>Comment noted. SCAG will consider providing constrained and unconstrained forecasts in future RTP/SCSS.</p>
<i>Submitted by</i> Jolles, Mark		Submittal 16207 Related Documents Link
16207.01	<p>FINANCIAL CONSTRAINTS & CARPOOL LANES The continued regional investment in additional carpool lane capacity is of concern. Firstly, this program diverts huge resources from competitive alternatives. Second, it is adding to the number of single vehicle (SOV) trips being taken. When carpoolers shift to additional lanes, this increases the capacity for single occupancy vehicles (SOV) in the main lanes. These lanes quickly fill. When the system overall exceeds capacity, as in the SCAG region, these additional single occupancy vehicles overload connecting roads. Congestion is simply moved and increases system wide. It appears to be relieved in one area only to migrate to adjoining streets. Relieving one bottleneck simply moves it down the road to the next bottleneck. A thorough "system" analysis of road capacity changes reveals this. A more effective objective is to improve mobility on the highway system without adding traffic or congestion elsewhere. I suggest using existing lanes for carpool lanes rather than adding new lanes and redirecting the saved resources to develop competitive transit alternatives. Also, I suggest referring local agencies to the Victoria Transport Policy Institute, http://www.vtpi.org/ for resources to facilitate modeshift from SOV to other alternatives. The average pedestrian on transit utilizes three square meters of public space. The average SOV vehicle occupies 115 square meters of public space. This is forty times more space for the same trip. Imposing this extra infrastructure cost on the taxbase and local business makes the region uncompetitive against other regions where the percentage of SOV trips is much less. The best example of resources ill spent on carpool lanes may be the \$4.2 billion I-405 widening from I-105 to Highway 101. The multi-project 12 year traffic delay from the construction was several times the benefit calculated. The delay is greater now than before the project and traffic is increased on connecting surface streets. Overall mobility in the corridor has declined. The \$4.2 billion would have been better spent making higher capacity improvements. An extensive "true" BRT (Bus Rapid Transit) system is one example.</p>	<p>The 2016 RTP/SCS directs approximately \$15.5 billion (out of a total \$556.5 billion) towards improvements in the region's managed lane system, which includes carpool lanes and high-occupancy toll (HOT) lanes. Managed lanes are a key part of the Plan's overall system management approach to manage congestion and optimize the performance of the transportation system. Managed lanes support transit, ridesharing, and other transportation demand management strategies, with the goal of reducing single-occupancy vehicle (SOV) trips. A study released by Metro on May 26, 2015, identified improvements in safety, traffic congestion, vehicle and person throughput, and travel time on the 405 corridor after the addition of carpool lanes through the Sepulveda Pass.</p>
<i>Submitted by</i> Jolles, Mark		Submittal 16263 Related Documents Link
16263.01	<p>INACCESSIBLE INFORMATION The document is too Verbose. This makes it difficult to read. Important facts and figures are buried in lengthy compound and run-on sentences. The meaning of the text is unclear to the reader. Hopefully this is not intentional. The 19 million citizens paying for the \$560 billion plan deserve more clarity.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16263 Related Documents Link
16263.02	FACTS & FIGURES Facts and figures buried in the text are better presented in graphic format. Important points are more readable in bullet or outline format. Clarity and brevity attracts more readers. Simple objective language instills confidence that issues and facts are not handpicked or manipulated	Comment noted.
16263.03	SPIN AND OBJECTIVITY The tone of the document has too much spin. It is not supposed to be a sales document but rather an objective analysis. If SCAG surveys those that pay for and use the regional transportation system, they may find viewpoints quite different and far more critical than what is presented in the RTP text. Language that may not be construed as objective should be edited out.	Comment noted.
16263.04	ILLUSTRATION EXAMPLES - SMART STREETS Some illustrations in the SCAG document portray one third of street capacity used for vehicle storage (parked cars) while high capacity transit vehicles are stuck in mixed traffic. This may not be a good model to provide as an example of smart streets or improved mobility.	Comment noted. This comment pertains to the visuals displayed in Chapter 5. The RTP/SCS encourages our partner County Transportation Commissions to pursue Bus Rapid Transit (BRT), BRT Lite, and designated bus only lanes where appropriate. The images that you refer to, accompany the Livable Corridors Concept. This is a concept that is meant to support High Quality Transit Areas served primarily by bus transit. These corridors cross large portions of the region, many of which still rely heavily on passenger cars. The strategies are meant to leverage improved bus service, increased active transportation investment, and more sustainable land uses.
16263.05	LRV TECHNOLOGY The SCAG discussion about BRT (Bus Rapid Transit Technology) and LRV (Light Rail Vehicle Technology) is not accurate. Light rail technology was developed prior to pavement and rubber tires, only steel on steel existed as an option. Since the development of paving systems, rubber tires, the internal combustion engine, and increases in vehicle ownership, LRV has lost much of its benefit and is obsolete against newer technologies.	Final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor and determined through a project-specific planning and environmental analysis process.
16263.06	"TRUE" BRT "True" BRT is a technology that replaces LRV at about one third the cost. It is faster, safer, more nimble, higher capacity, with less noise and vibration, and avoids construction and maintenance of rail and catenary systems. Please include with my comment, the attached photos and links with examples of "true" BRT as a competitive replacement to LRV at about 1/3 the cost. WHAT IS "TRUE" BRT? - INSTITUTE FOR TRANSPORTATION & DEVELOPMENT POLICY https://www.itdp.org/library/standards-and-guides/the-bus-rapid-transit-standard/what-is-brt/ NATURAL RESOURCES DEFENSE COUNCIL - SWITCHBOARD http://switchboard.nrdc.org/blogs/kbenfield/how_bus_rapid_transit_is_clean.html WORLD RESOURCES INSTITUTE - ROSS CENTER - http://www.wricities.org/media/video/bus-rapid-transit-social-environmental-and-economic-impacts	Comment noted. Final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor.

