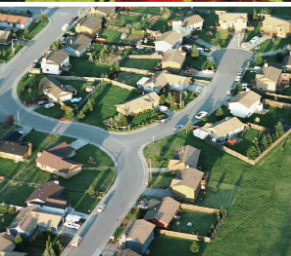
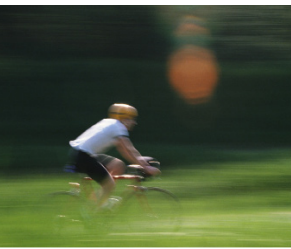


*FINAL*  
**Program Environmental  
Impact Report**  
*for the 2012-2035 RTP/SCS*

Southern California Association of Governments  
2012-2035 Regional Transportation Plan/Sustainable Communities Strategy  
March 2012 | State Clearinghouse # 2011051018



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# 1.0 INTRODUCTION

This document is the Final Program Environmental Impact Report (PEIR or EIR) for the 2012-2035 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS or Plan). This document together with the Draft PEIR and its technical appendices comprise the Final PEIR. The document has been prepared by the Southern California Association of Governments (SCAG) in accordance with the California Environmental Quality Act (CEQA).

A Final PEIR is required under Section 15132 of the CEQA Guidelines to include the Draft PEIR; comments and recommendations received on the Draft PEIR either verbatim or in summary; a list of persons, organizations, and public agencies who commented on the Draft PEIR; the responses of the Lead Agency to significant environmental issues raised by those comments in the review and consultation process; and any other relevant information added by the Lead Agency (including minor changes to the PEIR). A Mitigation Monitoring and Reporting Program is also required.

The evaluation and response to public comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft PEIR; (2) the ability to detect any omissions which may have occurred during preparation of the Draft PEIR; (3) the ability to check for accuracy of the analysis contained within the Draft PEIR; (4) the ability to share expertise; and (5) the ability to discover public concerns.

Furthermore, this document also provides revisions to the Draft PEIR made in response to comments, staff review, and/or changes to the proposed projects. These revisions also correct, clarify, and amplify the text in the Draft EIR, as appropriate, and do not alter the conclusions of the Draft PEIR.

## PROCESS

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As defined by Section 15050 of the CEQA Guidelines, SCAG is the Lead Agency which prepared both the Draft and Final PEIR for the project, the 2012-2035 RTP/SCS.

SCAG prepared and circulated the Draft PEIR beginning on December 30, 2011 and ending on February 14, 2012. SCAG placed the Draft PEIR at the offices of SCAG and at the main public library in each of six counties in the region, and posted an electronic copy of the Draft PEIR on the SCAG website. Additionally, a notice of availability of the Draft PEIR was transmitted to responsible and trustee agencies, regulatory agencies and others to request comments on the Draft PEIR, pursuant to CEQA Guidelines Section 15086. Comments on the Draft PEIR were received during the comment period, and those comments are responded to in this Final PEIR. The Final PEIR, together with the proposed project, will be submitted to SCAG Regional Council for review, and the Regional Council will consider certification of the Final PEIR and approval of the 2012-2035 RTP/SCS.

## CONTENTS OF THE FINAL PEIR

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As discussed above, the primary intent of the Final PEIR is to provide a forum to air and address comments pertaining to the analysis contained within the Draft PEIR. Pursuant to Section 15088 of the CEQA Guidelines, SCAG has reviewed and addressed all written comments received on the Draft PEIR by the comment period deadline. Included within the Final PEIR (Appendix H) are the written comments that were submitted during the required public review period.

In order to adequately address the comments provided by interested agencies and the public in an organized manner, this Final PEIR includes the Draft PEIR and the following chapters and appendices:

**Chapter 1: Introduction.** This chapter provides a brief introduction to the Final PEIR and its contents.

**Chapter 2: Master Responses.** This chapter provides Master Responses. These are responses to comments that recurred in a number of comment letters.

**Chapter 3: Commenters on the Draft 2012-2035 RTP/SCS PEIR.** This chapter provides a list of commenting agencies, organizations and individuals.

**Chapter 4: Responses to Comments on the Draft PEIR.** This chapter provides responses to written comments made by both the public agencies and interested parties. Some of the comment letters received on the Draft PEIR also provide comments on the Proposed Plan (not the anticipated environmental impacts). These Plan-related comments are addressed separately as part of the RTP/SCS process.

**Chapter 5: Corrections and Additions.** This chapter provides a list of corrections and additions to the Draft PEIR. None of the changes significantly impact the conclusions presented in the Draft PEIR.

**Chapter 6: Mitigation Monitoring and Reporting Program.** This chapter includes the Mitigation Monitoring and Reporting Program (MMRP) prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the CEQA Guidelines.

**Technical Appendices.** This Final PEIR includes two new appendices. Appendix G identifies measures that could reduce project impacts and Appendix H contains comment letters received on the Draft PEIR. Appendix H is included on a CD in a sleeve inside the back cover of printed copies of the Final PEIR and can also be downloaded (along with the rest of the PEIR) at <http://rtpscs.scag.ca.gov/Pages/Final-2012-PEIR.aspx>.

## REVIEW AND CERTIFICATION OF THE FINAL PEIR

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Consistent with CEQA (Public Resource Code Section 21092.5), responses to agency comments are being forwarded to each commenting agency ten days prior to certification of the Final PEIR. In addition, responses are also being distributed to all commenters who provided an address. The Final PEIR is available for public review at libraries in each county in the region. Additionally, the Final PEIR can be downloaded at <http://rtpscs.scag.ca.gov/Pages/Final-2012-PEIR.aspx>.

## 2.0 MASTER RESPONSES

### MASTER RESPONSE 1 – MITIGATION MEASURES

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In the Draft PEIR circulated beginning December 30, 2011, there were two types of mitigation measures:

1. Those that SCAG has committed to undertake in their role as MPO and regional clearinghouse. These measures include among other things, information gathering and dissemination, workshops to encourage coordination and problem solving.
2. Measures suggested for Project Sponsors and local agencies (phrased as “can and should” be implemented) to undertake as part of their obligations under CEQA for environmental review of individual planning, development and transportation projects.

CEQA requires that each lead agency establish CEQA guidelines to guide implementation of CEQA. These guidelines generally address what actions trigger CEQA and what thresholds are to be used to determine when an impact is significant. Once a lead agency determines that an impact is significant, CEQA requires that all feasible mitigation measures be implemented. CEQA further requires that a feasible project alternative, with the least environmental impacts and meeting most of the project objectives be adopted. It is up to the Lead Agency for each individual project, to make findings that for all significant impacts, all feasible mitigation measures are required and alternative(s) adopted in accordance with CEQA.

SCAG has no role in the determination of significance on a project-specific level or any role in requiring project-specific mitigation. The Draft PEIR identified several hundred *potential* project-specific mitigation measures. These were generic measures that were not tailored to specific locations or projects. CEQA allows a Lead Agency to identify mitigation measures that are outside its jurisdiction to implement. However, with respect to projects in the region, SCAG has no role in project specific analysis and identification of applicable and feasible mitigation measures.

With respect to individual planning, development, and transportation projects in the region, anticipated to occur under the RTP/SCS, SCAG has no authority to impose mitigation, nor does it have information on environmental settings or project-specific details that would allow identification of applicable and feasible mitigation measures. All discretion and judgment as to what constitutes a significant impact and what mitigation measures are applicable and feasible, lies with the local agency. Therefore, the measures identified in the Draft PEIR were a non-specific, non-exclusive, generic list of examples of mitigation measures for local agencies to consider and implement if applicable and feasible. SCAG can provide no guidance as to when to use the measures, what measures might be feasible in individual cases and if used to what extent impacts would be mitigated.

The Draft PEIR indicated that SCAG has no authority to adopt local land use plans and/or approve local land use projects and that SCAG has no authority to mitigate impacts of land use plans and projects. It further suggested that the project-specific measures were provided in order to help agencies in identifying potential measures to address different types of impacts that they may identify in their project-specific environmental documents. Given that there are numerous types of projects and geographic conditions throughout the region, the list of suggested measures is long. This list also includes measures that require compliance with various laws. While potential impacts are assessed assuming implementation of applicable legal requirements, when viewed from the regional perspective, many of the legal requirements are flexible and may require further interpretation or consultation with resource agencies. As such, the resulting reduction in impacts may be difficult to quantify. Thus, in the interest of providing information to the public, SCAG included these measures containing legal requirements among the example measures.

In response to numerous public and agency comments concerning SCAG's lack of authority to impose mitigation measures on local jurisdictions, transportation agencies, or project sponsors, this second set of project-specific mitigation measures has been moved in to a new appendix (Appendix G) to clarify that these measures are simply examples of different ways that Lead Agencies may comply with CEQA when **they find** a significant impact. While implementation of these measures (and/or other measures tailored specifically to projects) as applicable and feasible by local lead agencies would reduce impacts anticipated to result from the 2012-2035 RTP/SCS, the lack of specificity in how, when, and where to apply these measures, in addition to the lack of SCAG jurisdiction, makes placing these measures in an appendix an appropriate approach. As such, these measures are not included as formal mitigation measures for the 2012-2035 RTP/SCS, but instead may be considered a non-exclusive menu of examples of options from which local agencies may choose (together with other measures available from other sources).

While the number of actual mitigation measures in the PEIR has been substantially reduced, the effect of this change is less than significant. The underlying assumption to all the project specific mitigation measures (phrased as “can and should” in the Draft PEIR) remains true. It is assumed that all projects undertaken by project sponsors and local jurisdictions will comply with CEQA by exercising their discretionary authority to impose and implement all applicable and feasible mitigation measures necessary to reduce any identified significant impact to a less than significant level (or to reduce the impact to the extent feasible). In essence, all the project specific mitigation measures proposed in the Draft PEIR are captured in one measure, as follows: SCAG reasonably assumes that lead agencies will exercise their discretionary authority (through local land use and other project permits and approvals) to implement all applicable and feasible mitigation measures (and alternatives) identified through the CEQA process to reduce significant environmental impacts.

This assumption is reiterated in the new summary mitigation measures added to each PEIR resource area:

*Local agencies can and should comply with the requirements of CEQA to mitigate impacts to [RESOURCE AREA] as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.*

See Chapter 5.0 Corrections and Additions - Global Changes to Mitigation Measures Throughout the PEIR for a description of the changes being made to mitigation measures including moving all mitigation measures suggested for local agencies and project sponsors to the new Appendix G as well as minor edits to mitigation measures directed at SCAG.

There were a number of comments received on the Draft PEIR regarding the inclusion of existing legal requirements as mitigation measures. Legal requirements that mitigate environmental impacts are accounted for in the impact analysis to the extent feasible; however, a number of legal requirements require some amount of interpretation and/or negotiation and therefore cannot be anticipated in advance. In addition the general public may not be aware of all measures required by law that reduce environmental impacts and therefore inclusion of existing requirements as mitigation measures furthers the general purpose of CEQA to act as an informational document. Furthermore, courts have pointed to reliance on statutory requirements to mitigate environmental impacts as proper. (*Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 904; see also *Perley v. Board of Supervisors* (1982) 137 Cal.App.3d 424, 430 [A condition requiring compliance with environmental regulations is a common and reasonable mitigating measure]). Measures that include legal requirements are included as example measures in the new Appendix G.

Because of the wide variety of projects, environmental conditions and other factors, the PEIR finds that most impacts have the potential to remain significant after mitigation. This is because it is anticipated that each and every project will not be able to mitigate the different types of impacts that could occur throughout the region, potentially resulting in impacts that could be significant to the region. The exception to this is in

issue areas related to public safety that are addressed by regulatory agencies, existing regulations and/or local permits. Various regulatory agencies, regulations and guidelines at the federal, state and local levels protect public health, safety and welfare. Therefore, the PEIR finds that potential impacts related to 1) sensitive receptor proximity to transportation infrastructure, 2) potential risks associated with excavation encountering hazardous materials/wastes; and 3) potential impacts related to severing utility lines, will be mitigated to a level of less than significance.

In summary, the revisions to mitigation measures included in the Final PEIR do the following:

- (a) The revisions maintain the important distinction between the Draft PEIR mitigation measures directed to SCAG (phrased as “SCAG shall”) and mitigation measures suggested for other agencies to consider for implementation as part of project-specific CEQA review, as applicable and feasible for any given project;
- (b) The revisions clarify that SCAG has no authority/jurisdiction to require other agencies to implement project-specific mitigation measures, and that the authority to require mitigation resides in CEQA; and
- (c) The revisions more accurately capture SCAG’s intent concerning the mitigation for other agencies, i.e., those agencies have the discretion to determine which measures are applicable and feasible (from a variety of sources including the list of examples now provided in Appendix G) for any given project as project-specific environmental review proceeds.

See Chapter 5.0 Corrections and Additions for a description of changes made to mitigation measures in the Final PEIR.

## MASTER RESPONSE 2 – PROGRAM EIR VERSUS PROJECT/SITE SPECIFIC EIR

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This 2012-2035 RTP/SCS PEIR is a programmatic document that provides a region-wide assessment of the potential significant environmental effects of implementing the projects, programs, and policies included in the 2012-2035 RTP/SCS. CEQA allows that a Program EIR, “may be prepared on a series of actions that can be characterized as one large project and are related either (1) geographically, (2) as logical parts of the chain of contemplated actions, (3) in connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program, or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways” (CEQA Guidelines Section 15168). The 2012-2035 RTP/SCS PEIR offers regional scale analysis and examples of mitigation measures for subsequent, site specific environmental review, including project level EIRs and/or Environmental Impact Statements (EISs) prepared by implementing agencies for individual projects as well as General Plans.

The focus of the environmental analysis in the 2012-2035 RTP/SCS PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2012-2035 RTP/SCS as a whole. It does not include site-specific analysis of any project contained in the 2012-2035 RTP/SCS. Many of the highway, arterial, goods movement, and transit projects included in the 2012-2035 RTP/SCS are identified at a very preliminary conceptual level, and detailed site specific analysis is not possible or appropriate at this time. This 2012-2035 RTP/SCS PEIR addresses environmental impacts and considers alternatives to the level that they can be assessed without undue speculation. (See CEQA Guidelines Section 15126.6(f)(3)). Projects in the 2012-2035 RTP/SCS will require additional site-specific environmental analysis to assess impacts at the project level. As the 2012-2035 RTP/SCS PEIR is a programmatic, regional planning document, it is not intended to provide information in detail sufficient for project-specific analyses. Many of the projects identified in the 2012-2035 RTP/SCS have not yet gone through a full planning process and do not have final alignments or other details of project components.

While the 2012-2035 RTP/SCS PEIR identifies a number of significant and potentially significant impacts at the regional level, these impacts must be separately assessed for each individual project to determine whether any individual project (or General Plan) would have significant or potentially significant impacts at the local or subregional level. Subsequent project-level environmental evaluations will determine whether or not an individual project (or plan) has significant, project-level impacts.

## MASTER RESPONSE 3 – GROWTH ASSUMPTIONS UNDERLYING PEIR ANALYSIS

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The 2012-2035 RTP/SCS contains a growth forecast and set of land use assumptions, which were developed under a different set of parameters than used historically because of the new State law requirements of SB 375. In prior cycles, the RTP included an adopted growth forecast (typically at the subregional level of geography) and a set of assumptions around the more detailed distribution of population, employment and housing. In this cycle, pursuant to SB 375, SCAG prepared a Sustainable Communities Strategy (SCS) as part of the RTP, and the SCS must contain a forecasted pattern of development including general locations, uses, densities and intensities for growth. This process for establishing a growth forecast and pattern of development complies with both federal law requiring the use of current planning assumptions [federal metropolitan planning regulations, 23 CFR 450.322 (e)], and SB 375 requiring a land use pattern laid out with the goal of reducing GHG emissions through VMT reductions [Cal. Gov. Code Section 65080 (b)(2)(B)(vii)].

Moreover, in the 2012-2035 RTP/SCS, SCAG developed the growth and land use assumptions using an extensive, bottom-up, and input driven process. This process is well documented in the RTP/SCS (SCS Background Documentation Appendix). In summary, it involved a series of data exchanges, workshops, and/or one-on-one meetings with staff of the various local jurisdictions in the SCAG region to assure accuracy and agreement on the total population, jobs and housing for each jurisdiction for 2020 and 2035. SCAG further developed the forecasted land use pattern by assuming a general shift toward in-fill and transit oriented development (TOD) in the later years of the plan (between 2020 and 2035). This portion of the process was also documented and extensively discussed with local agencies. Finally, for purposes of plan evaluation and for this PEIR, SCAG developed alternative development patterns that were alternately closer to the past trends (with a more dispersed development pattern and a higher proportion of single family homes compared to multi-family) or more aggressively shifted toward in-fill and TOD (Envision2). These PEIR alternatives are similar, though not identical, to the concepts embedded within the alternatives developed for Plan evaluation. In particular, the PEIR alternatives used the same growth and land use assumptions as the Plan Alternatives, but did not include project and network components at the same level of detail.

Additionally, as allowed under SB 375, both Gateway Cities Council of Governments (GCCOG) and Orange County Council of Governments (OCCOG) developed and submitted to SCAG subregional SCSs including forecasted subregional growth numbers and distributions. These data sets are incorporated by SCAG, unaltered, into the proposed Plan. The subregional SCSs also included a set of implementation policies for their subregions intended to help achieve the goal of reducing passenger vehicle GHG emissions. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in these two subregions. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide. On January 26, 2012, OCCOG adopted a revision (known as 2010 OCP Modified) to the growth forecast data submitted to SCAG as part of their subregional SCS. This dataset is incorporated into the Final RTP/SCS and modeling. Similarly changes to growth distributions within Riverside and San Bernardino Counties are incorporated into the Final 2012-2035 RTP/SCS and modeling. The changes to growth distribution included in the 2010 OCP Modified as well as changes made to growth distributions in Riverside and San Bernardino Counties are minor and do not affect the impact analysis or conclusions included in the



PEIR. The following table summarizes changes to population, households and employment between the Draft and Final 2012-2035 RTP/SCS. The changes in forecast growth range from -0.25% to +0.05% and as such represents a de minimus change in population which results in a similarly de minimis change in traffic and air quality modeling results. In addition, such change is well within the range of impacts analyzed by the project and alternatives.

The result of this process is a regional set of growth data and assumptions that were used in this PEIR for analyzing the regional scale impacts of the Plan. The final proposed Plan recommends adoption of a growth forecast at the jurisdictional level, with underlying more detailed information assumed and used for modeling purposes.

**2012-2035 RTP/SCS GROWTH FORECAST - COMPARISON OF DRAFT AND FINAL**

	Population			Households			Employment		
	2008	2020	2035	2008	2020	2035	2008	2020	2035
Draft	17,895,000	19,700,000	22,146,000	5,814,000	6,462,000	7,323,000	7,738,000	8,417,000	9,436,000
Final	17,895,000	19,663,000	22,091,000	5,814,000	6,458,000	7,325,000	7,738,000	8,414,000	9,441,000
diff (final-draft)	-	(37,000)	(55,000)	-	(4,000)	2,000	-	(3,000)	5,000
% change	0%	-0.19%	-0.25%	0%	-0.06%	0.02%	0%	-0.04%	0.05%

Note: rounded to the nearest 1000

## 3.0 LIST OF COMMENTERS

The public comment period for the Draft 2012-2035 RTP/SCS PEIR extended from December 30, 2011, to February 14, 2012. The table below lists the 99 separate letters and e-mails (two organizations sent two letters) received that included comments on the Draft 2012-2035 RTP/SCS PEIR during the comment period. In addition, comments received on the PEIR in public hearings on the Draft 2012-2035 RTP/SCS around the region are summarized in “Letter 97”.