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16263 Related Documents Link
16263.07	<p>BENEFIT ANALYSIS STANDARDS Regarding LRV systems that SCAG discusses in the RTP, I am concerned that these systems are incurring cost without a comparative benefit. The "benefit", as described in the attached FTA and FHWA documents is what attracts ridership (primarily discretionary) and associated economic development. Without this "benefit", the LRV discussed in the SCAG document imposes investment and operational costs on the public without a mobility or economic advantage.</p>	<p>User benefit, as referenced in the correspondences attached to this comment, was a project level SAFETEA-LU era performance measure used as a project selection criteria by the Federal Transit Administration (FTA) as part of applications for grant funds awarded per 49 U.S.C. 5309 (b), the New Starts program. This program funds major capital investments for public transportation. The measure was one of about 12 used during this period, and consisted of projected travel time savings divided by projected passenger miles travelled on the corridor in question. A further cost effectiveness measure consisted of the proposed project cost divided by the quotient of the above measure. These measures were employed throughout the SAFETEA-LU era. After the passage of MAP-21, the FTA began a rulemaking process, culminating with the changes to 49 C.F.R. Part 611, effective April 9, 2013. The newly adopted project level performance measures include mobility improvements, environmental benefits, congestion relief, economic development, land use, and cost effectiveness. These measures each account for approximately 8.33% of the quantitative scoring of a New Starts grant application. The cost effectiveness measure used for rating grant applications per the new FTA rulemaking no longer employs the previous user benefits model; instead capital and operating and maintenance costs are divided by annual linked trips. The mobility measure also no longer employs user benefits, instead employing a weighted measure of projected total linked trips by discretionary and dependent passengers. The previous user benefit measures are no longer applicable to project development, as part of the grant application process. Additionally, as is discussed in the correspondence from FTA's Dwayne Meeks attached by the commenter, dated January 23, 2007, the SAFETEA-LU era performance measures used in the New Starts process were intended to measure the benefits of interventions to a particular corridor, usually by means of a particular fixed guideway project. When off-corridor feeder bus network service changes were implemented in the cited forecast, they interfered with the ability of the forecasters to determine the independent benefits of the project in question. The 2016 RTP/SCS is an integrated, system level package of strategies and investments, so it is not possible to use these kinds of corridor level measures to ascertain the performance of any particular project or strategy in the plan. Similar to the earlier findings of Mr. Meeks, it would be impossible to discern the impacts of one project or strategy from a neighboring project or strategy. Furthermore, final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor and determined through a project-specific planning and environmental analysis process.</p>
16263.08	<p>FUNDING - MISSED OPPORTUNITIES Specifically with the Expo Line LRV discussed in the attachments, the local agency, METRO, turned down a \$2.5 billion 50% federal match and developed the project without a "benefit". (see attached correspondence) The ridership of existing LRV lines without this "benefit", is equal to what prior bus service provided. I suggest that future transportation improvement projects provide a verifiable calculated "benefit", as is the industry standard, in order to obtain and leverage federal matching funds and meet economic development goals.</p>	<p>Comment noted. Final alignments, station stop locations, propulsion systems, and/or technologies employed in any major transit capital investment are ultimately the responsibility of the individual project sponsor.</p>

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16263 Related Documents Link
16263.09	COMPETITIVE TRANSIT ALTERNATIVES As an additional note, "true" BRT (Bus Rapid Transit Technology) developed correctly, provides a higher mobility "benefit" than LRV (Light Rail Vehicle Technology) at one third the cost. It is my understanding that a benefit is a "calculated" improvement in travel time, cost, and convenience, as compared to alternatives.	Comment noted.
16263.10	IMPORTANT FORECASTS EXCLUDED The SCAG RTP uses constrained forecasts that are obscuring a significant amount of forecasted regional travel demand. This has manifested itself most apparently as unmet demand and a capacity shortage in the region's core. Congestion is being forced outward toward suburban communities. Economic development is leaving the region due to the shortage and poor mobility.	Comment noted. SCAG will consider providing constrained and unconstrained forecasts in future RTP/SCSs.
16263.11	PROVIDE UNCONSTRAINED FORECASTS I urge SCAG staff to provide decisionmakers both constrained and unconstrained forecasts in the RTP. For other MPO RTPs it is standard to include both forecasts for comparison. This gives decisionmakers the tools necessary to measure the effectiveness of constrained plans against unconstrained need. Local governments then have the ability to strategically capture economic growth. Tax base benefits and growth regionwide are typically significant.	As part of the Plan develop process, SCAG staff presented decision makers with forecasts of the capital costs for transit, state highways, and arterials, as well as operations and maintenance costs and debt service payments over the 25-year planning timeframe for a projected total investment need of \$556.5 billion. Staff also presented how much money is reasonably expected to be available to build, operate, and maintain the region's surface transportation system over the 25-year planning timeframe. An initial core revenue forecast comprising existing local, state, and federal sources totaled \$356.1 billion through FY2039-40. The difference between the expenditure forecast total (\$556.5 billion) and the core revenue forecast total (\$356.1 billion) is \$200.4 billion. The Draft 2016 RTP/SCS proposes to invest \$556.5 billion through the forecast horizon year of 2040 to significantly improve every component of our multi-modal transportation system, including much needed investment for the operation and maintenance of our existing system. The funding of the Plan is based on \$356.1 billion in core revenue sources and \$200.4 billion in new revenue sources that are reasonably expected to be available over the plan period. Reasonably available revenues include short-term adjustments to state and federal gas excise tax rates and the long-term replacement of gas taxes with mileage-based user fees (or equivalent fuel tax adjustment). These and other categories of funding sources were identified as reasonably available on the basis of their potential for revenue generation, historical precedence and the likelihood of their implementation within the time frame of the Plan. In accordance with state and federal requirements, the 2016 RTP/SCS financial plan estimates how much funding will be needed to implement transportation investment needs, as well as operate and maintain the transportation system as a whole over the life of the Plan. The Plan demonstrates that there is a balance between the estimated costs of the projects and programs described in the Plan and revenue sources reasonably expected to be available for transportation investments.
16263.12	CARPOOL LANES - SYSTEM ANALYSIS The continued regional investment in additional carpool lane capacity is of concern. Firstly, this program diverts huge resources from competitive alternatives. Second, it is adding to the number of single vehicle (SOV) trips being taken.	The 2016 RTP/SCS directs approximately \$15.5 billion (out of a total \$556.5 billion) towards improvements in the region's managed lane system, which includes carpool lanes and high-occupancy toll (HOT) lanes. Managed lanes are a key part of the Plan's overall system management approach to manage congestion and optimize the performance of the transportation system. Managed lanes support transit, ridesharing, and other transportation demand management strategies, with the goal of reducing single-occupancy vehicle (SOV) trips.

ID	Comment	Response
<i>Submitted by</i> Jolles, Mark		Submittal 16263 Related Documents Link
16263.13	<p>CONGESTION MAKING INCENTIVES When carpoolers shift to additional lanes, this increases the capacity for single occupancy vehicles (SOV) in the main lanes. These lanes quickly fill. When the system overall exceeds capacity, as in the SCAG region, these additional single occupancy vehicles overload connecting roads. Congestion is simply moved and increases systemwide. It may appear to be relieved in one area only to migrate to adjoining areas. Relieving one bottleneck simply moves it down the road to the next bottleneck. A thorough "system" analysis of road capacity changes reveals this.</p>	<p>Comment noted. The 2016 RTP/SCS includes a wide variety of transportation strategies and investments, recognizing that improvements to all transportation modes are necessary in order to reduce congestion and improve the transportation system in the SCAG region. These include transportation demand management, transportation systems management, active transportation investments, land use strategies and multi-modal capital and operating improvements.</p>
16263.14	<p>CARPOOL LANE ALTERNATIVES A more effective objective is to improve mobility on the highway system without adding traffic or congestion overall. I suggest using existing lanes for carpool lanes rather than adding new lanes; then redirect the saved resources to develop competitive transit alternatives. Also, I suggest referring local agencies to the Victoria Transport Policy Institute, http://www.vtpi.org/ for resources to facilitate modeshift from SOV to other alternatives.</p>	<p>Comment noted. The 2016 RTP/SCS includes a wide variety of transportation strategies and investments, recognizing that improvements to all transportation modes are necessary in order to reduce congestion and improve the transportation system in the SCAG region. These include transportation demand management, transportation systems management, active transportation investments, land use strategies and multi-modal capital and operating improvements.</p>
16263.15	<p>REGIONAL COMPETITIVENESS The average pedestrian on transit utilizes three square meters of public space. The average SOV vehicle occupies 115 square meters of public space. This is forty times more space for the same trip. Imposing this extra infrastructure cost on the tax base and on local business makes the region uncompetitive. Many competing regions have a percentage of SOV trips that is much less, especially in the core.</p>	<p>Comment noted. The Plan includes a range of investment to increase mobility options.</p>
16263.16	<p>\$4.2 BILLION The best example of resources ill spent on carpool lanes may be the \$4.2 billion I-405 widening from I-105 to Highway 101. The 12 year multi-project traffic delays from construction exceeded by several times the benefit calculated. The delay is now greater than before the project and traffic is increased on connecting surface streets. Overall mobility in the corridor has declined. Would the \$4.2 billion have been better spent making higher capacity improvements. An extensive "true" BRT (Bus Rapid Transit) system is one example of a more effective long term investment.</p>	<p>The "I-405 Corridor Evaluation (I-405 Sepulveda Pass Improvement Project Before/After Study)," released by Metro on May 26, 2015, identified improvements in safety, traffic congestion, vehicle and person throughput, and travel time on the 405 corridor after the addition of carpool lanes through the Sepulveda Pass. The full report, along with the Metro Board report, can be found at: http://boardarchives.metro.net/BoardBox/BB2015/2015_05_May/150526_I_405_Sepulveda_Pass_Improvements_Project_Evaluation.pdf</p>
<i>Submitted by</i> Leland, Dolly		Submittal 16363 Related Documents Link
16363.01	<p>We are here to give unqualified support to this RTP. It is a great job. We are grateful, of course, that the 710 North Gap is within the RTP and we're here to present documents that we presented to Caltrans in the study currently on-going for the 710 for the funding and Caltrans approval.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
16363.02	<p>The 710 is critical to these plans because it is not only in the RTP right now, the tunnel, but it's also in the Measure R that was passed by the people several years ago and it's actually coming to fruition now. There is money, specifically, voted on \$780,000,000 by the people of this County. We think that is a pretty good mandate to build this tunnel so it's voter approved.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
<i>Submitted by</i> Newman, Robert		Submittal 16300 Related Documents Link
16300.01	<p>With the proposed crowding into the cities, contagious diseases are rapidly transmitted. Urban crowding leads to interpersonal conflict in our culture.</p>	<p>Comment noted.</p>

ID	Comment	Response
<i>Submitted by</i> Newman, Robert		Submittal 16300 Related Documents Link
16300.02	Do not get in the way of farming and ranching in California. We need food that is domestically produced, thus preserving the sovereignty of America.	Comment noted. SCAG is committed to preserving farm and ranch land in Southern California. SCAG is engaging numerous stakeholders as it creates a Natural Lands Conservation Plan. This strategic and comprehensive approach allows the region to meet its housing and transportation needs, while ensuring that important natural lands, farmlands and water resources are protected. Please see our Natural/Farm Lands Appendix for more information. http://scagrtpscsc.net/Documents/2016/draft/d2016RTPSCS_NaturalFarmLands.pdf
<i>Submitted by</i> Nig, Pat		Submittal 16198 Related Documents
16198.01	Please do not get rid of bus routes 187, 191, 193 I am a senior and live in CVME mobile home park San Juan Capistrano	The decision to add or cut fixed route service is ultimately the responsibility of the operating agency. In this case, that is the Orange County Transportation Authority (OCTA).
<i>Submitted by</i> Norman, Kirsty		Submittal 16139 Related Documents
16139.01	Looking at the proposed projects for Riverside and San Bernardino county projects I'm seeing very little transit and ATP improvements. The fact that SoCal is very much relying on cars is not something to be proud of. The IE in particular has a great need for more transit and ATP facilities, it's a shame that nothing is included in this project.	Comment noted. The six county SCAG region is a vast and diverse region, geographically as well as demographically. Accordingly, the 2016 RTP/SCS recognizes that a "one size fits all" approach will not work for our region. So, the plan is multi-modal and aims to address transportation needs of all segments of our society across our expansive region by expanding and enhancing travel choices. The plan creates opportunities to engage in a healthy and active lifestyle through a significant increase in investment in Active Transportation modes. At the same time, the plan also recognizes that over 90% of the trips will continue to rely on our roadways, particularly in places like Riverside and San Bernardino counties. So, strategic improvements to our roadways to improve safety and congestion must be a part of any sensible long term plan. In addition, investments to our roadways also serve to benefit other modes including transit and active transportation. Furthermore, it should be noted that many of these roadway improvement projects are part of a commitment made by the counties to their residents in the passing of local option sales tax measures that fund many of these projects. In addition, active transportation plans from local jurisdictions are included as part of the Plan and are beyond the project listings provided by the CTCs. These include the Imperial County Bicycle Plan, Western Riverside County Non-Motorized Transportation Plan, Coachella Valley Non-Motorized Transportation Plan, CVLink, and the San Bernardino County Non Motorized Transportation Plan. The 2016 RTP/SCS also includes nine large capital projects and seven bus corridor enhancements in Riverside and San Bernardino Counties.