In addition, a workshop was held February 21 to address the preliminary approach to responding to the change in approach to mitigation measures (see **Master Response No. 1** in Chapter 2.0 of this Final PEIR); no additional comments on mitigation measures were received at this workshop. Joint Policy Committee workshops on the Draft 2012-2035 RTP/SCS and PEIR were held March 1, and March 21, 2012. No substantial new comments on the Draft PEIR were received at those workshops.

Copies of the comments can be found in Appendix H (included on CD inside the back cover of hard copies of the Final PEIR), or available online along with the rest of the PEIR at: <http://rtpscs.scag.ca.gov/Pages/Final-2012-PEIR.aspx>. For purposes of identifying and responding to comments on the Draft PEIR, letters in Appendix H are assigned a number (top right hand corner of the first page of each letter) and each comment on the PEIR within each letter is assigned a number (noted in the right hand margin of each letter in Appendix H). Comments on the Draft 2012-2035 RTP/SCS are not numbered on the copies of letters in Appendix H. Rather, these comments are responded to in the Final 2012-2035 RTP/SCS Public Participation and Consultation Appendix.

The Draft 2012-2035 RTP/SCS was circulated for public during the approximately same time period as the Draft PEIR (December 20, 2011 to February 14, 2012). As noted above, comments on the Draft 2012-2035 RTP/SCS are addressed in a separate document -- Final 2012-2035 RTP/SCS Public Participation and Consultation Appendix.

Several commenters on the Draft 2012-2035 RTP/SCS indicated in the subject line of their letter that they were providing comment on the Draft PEIR but the substance of their letter included only comments on the Draft 2012-2035 RTP/SCS. These letters are not addressed in this Final PEIR. As noted above, comments contained within these letters and responses to those comments can be found in the Final 2012-2035 RTP/SCS Public Participation and Consultation Appendix.

No.	Organization	Commenter Name	Comment Date	Response Page Number
1	Arroyo Verdugo Cities	David A. Spence, Chair of the Arroyo Verdugo Steering Committee	February 9, 2012	4-1
2	Association of American Railroads	Kirk Marckwald, Principal, California Environmental Associates	February 14, 2012	4-1
3	Association of California Cities - Orange County	Lacy Kelly, CEO, ACC-OCC	February 13, 2012	4-2
4	Building Industry Association of Southern California, Inc.	Andrew R. Henderson, Vice President and General Counsel; Steven S. Schuyler, Vice President Government Affairs	February 14, 2012	4-2
5	Carol Teutsch	Carol Teutsch, M.D.	February 13, 2012	4-4
6	Centennial Founders LLC	Carlene Matchniff, Vice President Entitlements	February 14, 2012	4-5
7	Center for Demographic Research	Deborah S. Diep, CDR Director	February 14, 2012	4-5
8	City of Anaheim - Planning Department	Sheri Vander Dussen, AICP, Planning Director; Natalie Meeks, Public Works Director	February 14, 2012	4-8

No.	Organization	Commenter Name	Comment Date	Response Page Number
9	City of Brea	David M. Crabtree, AICP, Community Development Deputy Director/City Planner	February 9, 2012	4-8
10	City of Chino	Mike Kellison, AICP, Senior Planner	February 14, 2012	4-10
11	City of Diamond Bar	James DeStefano, City Manager	February 14, 2012	4-10
12	City of Glendale - Management Services Division	Scott Ochoa, City Manager	February 14, 2012	4-10
13	City of Glendale - Office of the Mayor	Laura Friedman, Mayor	February 3, 2012	4-11
14	City of Irvine	Sean Joyce, City Manager	February 13, 2012	4-11
15	City of Los Angeles (Board Packet)	Jaime de la Vega, General Manager, Department of Transportation	January 30, 2012	4-16
16	City of LA Canada-Flintridge	David A. Spence, Mayor	February 9, 2012	4-16
17	City of La Habra	Carlos Jaramillo, Deputy Director of Community Development	February 13, 2012	4-16
18	City of Lake Forest	Gayle Ackerman, AICP, Director of Development Services	February 14, 2012	4-17
19	City of Mission Viejo	Dennis Wilberg, City Manager	February 14, 2012	4-17
20	City of Newport Beach - Community Development Department	Brenda Wisneski, Deputy Director, Community Development Department	February 14, 2012	4-17
21	City of Ontario	Chris Hughes, City Manager	February 14, 2012	4-17
22	City of Orange	Alice Angus, Community Development Director	February 14, 2012	4-17
23	City of Rancho Santa Margarita	Nate Farnsworth, Senior Planner, AICP	February 9, 2012	4-18
24	City of Riverside - Community Development Department, Planning Division	Steve Hayes, AICP, Interim City Planner	February 14, 2012	4-18
25	City of San Bernardino Municipal Water District	Matthew H. Litchfield, P.E., Director, Water Utility	February 8, 2012	4-18
26	City of San Clemente - City Manager	George Scarborough, City Manager	February 14, 2012	4-18
27	City of Santa Ana - Planning & Building Agency	Jay M. Trevino, Executive Director	February 14, 2012	4-19
28	City of Santa Clarita	Robert Newman, Director of Public Works	February 14, 2012	4-19
29	City of South Pasadena - Office of the City Council	Michael A. Cacciotti, Mayor; Philip C. Putnam, Mayor Pro Tem; Robert S. Joe, Councilmember; Marina Khubesrian, M.D., Councilmember; Richard D. Schneider, M.D., Councilmember	February 1, 2012	4-19
30	City of Stanton	Omar Dadabhoy, Community Development Director	February 14, 2012	4-20
31	City of Tustin	John Nielsen, Mayor	February 8, 2012	4-20
32	Coachella Valley Association of Governments and Western Riverside Council of Governments	Tom Kirk, CVAG Executive Director; Rick Bishop, WRCOG Executive Director	February 14, 2012	4-21
33	Construction Industry Air Quality Coalition (CIAQC)	Michael W. Lewis, Senior Vice-President	February 14, 2012	4-21
34	County of Orange	Thomas G. Mauk, County Executive Officer	February 10, 2012	4-21
35	Elise Kalfayan	Elise Kalfayan	February 14, 2012	4-22
36	Ezekiel Gutierrez, ESQ.	Ezekiel Gutierrez, Jr.	February 14, 2012	4-23
37	G. K. Roumani	G. K. Roumani	February 11, 2012	4-23
38	Hank Fung	Hank Fung, P.E.	February 14, 2012	4-24
39	Hills for Everyone	Claire Schlotterbeck, Executive Director	February 10, 2012	4-24
40	Imperial County Air Pollution Control District	Brad Poiriez	February 14, 2012	4-24

No.	Organization	Commenter Name	Comment Date	Response Page Number
41	John M. Fentis	John M. Fentis, Deputy City Prosecutor (retired), Long Beach City Prosecutor, Environmental Crimes Unit, Current Environmental Project Director, California District Attorneys Association		4-24
42	Joyce Dillard	Joyce Dillard	February 14, 2012	4-25
43	Judy Bergstresser	Judy Bergstresser		4-26
44	Latino Health Access	Dolores Gonzalez-Hayes, Director of Policy	February 14, 2012	4-27
45	Majestic Realty	Fran Inman, Senior Vice President	February 14, 2012	4-27
46	Mesa Consolidated Water District	Paul E. Shoenberger, P.E., General Manager	February 13, 2012	4-27
47	Metropolitan Water District	Deirdre M. West, Manager, Environmental Planning Team	February 14, 2012	4-28
47A	Metropolitan Water District	Deirdre M. West, Manager, Environmental Planning Team	February 24, 2012	4-28
48	Municipal Water District of Orange County	Kevin P. Hunt, P.E., General Manager, Municipal Water District of Orange County; Robert R. Hill, General Manager, El Toro Water District; John Schatz, General Manager, Santa Margarita Water District; Paul Shoenberger, P.E., General Manager, Mesa Water District; Michael Dunbar, General Manager, South Coast Water District	February 14, 2012	4-28
49	NAIOP Commercial Real Estate Development Association- Inland Empire Chapter	Robert Evans, Executive Director	February 14, 2012	4-29
50	NAIOP Commercial Real Estate Development Association- SoCal Chapter	James V. Camp, Director	February 14, 2012	4-29
51	Natural Resource Defense Council & Endangered Habitat League	Amanda Eaken, Deputy Director, Sustainable Communities; Adrian Martinez, Staff Attorney; Michael Fitts, Staff Attorney	February 14, 2012	4-29
52	No710 Coalitions/ STOP 710	Dr. Tom Williams	February 14, 2012	4-29
53	No on 710 Action Committee	Claire Bogaard, Pasadena; Susan Bolan, La Crescenta; Sam Burgess, Pasadena; Janet Ervin, Alhambra; Trisha Gossett, Highland Park; Bill Graham, Burbank; Don Jones, Eagle Rock; Elise Kalfayan, Glendale; Clarice Knapp, South Pasadena; Harry Knapp, South Pasadena; Joanne Nuckols, South Pasadena; Carol Teutsch, Los Angeles; Don Smith, Long Beach; Jan Sao Hoo, La Canada Flintridge; Odom Stamps, South Pasadena; Sherry Stubbs, Glendale; Tom Williams, El Sereno	January 30, 2012	4-30
53A	No on 710 Action Committee	Clarice Knapp, South Pasadena; Carol Teutsch, Los Angeles; Susan Bolan, La Crescenta; Harry Knapp, South Pasadena; Sherry Stubbs, Glendale; Wayna Kato, South Pasadena	February 13, 2012	4-30
54	Occidental College, Urban and Environmental Policy Institute	Mark Vallianatos, Policy Director	February 14, 2012	4-31
55	Orange County Business Council	Kate Klimow, Vice President, Government Affairs	February 13, 2012	4-31
56	Orange County Council of Governments	Peter Herzog, Chairman	February 14, 2012	4-32
57	Orange County Department of Education	Andrea Sullivan, Director, Facilities Planning and Maintenance & Operations	February 9, 2012	4-32

No.	Organization	Commenter Name	Comment Date	Response Page Number
58	Orange County Transportation Authority, Transportation Corridor Agencies, Orange County Council of Governments, Association of California Cities - Orange County, County of Orange, Orange County Business Council	Will Kempton, Chief Executive Officer, Orange County Transportation Authority; Tom Margro, Chief Executive Officer, Transportation Corridor Agencies; Tom Mauk, Chief Executive Officer, County of Orange; Lucy Dunn, President, Orange County Business Council; Lisa Bartlett, President, League of California Cities, Orange County; Rich Freschi, President, Independent Special Districts of Orange County; Peter Herzog, Chairman, Orange County Council of Governments; Lacy Kelly, Chief Executive Officer, Association of California Cities - Orange County; Deborah S. Diep, Director, Center for Demographic Research	February 14, 2012	4-33
59	Orange County Transportation Authority	Paul G. Glaab, Chairman	February 14, 2012	4-34
60	Paskerian, Block, Martindale & Brinton LLP (PBMB)	C. Jeff Brinton	February 13, 2012	4-34
61	Peter A. Orona	Peter A. Orona	February 5, 2012	4-34
62	Port of Long Beach	Eric C. Shen, P.E., PTP, Director of Transportation Planning	February 3, 2012	4-34
63	Puente Hills Habitat Preservation Authority	Bob Henderson, Chairman	January 26, 2012	4-35
64	Realtors Committee on Air Quality	Carol Banner, Chairman	February 13, 2012	4-35
65	Regional Hispanic Chamber of Commerce	Jim Clarke, Executive Director, Apartment Association of Greater Los Angeles (AAGLA); Hilary Norton, Executive Director, FAST – Fixing Angelenos Stuck in Traffic; Gene Hale, Chairman, Greater Los Angeles African American Chamber; Andrew R. Henderson, Vice President and General Counsel, Building Industry Association of Southern California, Inc.; Elizabeth Warren, Executive Director, FuturePorts; Paul C. Granillo, President & CEO, Inland Empire Economic Partnership; Heidi L. Gallegos, Executive Director, Eastvale Chamber of Commerce; John Kelsall, President & CEO, Greater Lakewood Chamber of Commerce; Joeann Valle, Executive Director, Harbor City/Harbor Gateway Chamber of Commerce; Gary Toebben, President & CEO, Los Angeles Area Chamber of Commerce; Kate Klimow, Vice President of Government Affairs, Orange County Business Council; Rich Lambros, Managing Director, Southern California Leadership Council; Patty Senecal, Manager, Southern California Region and Infrastructure Issues Western States Petroleum Association; Alexander Pugh, Senior Project Manager - Policy & Project Management, Southern California Edison; David Fleming, Founding Chairman, Los Angeles County Business Federation; T.L. Garrett, Vice President, Pacific Merchant Shipping Association; Ron L. Wood, President & CEO, The Valley Economic Alliance; Michael W. Lewis, Senior Vice-President, Construction Industry Air Quality Coalition (CIAQC); Bill Allen, President & CEO, Los Angeles County Economic Development Corporation; Hugo W. Merida, Chairman of the Board, Los Angeles Metropolitan Hispanic Chamber of Commerce; Sandy Cajas, President & CEO, Regional Hispanic Chamber of Commerce; Stuart Waldman, President, Valley Industry &	February 15, 2012	4-35

No.	Organization	Commenter Name	Comment Date	Response Page Number
		Commerce Association (VICA); Michael W. Lewis, Senior Vice-President, Construction Industry Coalition on Water Quality (CICWQ); John Guerra, Director, Regional Public Affairs, SoCalGas; Michael Carroll, Regulatory, Flexibility Group; Randy Gordon, President/CEO, Long Beach Area Chamber of Commerce; LaDonna DiCamillo, Senior Manager Government Affairs, BNSF Railway; Eric Sauer, Vice President, Policy and Regulatory Affairs, California Trucking Association; Randy Gordon, President/CEO, Long Beach Area Chamber of Commerce; Eric Sauer, Vice President Policy and Regulatory Affairs, California Trucking Association; Madame M C Townsend, President & CEO, Regional Black Chamber of Commerce – San Fernando Valley; Jay McKeeman, Vice President, Government Relations & Communications, California Independent Oil Marketers Association (CIOMA); Lupe Valdez, Director of Public Affairs, Union Pacific Railroad; Bob Amano, Executive Director, Hotel Association of Los Angeles; Christina Davis, President & CEO, LAX Coastal Chamber; Fred Johring, President, Harbor Trucking Association		
66	Riverside County - Community Health Agency; Department of Public Health	Michael Osur, Deputy Director of Public Health	February 14, 2012	4-36
67	Riverside County - Planning Department	Carolyn Syms Luna, Director	February 14, 2012	4-36
68	Riverside County Transportation Commission	Anne Mayer, Executive Director	February 14, 2012	4-37
69	San Bernardino Association of Governments	Larry McCallon, President	February 14, 2012	4-37
70	San Bernardino Local Area Formation Commission	Kathleen Rolling-McDonald, Executive Officer	February 13, 2012	4-38
71	San Fernando Valley Council of Governments	Robert L. Scott, Executive Director	February 14, 2012	4-38
72	San Gabriel Valley Economic Partnership	Cynthia J. Kurtz, President & CEO	February 9, 2012	4-38
73	San Manuel Band of Indians	Jerry J. Paresa, Chief Administrative Officer	February 14, 2012	4-38
74	Santa Monica Mountains Conservancy	Elizabeth A. Cheadle, Chairperson	January 31, 2012	4-38
75	South Bay Cities Council of Governments	Ellen Perkins, SBCCOG Chair, Councilmember, City of Palos Verdes Estates	February 13, 2012	4-39
76	South Coast Air Quality Management District	Elaine Chang, DrPH, Deputy Executive Officer	February 21, 2012	4-39
77	Southern California Business Community	Jim Clarke, Executive Director, Apartment Association of Greater Los Angeles (AAGLA); Hilary Norton, Executive Director, FAST – Fixing Angelenos Stuck in Traffic; Gene Hale, Chairman, Greater Los Angeles African American Chamber; Andrew R. Henderson, Vice President and General Counsel, Building Industry Association of Southern California, Inc.; Elizabeth Warren, Executive Director, FuturePorts; Paul C. Granillo, President & CEO, Inland Empire Economic Partnership; Heidi L. Gallegos, Executive Director, Eastvale Chamber of Commerce; John Kelsall, President & CEO, Greater Lakewood Chamber of Commerce; Joann Valle, Executive	February 14, 2012	4-40

No.	Organization	Commenter Name	Comment Date	Response Page Number
		<p>Director, Harbor City/Harbor Gateway Chamber of Commerce; Gary Toebben, President &amp; CEO, Los Angeles Area Chamber of Commerce; Kate Klimow, Vice President of Government Affairs, Orange County Business Council; Rich Lambros, Managing Director, Southern California Leadership Council; Patty Senecal, Manager, Southern California Region and Infrastructure Issues Western States Petroleum Association; Alexander Pugh, Senior Project Manager - Policy &amp; Project Management, Southern California Edison; David Fleming, Founding Chairman, Los Angeles County Business Federation; T.L. Garrett, Vice President, Pacific Merchant Shipping Association; Ron L. Wood, President &amp; CEO, The Valley Economic Alliance; Michael W. Lewis, Senior Vice-President, Construction Industry Air Quality Coalition (CIAQC); Bill Allen, President &amp; CEO, Los Angeles County Economic Development Corporation; Hugo W. Merida, Chairman of the Board, Los Angeles Metropolitan Hispanic Chamber of Commerce; Sandy Cajas, President &amp; CEO, Regional Hispanic Chamber of Commerce; Stuart Waldman, President, Valley Industry &amp; Commerce Association (VICA); Michael W. Lewis, Senior Vice-President, Construction Industry Coalition on Water Quality (CICWQ); John Guerra, Director, Regional Public Affairs, SoCalGas; Michael Carroll, Regulatory, Flexibility Group; Randy Gordon, President/CEO, Long Beach Area Chamber of Commerce; LaDonna DiCamillo, Senior Manager Government Affairs, BNSF Railway; Eric Sauer, Vice President, Policy and Regulatory Affairs, California Trucking Association; Randy Gordon, President/CEO, Long Beach Area Chamber of Commerce; Eric Sauer, Vice President Policy and Regulatory Affairs, California Trucking Association; Madame M C Townsend, President &amp; CEO, Regional Black Chamber of Commerce – San Fernando Valley; Jay McKeeman, Vice President, Government Relations &amp; Communications, California Independent Oil Marketers Association (CIOMA); Lupe Valdez, Director of Public Affairs, Union Pacific Railroad; Bob Amano, Executive Director, Hotel Association of Los Angeles; Christina Davis, President &amp; CEO, LAX Coastal Chamber; Fred Johring, President, Harbor Trucking Association</p>		
78	Southern California Contractors Association, Inc.	Larry C. Russell, Executive Vice President	February 13, 2012	4-41
79	Southern California Edison	Alexander Pugh, Senior Project Manager	February 14, 2012	4-41
80	Southern California Gas Company	Hector Madariaga, Director Environmental Affairs	February 10, 2012	4-41
81	Southern California Leadership Council	Billie Greer, President; Richard Lambros, Managing Director	February 14, 2012	4-42
82	State of California Department of Transportation	James J. McCarthy, Deputy District Director, Division of Planning Public Transportation and Local Assistance	February 14, 2012	4-42
83	State of California Natural Resources Agency Department of Conservation	Yuko Sakano, Ph.D., Environmental Scientist	February 13, 2012	4-43

No.	Organization	Commenter Name	Comment Date	Response Page Number
84	State of California Natural Resources Agency Department of Toxic Substances Control	Al Shami, Project Manager, Brownfields and Environmental Restoration Program	February 8, 2012	4-43
85	State of California Natural Resources Agency Department of Fish and Game	Leslie MacNair, Environmental Program Manager, South Coast Region	February 14, 2012	4-43
86	State of California Natural Resources Agency Department of Parks and Recreation	Ron Krueper, District Superintendent	February 14, 2012	4-45
87	Stephanie Johnson	Stephanie Johnson	February 11, 2012	4-46
88	Stephen W. Rogers, P.E. Consulting	Stephen W. Rogers, P.E.	February 14, 2012	4-46
89	Susan Sulsky	Susan Sulsky	February 13, 2012	4-46
90	The Kennedy Commission	Cesar Covarrubias, Executive Director	February 14, 2012	4-46
91	Transportation Corridor Agencies	Scott Schoeffel, Chair, San Joaquin Hills Transportation Corridor Agency; Bill Campbell, Chair, Foothill/Eastern Transportation Corridor Agency	February 13, 2012	4-46
92	United States Department of Agriculture	William Metz, Forest Supervisor, Cleveland National Forest; Peggy Hernandez, Forest Supervisor, Los Padres NF; Jody Noiron, Forest Supervisor, San Bernardino NF; Thomas A. Contreras, Forest Supervisor, Angeles NF	February 8, 2012	4-47
93	United States Environmental Protection Agency	Connell Dunning, Transportation Team Supervisor, Environmental Review Office, Communities and Ecosystems Division	February 14, 2012	4-47
94	Wildlife Corridor Conservation Authority	Glenn Parker, Chairperson	February 10, 2012	4-58
95	City of Palmdale	Richard Kite, Planning Manager	February 14, 2012	4-59
96	California Regional Water Quality Control Board, Santa Ana Region	Glenn Robertson, Engineering Geologist CEQA Coordinator	March 6, 2012	4-59
97	Public Hearing Comments	Andy Henderson, Building Industry Association of Southern California Richard Lambros, Southern California leadership Council Michael Lewis, Construction Industry Air Quality Coalition Alexander Pugh, Southern California Edison Dennis Woods, Transportation Manager, City of South Pasadena	Variety of Dates	4-59
98.	Global Land Use and Economic Council	Greg McWilliams, Chair, GLUE Council	February 14, 2012	4-59



## 4.0 RESPONSES TO COMMENTS ON THE DRAFT PEIR

### Letter 1, Arroyo Verdugo Cities, David A. Spence, Chair of the Arroyo Verdugo Steering Committee, February 9, 2012

- 1-1 The commenter indicates that Table 3.2-4 shows that PM10 from heavy-duty trucks is increasing. The table shows that PM10 from heavy-duty trucks is decreasing considerably from 2012 to 2035. Nonetheless, the commenter's point that transportation-related emissions should be reduced to the extent feasible is noted. The only "project" that SCAG is responsible for is the RTP/SCS. As noted in the Project Description, the RTP/SCS includes numerous projects all of which are aimed at improving transportation performance measures in the region and reducing emissions so that regional conformity and consistency with SB 375 is attained. See also **Response 76-2** regarding health risk and additional examples of mitigation measures to address impacts at sensitive receptors.
- 1-2 The commenter indicates that SCAG assumes that the SR-710 extension would produce congestion relief and lower GHG emissions. While the SR-710 extension is one of the projects included in the Plan, the Draft PEIR discusses VMT on a regional level and does not discuss individual projects. The 2012-2035 RTP/SCS focuses transportation network improvements on transit, systems management, and demand management, lowering the need to drive alone and making roadways more efficient in order to reduce GHG emissions.

The Plan does not overly emphasize highway projects. Approximately 13 percent of the proposed Plan is allocated to highway capital improvements. While increasing highway capacity may increase VMT and expanded highways may become congested over time, it is anticipated that proposed transportation improvements and land use changes would lead to reduced regional congestion (reduced average vehicle hours of delay [VHD]) and increased transit options. The Plan would result in less per capita CO<sub>2</sub> emissions in both 2020 and 2035 as compared to 2005.

### Letter 2, Association of American Railroads, Kirk Marckwald, Principal, California Environmental Associates, February 14, 2012

- 2-1 Regarding how mitigation is intended to be applied in project specific circumstances, see **Master Response No. 1**. The commenter is correct that mitigation measures need only be applied to impacts identified as significant with respect to the change from existing conditions. Also regarding language in mitigation measure "can and should" and preliminary determination of feasibility, see **Master Response No. 1**.
- 2-2 The commenter indicates that the Draft PEIR does not fairly portray rail-related cancer risk against other sources of hazardous emissions. In particular, Map 3.2-7 does not clearly indicate that the risk presents regional risk from all sources as it relates to rail lines, not just risk from rail activity. Because of this potential confusion (risk from all sources is shown but the map could be red to imply that the risk is related to rail), this map is deleted from the PEIR. See also Chapter 5.0 Corrections and Additions for Air Quality (for pages 3.2-18 and 3.2-26).
- 2-3 The commenter's opinion that MM-AQ2 is not an appropriate mitigation is noted. See **Master Response No. 1**. The measure is directed at local air districts, local jurisdictions as well as project sponsors and contains a variety of suggested ways to reduce emissions, some of which could be included as conditions of approval for certain projects as applicable and feasible. Note that this Mitigation Measure is now example measure AQ2 in the new Appendix G.

- 2-4 The commenter's question regarding how the measures identified for project sponsors are to be applied is addressed in **Master Response No. 1**.
- 2-5 The commenter states that it is not clear why the use of non-renewable energy sources is considered an adverse impact to public services. The commenter also states that the CEQA Guidelines do not identify non-renewable energy use as an impact to public services or utilities and service systems, and that Mitigation Measure MM-PS65 [now example measure PS58 in Appendix G), relating to reducing the consumption of fossil fuels, should be deleted from the PEIR. This Mitigation Measure has been renumbered to PS58 and moved to Appendix G.

Appendix F of the CEQA Guidelines, relating to energy consumption, states that: "the goal of conserving energy implies the wise and efficient use of energy." The means of achieving this goal include "...(2) decreasing reliance on fossil fuels such as coal, natural gas and oil[.]" The commenter states that neither SCAG nor other local jurisdictions have the authority to require railroads to reduce fossil fuel use. In addition, the commenter states that several of the best practices recommended in Mitigation Measure MM-PS65 are vague and in need of clarification. Please refer to **Master Response No. 1** for clarification regarding SCAG's lack of authority to implement project-specific mitigation measures and how all measures aimed at local agencies are moved to Appendix G where they are more clearly labeled as examples of measures that could be applied to reduce identified significant adverse impacts.

**Letter 3, Association of California Cities - Orange County, Lacy Kelly, CEO, ACC-OCC, February 13, 2012**

- 3-1 The commenter expresses concern that the mitigation measures included in the PEIR will force cities to adopt costly programs, such as Climate Action Plans and Parking Management Plans. Please refer to **Master Response No. 1** for clarification regarding mitigation measures included in the PEIR.

**Letter 4, Building Industry Association of Southern California, Inc., Andrew R. Henderson, Vice President and General Counsel; Steven S. Schuyler, Vice President Government Affairs, February 14, 2012**

- 4-1 Commenter summarizes concerns regarding mitigation measures. Please refer to **Master Response No. 1**. (Commenter misinterprets the measure regarding edible landscaping. There is no "requirement to remove obstacles to edible landscaping." Rather, the measure, now example measure BIO/OS57 in Appendix G, indicates options for converting reflective and impervious surfaces including drought tolerant landscaping or edible landscaping.)
- 4-2 SCAG has provided copies of Traffic Analysis Zone (TAZ) level data assumptions to the commenter and has made the data generally available to local jurisdictions. Land use assumptions were made down to the TAZ level for the purposes of modeling including undertaking the GHG analysis required by SB 375 and for purposes of analysis in this PEIR. SCAG is not requiring nor can it require local jurisdictions to use TAZ-level data to determine consistency with the SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining consistency of any future project with the SCS.
- 4-3 Comment regarding longer-term horizon being appropriate is noted. However, the horizon year for the Plan is 2035 and will not be changed. Analysis of impacts 20 plus years into the future is extremely challenging; to analyze even further into the future could be speculative and CEQA does not require that speculative analysis be included. As discussed in the Draft PEIR, the Plan would meet the CARB GHG emission targets. Therefore, an APS is not necessary.

- 4-4 Commenter's concerns regarding statements in the Introduction regarding use of mitigation measures as policies are addressed in Chapter 5.0 Corrections and Additions - Introduction (for changes starting on page 1-5 of the Draft PEIR). Commenter's concerns regarding use of "can and should" in mitigation measures are addressed in **Master Response No. 1**.
- 4-5 Commenter's concerns regarding use of the PEIR under the subheading "CEQA Incentive" are addressed in Chapter 5.0 Corrections and Additions (for the Introduction page 1-13). See also **Response 4-2** above.
- 4-6 The comment asks for revisions and clarifications to the text of the Project Description to clarify the requirements of the SCS. In response, the text on pages 2-2 and 2-25 has been revised to reflect this comment. See Chapter 5.0 Corrections and Additions.
- 4-7 See Chapter 5.0 Corrections and Additions for page 2-2 regarding adding a sentence acknowledging that the SCS would not supersede local jurisdiction authority. As the commenter notes, the proposed Plan exceeds the California Air Resources Board (CARB) per capita GHG reduction target for the year 2035.
- 4-8 Commenter's concerns regarding the language on p. 2-3 are addressed in **Master Response No. 1**. To the extent that local jurisdictions want to use information contained in the Draft PEIR for purposes of CEQA Streamlining they may. However, the Final PEIR does not include any project-specific mitigation, except for requiring compliance with CEQA by the exercising their discretionary authority to mitigate project-level impacts.
- 4-9 Commenter's numerous concerns with respect to mitigation measures are addressed in **Master Response No. 1**. The RTP/SCS has been updated to reflect changes in the mitigation measures in the PEIR.
- 4-10 The comment asks for clarification on several aspects of the Envision 2 Alternative. The comment summarizes the general qualities of the Envision 2 Alternative including that it calls for "far more aggressive densities than the Plan." The commenter asks that the SCAG Regional Council reject the Envision 2 Alternative as infeasible. Chapter 5.0 Corrections and Additions includes additional information related to the Envision 2 Alternative, including clarification of information where the Envision 2 Alternative could have greater impacts as compared to the Plan. Because Envision 2 would result in greater densification in urban areas it would also result in more environmental impacts in urban areas. Therefore, while Envision 2 would result in less development of natural lands it would result in greater impacts to urban areas. The Regional Council will weigh the information provided in the PEIR and will make findings with respect to Envision 2 based on relative impacts and feasibility.

The comment asks if the Envision 2 Alternative includes densities that are more aggressive than those found in local general plans and states conflict with existing general plans as the basis for rejecting this alternative. The Envision 2 Alternative focuses growth in urban and high quality transit areas and does include densities that are greater than existing general plans in many (if not all) of the cities in the SCAG region (see Chapter 5.0 Corrections and Additions and changes to the Alternatives section of the PEIR). SCAG does not have any local land use authority and does not intend that these growth patterns should be imposed on any jurisdictions. However, if local jurisdictions chose to adopt these more aggressive growth patterns in their own local plans, it is possible that these more aggressive patterns could become the norm in the region. The 2012-2035 RTP/SCS includes land use patterns through the year 2035, which is beyond the horizon year of many local general plans.

SCAG does not have any local land use authority and serves as a regional facilitator. Many jurisdictions have sought assistance from SCAG to prepare land use plans, climate action plans and various other plans and programs through SCAG's Compass Blueprint Program. SCAG intends to continue assisting local jurisdictions with preparation of plans, but does not intend to "force" jurisdictions to choose certain land use patterns. The comment also states SCAG's lack of land use authority is reason for the Regional Council to reject the Envision 2 Alternative as infeasible. As stated above, the Regional Council will make findings on the relative impacts and feasibility of the alternatives as required under CEQA. These decisions will be made in light of the evidence in the whole of the record including these comments and responses.

The comment asks if the Envision 2 Alternative would increase population adjacent to transportation/transit facilities. The Envision 2 Alternative would increase population near transit compared to the Plan. However, the total population (at the regional level) would remain the same.

The comment states Envision 2 should be rejected by the Regional Council as infeasible because it eliminates single family housing. Envision 2 includes a mix of land uses including single-family housing with the mix of heavily weighted towards multi-family housing (88 percent) and less growth in large lot or small lot single-family homes (1 percent and 3 percent respectively). Nevertheless, the commenter correctly points out that the Envision 2 alternatively shifts very aggressively away from existing development patterns and the type of development projected in current local plans.

The comment states the Draft PEIR fails to adequately analyze the effects of densification under the Envision 2 Alternative. Please see Chapter 5.0 Corrections and Additions for additional clarification on the effects of the Envision 2 Alternative.

The comment points to an error in Table 4-16 and asks for clarification on Envision 2's potential for air quality risk. Please see Chapter 5.0 Corrections and Additions.

**Letter 5, Carol Teutsch, Carol Teutsch, M.D., February 13, 2012**

5-1 The commenter indicates that SCAG should implement health risk and health impact assessment as part of the standard operating plan development. As discussed in Chapter 2.0 of the Draft PEIR, Project Description, public health is one of the main objectives of the proposed Plan. The Plan includes a number of performance measures related to public health. In addition, as discussed in the Section 3.2 of the Draft PEIR, a screening level health risk assessment was performed for the 2012-2035 RTP/SCS and was included as Appendix F.

The commenter suggests that the 2012-2035 RTP/SCS should consider alternatives to freight movement provided by trucks such as rail. The Plan provides a comprehensive transportation strategy for the region. The 2012-2035 RTP/SCS focuses on a two-pronged approach for achieving an efficient freight system that reduces environmental impacts. For the near-term, 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, upgrading switcher locomotive engines could reduce one to three percent of regional rail emissions. Additionally, heavy-duty hybrid trucks are already in use, but market penetration can be increased. In the longer term, the strategy focuses on a more fundamental shift in technology—taking critical steps toward gradual implementation of a zero- and/or near zero-emission freight system. Two of many promising technologies that merit further investigation are battery electric trucks and electrified rail systems. This latter component of the regional strategy offers the promise of longer-term environmental sustainability, including significant reductions in GHG emissions. Additionally, SCAG's planning efforts are cognizant of the need to incorporate evolving technologies into new infrastructure.

A reasonable range of alternatives for the Plan as a whole is presented in Chapter 4.0 of the Draft PEIR. The alternatives analysis does not present a range of options for different components of the Plan since the Plan is viewed as a whole.

Movement of goods using freight rail already plays a critical and substantial role in the SCAG region. However, the goods movement system is complex and cannot effectively rely on a single mode of transportation. It is not feasible to move all goods by rail, whether electrified or conventional rail, as existing modal segments generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be able to use rail from the San Pedro Bay Ports to their final destination. However, goods moving from the Ports to local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors.

Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and/or zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to continue to identify potential solutions to regional freight challenges

The commenter's opposition to the proposed 710 tunnel due to potential health effects is noted. As the 2012-2035 RTP/SCS is programmatic in nature, the focus of the environmental analysis in the PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2012-2035 RTP/SCS as a whole. It does not include site-specific analysis of any project contained in the 2012-2035 RTP/SCS. Please refer to **Master Response No. 2**, for a discussion about the differences between Program EIRs and Project/Site Specific EIRs.

**Letter 6, Centennial Founders LLC, Carlene Matchniff, Vice President Entitlements, February 14, 2012**

6-1 The commenter requests technical corrections to several maps included in the Draft PEIR. The PEIR provides a programmatic overview of the region and is not intended to be used for the analysis of a single project (see **Master Response No. 2**). Maps 2.8 (Land Use Pattern Los Angeles County), 3.3-5 (Special Status Natural Communities in the SCAG Region) and 3.8-1 (Regional Distribution of Important Farmlands and Grazing Lands) have been corrected/clarified and are available on-line with this Final PEIR and included on CD in the back cover of hard copies of this Final PEIR. Maps 3.8-9 (Household Density) and 3.8-10 (Employment Density) are accurate. Their titles have been revised to reflect that they show growth by Traffic Analysis Zone (TAZ); See Chapter 5.0 Corrections and Additions. Updated maps are provided in the Final 2012-2035 RTP/SCS. The maps show growth between 2008 and 2035, not absolute numbers in 2035.

**Letter 7, Center for Demographic Research, Deborah S. Diep, CDR Director, February 14, 2012**

7-1 Commenter's support for Orange County Projections – 2010 Modified Growth is noted. See **Master Response No. 3**. Commenter's request to incorporate the Orange County Projections-2010 Modified Growth Projection into all RTP/SCS/PEIR documents, appendices, tables, maps, narrative, modeling runs, and PEIR Alternatives is addressed in the **Master Response No. 3**.

- 7-2 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**. In addition SCAG measures have been edited to clarify their intent and SCAG's area of responsibility, see Chapter 5.0 Corrections and Additions, Global Changes to Mitigation Measures Throughout the PEIR.
- 7-3 Commenter's concerns regarding mitigation measures are addressed in **Master Response No. 1**. The alternatives analyzed in the PEIR address a reasonable range of options for the Plan.
- 7-4 The alternatives identified in the SCS Background document were those used to help in creating the alternatives ultimately analyzed in the PEIR. They may not correspond exactly and hence the nomenclature is slightly different.
- 7-5 The commenter states the numbering of the last two GHG mitigation measures should be corrected. The mitigation discussion has been reorganized throughout the document as indicated in **Master Response No. 1**. Most of the mitigation measures have been re-numbered, and many have been moved to the new Appendix G. The numbering error has been corrected.
- 7-6 The commenter asks for a definition of the smart growth principles and benchmarks for smart growth as mentioned in Mitigation Measures MM-LU63 and MM-LU64 of the Draft PEIR. Smart growth is an urban planning and transportation concept that concentrates growth in compact, walkable urban centers to avoid sprawl. It advocates compact, transit-oriented, walkable, mixed-use development with a range of housing choices, and values long-range, regional considerations of sustainability over a short-term focus. Also see EPA's "Getting to Smart Growth: 100 Policies for Implementation," available at: [http://www.smartgrowth.org/partner\\_pubs/epa.php](http://www.smartgrowth.org/partner_pubs/epa.php).
- Benchmarks for smart growth could include any parameters that would indicate increased sustainability for example reductions in VMT, energy use and/or GHG emissions (per capita or in total). The commenter states that in the Executive Summary of the Draft PEIR, Mitigation Measures PS17 and PS18 are missing, and that there is duplicate naming of PS36 and PS37. See Chapter 5.0 Corrections and Additions, Global Changes to Mitigation Measures Throughout the PEIR, regarding how mitigation measures are re-organized entirely.
- 7-8 The commenter asks for clarification about what the, "identified transportation benchmarks" are in Mitigation Measure MM-TR34. Please refer to **Master Response No. 1**. Mitigation Measure TR34 is now TR18 in Appendix G. Should a Lead Agency choose to use this measure the Lead Agency would determine appropriate benchmarks for its community.
- 7-9 The commenter asks for a definition of climate change hydrology. Climate change hydrology refers to the hydrologic conditions that result from climate change. The term is typically used when referencing the uncertainty of future water supplies as a result of unknown climatological changes.
- 7-10 The commenter asks for a definition of urban growth boundary. An urban growth boundary (UGB) is a boundary set by local governments, as a guide to zoning and land use decisions, in an attempt to control urban sprawl by mandating that the area inside the boundary be used for higher density development and the area outside is for lower density development. The example measure citing UGB has been substantially revised (see LU 28 in Appendix G).
- 7-11 The commenter asks to define parking cash out programs, which are identified in Appendix G example Mitigation Measures PS61, TR69, and TR80. A parking cash out program provides employees the option of "cashing out" their subsidized parking space and taking transit, biking, walking or carpooling to work.
- 7-12 Commenter's suggested changes are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

- 7-13 Other than Intergovernmental Review (IGR) and monitoring of SCAG measures included in the PEIR, SCAG is not in charge of any monitoring efforts related to this PEIR. SCAG monitors regional performance based on parameters laid out in the 2012-2035 RTP/SCS (see Chapter 5 – Measuring Up). See Chapter 5.0, Corrections and Additions for changes to page 1-5 of the Draft PEIR.
- 7-14 The commenter’s requested changes to the Introduction of the Draft PEIR are included in Chapter 5, Corrections and Additions for changes starting on page 1-5 of the Draft PEIR.
- 7-15 Commenter’s request to incorporate the Orange County Projections-2010 Modified Growth Projection into all RTP/SCS/PEIR documents, appendices, tables, maps, narrative, modeling runs, and PEIR Alternatives is addressed in **Master Response No. 3**.