ID	Comment	Response
<i>Submitted by</i> O'Keefe, Eva		Submittal 16158 Related Documents
16158.01	<p>My biggest issues are the proliferation of unregulated Sober Homes in residential neighborhoods bringing more drugs into the community, not helping the addicts themselves, not offering any protections to the addicts themselves, changing the residential character of the communities, preventing children to grow up in neighborhoods with other children but now growing up with communities full of adults and the clustering in certain cities. My next issue is the incredible growth of our homeless population and the unsanitary conditions that brings to our cities. I frequently witness public urination and defecation, which is unsanitary and brings disease into the communities. I believe that homeless people should be given housing and that not accepting housing is not a choice because their actions affect ALL of us. I am a mother of young children. Every time we go out, we see someone passed out, sleeping on the street, defecating and urinating. This is not the example I want to set for my children. Our homeless deserve better and they deserve housing weather they want it or not.</p>	<p>Zoning housing for specific needs, such as transitional living shelters and group homes, is determined by local jurisdictions. SB 375 does not require that a jurisdiction's land use policies and regulations, including building codes and design guidelines, need to be consistent with the RTP or SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, local jurisdictions maintain local land use authority. In regard to homeless populations, there are a number of local programs that are looking to develop funding for permanent housing for homeless individuals and families. Currently while State law designates homelessness as a mental health issue rather than a land use issue, a number of jurisdictions are looking to provide permanent housing for certain homeless populations, such as those with disabilities or medical issues. As with transitional living shelters and group homes, the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, local jurisdictions maintain local land use authority.</p>
<i>Submitted by</i> Oliver, Bill		Submittal 16051 Related Documents
16051.01.1	<p>The plan is good, BUT does anyone think outside the box. What makes you think that you can continue to add lanes to the current roads forever. Every plan that has been put forward in the last 10 to 20 years has been to widen the freeway and add more HOV/ Carpool lanes. It has only created delays during the construction and by the time of completion the increase of newer traffic has delays in the same area. ("Orange Crush" 15,57,22)</p>	<p>The 2016 RTP/SCS is rooted upon a multi-modal approach towards addressing congestion and provides individuals with various options ranging from transit, bicycling, and walking as a means towards reducing single occupancy demand (SOV) demand on our highways and local arterials. As one of strategies for highways and arterials, the system management approach serves to address congestion by reducing demand and increasing efficiency without the need for expansion through the use of transportation system management (TSM) and transportation demand management (TDM) strategies. Examples of TSM/TDM include providing real time traffic information, advanced ramp metering, and incentivizing carpooling.</p>
16051.01.2	<p>There is an old military saying. Proper Prior Planning Prevent Poor Performance. For years I have asked WHY NO MONO RAIL above THE CENTER OF THE FREEWAYS? How much space is required? how many passengers per mile. If you build it, they will use it. We need to provide AFFORDABLE MASS TRANSIT to the suburbs to will reduce the pressure on the major arteries. The north has BART and it works. We can due a lot better.</p>	<p>The Draft 2016 RTP/SCS includes a significant investment in public transportation across the region through 2040, and allocates roughly 22% of capital spending to public transportation, and roughly 57% of operations and maintenance spending. The Draft 2016 RTP/SCS also allocates an additional 15% of capital spending to passenger rail. These investments include a wide variety of major capital projects, in a variety of communities, and along a wide variety of corridors. Final alignment decisions are the responsibility of project sponsors.</p>

ID	Comment	Response
<i>Submitted by</i> Robinson, Betty		Submittal 16253 Related Documents
16253.01	<p>I greatly object to a non-elected government entity making decisions on transit and land use, among other things, that will negatively impact southern California in so many ways, including the addition of a huge financial burden to an already fiscally stressed area. You say that you encourage public comment but I dare say but for a very few persistent and patriot citizens NO ONE knows about your plans---if the plans were in ballot form, they would go down in flames. SCAG and other similar, secretive groups are why the American public SO distrusts this Administration. I recommend that SCAG be dissolved and their burdensome plans be discarded. Planning should be done on a local basis with transparency and consent of the majority of residents.</p>	<p>Comment noted. SCAG's Regional Council and Policy Committee Members are elected Mayors, City Council members and County Supervisors from jurisdictions throughout the SCAG region. The cities and counties appoint the elected officials to represent them at SCAG's Regional Council and Policy Committees. SCAG's Regional Council and Policy Committee meetings are open to the public and publicly noticed. SCAG's Regional Council meetings are also available via live streaming on SCAG's website, www.scag.ca.gov, and are archived for on-demand viewing online. The names of the Regional Council and Policy Committee Members are posted on SCAG's website. SCAG has provided significant opportunities for input to the Draft 2016 RTP/SCS. This included, but was not limited to, the SCAG RTP/SCS website, policy committee meetings, a series of twenty-three open houses held during Summer 2015, and nineteen additional workshops and public hearings held following the release of the Draft 2016 RTP/SCS. As required by law, SCAG provided advance notice of public hearings on the Draft 2016 RTP/SCS, including publication in newspapers throughout the region, to give as many interested parties as possible the opportunity to attend and provide input. These hearings and workshops were held in every county in the region to solicit input from various interests such as residents, elected officials, representatives of public agencies, community organizations, and environmental, housing and business stakeholders.</p>
16253.02	<p>I greatly object to a non-elected government entity making decisions on transit and land use, among other things, that will negatively impact southern California in so many ways, including the addition of a huge financial burden to an already fiscally stressed area. You say that you encourage public comment but I dare say but for a very few persistent and patriot citizens NO ONE knows about your plans---if the plans were in ballot form, they would go down in flames. SCAG and other similar, secretive groups are why the American public SO distrusts this Administration. I recommend that SCAG be dissolved and their burdensome plans be discarded. Planning should be done on a local basis with transparency and consent of the majority of residents.</p>	<p>Comment noted. SCAG's is governed by an 86-member Regional Council, which is comprised of duly elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. These elected officials meet monthly as members of SCAG's Regional Council and Policy Committees, and they have discussed the proposed Draft 2016 RTP/SCS at regular and special meetings and will consider the Final Plan for adoption at their April 7, 2016 meeting. The roster of Regional Council members can be found on SCAG's website at http://scag.ca.gov.</p>

ID	Comment	Response
<i>Submitted by</i> Romero, Vivian		Submittal 16362 Related Documents
16362.01	<p>I want to start by addressing some of the concerns about the traffic flow that continues to plague residence in my neighborhood. I'm off the SR60 Freeway the Pomona freeway, have been for years, my family has been there for years. Actually, my family purchased a home in 1964 and the developer never disclosed that the SR60 was even going to be graded in the future. Over the years there have been issues with all the residents and there is many original homeowners there that had issues with and complaints with flooding, cracked foundations, they've had windows that have vibrated, windows that have loosened off their frames. Some residents' problems have been exacerbated with heavy rains due to the runoff from the freeway lanes, the cracked Arroyo drain canal causes flooding and ground water issues to rise over the two-foot broken Arroyo drain cracked wall between the freeway and backyards into homes that get submerged leading into people's living rooms like it happened back then in, probably, all the residents homes there, and at the bottom of our street most recently about, I would say, two and a half -- no, three and a half years ago where cars were submerged in water at the bottom of Arroyo and I have photographs of all of this. I did submit them to Caltrans as well. They did repair some of the cracked canal and they removed some of debris that is there. There is also a cracked sound barrier wall that was it's original to the freeway as is the cracked pavement along the SR60 Freeway behind the homes. As you may or may not know, there is no irrigation between Veil, Markland and Paramount Boulevard which would help with the air quality issues. There is an industrial park on the Monterey Park side which is the Edison Sub Basis Station which it has plans right now, I believe, for expansion. There is a proposed market place that is supposed to go and it has come to some of the residents' hears that Caltrans plans to expand those ramps to be in line with the Paramount Bridge expansion -- I'm sorry, with the Ramp Expansion Project to align with the new bridge that was compromised during the tanker fire and so the freeway is going to come and encroach more upon the homes.</p>	Comment noted. We will share your concerns with Caltrans.