The comment states that the policies on page 2-3 of the Project Description in the Draft PEIR should be amended to reflect the strategies included in the SCS chapter of the RTP. Please refer to **Response 8-2** below. Commenter's concerns with respect to the growth forecast data underlying the PEIR analysis are addressed in **Master Response No. 3**. The commenter states several suggested revisions to text on page 2-5 and 2-26 through 2-28 of the Project Description in the Draft PEIR. These revisions are included in Chapter 5.0 Corrections and Additions. In addition, the commenter asks for a definition of scrip. As stated in the Glossary of the 2012-2035 RTP/SCS, scrip is a form of fare payment transferrable among transportation providers, often issued by Dial-A-Ride transit service providers to be used on taxis.

- 7-16 The commenter states that references to “global climate change” should be changed to “global warming.” Global climate change is correct in the context. Global warming would also be correct in this context, but in general global warming is only one facet of global climate change.
- 7-17 The commenter indicates suggested edits for: paragraph 3 on page 2-25, paragraph 1 on page 2-26; paragraph 3 on page 2-27; and paragraph 1 on page 2-28 of the Project Description. These revisions are included in Chapter 5.0 Corrections and Additions. The commenter states that the statement made in the last sentence of paragraph 4 on page 2-27 of the Project Description is incorrect and should be deleted; however, the sentence stating that Goods Movement is a major source of GHG emissions is correct. The commenter asks for confirmation that there have been no changes to the local land use inputs provided by Orange County. This is confirmed; see **Master Response No. 3**.
- 7-18 SCAG has provided copies of TAZ level data assumptions to the commenter and has made the data generally available to local jurisdictions. The land use assumptions made at the TAZ level were made for purposes of modeling including undertaking the GHG analysis required by SB 375 and for purposes of analysis in the PEIR. SCAG is not requiring, nor can it require, local jurisdictions to use TAZ-level data to determine consistency with the SCS; local jurisdictions are responsible for determining consistency with the SCS and they may do so as they see fit.
- 7-19 The commenter requests a number of edits to the document (the title of Table 2-20 on page 2-32 of the Project Description, the text in paragraph 4 on page 3.8-5, paragraph 4 on page 3.11-6). These revisions are included in Chapter 5.0 Corrections and Additions.

The commenter asks for a definition of progressive jobs/housing distribution optimized for TOD and infill. A jobs/housing distribution optimized for TOD and infill includes relatively high-density development located within close proximity to a transit stop. Infill distribution focuses on the reuse and repositioning of land within an already built-up, but underutilized area, for further construction, as opposed to constructing new development that spreads out laterally from urban centers, contributing to urban sprawl. The commenter asks for a definition of open space. Open space in terms of urban planning is defined as areas of undeveloped, protected, or conserved land.

7-20 The commenter requests several edits to Chapter 4.0 of the Draft PEIR. See Chapter 5.0 Corrections and Additions and changes to the Alternatives section to provide additional information on Envision 2.

**Letter 8, City of Anaheim - Planning Department, Sheri Vander Dussen, AICP, Planning Director; Natalie Meeks, Public Works Director, February 14, 2012**

8-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**. See also **Response 7-13** above. See also Chapter 5.0 Corrections and Additions for changes to the Introduction.

8-2 The comment states that policies on page 2-3 of the Project Description are not consistent with policies included in the RTP/SCS. Page 2-3 states "The plan achieves its overall objectives by combining transportation investment and policies with integrated land use strategies that reduce VMT and emissions. These land use *strategies* include [emphasis added]:

- Focusing new growth and development in areas well served by transit,
- Promoting a better fit between jobs and housing,
- Redirecting future housing growth toward more compact unit types, and
- Promoting a mix of uses and neighborhood design that enables more walk and bike trips."

The comment indicates the above bullet points to be "policies." As noted in the text, the PEIR identifies them as strategies; the bullet points summarize the major points of the SCS and do not identify policies. Throughout the SCS the above strategies are discussed, for example, page 128 of the (Draft) SCS includes the following statement "[t]he overall land use pattern focuses jobs and housing in the region's High Quality Transit Areas (HQTA)..." which generally encompasses bullet points one and two. Further, page 119 of the (Draft) SCS includes a discussion of the components of the overall land use system including land use policies and strategies: develop complete communities, and plan for additional jobs and housing near transit. Therefore, although the exact text included in the 2012-2035 RTP/SCS PEIR is not taken from the RTP/SCS, these concepts are appropriately summarized in the 2012-2035 RTP/SCS PEIR.

8-3 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

8-4 See **Master Response No. 1** regarding mitigation measures applicable to local jurisdictions. See Chapter 5.0 Corrections and Additions for changes to measures that SCAG will implement. Local jurisdictions will be solely responsible for determining consistency and implementing CEQA streamlining. SCAG will fund implementation of SCAG's mitigation measures out of its budget.

8-5 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**. See Chapter 5.0 Corrections and Additions for changes to measures that SCAG will implement.

8-6 Commenter's concerns regarding use of growth projections are addressed in **Master Response No. 3**.

8-7 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 9, City of Brea, David M. Crabtree, AICP, Community Development Deputy Director/City Planner, February 9, 2012**

9-1 The commenter questions whether there is a legal risk in overriding the significant adverse impacts identified in the PEIR. The PEIR addresses regional scale impacts anticipated to result from



transportation improvements and development through 2035. While significant adverse impacts are identified for most areas analyzed, impacts are generally less than would occur without the Plan. In order to approve the Plan, the Regional Council will need to make Findings of Fact and adopt a Statement of Overriding Considerations. SCAG does not see this as an area where legal challenge would be justified. Local agencies will be responsible for determining how to implement CEQA Streamlining. Individual projects would only need to prepare project-specific analysis of issues found to be significant in this PEIR if they a) would have a project specific impact, or b) could result in a cumulatively considerable contribution to an impact. Each local jurisdiction is responsible for determining what is cumulatively considerable and undertaking appropriate environmental review.

- 9-2 Commenter's questions regarding mitigation measures included in the Draft PEIR are addressed in **Master Response No. 1**. SCAG will be responsible only for monitoring those measures for which it is responsible (see Chapter 6.0 Mitigation Monitoring and Reporting Program).
- 9-3 Commenter's concerns as to growth projections are addressed in **Master Response No. 3**.
- 9-4 The comment states that policies included in the Draft 2012-2035 RTP/SCS PEIR should be consistent with RTP policies. Please see **Response 8-2** above.
- 9-5 In Item #6, the commenter states there is an inconsistency between the text on page 3.6-15 of the Draft PEIR and Table 3.6-3. See Chapter 5.0 Corrections and Additions for page 3.6-15 regarding the correct table references.

In Item #7, the commenter asks if construction-related GHG emissions accounted for projects smaller than 100 residential units or 250,000 square feet of non-residential development. The analysis accounted for the total amount of development anticipated under the Plan. The air quality model used to estimate construction emissions (i.e., CalEEMod) requires the user to make various assumptions, including project size. CalEEMod emissions were obtained for individual projects of 100 residential units and non-residential projects of 250,000 square feet. Then a reasonable estimate of total emissions was obtained by multiplying emissions from these individual projects by total anticipated development. It is acknowledged that some projects will be smaller and some projects will be larger than the project size assumptions used to estimate emissions. However, the analysis captures average project-related construction emissions and represents emissions from projects of all sizes.

In Item #8, the commenter indicates that the PEIR does not disclose the models used in the analysis. Additional information regarding the calculation of GHG emission reductions has been included in the Final 2012-2035 RTP/SCS.

In Item #9, the commenter expresses concern that local agencies have limited funding to enact mitigation measures. See **Master Response No. 1**.

- 9-6 The commenter indicates that the Existing Setting narrative on page 3.8-5 should include information regarding the existing land use density and trends for Orange County. See Chapter 5.0 Corrections and Additions for changes to Existing Setting narrative as suggested.
- 9-7 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**. Measures now included in Appendix G are examples of measures that could be used by lead agencies to mitigate identified significant adverse impact. It is anticipated that if a lead agency chooses to use measures included in Appendix G, that they would implement them as necessary (to reduce identified impacts and/or to comply with existing regulations) and as applicable and feasible and that they would be tailored to address individual project conditions.

**Letter 10, City of Chino, Mike Kellison, AICP, Senior Planner, February 14, 2012**

- 10-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.
- 10-2 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 11, City of Diamond Bar, James DeStefano, City Manager, February 14, 2012**

- 11-1 The commenter states that it is premature to identify State Route 60 and the San Jose Creek Wash Alignments as a viable East-West Freight Corridor Project in the 2012-2035 RTP/SCS because no studies have been completed to assess environmental impacts of an elevated facility along the Corridor. The PEIR addresses the proposed plan as a whole and does not address individual projects. Please also refer to **Master Response No. 2**, Program EIR versus Project/Site Specific EIR.
- 11-2 The commenter questions the motivation of truck owners/operators to convert to electric technology. The commenter also questions if the 2012-2035 RTP/SCS specifically restricts the use of the truck-only freight corridor to only new technology, zero emission trucks.

The 2012-2035 RTP/SCS is a long-term (23-year) plan and therefore it must try to anticipate what is reasonably foreseeable over that timeframe. Development of both the proposed I-710 freight corridor and East-West Freight Corridor (EWFC) provide opportunities to commercialize zero- and/or near zero-emissions technologies for freight transportation and create incentives for development. Zero- and/or near zero-emission trucks, which either charge through wayside power infrastructure, at charging stations off the system, or through fuel cell systems, show promise for goods movement corridors. Wayside power offers a potential advantage to trucks that move on key freight corridors as it extends the range of the vehicle by providing a charge for batteries so that the truck can continue to operate in zero emissions mode when it leaves the freight corridor. Another alternative is to provide charging stations located at truck stops and fuel stations similar to current fueling infrastructure. Ongoing efforts are underway to evaluate the costs and operational parameters associated with either method. Though the specific technology to be used will be determined with stakeholder input as the market evolves, the EWFC offers a significant opportunity to catalyze development, deployment and commercialization of zero- and/or near zero emission technologies for freight transport. While these corridors are included in the Plan, and are analyzed in the PEIR in terms of traffic impacts on the regional system, credit is not taken for zero- and/or near zero-emission technology in the air quality analysis.

- 11-3 As noted above, the air analysis contained in the PEIR does not account for zero- and/or near zero-emission vehicles. Instead, it assumes the CARB-approved emission factors for the year 2035. This was done as a conservative analysis to disclose worst-case scenario outcomes as part of the environmental review. The related analysis has been added to the Goods Movement Chapter of the Final 2012-2035 RTP/SCS.

**Letter 12, City of Glendale - Management Services Division, Scott Ochoa, City Manager, February 14, 2012**

- 12-1 The commenter's recommendation that transit, (bus and rail), bicycle and pedestrian projects improve mobility and improve emissions and should therefore be prioritized is noted. See also **Response 1-2** above.
- 12-2 The 2012-2035 RTP/SCS PEIR presents and analyzes a reasonable range of alternatives (see Chapter 4.0 of the Draft PEIR). The projects included in the constrained plan are considered reasonably foreseeable and are therefore analyzed as part of the project. An alternative including only projects funded by core revenues would fall within the range of alternatives analyzed in the

PEIR (it would include more projects than the No Project Alternative but less than the Plan and 2008 RTP Alternative). The commenter's opposition to the SR-710 Gap Closure project is noted. The SR-710 project is one part of the entire RTP; the PEIR analyzes the entire plan and does not address impacts of individual projects. See also **Master Response No. 2** regarding programmatic environmental analysis as compared to project specific analysis.

12-3 The position of the City of Glendale with respect to opposing any SR-710 gap closure is noted.

**Letter 13, City of Glendale - Office of the Mayor, Laura Friedman, Mayor, February 3, 2012**

13-1 Commenter's concerns in regards to a project specific EIR and analysis (i.e., the gap closure alternatives, specifically SR-710 Gap Closure in Los Angeles County) are addressed in **Master Response No. 2**.

**Letter 14, City of Irvine, Sean Joyce, City Manager, February 13, 2012**

14-1 Commenter's suggestions to update all documents, tables, maps, narrative, modeling runs, and PEIR Alternative with Orange County Projections 2010 Modified Growth Projections are addressed in **Master Response No. 3**.

14-2 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

14-3 Commenter's summary introductory comments are addressed in detail below. Chapter 5.0 Corrections and Additions includes minor changes and clarifications. These changes expand and clarify the Draft PEIR but do not add significant new information that would warrant recirculation.

14-4 Commenter's concerns with respect to mitigation measures ("can and should" language, feasibility of mitigation, applicability at project level) are addressed in **Master Response No. 1**. Commenter also asks how project-specific environmental documentation would use the PEIRs identification of numerous significant and unavoidable impacts. Project-specific EIRs may use the 2012-2035 RTP/SCS analysis of regionally significant impacts, as they deem appropriate. Only if a project could make a cumulatively considerable contribution to a significant impact (as identified by the Lead Agency using applicable thresholds of significance of that Lead Agency) would the impact have to be addressed in project-specific environmental documentation.

14-5 Commenter's concerns with respect to mitigation measures (feasibility, effectiveness, uncertain application, duplication of existing regulations, policy considerations, assumptions regarding use, SCAG's authority) are addressed in **Master Response No. 1**. Appendix G includes example measures that local jurisdictions may choose to use. Performance standards are best identified at the local level since different jurisdictions have different thresholds of significance.

14-6 Commenter's concerns with respect to their ability to rely on the analysis in the PEIR and to tier from it as a result of concerns with mitigation measures are addressed in **Master Response No. 1**. The PEIR provides a programmatic analysis of regional impacts and can be used by local jurisdictions for purposes of providing a regional cumulative analysis. Local jurisdictions will need to provide localized analysis of project and cumulative impacts.

14-7 Commenter's recommendation for clarification to statements that concerns with the feasibility and effectiveness of mitigation based on programmatic assumptions, not project-specific determinations are addressed in **Master Response Nos. 1 and 2**.

14-8 Commenter's questions about mitigation measures listed in the Aesthetics and View Impact section are addressed in **Master Response No. 1**.

- 14-9 The commenter requests examples of air district fugitive dust rules and for an explanation of how these rules would control regional dust. The City of Irvine is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). It is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce control fugitive dust emissions at the source and reduce regional emissions of dust.
- 14-10 The commenter requests SCAG to justify Mitigation Measure MM-AQ19, which indicates that project sponsors “can and should” incorporate “appropriate measures” into project building designs to achieve acceptable interior air quality levels at sensitive receptors. Please refer to **Master Response No. 1**. The commenter also requests SCAG to clarify any potential conflict with requiring implementation of Mitigation Measures MM-AQ1 through MM-AQ18 on a project level. Please refer to **Master Response No. 1**. See also Chapter 5.0 Corrections and Additions for pages 3.2-21, 3.2-35, 3.2-39 and the new examples of air quality mitigation measures to address health risk in the 500 foot buffer area added to the new Appendix G.
- 14-11 Table references are corrected. See Chapter 5.0 Corrections and Additions for page 3.2-39. See Chapter 5.0 Corrections and Additions for page 3.2-39 regarding the correct table references.
- 14-12 The commenter requests SCAG to explain how the number of annual health incidences and associated costs is derived for the PEIR. The Rapid Fire model was used to estimate differences in health incidences and costs associated with air pollution from auto travel. Information regarding the Rapid Fire Model can be found in the technical appendix that discusses the model methodology (Appendix E of the PEIR).

Auto-related air pollution results in a spectrum of health incidences, including cases of chronic bronchitis; acute myocardial infarction; respiratory and cardiovascular hospitalizations; respiratory-related emergency room visits; acute bronchitis; work loss days; premature mortality; asthma exacerbation; and acute, lower, and upper respiratory symptoms. Health incidences, and their related costs, are reduced along with miles driven. Savings (rather than absolute totals) in health incidences and costs to 2035 are estimated according to research-based rates and valuations.

Criteria pollutant emissions are calculated by the California Air Resources Board Emissions Factors model, using modeled travel metrics and fleet characteristic assumptions. The criteria pollutants for which health incidences and costs are modeled include nitrogen oxides, particulate matter, sulfur oxides, and reactive organic gases/volatile organic chemicals. The rates of avoided health incidences and health costs per ton of criteria pollutant are applied to the pollutant emission totals to arrive at totals for each scenario. Note that results may not be expressed as absolute totals, but only in terms of relative differences between scenarios (avoided incidences or costs of one scenario relative to another).

The public health incidence and cost assumptions were developed by TIAX LLC for the American Lung Association. Assumptions are based on national data from the Environmental Protection Agency, Office of Air Quality Planning & Standards, Air Benefit and Cost Group, with valuations (costs) extrapolated for the year 2035. The incidence rates are inclusive of both PM-related and ozone-related health cases.

- 14-13 The commenter asks how the concept of “induced growth” under MM-BIO/OS 47 does not conflict with Measure M2 and indicates that MM-BIO/OS55 should include a standard to determine how effective imposition of additional taxes and fees would be in creating programs and funding to create conservation plans. Also the commenter asks to clarify which Information Center MM-CUL1, MM-CUL2, and MM-CUL7 are referring to.

Please refer to **Master Response No. 1** for an explanation on SCAG’s authority to implement mitigation measures and how all measures aimed at local agencies are moved to Appendix G where they are more clearly labeled as examples of measures that could be applied to reduce identified significant adverse impacts. Note that the 2012-2035 RTP/SCS has been revised to delete references to induced growth. In selecting applicable and feasible mitigation measures to reduce project-specific impacts, local lead agencies would consider local ordinances such as Measure M. Similarly if a local lead agency were to impose a fee, it would be responsible for developing a nexus study including documenting the anticipated effectiveness of the fee. SCAG has no role in determination of significance on a project-specific level, or any role in requiring project-specific mitigation. The appropriate Information Center regarding Cultural Resources is based on the county in which a proposed project would take place. A list of contact information by county can be found at this website: <http://www.ohp.parks.ca.gov/pages/1068/files/IC%20Roster.pdf>.