ID	Comment	Response
<i>Submitted by</i> Romero, Vivian		Submittal 16362 Related Documents
16362.02	<p>Without that irrigation in that part of the corridor you've got another issue which gets exacerbated over there which is constant exhaust and fumes from tailpipes and soot and dirt and dust. You know, you have got a poor wall design that was constructed in the early 1960s. You've got excessive inhalation of tailpipe fumes, you're breathing the soot the gas the dust, the particles are going into people's lungs every minute of the day. You've got cars that are queuing going westbound in the morning probably starting at 5:30 in the morning. I had to go to Sacramento the other day the cars were queuing starting at 5:45 in the morning and it doesn't stop until, probably, 9:30. Then going eastbound you've got cars queuing starting around 3 p.m. going all the way up until about 6:30 p.m. So, every minute of every day people are breathing and having health problems and then you have no trees oxygenating your air and you have no irrigation there because I've talked to District 7 and I've talked to Mike Miles and Debra Wong and various people at Caltrans and I asked "Why don't we have any landscape there? Can we put any landscape there?" And they said, "No, we have no irrigation there." You know, how can we mitigate some of the noise? How do we help with the fine particulates that everybody is breathing? How are people going to have a quality night's rest when you've got your house shaking because of the vibration? They've done some noise studies there houses are shaking constantly. You hear the trucks, the 18-wheeler trucks, you know, going over the lanes of the cracked pavement on the SR60 which is, again, original pavement, and when you have an empty 18-wheeler shaking you've got these booms going on. You hear the tire pop and we've signed petitions and we've asked, you know, and had formal complaints signed and we get -- we get nothing, you know, it falls on deaf ears.</p>	<p>Comment noted. The PEIR for the 2016 RTP/SCS is a programmatic document that provides a region-wide assessment of the potential significant environmental effects of implementing goals, policies, strategies, programs, and projects included in the Draft 2016 RTP/SCS. As a programmatic environmental document for a region-wide, long-range Plan, the PEIR is not intended to conduct local impacts or provide information in detail sufficient for project or site-specific analyses. Project or site-specific environmental analysis to assess impacts at the project level must be separately assessed for each individual project. That said, the comments regarding concerns regarding this portion of SR 60 will be forwarded to Caltrans, District 7.</p>
16362.03	<p>So, we've got cars and traffic, we've got air quality issues, we've got flooding issues, we've got a host of environmental issues here and those are the primary focus of my, you know, and my reason for coming to you today. Because there are many concerns about the constituents and the people, the residents, like myself, in my neighborhood and -- so I looked at your plan, it did not include any kind of a project in our area between the 710 and the 605.</p>	<p>Comment noted. Upon review of the Project List Appendix, financially constrained RTP projects as related to SR-60 between I-710 and SR-605 were not identified. However, as part of the strategic portion of the Project List, specifically RTP ID# S1120044 proposes an HOV lane on SR-60 between I-710 and US-101. However the project is financially unconstrained in which funding has not been identified for RTP ID# S1120044. We will share your comment with Metro and Caltrans for consideration in future needs assessment studies.</p>
16362.04	<p>It should be that you look at disadvantaged communities which that area has moderate to low income and we're significantly impacted by the movement of freight and goods through our corridor through the SR60, you know, all of this movement of freight and goods coming through, you know, to eastern parts of the country and through different counties is coming through the SR60. And because we're severely impacted by all of these air quality issues and human quality issues and environmental injustices, I would ask that you please consider the route 60 because it is a very congested corridor. There is not even an HOV lane there. There is no -- nothing to remedy some of the issues and the excessive traffic, vibration, sound. So, please, in your further studies I would ask that you please consider some funding and in the very near future for that corridor. SCAG has a responsibility, especially, for disadvantaged communities, to consider those. And I anticipate that in the next round that you'd be a little more astute and a little more sensitive to these things.</p>	<p>Thank you for your comment. Impacts of the RTP/SCS on disadvantaged communities are analyzed in the Environmental Justice Appendix, and show that the Plan results in positive outcomes for low income and minority communities as a result of the Plan. Specifically for the SR-60 corridor, there are currently multiple transportation improvement proposals under consideration, including transit options which do not preclude the potential for an East-West Freight Corridor. SCAG recognizes the multiple needs associated with the corridor—serving the residential population including addressing environmental justice concerns while also serving commercial/industrial activities. Ongoing evaluations of the corridor will continue to address these issues.</p>

ID	Comment	Response
<i>Submitted by</i> Sandler, Irene		Submittal 16226 Related Documents Link
16226.01	<p>The Sepulveda Reversible Lane and Improvement Project came into existence in 1998 as an Los Angeles Dept. of Transportation project. For many years It has been a component of the SCAG RTIP's and SCAG RTP'S. LA 996425 can be found in both the SCAG 2016 PEIR and the 2016 SCAG RTP/SCS documents. Funding has been set aside for this Project for about 18 years. The project scope has been modified over time, and it is now substantially complete. However, It is still part of both the Draft 2016 PEIR Impact Report and the Draft 2016 RTP/SCS Plans .The one component that is not completed is the unnecessary Sepulveda Reversible Lane in the Mulholland Tunnel on Sepulveda Blvd in CD 5 and 11, and Metro District 7. The I-405 Sepulveda Pass Improvement Project, (funded by Federal, State, County, and City governments), added new Skirball ramps to the I-405 and an additional northbound lane on Sepulveda Blvd itself, leading from the new I-405 Skirball northbound exit ramp northward to the Skirball Bridge. Northbound Sepulveda traffic flows well. Northbound traffic going toward/through the Mulholland Tunnel does not present a traffic problem. The Reversible Lane Project in the Mulholland Tunnel is not needed.</p>	<p>Comment noted. Since the completion of the improvements on I-405, additional improvement needs in this corridor, including Sepulveda Boulevard, are being further examined. SCAG will work with Metro and Caltrans to reflect the ultimate improvement configuration in this corridor in the future RTP/SCS amendments or updates as appropriate.</p>
<i>Submitted by</i> Segura, Melody		Submittal 16054 Related Documents
16054.01.1	<p>I believe the RTP does a good job of addressing the future needs of millenials. Myself and my peers are more conscious about the environment and the effects our actions have on the environment. Therefore, we are interested in activities that reduce our impact on the environment. Specifically, we are more interested in hybrid cars, more efficient public transit and living closer to where we work.</p>	<p>Comment noted. The Mobility Innovations appendix provides an overview of how SCAG analyzed a wide range of technology innovations that could potentially impact travel behavior and locational choices in the region over the next 25 years. In addition, the SCAG Clean Cities Coalition works with regional transit operators to improve the fuel efficiency of transit vehicles. In addition to new bus and rail transit services such as Metro Rail expansion in LA County and rapid bus improvements in Orange, Riverside, and San Bernardino Counties, the RTP/SCS recommends operational and accessibility strategies to improve the efficiency and effectiveness of transit. This includes transit signal priority, inter-county fare agreements (universal transit pass), real-time passenger information systems, and first/last mile strategies. One of the 2016 RTP/SCS land use strategies is to focus future housing and employment growth in High-Quality Transit Areas (HQTA), which moves the region towards more compact, mixed-use development leading to more opportunities for walking and biking, more transit use, and shorter auto trips. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, local jurisdictions maintain local land use authority.</p>

ID	Comment	Response
<i>Submitted by</i> Segura, Melody		Submittal 16054 Related Documents
16054.01.2	In regards to transportation and jobs, I think the plan should include a strategy to attract more jobs to areas like the Inland Empire, where several people commute out to other areas for jobs. Personally, I think the more jobs that are available for residents near the areas where they live, the less they will have to commute long distances for jobs.	Comment noted. The 2016 RTP/SCS in and of itself is a job creation engine and the jobs created by the plan would come either directly from investments in transportation infrastructure (jobs from construction, operations, and maintenance) or from the improvements made to the transportation network (jobs from network efficiencies and related increases in regional economic and business competitiveness). SCAG develops the RTP/SCS in close collaboration with stakeholder agencies such as the county transportation commissions, which are responsible for planning, managing, and prioritizing the portfolio of transportation investments in their respective counties, as well as the allocation of locally generated transportation revenues. One of the benefits of an improved transportation system is the impact on commutes. Chapter 7 of the 2016 RTP/SCS provides some insight on how transportation improvements increase the region's economic competitiveness. Reducing travel time allows firms to hire from a larger geographic area. This effectively increases the firm's labor market – particularly in a large urban area like the SCAG region where reductions in commuting time can yield access to many more potential employees. Likewise, if the region's transportation system supports more efficient commutes, then employers will be encouraged to draw from larger labor market pools, and if that larger employee pool allows firms to hire better employees, eventually those firms will move into the region in response to those improved hiring prospects.
16054.01.3	Also, the Inland Empire has a large trucking and logistics industry and as a result, there is heavy truck traffic in the area. One concern I have is pollution. It would be great if the plan could include guidelines or recommendations for these vehicles so their impact on air quality is reduced or if companies could reduce the trips they generate in the area.	2016-2040 RTP/SCS Goods Movement Environmental Strategy emphasizes coordinated strategies that support state and regional initiatives to reduce harmful pollutants from goods movement activities. The Plan continues to focus on the long-term goal of a zero-emission goods movement system where technically feasible and economically viable, while also integrating near zero-emissions technologies that serve as bridging options to continue to reduce emissions. Broad deployment of zero-and near zero-emission transportation technologies in the 2023 to 2040 timeframe is a critical and significant undertaking with technological, cost and operational challenges. In recognizing this, the 2016 RTP/SCS outlines a roadmap for developing and deploying needed technologies, along with key action steps for public sector agencies to help move the region to that objective.
<i>Submitted by</i> Snyder, Kristi		Submittal 16057 Related Documents
16057.01.1	I live in Rancho Cucamonga commute to Orange then husband continues to Long Beach. We can not afford to be penalized for commuting a long distance. We already pay our fair share in gas taxes for the STATE, LOCAL & FED governments'. People will not want to buy real estate in Rancho Cucamonga if they are fined. Our real estate prices will go down.	Gas tax revenues, in real terms, are actually in decline as tax rates (both state and federal) have not been adjusted in more than two decades while the number of more fuel efficient and alternative powered vehicles continue to grow. The Plan identifies several new funding sources that are reasonably expected to be available and are included in the financially constrained plan. These sources include adjustments to existing state and federal gas tax rates and a long-term replacement of state and federal gas taxes with a mileage-based user fee to maintain the historical purchasing power of the gas tax.

ID	Comment	Response
<i>Submitted by</i> Snyder, Kristi		Submittal 16057 Related Documents
16057.01.2	Ditch the speed train to Northern California. No one wants it and no one will use it. I see trains go by in Orange with only a few people on them. Cancel any train/bus schedules that are not profitable.	The 2016 RTP/SCS includes investments in our region's rail network in order to provide additional capacity for interregional travel in our state as its population continues to grow. This includes investments in existing commuter and passenger rail systems in addition to future CA High Speed Train (HST). The CA HST is mandated to operate without a public subsidy. Rail ridership in our state and region consistently has increased year over year except during the Great Recession.
16057.01.3	Do not spend money you do not have. I have to live within a budget and so should the Government. You should be trying to reduce your spending and living within your means. Kristi Snyder 14078 San Dimas Lane Rancho Cucamonga, CA 91739 951-966-5044	In accordance with state and federal requirements, the 2016 RTP/SCS includes a financial plan that estimates how much funding will be needed to implement transportation investment needs, as well as operate and maintain the transportation system as a whole over the life of the Plan. The Plan must demonstrate that there is a balance between the estimated costs of the projects and programs described in the Plan and revenue sources reasonably expected to be available for transportation investments.
<i>Submitted by</i> Swan, Cari		Submittal 16269 Related Documents
16269.01	I find this entire plan, all the assumptions and vision to be fundamental WRONG and repulsive! This UNELECTED board has far overstepped what should "reasonably" be the role of SCAG....although I would argue that there is NO ROLE for SCAG in a representative government! I fundamentally disagree with virtually all the assumptions being spewed as fact with respect to: 1) "Climate Change" which is nothing more than weather and has been scientifically disproven; 2) land use---I have yet to meet the "millennial" who actually WANTS to live in a stack-n-pack box (I happen to be the parent of 3 millenials!). There isn't anything I read in this document that I can agree with or be even remotely comfortable!! The only simple way I can summarize is that if Federal transportation money is tied to having these plans (RTP & SCS) then you should go back to the drawing board, and do AS LITTLE AS POSSIBLE AND GET THE HECK OUT OF OUR LIVES!!! SCAG is systematically destroying the wonderful communities of Southern Calif and attempting to socially engineer our lives! What a WASTE of taxpayer money. If SCAG is truly concerned about repairing the issues of transportation & infrastructure, how about trying to fix the MASSIVE unfunded liabilities caused by excessive employee union commitment throughout the state! Take care of this problem and EVERYTHING else will fix itself!	Comment noted.
<i>Submitted by</i> Tarkington, Ann		Submittal 16365 Related Documents Link
16365.01	NO MORE HIGH DENSITY!!! I live in Huntington Beach, CA. and it is NOW A NIGHTMARE!!! No one really does substantial planning for anything!!! I only found the info for this this afternoon. I only have a few hours to respond!! The majority of people have had it with HD!! It has to STOP NOW!!	Comment noted. SCAG's SCS is built upon input from local jurisdictions and SB 375 legislation does not require a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. For the purposes of SB 375, and reducing Greenhouse Gas (GHG) emissions and Vehicle Miles Traveled (VMT), SCAG, in some cases, altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. The "Forecasted Regional Development Types" maps have been developed for the purpose of modeling performance. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, local jurisdictions maintain local land use authority.