- 14-14 The comment indicates that the analysis in Section 3.5 Geology and Soils should conclude impacts would be greater under than Plan than under the No Project Scenario. As stated in Section 3.5, both the Plan and the No Project Scenario would expose the same number of people in the region to risk. While the Plan would result in a greater number of transportation projects and greater densification (which could also potentially increase risk), due to the size of the region, it is not possible to guess where in the region damage would occur in the event of an earthquake, mudslide or other geologic hazard and it is beyond the scope of this PEIR to speculate where (or when) such an event could occur. For that reason, the determination of greater or lesser impact (or in this case similar impact) is based on the fact that the same total population would be exposed to risk in the region. The commenter indicates that with more new lane miles the Plan could have more impacts related to geologic and seismic risk than the No Project Alternative. The PEIR indicates that geologic risk under the Plan and No Project alternative would be similar because, as the commenter notes, the same number of people would need to travel around the region under the Project and No Project scenarios. Under the No Project scenario travelers would have fewer options and may have to travel on infrastructure that is older and therefore potentially more subject to failure in a seismic event. Under the Plan, with more infrastructure more people may choose to travel but risk is considered to be similar.
- 14-15 Commenter indicates that the description of Assembly Bill (AB) 811 appears to be incomplete. The description of AB 811 is revised. See Chapter 5.0 Corrections and Additions for changes to page 3.6-6 regarding AB 811. Commenter also notes discrepancies between the text and table on page 3.6-15 and Table 3.6-3. See Chapter 5.0 Corrections and Additions for changes to page 3.6-15.
- 14-16 The commenter states that it is misleading to mention in the PEIR that, in general, the increase of transport of hazardous materials would result in a less-than-significant impact to the public and/or the environment, but conclude that impacts could be significant. Impact 3.7-2 is found to be significant because while the increase in transport of hazardous materials is less than significant any increase in potential for accident is conservatively considered potentially significant. As discussed in Section 3.7 of the Draft PEIR, the risks associated with transporting hazardous materials would be handled on a case-by-case basis. Please refer to **Master Response No. 2** for a discussion of the environmental analysis on a regional scale as presented in the PEIR, versus project-level environmental evaluations, which would include further analysis of project-specific impacts related to transport of hazardous materials.

- 14-17 Commenter's concerns with respect to Mitigation Measure MM-HM1 and MM-HM2 are addressed in **Master Response No. 1**.
- 14-18 This comment is an introduction to specific comments that follow. Responses to these individual comments are provided below.
- 14-19 Commenter's concerns about mitigation measures and SCAG's authority and mitigation measures included in the Draft PEIR for Land Use & Agricultural Resources are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions -- Global Changes to Mitigation Measures Throughout the PEIR.
- 14-20 The commenter states that Section 3.11 of the Draft PEIR notes the expected number of households exposed to wildfire threats in 2035 under the No Project scenario as compared with under the Plan; however, the PEIR does not note the current number of households exposed, to reflect a corresponding potential increase under the Plan. As discussed on page 3.11-9 of the Draft PEIR, the numbers used in the analysis to identify the threat of household exposure to wildfires uses information from 2008, the most recent data available at the time of the Draft PEIR preparation. In 2008, the number of existing households exposed to extreme wildfire threat was 46,052. This number is expected to increase to 89,990 households under the No Project scenario, compared with 71,553 households under the Plan. The number of households exposed to wildfire threat is added to page 3.11-6 in Chapter 5.0 Corrections and Additions.
- 14-21 The commenter states that Table 3.11-11, on page 3.11-47 of the Draft PEIR, reflects an increase in total electricity and natural gas consumption in 2035 under the Plan as compared to 2011, and a lower overall use of energy resources in 2035 under the Plan as compared to the No Project scenario. Thus the statement "urban development and growth [...] would result in less overall use of energy resources in 2035 than in 2011" should be amended to reflect the data in the table. The commenter is partially correct as natural gas consumption would increase by 2035 as compared to 2011; while electricity consumption would decrease. The statement that the Plan would result in less overall energy usage is referring to per capita energy use, and takes into account the increase in population that is expected to occur by 2035. This clarification for page 3.11-47 is included in Chapter 5.0 Corrections and Additions of the Final PEIR. A comparison of anticipated energy consumption under the Plan as compared with the No Project scenario is provided in the Comparison with the No Project Alternative, at the end of Section 3.11 Public Services.
- 14-22 The commenter states that Mitigation Measures MM-PS64, MM-PS91, and MM-PS92 are measures that federal, State, and local agencies and lawmakers would be required to enforce, all of which are outside of SCAG's purview. These Mitigation Measures have been renumbered to PS57, PS83, and PS84 and moved to Appendix G In addition, the commenter raises concerns about assumed consequences of these mitigation measures. Please refer to **Master Response No. 1**.

The commenter also indicates that it is unclear how MM-TR1 will be measured for effectiveness and how it could mitigate identified impacts. MM-TR1 establishes a forum where policy-makers can be educated and can develop consensus on regional transportation safety and security policies. The intent of the mitigation measure is to encourage broad regional discussions to improve safety and security and learn from other municipalities' efforts. The effectiveness of this measure is based on the creation of the forum and available resources to be used at the local level to improve safety and security.

The commenter indicates that Mitigation Measures MM-TR26 and MM-TR27 have no measures of effectiveness if such measures are adopted or implemented. Note that MM-TR26 has been renumbered as MM-TR21 and MM-TR27 has been renumbered as MM-TR22. Both of the mitigation measures state that SCAG shall encourage lead agencies to fully implement policies and projects in the Plan. The effectiveness of these mitigation measures would result in local

municipalities implementing the transportation strategies in the 2012-2035 RTP/SCS, which would reduce overall vehicle hours traveled by both passenger and heavy-duty vehicles.

The commenter asks for clarifications related to various mitigation measures. The following mitigation measures that are referenced in the comment letter have been renumbered and moved to Appendix G, as example measures. Appendix G 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. These mitigation measures may be interpreted and implemented accordingly by lead agencies:

- MM-TR34 is now listed in Appendix G as TR18.
- MM-TR37 is now listed in Appendix G as TR21.
- MM-TR56 is now listed in Appendix G as TR40.
- MM-TR59 is now listed in Appendix G as TR43.
- MM-TR74 is now listed in Appendix G as TR58.
- MM-TR97 is now listed in Appendix G as TR88.
- MM-TR98 is now listed in Appendix G as TR82.

The commenter states that Impact 3.14-6 should read Impact 3.12-6. See Chapter 5.0 Corrections and Additions for page 3.12-30 regarding the corrected language.

- 14-23 The comment states that additional description should be provided regarding the alternatives. Please see Chapter 5.0 Corrections and Additions regarding additional analysis of the Envision 2 Alternative. The 2008 RTP Alternative does not include urban form strategies that encourage concentration of development adjacent to transit to the same extent as the Plan and therefore development is more dispersed compared to the Plan. Nonetheless, because it does include some of the same growth strategies as the Plan, the 2008 RTP Alternative results in many of the same impacts as the Plan. One example is impacts associated with accidental release of hazardous materials. The Modified 2008 RTP Alternative is described in sufficient detail (page 4-22) to allow comparison of impacts with those of the project. The additional detail that the commenter would like to see and the reason for wanting to see such information is not identified, and therefore no further response is necessary.
- 14-24 The commenter indicates that to better understand how it was determined that the proposed project would not result in significant environmental impacts related to the *unnecessary, inefficient, or wasteful* use of water, electricity, natural gas, fossil fuels, and aggregate resources, the reasoning behind such a conclusion should be provided. The PEIR concludes that the activities anticipated to occur under the Plan would generally reduce consumption of resources as compared to the No Project Alternative because it would promote a more efficient development pattern and therefore more efficient use of resources. Since the project responds to forecast growth and minimizes use of resources the PEIR found that, on a regional scale, it would not result in significant unnecessary, inefficient or wasteful use of resources.
- 14-25 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.
- 14-26 Commenter's concerns (insufficient analysis of feasibility, no articulated standard/deferred mitigation, improper integration of regulatory requirement, improper integration of project component, and/or assumption of implementation even though within the control of another agency) with mitigation measures listed in the PEIR document are addressed in **Master Response No. 1**.
- 14-27 See responses to **Letter 16**, below.

**Letter 15, City of La Canada-Flintridge, David A. Spence, Mayor, February 9, 2012**

- 15-1 The commenter states that SCAG should provide environmentally superior alternatives to those currently in the plan. See **Response 12-1**, above. The commenter also states that the PEIR should include mitigation measures to reduce pollutant exposure at sensitive receptors such as school and residences. See **Response 76-2**. Also please refer to **Response 1-1** and **Master Response No. 1**.
- 15-2 See **Response 1-2** above.
- 15-3 Commenter's concerns with regards to site-specific analysis of projects contained in the 2012-2035 RTP/SCS (e.g., the SR-710 Gap Closure Project) are addressed in **Master Response No. 2**.

**Letter 16, City of La Habra, Carlos Jaramillo, Deputy Director of Community Development, February 13, 2012**

- 16-1 Commenter's questions and concerns regarding growth projections are addressed in **Master Response No. 3**.
- 16-2 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions for the Introduction.
- 16-3 Commenter's questions about mitigation measures are addressed in **Master Response No. 1**. Also Chapter 5.0 Corrections and Additions revises the Introduction to clarify that lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining consistency of any future project with the SCS. See also **Response 4-1** above. Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions – Introduction.
- 16-4 The comment states that the policies on page 2-3 of the Project Description should be amended to reflect the strategies included in the SCS chapter of the RTP. Please refer to **Response 8-2** above.
- 16-5 Commenter's concerns with mitigation measures including (1) measures that appears to go beyond the requirements of the Regional Transportation Plan and Senate Bill 375; (2) measures already required by State and federal law or are already regulated by other agencies, measures that counter local control, and (3) measures that are financially infeasible for implementation, are addressed in **Master Response No. 1**.
- 16-6 Commenter's recommendation to remove mitigation measures that are duplicative of existing regulations is addressed in **Master Response No. 1**.
- 16-7 The commenter indicates that the alternatives in the Draft PEIR should be identified consistently with numbers, letters and specific throughout the document. Please see **Response 30-4** below.

**Letter 17, City of Lake Forest, Gayle Ackerman, AICP, Director of Development Services, February 14, 2012**

- 17-1 Commenter requests an extension of the comment period for the PEIR. Please see **Response 50-1** below.
- 17-2 Commenter's request that SCAG incorporate the Orange County Projections 2010 Modified Growth numbers is addressed in **Master Response No. 3**.
- 17-3 Commenter's concerns with respect to mitigation measures such as clarification of the applicability of mitigation measures to specific project under local jurisdiction and the use of "can and should" language are addressed in **Master Response No. 1**.



**Letter 18, City of Los Angeles (Board Packet), Jaime de la Vega, General Manager, Department of Transportation, January 30, 2012**

18-1 Commenter's concerns with the extent and legal impact of the mitigation measures included in the PEIR are addressed in **Master Response No. 1**.

**Letter 19, City of Mission Viejo, Dennis Wilberg, City Manager, February 14, 2012**

19-1 Commenter's concerns with mitigation measures are addressed in **Master Response No. 1**.

19-2 See responses to **Letter 16**, above.

19-3 See responses to **Letter 59**, below.

**Letter 20, City of Newport Beach - Community Development Department, Brenda Wisneski, Deputy Director, Community Development Department, February 14, 2012**

20-1 Commenter's request that SCAG incorporate the Orange County Projections 2010 Modified Growth numbers is addressed in **Master Response No. 3**.

20-2 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 21, City of Ontario, Chris Hughes, City Manager, February 14, 2012**

21-1 Commenter's request that SCAG clearly state that the mitigation measures as proposed are intended to assist local agencies in their independent decision making process and are not mandatory is addressed in **Master Response No. 1**.

**Letter 22, City of Orange, Alice Angus, Community Development Director, February 14, 2012**

22-1 The City's support of the Modified 2008 RTP Alternative is noted.

22-2 Commenter's concerns about the anticipated patterns of future residential development are addressed in **Master Response No. 3**. The 2012-2035 RTP/SCS focuses growth in urban and HQTAs and does include densities that are greater than existing general plans in many (if not all) of the cities in the SCAG region. SCAG does not have any local land use authority and does not intend that these growth patterns be imposed on any jurisdictions. However, if local jurisdictions chose to adopt these more aggressive growth patterns in their own local plans, it is possible that these more aggressive patterns could become the norm in the region. The 2012-2035 RTP/SCS includes land use patterns through the year 2035, which is beyond the horizon year of many local general plans.

22-3 Commenter indicates concerns with respect to Development Types and application of average residential densities. See **Response 22-2**, above.

22-4 The commenter states that the PEIR should clarify that the transportation projects in the RTP combined with the SCS would focus growth in urbanized areas and therefore development would be infill. However, as discussed on page 2-27 of the Chapter 2.0 Project Description in the Draft PEIR "The land use development pattern of the 2012-2035 RTP/SCS, which assumes a significant increase in small-lot single-family and multi-family housing will mostly occur in infill locations near transit infrastructure, in so-called HQTAs." Throughout the PEIR, it is discussed that most of the new growth would occur as infill development.

22-5 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 23, City of Rancho Santa Margarita, Nate Farnsworth, Senior Planner, AICP, February 9, 2012**

- 23-1 Commenter's concerns with respect to the time available for review are noted. See **Response 50-1**.
- 23-2 The commenter requests definitions for urban growth boundary, parking cash out, references to benchmarks, smart growth principles, SCRIP, active transportation, gentrification, Greenfield, and open space. See **Responses 7-6, 7-8, 7-10, 7-11, 7-15, and 7-19**, above. Additionally, as defined in the Glossary of the Plan, Active Transportation is a mode of transportation that includes walking, running, biking, skateboarding, and other self-propelled forms of transportation; Gentrification, while holding many definitions, is commonly understood as a change process in historically low-wealth communities that results in rising real estate values coupled with shifts in the economic, social and cultural demographics and feel of the communities; and greenfield is also known as "raw land," land that is privately owned, lacks urban services, has not been previously developed, and is located at the fringe of existing urban areas.
- 23-3 Commenter's request that SCAG incorporate the Orange County Projections 2010 Modified Growth numbers is addressed in **Master Response No. 3**.

**Letter 24, City of Riverside - Community Development Department, Planning Division, Steve Hayes, AICP, Interim City Planner, February 14, 2012**

- 24-1 Commenter's request that SCAG update the PEIR with new socio-economic data for Riverside County is addressed in **Master Response No. 3**.
- 24-2 Commenter notes that the City of Riverside Wastewater Plant has a current flow of 34 million gallons per day (mgd), a capacity flow of 40 mgd, and will have a capacity flow of 53 mgd by 2035. See Chapter 5.0 Corrections and Additions for Table 3.13-6. Capacity flow was already listed as 40 mgd; therefore, no change is necessary. The table does not show future capacity flows, therefore, this information will not be incorporated.
- 24-3 The 2012-2035 RTP/SCS focuses growth in urban and HQTAs and does include densities that are greater than existing general plans in many (if not all) of the cities in the SCAG region. SCAG does not have any local land use authority and does not intend that these growth patterns should be imposed on any jurisdictions. Local jurisdictions will be responsible for determining and implementing CEQA streamlining.

**Letter 25, City of San Bernardino Municipal Water District, Matthew H. Litchfield, P.E., Director, Water Utility, February 8, 2012**

- 25-1 Commenter's concerns regarding the length of the review period are noted. See **Response 50-1**, below.
- 25-2 In Table 3.13-5 "San Bernardino Municipal Water" is changed to "San Bernardino Valley Municipal Water District." See Chapter 5.0 Corrections and Additions.
- 25-3 The commenter indicates that details of the San Bernardino Municipal Water Department Recycled Water Project should be added. This revision is included in Chapter 5.0 Corrections and Additions for page 3.13-17.

**Letter 26, City of San Clemente - City Manager, George Scarborough, City Manager, February 14, 2012**

- 26-1 The commenter indicates that the General Plan and Zoning maps for the City of San Clemente are not accurate and that they have worked closely with SCAG in the past to ensure accuracy. The General Plan and Zoning maps contain the most current regional-scale information available at the time the Draft PEIR was prepared. The maps are intended to be used for purposes of understanding

regional land use; minor errors in local land use do not affect the analysis contained in the Draft PEIR. SCAG will continue to work with the City to refine land use data. Please refer to **Master Response No. 3** for a discussion of the OC SCS.

26-2 Commenter's request that SCAG incorporate the Orange County Projections 2010 Modified Growth numbers is addressed in **Master Response No. 3**.

26-3 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 27, City of Santa Ana - Planning & Building Agency, Jay M. Trevino, Executive Director, February 14, 2012**

27-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 28, City of Santa Clarita, Robert Newman, Director of Public Works, February 14, 2012**

28-1 Commenters questions regarding mitigation measures are in part addressed in **Master Response No. 1**. Local jurisdictions are solely responsible for determining consistency with the SCS and for identifying appropriate mitigation measures for individual projects. Appendix G presents examples of measures that local jurisdictions may use to mitigate identified impacts. The commenter identifies that the City is preparing a Climate Action Plan (CAP) and asks how their CAP should link to the Climate Action Plan process identified in MM-GHG9 (now GHG1 in Appendix G). Measure GHG1 identifies preparation of a CAP as potential mitigation for GHG impacts. Each jurisdiction is responsible for identification and mitigation of impacts within its jurisdiction. GHG1 is one suggested measure. The SCS evaluates GHG reductions region-wide based on land use assumptions. The commenter's CAP would not feed in to the current SCS process, as it will not be completed until later this year, but to the extent it identifies land use patterns that contribute to GHG reductions, it could feed into the next RTP/SCS. If a jurisdiction were to use incentive funding to support "desired projects" that jurisdiction would identify what was desired. The commenter indicates that reducing street-widths to pre-World War II widths is impractical. Local jurisdictions are responsible for identifying any potential significant impact and then requiring mitigation as applicable and feasible, SCAG does not have a role in project-specific analysis. The commenter indicates his preference for SCAG to incentivize cities to adopt Tier 1 or Tier 2 guidelines included in CalGreen rather than reference independent programs. Mitigation measures included in the PEIR identify a number of outreach efforts that SCAG plans to undertake in order to encourage local jurisdictions and businesses to "adopt policies and develop practices that lead to GHG emission reductions." The commenter identifies a number of measures (now in Appendix G) that he believes are more appropriate for dense, urban centers rather than for suburban and rural areas. As noted above and in **Master Response No. 1**, each local jurisdiction is responsible for identifying project-specific impacts and applicable and feasible mitigation measures.

**Letter 29, City of South Pasadena - Office of the City Council, Michael A. Cacciotti, Mayor; Philip C. Putnam, Mayor Pro Tem; Robert S. Joe, Councilmember; Marina Khubesrian, M.D., Councilmember; Richard D. Schneider, M.D., Councilmember, February 1, 2012**

29-1 The commenter states that questionable assumptions have been made regarding inclusion of certain projects in the financially constrained Plan, for example the 710 extension project. The commenter also notes the 710 extension should not be referred to as the "gap closure project;" The comment regarding the project name is noted; the term gap closure has been in common use in reference to this project and use of this name does not affect the analysis.

The SR-710 project is one part of the entire RTP; the PEIR analyzes the entire plan and does not address impacts of individual projects. See **Master Response No. 2** regarding programmatic environmental analysis as compared to project specific analysis.

Furthermore, while the SR-710 extension is one of the projects included in the Plan, the Draft PEIR addresses VMT on a regional level and does not analyze individual projects. In addition, the 2012-2035 RTP/SCS focuses transportation network improvements on transit, systems management, and demand management, lowering the need to drive alone and making roadways more efficient in order to reduce GHG emissions. It is acknowledged that increasing highway capacity can increase VMT and that expanded highways may become congested over time. However, it is anticipated that proposed transportation improvements and land use changes would lead to reduced regional congestion and increased transit options.

- 29-2 Commenter's questions about the programmatic analysis performed in the PEIR are addressed in **Master Response No. 2**.