ID	Comment	Response
<i>Submitted by</i> Teutsch, Carol		Submittal 16162 Related Documents Link
16162.01	<p>Is Metro going to do the right thing for the people of Los Angeles as they consider the 710 north tunnel? The preponderance of evidence from scientific sources addresses great concern about the significant negative impact of the 710 tunnel on our air quality and human health. I highlight health concerns as you continue to deliberate on the future of the tunnel proposal. More detailed health comments and scientific literature can be seen in my DEIR comments. I wanted to bring to your attention two recent articles authored by leading researchers in the field of environmental health. The first is by Dr. Scott Fruin from the University of Southern California entitled "LA Metro/CalTran's 710 tunnel plan will take your breath away. Literally." http://www.wpra.net/files/public/WPRA%20News%20PDFs/WPRA2016winNL.pdf. According to the article, the tunnel will result in concentrated pollution for many nearby residents, visitors, and sensitive receptors. The author points out valid critiques of the model used in the EIR and points to the omission of critical traffic related pollutants in the studies done by the transportation agency. According to Civil Engineer Gregory M. Rowangould's analyses, models, and maps, one can see very clearly near roadway pollution gradients based on specific transportation pollution sources. These findings, based on detailed data, are very relevant to an examination of health impacts. Metro/Caltrans maps seem to show overall regional pollution at a much lower resolution and lower specificity and predictive models on air quality seem to rely heavily on general pollution reduction measures which is a deficit in their model. For transparency and for adequate consideration of health effects, a comparison of the data and reconciliation should be performed by independent scientists. The second article by Dr. Andrea Hricko, faculty from the Environmental Health Department in Preventive Medicine from the University of Southern California, reports on her team's National Institute of Environmental Health Sciences research showing the important negative impact of diesel pollution on health.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>
16162.02	<p>"Two decades of NIEHS-funded research (http://www.ncbi.nlm.nih.gov/pubmed/8179653) have clearly linked serious health risks with exposure to elevated levels of fine particulate matter and other components of diesel exhaust, especially for those who live close to highways and roads (http://www.ncbi.nlm.nih.gov/pubmed/17307103" Importantly, children's lungs improved as pollution dropped. We must think of the health of our children, all our region's children, as we consider this massive infrastructure proposal. Metro/Caltrans needs to be transparent about how port traffic would use this 710 north tunnel route. Otherwise their impact assessments are wrong and misleading. As citizens, we are appalled when we see large corporations and government agencies flagrantly disregarding the legally binding agreements, such as the clean port mitigation standards and looking to overturn them. ("Port of Los Angeles has failed to meet pollution-cutting measures" Los Angeles Times.) Trust in government and transportation agencies evaporates with this kind of illegal maneuvering. Increasing scientific evidence is being published about increased mortality with noise at certain decibel levels and the physiologic impacts of noise on sleep, stress hormones and blood pressure. (The risks of noisy roads LA Times Jan 9, 2016) PLEASE RESTORE FAITH IN THE REGION'S TRANSPORTATION DECISION MAKING BODIES BY REMOVING THE 710-NORTH TUNNEL FROM ALL PROJECT LISTS FOREVER. BUILD US A STRONG MULTIMODAL TRANSIT PLAN THAT WILL BE USED BY ALL TO IMPROVE THE ECONOMIC STRENGTH OF THE REGION, AND TRULY IMPROVE OUR AIR QUALITY AND PROTECT OUR HEALTH.</p>	<p>Comment Noted. SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.</p>

ID	Comment	Response
Submitted by Tripoli, Vicki		
16195.01	Single person auto travel is rapidly becoming unsustainable. It would be a waste of scarce finances to expand or upgrade this method of transportation. Allowing this option to decay encourages the use of more sustainable public transportation in which most of the budget should be used.	Submittal 16195 Related Documents Comment noted. One of the many goals of the RTP/SCS is provide people with options when it comes to travel. We believe, 90 percent of the trips will continue to rely on our roadways. Therefore, investments to maintain and strategically add capacity to our roadways will continue to be critical to meet the needs of our region.
Submitted by West, Janet		
16229.01	I oppose this plan and SCAG in it's entirety. SCAG is a big government, top down entity that most of the public has no knowledge that it even exists. It's activities are tyrannical socialism whereby they believe they know what's best for us lesser people. The last thing we need is another layer between local and state government. Stop the nonsense.	Submittal 16229 Related Documents Comment noted. SCAG's Regional Council and Policy Committee Members are elected Mayors, City Council members and County Supervisors from jurisdictions throughout the SCAG region. The cities and counties appoint the elected officials to represent them at SCAG's Regional Council and Policy Committees.
Submitted by Anonymous		
16357.01	Okay. First and foremost, SCAG is a Corporation and because SCAG is a corporation I do not consent to any of your mandates, edicts or demands. You need to show me the contract that I signed as a willing consenting adult before we can even have this conversations. Secondly, SCAG is not constitutional. Nowhere in the Constitution does it talk about JPA it's a made-up term to steal government away from people at the local level. There is nothing good about Regional Government. When you take 191 cities and put them altogether in one body which is what SCAG is, you have created a massive government. There is not one big government in history that has ended well for the people. This whole SCAG Regional Transportation process proves why Regionalism is terrible for this country. An associate of mine who is not here we discussed -- he and I discussed sitting down and reading the thousands of page that are in the SCAG RTP/SCS and EIR documents we were going to make notes and eventually publish a report refuting the plan.	Submittal 16357 Related Documents Comment noted. Founded in 1965, the Southern California Association of Governments (SCAG) is an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law as a Regional Transportation Planning Agency and a Council of Governments. SCAG's is governed by an 86-member Regional Council, which is comprised of duly elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. These elected officials meet monthly as members of SCAG's Regional Council and Policy Committees, and they have discussed the proposed Draft 2016 RTP/SCS at regular and special meetings and will consider the Final Plan for adoption at their April 7, 2016 meeting. The roster of Regional Council members can be found on SCAG's website at http://scag.ca.gov .
16357.02	The whole idea of reading the document that is published in the report is not even possible given the time constraints; secondly, even if we were able to get the report complete we would then have to go to through 191 elected representatives in 191 different cities and try to convince them on a side to vote, that's 191 people and we only have several months to do all of this. So, we have to take the localism and local government if the same thing were happening in a local city we would only have to convince three people to agree with us on the plan. That is three versus 191. That example that I just read is the very reason why this regionalism has to stop, it completely shuts we the people out of progress.	Comment noted. SCAG provided a 60 day public review and comment period beginning December 4, 2015, and concluding on February 1, 2016, for the Draft 2016 RTP/SCS and the PEIR. There are additional opportunities to provide comment, including speaking at upcoming meetings of the Regional Council and Policy Committees or speaking with your Regional Council representative. To find your SCAG board representative, please visit SCAG's website, www.scag.ca.gov SCAG's Regional Council and Policy Committee members are elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. The cities and counties appoint the elected official to represent them at SCAG's Regional Council and Policy Committees. SCAG's Regional Council and Policy Committee meetings are open to the public and publicly noticed. SCAG Regional Council meetings are also available via live streaming on SCAG's website, www.scag.ca.gov .

ID	Comment	Response
<i>Submitted by</i> Anonymous		Submittal 16357 Related Documents
16357.03	<p>Now, let's get into what the plan is based on. The entire plan is based on sustainability. Now, when you ask these planners what sustainability is they are likely to say something along the lines of making development that fits the current needs while preserving the ability for future generations to meet their own needs. What the hell does that even mean? Seriously, half the time you ask a planner what sustainability is they usually use the word sustainability in their answer which tells me they don't even know what it means. So, I have spent four years trying to figure out what sustainability actually is and I have the answer. Sustainability is rational. It is being forced to use less of everything. Less water, they've got that covered already. Less energy, they are attempting that as renewable. Renewable energy is a giant total capital scam where the government takes one of the looters and crops up field industries by that trade [sic]. Less food, that's been worked on by the United Nations right now.</p>	Comment noted.
16357.04	<p>Less mobility, I cannot believe you guys think we are so stupid that people are actually going to believe that going from a car to a bus or a bike is somehow getting around quicker. Seriously, that is insane. Less freedom, freedom is choice and you are destroying our choices with this plan. And let's talk about those choices. You are acting like you are doing us a favor by providing us a bike lane, buses and trains that most people want nothing to do with. However, this is all a huge scam.</p>	Comment noted.
16357.05	<p>Last year the state attempted to cut gasoline in half by 50 percent the bill was called SB350. The bill passed but the gasoline language was taken out of the bill. We have confirmation the state will be trying to pass that again this year in 2016. So yes, the State of California is trying to get us out of our cars. We are seeing all of this planning right now because you know the main option that everyone wants is going to be eliminated. So, stop with this garbage that you are doing us a favor. This is a surrounded big government that is waging war against us. You are not doing anybody any favors.</p>	Comment noted.
16357.06	<p>Lastly, I want to address this lie about the millennials how my generation wants to walk and ride bikes everywhere and live in little shoebox apartments. First off, my generation is glued to their phones so they are completely disengaged, as a result they are not coming to these meetings and demanding what you are saying, they are demanding. I have yet to see this ever happening.</p>	Comment noted.

ID	Comment	Response
<i>Submitted by</i> Anonymous		Submittal 16357 Related Documents
16357.07	<p>Secondly, we are told the millennials want to spend lots of money with small apartment. How is that going to happen? We were screwed by older generations when they told us that we must go to college. Not only is a college degree worthless now, but it has put all the young people in debt so they're not going to be spending \$400,000 on a so-called luxury apartment. The truth is every single city is increasing the number of housing units and we have a president that has opened up the borders and brings in illegal aliens and refugees in the different wars that are going on. Those people need a place to live if they are going to be here. That is the real reason why we are seeing all this building. America is being transformed into a Third World Country and that is evident by the fact that the American dream of a golden card is being destroyed. If you want to know what Obama's fundamental transformation looks like this is it. All this planning this Central planning that you are engaged in this is communism. Mouths trying to sell Russia in a 5-year, 10-year and 20-year planning cycle. I mean, come on, this is such a joke. How is it you are throwing this at our faces.</p>	<p>A lack of housing options is one of the contributing factors to the high cost of housing, particularly in areas where there are few affordable housing units available. While the RTP/SCS is a regional document, local land use decisions are made at the jurisdictional (city and county) level. SCAG encourages jurisdictions to look at different strategies to ensure that there is sufficient housing for its current and future population, otherwise it will lead to a multitude of problems, such as overcrowding and unsafe conditions.</p>
<i>Submitted by</i> Anonymous		Submittal 16358 Related Documents
16358.01	<p>But here's the thing so we've got a really hugely growing population. I mean, side to side all your feelings about everything else, we have the second worst congestion in the country. So, it is taking a long time to get around and that actually does put a burden on people that have less money. I mean, I just moved back to California I used to be a homeowner, I can't afford like a \$2,000 apartment and to have a car and drive around and transition between careers. So, being able to jump on something quickly the obligation to not own a car would really help me so I could afford a \$2,000 apartment and I could get around. So, here is my thing, what is the solution, you guys? We have so many people in this environment.</p>	<p>Comment noted. The RTP/SCS begins with a vision for the region that states: "In our vision for the region in 2040, many communities are more compact and connected seamlessly by numerous public transit options, including expanded bus and rail service. People live closer to work, school, shopping and other destinations. Their neighborhoods are more walkable and safe for bicyclists. They have more options available besides driving alone, reducing the load on roads and highways." The integrated land use and transportation strategies in the plan aim to build more transit infrastructure, increase existing service, improve housing affordability by strategically increasing supply, and improve congestion through innovative market-based strategies.</p>