**Letter 30, City of Stanton, Omar Dadabhoy, Community Development Director, February 14, 2012**

- 30-1 Commenter's questions regarding the growth assumption used in the PEIR analysis and request that SCAG update the PEIR with Orange County Projections 2010 Modified dataset are addressed in **Master Response No. 3**.
- 30-2 Commenter's concerns with respect to local jurisdiction compliance with the Mitigation Monitoring and Reporting Program are addressed in Chapter 5.0 Corrections and Additions for the Introduction. There is no requirement for local jurisdictions to submit mitigation documentation to SCAG. See also the Mitigation Monitoring and Reporting Program included in Chapter 6.0.
- 30-3 Commenter's concerns regarding mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions for the Introduction.
- 30-4 The commenter indicates that the alternatives in the Draft PEIR should be identified consistently with numbers and letters throughout the document. The three alternatives evaluated in the Draft PEIR are the No Project Alternative known as Alternative 1, the Modified 2008 RTP Alternative known as Alternative 2, and the Envision 2 Alternative known as Alternative 3. These three alternatives are consistently identified as such throughout the Draft EIR. Identifying alternatives by name and number is standard practice in EIRs. The alternatives are not identified with letters (e.g., Alternative A, B or C). The alternatives identified in the SCS (page 80 of the Draft SCS Background Report) are identified by letter; these alternatives were used to develop the alternatives analyzed in the PEIR, but they are not identical and therefore their names are not the same. No revision to the PEIR is necessary. This comment is further addressed in **Master Response No. 3**.
- 30-5 Commenter requests revising mitigation measures that pertain to local agencies to include "if applicable." This comment is addressed in **Master Response No. 1**.

**Letter 31, City of Tustin, John Nielsen, Mayor, February 8, 2012**

- 31-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.
- 31-2 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 32, Coachella Valley Association of Governments and Western Riverside Council of Governments, Tom Kirk, CVAG Executive Director; Rick Bishop, WRCOG Executive Director, February 14, 2012**

32-1 Local jurisdictions will be responsible for determining consistency with the SCS and the appropriate form of CEQA streamlining.

**Letter 33, Construction Industry Air Quality Coalition (CIAQC), Michael W. Lewis, Senior Vice-President, February 14, 2012**

33-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 34, County of Orange, Thomas G. Mauk, County Executive Officer, February 10, 2012**

34-1 Commenter's detailed comments are addressed below. These responses and corrections and additions expand on or clarify information that was presented in the Draft PEIR. This Final PEIR presents no new significant information and therefore recirculation is not necessary.

34-2 Commenter's concerns with respect to the OC SCS as incorporated into the RTP/SCS are addressed in **Master Response No. 3**.

34-3 Commenter's concerns with respect to mitigation measures and SCAG's authority to enforce mitigation are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions – Introduction.

34-4 Commenter's concerns regarding the length of the review period are noted. See **Response 50-1**.

34-5 Commenter's concerns regarding the broadness of the 2012-2035 RTP/SCS are discussed in **Master Response No. 2**. Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction. Chapter 2.0 Project Description of the Draft PEIR was prepared in accordance the requirements of the CEQA Statutes Public Resources Code Section 21000 *et seq.* and CEQA Guidelines Title 14 California Code of Regulations Section 15000 *et seq.*

34-6 Commenter's concerns with respect to mitigation measures and SCAG's authority to enforce mitigation are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

34-7 Commenter's concerns with respect to mitigation measures and SCAG's authority to enforce mitigation are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

34-8 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

34-9 Commenter's concerns with respect to mitigation measures and SCAG's authority to enforce mitigation are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

34-10 The commenter requests definitions for urban growth boundary, parking cash out, references to benchmarks, smart growth principles, SCRIP, active transportation, gentrification, Greenfield, and open space. See **Response 23-2**, above.

34-11 Commenter's concerns with respect to naming alternatives are addressed in **Response 30-4**.

- 34-12 Commenter's concerns regarding documentation of mitigation are addressed in **Response 30-2**.
- 34-13 The commenter states that the policies on page 2-3 of the Project Description should be amended to reflect the strategies included in the Chapter 4 of the 2012-2035 RTP/SCS. Please refer to **Response 8-2**, above.
- 34-14 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.
- 34-15 The commenter indicates opposition to many mitigation measures in the Water Resources section. Please refer to **Master Response No. 1** for a clarification on how mitigation measures are intended to be used.
- 34-16 The commenter states that various mitigation measures may be outside of SCAG's purview. Please refer to **Master Response No. 1**.
- 34-17 The commenter suggests an alternative to capture and use landfill gas as an alternative source of energy. This comment is noted.
- 34-18 The commenter discusses recent changes to the California Integrated Waste Management Act and notes that the agency name for the California Integrated Waste Management Board has been changed to the California Department of Resources Recycling and Recovery (Cal Recycle). The commenter also provides updated information regarding Orange County's solid waste disposal facilities and statewide waste diversion rates. These revisions are included in Chapter 5.0 Corrections and Additions (for pages 3.11-22, 3.11-23, 3.11-24, 3.11-26, 3.11-29).

In addition, the commenter states that the Draft PEIR mistook the waste disposal rate as the total amount of waste, including items to be recycled. However, the disposal rate is the amount of waste landfills receive and does not include materials that can be recycled. Therefore, the diversion rate was improperly applied to the disposal rate. In addition, the commenter states that the 2010 diversion rate is 65 percent. According to Cal Recycle's website: <http://www.calrecycle.ca.gov>, in 2010 the diversion rates for residents and employees was 65 percent and 63 percent respectively. This revision is included in Chapter 5.0 Corrections and Additions of the Final EIR. The commenter also states that the waste generation and disposal projections for the 2010 through 2035 timeframe should be re-evaluated to include either a residential or employee disposal rate, but not both, since the data is not meant to be additive and likely double-counts people who both live and work within the SCAG region. The solid waste analysis includes both residential and employee waste generation in order to provide a conservative estimate, and captures individuals who are employed in within the SCAG Region but live outside of the Region's boundaries, and vice versa.

- 34-19 The commenter discusses opposition to former Mitigation Measures MM-PS37 and MM-PS38, which discourage the siting of new solid waste landfills, as well as the exportation of locally generated waste outside of the SCAG Region. These Mitigation Measures have been renumbered to PS30 and PS31 and moved to Appendix G. Please refer to **Master Response No. 1** for a discussion of SCAG's authority in terms of imposing mitigation measures on other jurisdictions and agencies.
- 34-20 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

**Letter 35, Elise Kalfayan, February 14, 2012**

- 35-1 The commenter indicates that the PEIR should include electrified rail as an alternative within the PEIR.

SCAG works closely with regional partners and stakeholders to identify appropriate solutions to freight challenges that may include expansion of regional facilities used for goods movement activities. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., zero and/or near zero-emission), as identified in the 2012-2035 RTP/SCS, offers a promising solution to regional freight concerns. This system also offers the opportunity to incentivize the adoption of clean, zero- and/or near zero-emission technologies for regional freight movement. The East-West Freight Corridor is anticipated to lead to reduced emissions through the use of clean trucks, improved mobility and decreased congestion as a result of added capacity and a separation of trucks and passenger vehicles, and increased safety by limiting the interactions of trucks and passenger vehicles. Moreover, preliminary analysis of the East-West Freight Corridor did consider adjacent land uses and potential right-of-way impacts. SCAG continues to work with affected communities.

SCAG's recent study initiatives have included an assessment of electrified rail technologies. Analyses to date suggest that additional evaluation would be needed due to operational, reliability, and safety concerns among other factors. However, it is not feasible to move all goods by rail, whether electrified or conventional rail, as existing modal segments generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be able to use rail from the San Pedro Bay Ports to their final destination. However, goods moving from the Ports to local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors. The goods movement system is complex and cannot effectively rely on a single mode of transportation.

SCAG will continue ongoing dialogue with stakeholders and transportation interests to continue to identify potential solutions to regional freight challenges. This will include further analysis of concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders, and costs among others.

**Letter 36, Ezequiel Gutierrez Jr., Esq., February 14, 2012**

- 36-1 The commenter expresses concern about the capacity of highways and the potential for gridlock. The 2012-2035 RTP/SCS includes numerous projects and planning measures to reduce the potential for gridlock and provide adequate transportation infrastructure. Since this comment does not address the adequacy, analysis, or completeness of the Draft PEIR, no further response is required.
- 36-2 Commenter indicates that the Plan and related PEIR are fundamentally not certifiable. As discussed in Chapter 2.0 of the Draft PEIR, the PEIR was prepared in accordance with the requirements of the CEQA Statutes Public Resources Code Section 21000 *et seq.*, CEQA Guidelines Title 14 California Code of Regulations Section 15000 *et seq.*, and SB 375.

**Letter 37, Ghassan K. Roumani, February 11, 2012**

- 37-1 Commenter's concerns with respect to project specific impacts are addressed in **Master Response No. 2**.

**Letter 38, Hank Fung, P.E., February 14, 2012**

38-1 Commenter's questions regarding how measures protecting public health adjacent to transportation infrastructure are addressed in **Response 76-2**.

38-2 The commenter indicates that several commercial and residential neighborhoods on the National Register of Historic Places are located near transit-friendly areas that are slated for increased density under the RTP. Additionally, the commenter states that in the development approval process, local jurisdictions should recognize the impacts from increased density and mitigate appropriately. It will be up to the local jurisdictions in each area to determine the appropriate environmental review for each project and the appropriate mitigation (see **Master Response No. 1**).

There are a number of example measures (CUL1 through CUL5) provided in Appendix G, which could potentially address this impact. Since SCAG cannot ensure that impacts will be mitigated, impacts to cultural resources are identified as significant and unavoidable. As discussed in **Master Response No. 1**, SCAG does not have the authority to enforce mitigation measures at the local level or require project-specific mitigation.

38-3 Commenter's support for measures promoting transportation security, congestion pricing and smart cards are noted.

**Letter 39, Hills for Everyone, Claire Schlotterbeck, Executive Director, February 10, 2012**

39-1 The commenter indicates suggestions to strengthen MM-BIO/OS2, MM-BIO/OS36, and MM-BIO/OS38. These changes have been incorporated into Example Measures BIO/OS2, BIO/OS35, and BIO/OS37, now included in Appendix G; however, please refer to **Master Response No. 1** for clarification as to how mitigation measures in the PEIR are intended to be used.

**Letter 40, Imperial County Air Pollution Control District, Brad Poiriez, February 14, 2012**

40-1 The commenter indicates that the 8-hour ozone attainment status in Imperial County listed on page 3.2-12 should be corrected from maintenance to non-attainment. This correction is included in Chapter 5.0 Corrections and Additions, of the Final PEIR.

The commenter indicates that it is important to note that future projects will be required to comply with local rules and regulations to minimize construction and operational emissions, including the Imperial County CEQA Air Quality Handbook. See also **Master Response No. 2**.

The criteria pollutant emissions by county in Table 3.2 are based on the RTP travel activity data (including 2012 and 2035 Plan) that are provided to CARB for updating the emission inventory.

**Letter 41, John M. Fentis, John M. Fentis, Deputy City Prosecutor (retired), Long Beach City Prosecutor, Environmental Crimes Unit, Current Environmental Project Director, California District Attorneys Association**

41-1 The commenter indicates that the 8-hour ozone attainment status in Imperial County listed on page 3.2-12 should be corrected from maintenance to non-attainment. See Chapter 5.0 Corrections and Additions for page 3.2-12 regarding Imperial County's attainment status.

The commenter indicates that it is important to note that future projects will be required to comply with local rules and regulations to minimize construction and operational emissions, including the Imperial County CEQA Air Quality Handbook. See Chapter 5.0 Corrections and Additions for page 3.2-32 regarding compliance with local rules and regulations. See also **Master Response No. 2**.

The commenter identifies the GRID project (construction of a super dock in either the Port of Los Angeles or Long Beach capable of storing 7,000 containers and loading them on to electrified trains



with transfer to electrified trucks and construction of a tunnel) as a potential beneficial project for the region. The 2012-2035 RTP/SCS PEIR evaluates the region as a whole and does not focus on review of individual projects. Please refer to **Response 35-1** for additional information pertaining to the GRID project.

- 41-2 Commenter's concerns with respect to project specific impacts are addressed in **Master Response No. 2**.

**Letter 42, Joyce Dillard, February 14, 2012**

- 42-1 The commenter states the Envision 2 Alternative does not include General Plan elements from all municipalities. The Envision 2 Alternative includes densities that are greater than existing general plans in many (if not all) of the cities in the SCAG region (see Chapter 5.0 Corrections and Additions and changes to the Alternatives chapter of the PEIR). The Plan growth assumptions are based on local input (i.e., city and county general plans). The Envision 2 Alternative aims to show how the region would change if cities and counties encouraged more aggressive in-fill and TOD strategies in their general plans.
- 42-2 The commenter requests that the PEIR address the issues of AB 162 and the Department of Water Resources 200-year floodplain management and that the watersheds, basin plans, Integrated Regional Water Management Plans, wetlands protection, beneficial uses of water, and significant biological areas should be mapped. The commenter notes that alluvial fans are now a factor in planning, land use, hazards, and public safety. The Map Chapter of the PEIR includes regional maps depicting flood hazard zones, major watersheds, and major surface waters. The Draft PEIR programmatically assesses whether the 2012-2035 RTP/SCS would have an adverse impact on flood control and water resources (see Section 3.13). The detailed mapping suggested by the commenter is more appropriately provided at the local level.
- 42-3 The commenter asks what are the migratory bird patterns, fish restoration, and wetland areas that are significant to maintaining watersheds. The PEIR provides a regional assessment of impacts to biological and water resources. Project-specific environmental review is necessary to identify the types of mitigation measures appropriate to each site that could reduce impacts to watersheds (see Appendix G for some examples of measures to address impacts to biological and water resources).
- 42-4 The commenter requests that Total Daily Maximum Loads per the National Pollution Discharge Elimination System should be defined. A complete list of Total Maximum Daily Loads (TMDL) in the region is not currently available. The California State Water Resources Control Board website (<http://www.swrcb.ca.gov>) indicates: *Technical issues and the number of combinable pollutants affect the exact number of TMDLs that will be necessary to address the State's water quality problems. Some multiple pollutants can be addressed in a single TMDL or multiple water bodies in a watershed may be addressed in a single TMDL project. Based on the current 303(d) list with over 1,883 water body/pollutant combinations, the State Board estimates that the total number of TMDLs needed is over 400 projects. The Regional Boards are currently engaged in developing over 120 TMDLs, many addressing multiple pollutants. Schedules have been developed for establishing all required TMDLs over a 13-year period. More detailed schedules of work to be undertaken in the 3- and 5-year periods have also been developed.*
- 42-5 The commenter states that geology and soils need to be mapped for the entire region. Maps 3.5-1 and 3.5-2 in Section 3.5 Geology and Soils of the Draft PEIR programmatically (i.e. at an appropriate level for this regional analysis) show the geology and soils of the SCAG region. No change is required.

- 42-6 The commenter requests an explanation of how the Draft PEIR addresses diesel emissions from trains and under what authority as responsible party. As discussed on page 3.2-26, rail engines generate emissions of diesel particulate matter (DPM) and other cancer-causing toxics. Map 3.2-6 located in Chapter 8.0 (Maps) shows sensitive receptors located along regional rail lines. Map 3.2-7 located in Chapter 8.0 (Maps) shows regional 2005 cancer risk as it relates to rail lines. As with freeway corridors, as a result of diesel engines, above-average cancer risk is often located near rail lines. Emissions from trains are not calculated in the PEIR. The commenter's question regarding authority is not clear. SCAG is the Lead Agency for preparation of this PEIR and as such is responsible for preparing an evaluation of anticipated impacts.
- 42-7 The commenter states that reduced municipal budgets have decreased the reliability of Fire, Police, and Emergency Services, and that each municipality should be reviewed for their current capabilities of protecting public health and safety. Please refer to **Master Response No. 2** for a discussion of environmental analysis on a regional scale versus smaller scale environmental evaluations, which would include service capabilities of individual municipalities within the SCAG Region.

**Letter 43, Judy Bergstresser**

- 43-1 Comments regarding any similarity between the SANDAG PEIR and the SCAG PEIR are addressed in **Response 89-1**. Commenter's opposition to highway projects is noted.
- 43-2 The commenter states that SCAG's assumption that highway expansion reduces congestion and improves pollution levels is grossly inaccurate because the traffic modeling fails to fully account for generated and induced traffic. The Draft PEIR discusses VMT on a regional level and does not discuss individual projects. In addition, the 2012-2035 RTP/SCS focuses transportation network improvements on transit, systems management, and demand management, lowering the need to drive alone and making roadways more efficient in order to reduce GHG emissions. It is acknowledged that increasing highway capacity can increase VMT and that expanded highways may become congested over time. However, it is also anticipated that proposed transportation improvements and land use changes would lead to reduced regional congestion and increased transit options.
- 43-3 The commenter states that the 2012-2035 RTP/SCS will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks throughout the Southern California region. This comment is acknowledged. The issues identified by the commenter are addressed in the PEIR. The commenter provides no specific comment on these issues therefore no specific response can be prepared.
- 43-4 Commenter's concerns with respect to project specific impacts are addressed in **Master Response No. 2**, which discusses the differences between a program level EIR (such as this PEIR) and a project-level EIR.
- 43-5 The commenter indicates opposition to increased conventional roadway and rail yard capacity for goods movement and supports zero-emission goods movement alternatives.

The commenter quotes from the Plan, "The plan states that to attain federal ozone standards, the region will need broad deployment of zero and/or near zero emission transportation technologies in the 2023 to 2035 timeframe (page 74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor air quality (page 68) and negative impacts in neighboring communities and throughout the region." The Plan provides a comprehensive transportation strategy for the region. A reasonable range of alternatives for the Plan as a whole is presented in Chapter 4.0 of the Draft PEIR. The alternatives analysis does not present a range of options for different components of the Plan since the Plan is viewed as a whole. As discussed on page 194 of the Draft Plan, SCAG is exploring three electric rail options. Please refer to **Response 5-1** for additional information.

**Letter 44, Latino Health Access, Dolores Gonzalez-Hayes, Director of Policy, February 14, 2012**

44-1 Commenter's recommendations regarding tools and metrics, including the use of I-THIM, to monitor Plan performance are noted. The I-THIM model is a relatively new model that was used in a study jointly sponsored by the California Department of Public Health (CDPH), MTC and the Bay Area Air Quality Management District (BAAQMD) and published about 3 month ago. The model is not yet readily available and it is not clear that it has been validated. The I-THIM model appears to be a spreadsheet model that can predict health benefits from increased physical activity associated with greater walk/bike use within a regional transportation plan. Increased physical activity clearly has health benefits. The I-THIM or similar tool could be used in the future after model validation. Commenter may note that SCAG is involved in discussions with CDPH to use the I-THIM model in future planning and monitoring efforts.

Comments regarding focusing investments on completing the transit system, front-loading active transportation and increasing investments in zero emission freight transportation are noted. The RTP/SCS includes extensive investment in all these areas.

Evaluation of individual projects must be done on a site-specific basis. See **Response 76-2**.

**Letter 45, Majestic Realty, Fran Inman, Senior Vice President, February 14, 2012**

45-1 Commenter indicates insufficient time was available to coordinate with other businesses regarding response to the PEIR. The comment period extended for 45-days as required by CEQA. See also **Response 50-1**.

45-2 Commenter's concerns with respect to mitigation measures ("can and should" language, mitigation measures not appropriate for all projects) and SCAG's authority to enforce mitigation are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

45-3 Commenter's concerns with respect to project specific impacts are addressed in **Master Response No. 2**.

**Letter 46, Mesa Consolidated Water District, Paul E. Shoenberger, P.E., General Manager, February 13, 2012**

46-1 The commenter expresses concern with many of the water-related mitigation measures stating that SCAG is exceeding its authority over water districts. Please see **Master Response No. 2** for clarification on a programmatic analysis versus a project-specific analysis and **Master Response No. 1** for a description of how mitigation measures identified in the PEIR are intended to be used.

46-2 The commenter expresses concern with many of the water-related mitigation measures for the reason that existing regulatory framework is already in place. Please refer to **Master Response No. 1** for clarification as to how mitigation measures in the PEIR are intended to be used.

46-3 The commenter expresses concern with many of the water-related mitigation measures because they provide project-level mitigation measures without project-level analysis. Commenter notes that it is not necessary to mitigate effects that are not significant, and that mitigation measures should not be prescriptive. Please refer to **Master Response No. 1** for clarification as to how mitigation measures in the PEIR are intended to be used.

46-4 The commenter expresses concern regarding adequacy of the No Project Alternative analysis. The no Project analysis is presented at the end of each impact section as well as in the Alternatives chapter of the PEIR. Sufficient programmatic analysis is presented to allow the decision makers to understand the relative impacts of the No Project Alternative as compared to the proposed Plan.

- 46-5 Commenter's concerns with respect to mitigation measures and SCAG's authority to enforce mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.
- 46-6 The comment indicates that additional impact analysis is needed for a comparison of the No Project Alternative to the proposed Plan regarding water supply and wastewater, and any associated energy or GHG impacts. See **Response 46-4**, above.
- 46-7 The commenter provides comments on all of the water-related mitigation measures, listing reasons why the mitigation measure should be deleted, or kept. Please refer to **Master Response No. 1** for clarification as to how mitigation measures in the PEIR are intended to be used.

**Letter 47, Metropolitan Water District, Deirdre M. West, Manager, Environmental Planning Team, February 14, 2012**

- 47-1 Commenters concerns with respect to lack of coordination with commenter (MWD) in the preparation of the Draft PEIR are noted. See Chapter 5.0 Corrections and Additions for changes to the Water Resources section of the Draft PEIR.

**Letter 47A, Metropolitan Water District, Deirdre M. West, Manager, Environmental Planning Team, February 14, 2012**

- 47A-1 The commenter indicates detailed corrections/revisions to the environmental setting section that should be made to the Water Resources section of the Draft PEIR. The corrections/revisions are included in Chapter 5.0 Corrections and Additions.
- 47A-2 Commenter indicates that in light of the information provided, the impact analysis should be updated. Changes are included in Chapter 5.0 Corrections and Additions for the Water Resources section.
- 47A-3 Commenter indicates concerns with respect to cumulative analysis and growth inducement as well as agencies consulted and sources. Changes are included in Chapter 5.0 Corrections and Additions for the Water Resources and Growth Inducement sections.

**Letter 48, Municipal Water District of Orange County, Kevin P. Hunt, P.E., General Manager, Municipal Water District of Orange County; Robert R. Hill, General Manager, El Toro Water District; John Schatz, General Manager, Santa Margarita Water District; Paul Shoenberger, P.E., General Manager, Mesa Water Dis, February 14, 2012**

- 48-1 Commenter's concerns with respect to mitigation measures and SCAG's authority to enforce mitigation are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.
- 48-2 The commenter states concern with many of the water-related mitigation measures. Please refer to **Master Response No. 1** for clarification as to how mitigation measures in the PEIR are intended to be used and a discussion of voluntary mitigation measures recommended for local level agencies to consider when reviewing project-level EIRs.
- 48-3 Commenter's concerns with respect to mitigation measures and SCAG's authority to enforce mitigation are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.
- 48-4 The commenter provides comments on all of the water-related mitigation measures, listing reasons why the mitigation measure should be deleted or kept. Please refer to **Master Response No. 1** for clarification as to how mitigation measures in the PEIR are intended to be used.

**Letter 49, NAIOP Commercial Real Estate Development Association- Inland Empire Chapter, Robert Evans, Executive Director, February 14, 2012**

- 49-1 Commenter indicates he has been involved with development of the 2012-2035 RTP/SCS and that he supports positions in two attached letters. This comment is acknowledged. Since this comment does not address the adequacy, analysis, or completeness of the Draft PEIR, no further response is required.
- 49-2 Commenter expresses concern with inadequate time to review the Draft PEIR, concern over the number of mitigation measures and the number of measures that duplicate existing regulations as well as SCAG's lack of ability to ensure outcomes. See **Master Response No. 1** and Chapter 5.0 Corrections and Additions – Global Changes to Mitigation Measures Throughout the PEIR and responses to **Letter 50**, below.
- 49-3 This is a copy of a letter separately submitted. See responses to **Letter 65**, below.

**Letter 50, NAIOP Commercial Real Estate Development Association- SoCal Chapter, James V. Camp, Director, February 14, 2012**

- 50-1 Commenter requests an extension of the comment period for the PEIR. The 2012 RTP/SCS PEIR has been appropriately noticed and was circulated for 45-day public review period consistent with CEQA Guidelines Section 15105. Further, SCAG held two scoping meetings on May 26, 2011 to allow agencies, interested parties and members of the public to provide input on the scope and content of the PEIR. SCAG has provided sufficient time for review and comment on the PEIR. . SCAG apologizes that the comment period could not be extended primarily due to schedule constraints dictated by deadlines for SCAG to meet federal transportation conformity requirements.
- 50-2 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 51, Natural Resource Defense Council & Endangered Habitat League, Amanda Eaken, Deputy Director, Sustainable Communities; Adrian Martinez, Staff Attorney; Michael Fitts, Staff Attorney, February 14, 2012**

- 51-1 Local jurisdictions will be solely responsible for determining consistency with the SCS; see Chapter 5.0 Corrections and Additions for the Introduction, for page 1-13 -- text is deleted that refers to methodology for determining consistency. See also **Response 7-18** regarding TAZ data being available to local jurisdictions for their use.

**Letter 52, No. 710 Coalitions/ STOP 710, Dr. Tom Williams, February 14, 2012**

- 52-1 The commenter indicates that there is a lack of supporting information, including model results, for figures and maps showing various congestion, mobility, noise, and air quality aspects for both road and rail systems for 2035. The commenter also states that there is an absence of basic assumptions and inputs to model and criterion levels for various map designations, absence of modeling for railroads and basic assumptions and inputs to model and criterion levels for various map designations, and distractive information without specific relevance to the transportation setting, impact assessment, and mitigation.

The 2012-2035 RTP/SCS appendices available on SCAG's website include detailed supporting information on the analysis and models. The comment on distractive information in the transportation discussion is noted. SCAG considers the detailed discussion necessary to present a complete assessment of transportation issues.

**Letter 53, No. on 710 Action Committee, Claire Bogaard, Pasadena; Susan Bolan, La Crescenta; Sam Burgess, Pasadena; Janet Ervin, Alhambra; Trisha Gossett, Highland Park; Bill Graham, Burbank; Don Jones, Eagle Rock; Elise Kalfayan, Glendale; Clarice Knapp, South Pasadena; Harry Knapp, South Pasa, January 30, 2012**

53-1 The commenter notes the Environmental Justice analysis in the Plan and that the analysis in the Plan addresses freight movement and rail, but the commenter is concerned that there is no mention of sustained community opposition to the SCIG project. The commenter indicates opposition to the SCIG project based on the additional impact to sensitive communities in the vicinity of the SCIG project. As noted by the commenter, Environmental Justice issues are addressed in the Environmental Justice Appendix to the Plan. The commenter's opposition to the SCIG project is noted. The PEIR provides a programmatic assessment of the Plan. Individual projects complete separate project-specific environmental analyses. See **Master Response No. 2**.

A health risk assessment was prepared for the 2012-2035 RTP/SCS proposed improvements. In general cancer risk is anticipated to be reduced by a large amount because of the large reduction in diesel particle matter as a result of emission controls in the coming years. More detailed site-specific analysis will be necessary to determine specific impacts that could result from new projects that could either substantially increase DPM adjacent to a school. New facilities will also have to do site-specific analyses (whether new transportation facilities or new schools) as deemed appropriate by the applicable Lead Agency to ensure that health risks are mitigated as appropriate. See **Response 76-2** for further discussion of health risks. In order to determine site-specific risks (for example near the I-710), site-specific details would be needed, including topography, meteorology and other such details. Please see Section 3.2 and Appendix F of the Draft PEIR for a detailed discussion of health impacts related to the Plan.

**Letter 53A, No. on 710 Action Committee, Claire Bogaard, Pasadena; Susan Bolan, La Crescenta; Sam Burgess, Pasadena; Janet Ervin, Alhambra; Trisha Gossett, Highland Park; Bill Graham, Burbank; Don Jones, Eagle Rock; Elise Kalfayan, Glendale; Clarice Knapp, South Pasadena; Harry Knapp, South Pasa, January 30, 2012**

53A-1 The commenter raises concerns with health risk exposure. Specifically, the comment states that baseline data compiled from monitors would allow SCAG to look at health risk more accurately. As stated on page 3.2-26 of the Draft PEIR, a mobile source health risk assessment was completed for freeway corridors under the Plan. The analysis assessed at least one freeway corridor in each of the six counties contained in the SCAG planning area. To focus on the maximum risks, the segment within each corridor that exhibited the highest daily total traffic volumes were identified and quantitatively modeled for increased cancer risk. The analysis was completed using current methodologies set forth by applicable regulatory agencies (e.g., the California Office of Environmental Health Hazard Assessment). Emissions were characterized using the most accurate emission factors available and the Environmental Protection Agency AERMOD dispersion model. SCAG considers the health risk analysis presented in the Draft PEIR to be a reasonably accurate estimation of health risks along a representative sample of freeway corridors. No additional analysis is required.

53A-2 The commenter states that the conclusion of a significant impact related to criteria pollutants and construction emissions invalidates the conclusion of a less-than-significant impact related to health risk. The health risk analysis assessed toxic air contaminants (e.g., DPM) from mobile sources and the general regional and construction emissions analysis assessed criteria pollutants (e.g., carbon monoxide). Health risks associated with construction are site-specific and short-term and were not addressed in this PEIR.

The commenter disagrees with the SCAG conclusion that particulate matter exhaust emissions from heavy-duty trucks are anticipated to decrease from 2011 to 2035. The comment is noted. SCAG considers the Draft PEIR analysis to be an accurate representation of emissions.

The commenter also discusses concerns related to changes to the I-710. The commenter's opposition to that project is noted. As the 2012-2035 RTP/SCS is programmatic in nature, the focus of the environmental analysis in the 2012-2035 RTP/SCS PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2012-2035 RTP/SCS as a whole. It does not include site-specific analysis of any project contained in the 2012-2035 RTP/SCS. Please refer to **Master Response No. 2**, for a discussion about the differences between Program EIRs and Project/Site-specific EIRs.

53A-3 The commenter states that the 2012-2035 RTP/SCS must include a health risk analysis for all of the I-710 corridor communities. Please refer to Comment 53A-2, above.

53A-4 This commenter discusses pollution related to goods movement from the Ports of Los Angeles and Long Beach and suggests that lower polluting alternative modes of goods movement should be incorporated into the 2012-2035 RTP/SCS. As discussed in the 2012-2035 RTP/SCS, SCAG is exploring zero and/or near zero-emission truck routes as well as three electric rail options (page 194), as well as long-term emissions reduction strategies (page 195), which would reduce overall emissions.

53A-5 Commenter's indicate their preference for increased transit and comment that the Plan is "front-loaded" with highway projects and "backloaded" with transit. The Plan does not represent this scenario. See **Response 1-2**, above.

53A-6 Commenter's concerns with respect to project specific impacts are addressed in **Master Response No. 2**.

**Letter 54, Occidental College, Urban and Environmental Policy Institute, Mark Vallianatos, Policy Director, February 14, 2012**

54-1 The commenter identifies recommendations to expand clean transportation, encourage sustainable land uses, and reduce greenhouse gas emissions. The Plan provides a comprehensive transportation strategy for the region. A reasonable range of alternatives for the plan as a whole is presented in Chapter 4.0 of the Draft PEIR. The alternatives analysis does not present a range of options for different components of the Plan since the Plan is viewed as a whole. As discussed on page 194 of the 2012-2035 RTP/SCS, SCAG is exploring three electric rail options.

**Letter 55, Orange County Business Council, Kate Klimow, Vice President, Government Affairs, February 13, 2012**

55-1 The commenter indicates concerns regarding SCAG's authority to implement mitigation measures. Please see **Master Response No. 1**. The commenter states that the RTP/SCS and the PEIR should differentiate between balanced, planned growth identified by local jurisdictions, and growth that is inconsistent with what is already being planned for at the local level. As discussed in Chapter 2.0 of the Draft PEIR, SCAG worked with local jurisdictions to identify regional strategic areas for infill and investment. In addition, the 2012-2035 RTP/SCS focuses growth in urban and HQTAs and does include densities that are greater than existing general plans in many (if not all) of the cities in the SCAG region. SCAG does not have any local land use authority and does not intend that these growth patterns should be imposed on any jurisdictions.

- 55-2 Commenter's concerns with respect to mitigation measures and SCAG's authority to enforce mitigation are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

**Letter 56, Orange County Council of Governments, Peter Herzog, Chairman, February 14, 2012**

- 56-1 See corresponding response regarding growth projections in **Letter 16**, above.
- 56-2 See corresponding response regarding “can and should” language in **Letter 16**, above.
- 56-3 See corresponding response regarding CEQA Streamlining in **Letter 16**, above.
- 56-4 See corresponding response regarding RTP/SCS Policies in **Letter 16**, above.
- 56-5 See corresponding response regarding mitigation measures in **Letter 16**, above.
- 56-6 See corresponding response regarding mitigation measures that duplicate existing regulations in **Letter 16**, above.
- 56-7 See corresponding response regarding requested clarifications in **Letter 16**, above.

**Letter 57, Orange County Department of Education, Andrea Sullivan, Director, Facilities Planning and Maintenance & Operations, February 9, 2012**

- 57-1 Commenter indicates that more intense development would increase impacts on existing schools. The PEIR indicates that light and glare and shading impacts are potentially significant (see page 3.1-15). In general, in areas adjacent to existing facilities cancer risk is anticipated to be reduced by a large amount because of the large reduction in DPM as a result of emission controls in the coming years. More detailed site specific analysis will be necessary to determine specific impacts that could result from new projects that could either substantially increase DPM adjacent to a school. New facilities will also have to do site specific analyses (whether new transportation facilities or new schools) as deemed appropriate by the applicable Lead Agency to ensure that health risks are mitigated as appropriate. See **Response 76-2** for further discussion of health risks. In order to determine site-specific risks (at for example individual schools), site-specific details would be needed, including topography, meteorology and other such details. A map of schools in Orange County would provide no additional information to school districts beyond that already presented in the PEIR. In general all sensitive receptors within 500 feet of freeways and high-volume roadways are potentially impacted by particulate matter from transportation.

- 57-2 Commenter indicates concern with respect to the limited scope of the screening health risk Assessment contained in the PEIR. See **Responses 57-1** and **76-2**. The RTP/SCS PEIR places no additional requirements on schools above what is currently required. Existing schools within 500 feet of freeways and high-traffic volume roadways already experience high levels of particulate matter. In the future emissions are anticipated to decrease substantially; therefore health risks will be improved compared to today for these schools. New schools should do careful siting studies and undertake environmental review prior to being constructed.

With respect to the GHG mitigation measure (now measure GHG7 in Appendix G), this is an example of a measure that could be used to mitigate significant adverse impacts to GHG emissions. See also **Master Response No. 1**.

- 57-3 The commenter indicates that many schools could be impacted from more intense development patterns associated with designated HQTAs and RTP/SCS projects. The commenter states that the Draft PEIR is not clear about exactly which areas were included in its survey of schools and which areas were omitted, and that the Draft PEIR should be revised to include this information and the



analysis of schools should be broadened beyond hazardous materials. The commenter also states that the analysis should be expanded to address impacts to schools' exposure to non-transportation source emissions and hazardous materials handlers, as well as impacts from increased densities, mixed-uses, and schools.

Please refer to **Master Response No. 2**, for a discussion of the region-wide assessment provided in the PEIR, versus site-specific impacts related to individual projects under the Plan. In addition, air quality, noise, and capacity impacts to schools (i.e., sensitive receptors) were discussed in Sections 3.2, 3.9, and 3.11, respectively, of the Draft PEIR. See also **Response 76-2** with respect to toxic air emissions within 500 feet of freeways.

57-4 The commenter indicates that the proposed land use pattern under the Plan will conflict with sensitive land uses. Potential conflicts with sensitive land uses (sensitive receptors) are discussed in Sections 3.2, 3.9, and 3.11 of the Draft PEIR.

57-5 This comment is a reference to comments earlier in the comment letter. See **Response 57-4**, above.

57-6 The commenter states that the PEIR should identify several representative existing schools in designated HQTAs. Analyses of these representative schools should consider how such schools will bear the brunt of future development patterns under the 2012-2035 RTP/SCS, especially in terms of noise and air pollution. As discussed on page 3.2-23 the Draft PEIR includes detailed health risk assessments for sensitive receptors located along a representative sample of high volume freeway corridors. In addition, refer to page 3.9-18 for a discussion of freeway noise. See also **Master Response No. 2**.

57-7 The commenter states that the PEIR should include analysis of how the use of outdoor recreational areas at schools may be restricted due to exposure to air pollution. The commenter notes that although the 2012-2035 RTP/SCS is intended to reduce regional air pollution, schools in areas targeted for intense urban development and transportation improvements may be adversely impacted. In general, risk next to existing freeways is projected to go down, even in urban areas with increased density, so existing schools next to existing freeways will be exposed to less risk in the future compared to today, even in urban areas with increasing density. New schools or new transportation facilities will have to address potential changes in use of school facilities as a result off potential health impacts. In addition, refer to **Response 76-2**. See also **Master Response No. 2**.

57-8 The commenter states that schools near transportation corridors will be impacted by transportation-related noise and air pollution and pedestrian bike hazards where full pedestrian and bike facilities have not been completed. The commenter also states that school districts should continue to work with local jurisdictions to identify problem areas, seek grant money for Safe Routes to School improvements, and encourage students to walk and bike to school. This comment is acknowledged. Since this comment does not address the adequacy, analysis, or completeness of the Draft PEIR, no further response is required.

**Letter 58, Orange County Transportation Authority, Transportation Corridor Agencies, Orange County Council of Governments, Association of California Cities - Orange County, County of Orange, Orange County Business Council, Will Kempton, Chief Executive Officer, Orange County Transportation Authority; Tom Margro, Chief Executive Officer, Transportation Corridor Agencies; Tom Mauk, Chief Executive Officer, County of Orange; Lucy Dunn, President, Orange County Business Council, February 14, 2012**

58-1 The commenter is concerned with the language “can and should” used in reference to the mitigation measures provided in the Draft PEIR and that several mitigation measures appear to exceed SCAG’s authority. Please see **Master Response No. 1**.

**Letter 59, Orange County Transportation Authority, Paul G. Glaab, Chairman, February 14, 2012**

- 59-1 The commenter is concerned with several aspects of the mitigation measures included in the Draft PEIR. Specifically, the commenter is concerned with: the manner in which the “preliminary determination that the proposed mitigation measures are feasible and effective” was made; that many of the mitigation measures exceed the purview of SCAG; many mitigation measures are duplicative of existing statutes, regulations, and policies; and, usage of the phrase “can and should” in reference to local agencies implementation of mitigation measures provided in the Draft PEIR. Please see **Master Response No. 1**.
- 59-2 Commenter’s recommendations to modify mitigation measures noted in the letter attachment (Attachment C) are addressed in **Master Response No. 1**.

**Letter 60, Paskerian, Block, Martindale & Brinton LLP (PBMB), C. Jeff Brinton, February 13, 2012**

- 60-1 The commenter states an opinion that the approach in the Program EIR is appropriate for a first-tier document. This comment is noted. Commenter’s concerns regarding mitigation measures are addressed in **Master Response No. 1**.

**Letter 61, Peter A. Orona, February 5, 2012**

- 61-1 The commenter indicates opposition to an I-710 tunnel because of freeway pollution and noise. The PEIR addresses the proposed plan as a whole and does not address individual projects. Please refer to **Master Response No. 2**, for a discussion about the differences between Program EIRs and Project/Site-specific EIRs. In addition, refer to page 3.2-23 for a detailed freeway health risk analysis and page 3.9-18 for a discussion of freeway noise.
- 61-2 The commenter indicates questions regarding electrostatic precipitators, asks how they could be used in El Sereno and how they relate to the I-710 tunnel. Please refer to **Master Response No. 2**, for a discussion about the differences between Program EIRs and Project/Site-specific EIRs.
- 61-3 The commenter states concerns over particulate matter pollution and noise associated with the I-710 Tunnel. Please refer to **Master Response No. 2**, for a discussion about the differences between Program EIRs and Project/Site-specific EIRs.
- 61-4 The commenter states concerns over construction activity associated with the I-710 tunnel. Please refer to **Master Response No. 2**, for a discussion about the differences between Program EIRs and Project/Site-specific EIRs.
- 61-5 The commenter proposes several questions specifically regarding the I-710 Tunnel, including compensation for illnesses related to PM2.5 and PM10 particle emissions, whether a comprehensive health study will be conducted by an unbiased “environmental overseer”, securing the entire I-710 Tunnel and facilities, and necessary green space provisions to offset pollution from I-710 Tunnel. Please refer to **Master Response No. 2**.
- 61-6 The commenter requests an explanation discussing whether or not current modes of production are changing to prevent the harmful effects of pollution. As can be seen in the air quality analysis contained in the PEIR, air quality will improve considerably between now and 2035 despite increases in vehicle miles traveled (VMT). In general emission controls are increasing and pollutant emissions are decreasing. See also **Response 76-2**.

**Letter 62, Port of Long Beach, Eric C. Shen, P.E., PTP, Director of Transportation Planning, February 3, 2012**

- 62-1 The commenter provides updated statistics for the Ports of Long Beach and Los Angeles. See Chapter 5.0 Corrections and Additions for changes to page 3.12-15.

**Letter 63, Puente Hills Habitat Preservation Authority, Bob Henderson, Chairman, January 26, 2012**

63-1 The commenter indicates that while three specific woodland communities are listed as sensitive communities in Section 3.3 Biological Resources and Open Space of the Draft PEIR, any oak woodland may be considered protected under CEQA Guidelines Section 21083.4. Additionally, the commenter states that while three coastal scrub communities are listed as sensitive, the California Department of Fish and Game also lists the Diegan and Venturan Coastal Sage Scrub as sensitive plant communities. These plant communities are mentioned in the comment letter specifically since coast live oak woodlands and coastal sage scrub occur on the Puente Hills Preserve. The commenter believes that impacts to these habitat types should be mitigated at a 3:1 ratio as required for sensitive plant communities in Mitigation Measure MM-BIO/OS11.

Oak woodland has been added to the description of hardwood forests and woodlands on page 3.3-6 of Section 3.3 Biological Resources and Open Space of the Draft PEIR, and Diegan and Venturan Coastal Sage Scrub have been added as sensitive plant communities on page 3.3-9 of the Draft PEIR. These revisions are included in Chapter 5.0 Corrections and Additions. The mitigation measure referenced by the commenter is now example measure BIO/OS11 in Appendix G and would be applicable to these added species; no change to BIO/OS11 is necessary. Please refer to **Master Response No. 1** for clarification as to how mitigation measures in the PEIR are intended to be used.

63-2 The commenter states that MM-BIO/OS35 declares that active bird nests can be “relocated” if found during preconstruction surveys. It is the commenter’s understanding that regulatory agencies do not issue permits for the relocation of active nests and that the language should be reconsidered to avoid any disturbance to active nests. Additionally, the commenter notes that the Puente Hills Preserve can be used to accept off-site land conservation mitigation for projects as mentioned in MM-BIO/OS36 and 45, and that it would like to be included in the list of “large-scale protected areas in the SCAG region” in Appendix C of the PEIR. MM-BIO/OS35 has been revised (now Mitigation Measure BIO/OS34 in Appendix G) to clarify the intent of the mitigation measure and to remove references to relocating active nests.

The commenter states that Puente Hills Preserve can be used for off-site conservation mitigation. The comment is noted. The Puente Hills Preserve has been added to Appendix C of the PEIR.

63-3 The maps provided in the PEIR are intended to provide a regional overview of information. The level of detail provided by commenter is more appropriate to a project-specific map. As part of SCAG’s ongoing GIS efforts SCAG staff will update their database with the information provided by commenter.

**Letter 64, Realtors Committee on Air Quality, Carol Banner, Chairman, February 13, 2012**

64-1 Commenter’s requests for clarification with Mitigation Measures **MM-PS91** and **MM-PS92** are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction.

**Letter 65, Regional Hispanic Chamber of Commerce, Jim Clarke, Executive Director, Apartment Association of Greater Los Angeles (AAGLA); Hilary Norton, Executive Director, FAST – Fixing Angelenos Stuck in Traffic; Gene Hale, Chairman, Greater Los Angeles African American Chamber; Andrew R. Henderson, Vice President and General Counsel, Building Industry Association of Southern California, Inc.; Elizabeth Warren, Executive Director, FuturePorts; Paul C. Granillo, President & CEO, Inland Empire Economic Partnership; Heidi L. Gallegos, Executive Director, Eastvale Chamber of Commerce; John Kelsall, President & CEO, Greater Lakewood Chamber of Commerce; Joann Valle, Executive Director, Harbor City/Harbor Gateway Chamber of Commerce; Gary Toebben, President & CEO, Los Angeles Area Chamber of Commerce; Kate Klimow, Vice President of Government Affairs, Orange County Business Council; Rich Lambros, Managing Director, Southern California Leadership Council; Patty Senecal, Manager, Southern California**

**Region and Infrastructure Issues Western States Petroleum Association; Alexander Pugh, Senior Project Manager - Policy & Project Management, Southern California Edison; David Fleming, Founding Chairman, Los Angeles County Business Federation; T.L. Garrett, Vice President, Pacific Merchant Shipping Association; Ron L. Wood, President & CEO, The Valley Economic Alliance; Michael W. Lewis, Senior Vice-President, Construction Industry Air Quality Coalition (CIAQC); Bill Allen, President & CEO, Los Angeles County Economic Development Corporation; Hugo W. Merida, Chairman of the Board, Los Angeles Metropolitan Hispanic Chamber of Commerce; Sandy Cajas, President & CEO, Regional Hispanic Chamber of Commerce; Stuart Waldman, President, Valley Industry & Commerce Association (VICA); Michael W. Lewis, Senior Vice-President, Construction Industry Coalition on Water Quality (CICWQ); John Guerra, Director, Regional Public Affairs, SoCalGas; Michael Carroll, Regulatory, Flexibility Group; Randy Gordon, President/CEO, Long Beach Area Chamber of Commerce; LaDonna DiCamillo, Senior Manager Government Affairs, BNSF Railway; Eric Sauer, Vice President, Policy and Regulatory Affairs, California Trucking Association; Randy Gordon, President/CEO, Long Beach Area Chamber of Commerce; Eric Sauer, Vice President Policy and Regulatory Affairs, California Trucking Association; Madame M C Townsend, President & CEO, Regional Black Chamber of Commerce – San Fernando Valley; Jay McKeeman, Vice President, Government Relations & Communications, California Independent Oil Marketers Association (CIOMA); Lupe Valdez, Director of Public Affairs, Union Pacific Railroad; Bob Amano, Executive Director, Hotel Association of Los Angeles; Christina Davis, President & CEO, LAX Coastal Chamber; Fred Johring, President, Harbor Trucking Association, February 15, 2012**

65-1 The commenter is concerned with the feasibility of mitigations measures proposed in the Draft PEIR, the nexus between the RTP/SCS impacts and proposed mitigations, and the potential or actual conflicts the mitigation measures would have with existing regulations and policies. Please see **Master Response No. 1.**

**Letter 66, Riverside County - Community Health Agency: Department of Public Health, Michael Osur, Deputy Director of Public Health, February 14, 2012**

66-1 Commenter's recommendations regarding tools and metrics to monitor Plan performance are noted. See also **Response 44-1.**

**Letter 67, Riverside County - Planning Department, Carolyn Syms Luna, Director, February 14, 2012**

67-1 The commenter is concerned with the feasibility of many of the “blanket” mitigation measures contained in the PEIR. The commenter’s concerns with respect to mitigation measures are addressed in **Master Response No. 1.**

67-2 Commenter’s concerns regarding growth assumptions in Riverside County are addressed in **Master Response No. 3.** SCAG’s SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction’s land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. Based on the agreed-upon forecasted growth of population, household and employment at the jurisdictional level for Riverside County, SCAG shifted some of the growth to HQTAs while maintaining jurisdiction level forecast control totals for the Plan Alternative.

67-3 Commenter’s concerns that SCAG does not provide detail of how the demographics/socioeconomics data, general plan land use data, and growth projections data have been incorporated into the RTP/SCS and PEIR are addressed in **Master Response No. 3.**

67-4 The commenter states that more efforts should have been made to address the greenhouse gas issues outlined in AB32 Scoping Plan through quantifications to assist the local jurisdictions who are

struggling with AB32 compliance. SCAG’s responsibility in preparing the 2012-2035 RTP/SCS is to address mobile source emissions. Mobile source emissions are extensively addressed in the Plan and PEIR (see Impact 3.6-1, page 3.6-13). The PEIR also provides gross estimates of GHG emissions associated with construction, energy and water use. As noted in the analysis of AB 32 (Impact 3.6-2, page 3.6-17 of the PEIR), “[i]t is anticipated that a number of business and industry sectors, including energy and water providers, will be involved in meeting these targets through aggressive conservation and through emission reductions associated with their operations. However, this PEIR is not able to identify reasonably foreseeable new demand rates or emission factors based on available information.”

- 67-5 The commenter is concerned with the usage of “should and can” in regards to mitigation measures included in the PEIR and advises using alternative language. The commenter’s concern about language used in reference to mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions – Introduction.
- 67-6 The commenter suggests that SCAG “detail some aspects of the plan, analysis, and mitigation measures to target specific locations.” The commenter’s suggestion is addressed in **Master Response No. 2**.
- 67-7 The comment indicates that mitigation measures in the PEIR should not reiterate existing laws or regulations and further states that mandated items cannot be used to further mitigate an impact. While impacts are assessed after the application of applicable regulations: a) some regulations have a degree of flexibility and some interpretation/negotiation may be necessary, b) reduction in impacts resulting from such measures cannot always be quantified; and c) the general public is not aware of many of the regulations that will reduce impacts and therefore identification of these regulations is provided to inform the public. Please also see **Master Response No. 1** for additional discussion and clarification on the changes to mitigation measures since publication of the Draft PEIR.
- 67-8 The commenter indicates that the Draft PEIR mischaracterizes the County of Riverside’s GHG regulatory framework. Please see Chapter 5.0 Corrections and Additions for changes to page 3.6-7, paragraph 3.
- 67-9 The commenter indicates that Table 2-1 on page 2-3 of the Draft PEIR contains an error, as the numbers for population, households, and employment are the same under the No Project scenario as under the Plan. The information in this table is correct. The Plan would have the same future population, housing, and employment growth as it would under the No Project scenario. The Plan is intended to influence distribution of growth throughout the SCAG region to not consume as much vacant land for development as compared to the No Project Alternative.

**Letter 68, Riverside County Transportation Commission, Anne Mayer, Executive Director,  
February 14, 2012**

- 68-1 The commenter suggests that SCAG replace “require” with “encourage” or “support” because local agencies are outside the purview of SCAG and SCAG does not have the authority to require local agencies to implement mitigation measures. Additionally, the commenter also calls attention to the issue of many mitigation measures either duplicating local, state, and/or federal regulations and policies and that mitigations included in the Draft PEIR should be programmatic in nature and not project specific. Please see **Master Response No. 1**.

**Letter 69, San Bernardino Association of Governments, Larry McCallon, President,  
February 14, 2012**

- 69-1 The comment requests that the mitigation measures that begin with “local jurisdictions can and should...” or “project sponsors can and should...” be revised to clarify their intent. The comment

also recommends that those mitigation measures that are either the same as or similar to an existing regulation reference the regulation rather than restating the content of the regulation. **Master Response No. 1** includes a discussion of the changes made to the mitigation measures since the circulation of the Draft 2012-2035 RTP/SCS.

**Letter 70, San Bernardino Local Area Formation Commission, Kathleen Rolling-McDonald, Executive Officer, February 13, 2012**

70-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction. The commenter states that they could not find any mention of SCAG's intergovernmental review (IGR) process. The IGR process consists of review of regionally significant projects for consistency with regional plans. The commenter states there is no definition of an urban growth boundary. See **Response 7-10** above.

**Letter 71, San Fernando Valley Council of Governments, Robert L. Scott, Executive Director, February 14, 2012**

71-1 The commenter indicates further consideration is needed on policies and principles of a sound RTP/SCS and indicates the principles of a sound RTP/SCS include CEQA compliance and providing for CEQA streamlining. The commenter's opinion is noted.

71-2 The commenter requests an extension of the comment period. See **Response 50-1** above.

**Letter 72, San Gabriel Valley Economic Partnership, Cynthia J. Kurtz, President & CEO, February 9, 2012**

72-1 The commenter has three concerns with the Draft PEIR, all relating to mitigation measures. First, the commenter states that the mitigation measures are overly broad and that specific project requirements should be overseen by local governments. Second, the commenter is concerned with all the mitigation measures being described as "feasible" and asks that the mitigations be identified as a prescriptive "tool kit of measures". Third, the commenter calls attention to MM-AQ19, which would be elevated from its current status as a guideline to a mandatory requirement if left as is. Please see to **Master Response No. 1**.

**Letter 73, San Manuel Band of Indians, Jerry J. Paresa, Chief Administrative Officer, February 14, 2012**

73-1 Commenter's recommended revisions to mitigation measures addressing Cultural Resources have been made to example measures in Appendix G. Please also refer to **Master Response No. 1**.

**Letter 74, Santa Monica Mountains Conservancy, Elizabeth A. Cheadle, Chairperson, January 31, 2012**

74-1 Commenter's questions about mitigation measures are addressed in **Master Response No. 1** and Chapter 5.0 Corrections and Additions - Introduction to clarify that local jurisdictions will be responsible for CEQA Streamlining.

74-2 The commenter states support of the Biological Resources, Open Space, and Water Resources analyses and mitigation measures of the 2012-2035 RTP/SCS. The commenter requests an invitation to participate in the collaboration process on regional conservation planning policy to address cumulative impacts to biological resources (MM-BIO/OS45). In addition, the commenter states that SCAG should develop best practices that would be applicable to new transportation corridors such as the High Desert Corridor to prevent new development from extending into resource lands; when evaluating projects during the environmental review process, SCAG should identify regionally significant projects that may impact downstream waters and include comments to that effect in NOP and EIR responses; and, should participate in the development of models of natural processes for the

remaining natural rivers in the SCAG region to ensure that environmental review can comprehensively evaluate project impacts based on the best available information. This comment is acknowledged. See also **Master Responses Nos. 1 and 2** with respect to SCAG’s lack of authority with respect to individual projects and the relationship between this PEIR and project-specific analyses.

The commenter indicates that SCAG should provide technical assistance and facilitate inter-jurisdictional transfer of development rights programs among member governments as appropriate. SCAG does provide technical assistance to its member agencies; however, SCAG has no land use authority. SCAG may consider such efforts as part of the on-going technical assistance programs.

The commenter states that the urban growth boundaries should not allow densities about one dwelling unit per ten acres. This example measure has been revised. See LU28 in Appendix G of this Final PEIR.

The commenter states that SCAG should undertake an economic analysis to determine what level of developer fees referenced in the former MM-LU81 (now LU62) would be required to achieve regional growth objectives. SCAG does not have the authority to implement this mitigation measure. Please see **Master Response No. 1**.

**Letter 75, South Bay Cities Council of Governments, Ellen Perkins, SBCCOG Chair, Councilmember, City of Palos Verdes Estates, February 13, 2012**

75-1 The commenter requests that SCAG clarify what obligations local agencies have regarding the Mitigation Monitoring Program mentioned in the Draft PEIR, and that SCAG identify the mitigation measures in the Draft PEIR as a “toolbox” to local agencies to use when appropriate. Please see **Master Response No. 1**.

**Letter 76, South Coast Air Quality Management District, Elaine Chang, DrPH, Deputy Executive Officer, February 21, 2012**

76-1 Although zero- and/or near zero-emission technologies are described in the Draft RTP, SCAG did not include emissions reductions from these projects modeling and analysis in the constrained plan. Nevertheless, further analysis is being conducted and may be included in the Final RTP. Additionally, SCAG will provide further clarification on funding and near-term demonstration initiatives for zero- and/or near zero-emission technologies. SCAG looks forward to continuing to work with AQMD on future demonstration and deployment of these critical technologies.

76-2 See Chapter 5.0 Corrections and Additions for pages 3.2-21, 3.2-35, 3.2-39 and the new examples of air quality mitigation measures to address health risk in the 500 foot buffer area added to the new Appendix G.

The issue of health hazards within 500 feet of freeways is an evolving issue. The threshold SCAG used in the PEIR includes the words “substantially” and “average” without definition. The calculation of “average” health risk from sources of air pollution is extremely complex and may be difficult or impossible to determine since it is based on site-specific, meteorology, interior and exterior factors as well as lifestyle choices. SCAG’s evaluation of this threshold is based on the impact of the 2012-2035 RTP/SCS (which includes implementation of reasonably foreseeable regulations and attainment of regional transportation conformity required under the Clean Air Act) that is anticipated to have a beneficial effect on air quality region-wide and an even bigger effect on reducing health risk in the 500-foot buffer (i.e. air quality in the buffer area is anticipated to improve substantially more than air quality in the region as a whole). Therefore the risk associated with mobile source emissions in the buffer area while still above average risk associated with mobile

source emissions in the region would be substantially less than today (i.e., the difference between the buffer area and the region as a whole would decrease).

Note that while the 2012-2035 RTP/SCS would encourage location of people adjacent to transit it would not disproportionately encourage the relocation of people compared to today. In fact, the percentage of households within 500 feet of freeways would actually go down slightly in the future (5.8 percent in 2008 and 5.7 percent in 2035 under the Plan).

In light of this decrease in anticipated risk combined with the anticipated increase in emission controls and other regulations that will be implemented and enforced at the federal, state and local level (including mitigation measures imposed as a result of the CEQA process at the local jurisdictional level), SCAG found this impact to be less than significant. However, as discussed throughout the PEIR, SCAG's analysis is from a regional/programmatic perspective over the planning horizon of the 2012-2035 RTP/SCS; individual projects must undergo project-specific environmental review.

**Letter 77, Southern California Business Community, Jim Clarke, Executive Director, Apartment Association of Greater Los Angeles (AAGLA); Hilary Norton, Executive Director, FAST – Fixing Angelenos Stuck in Traffic; Gene Hale, Chairman, Greater Los Angeles African American Chamber; Andrew R. Henderson, Vice President and General Counsel, Building Industry Association of Southern California, Inc.; Elizabeth Warren, Executive Director, FuturePorts; Paul C. Granillo, President & CEO, Inland Empire Economic Partnership; Heidi L. Gallegos, Executive Director, Eastvale Chamber of Commerce; John Kelsall, President & CEO, Greater Lakewood Chamber of Commerce; Joann Valle, Executive Director, Harbor City/Harbor Gateway Chamber of Commerce; Gary Toebben, President & CEO, Los Angeles Area Chamber of Commerce; Kate Klimow, Vice President of Government Affairs, Orange County Business Council; Rich Lambros, Managing Director, Southern California Leadership Council; Patty Senecal, Manager, Southern California Region and Infrastructure Issues Western States Petroleum Association; Alexander Pugh, Senior Project Manager - Policy & Project Management, Southern California Edison; David Fleming, Founding Chairman, Los Angeles County Business Federation; T.L. Garrett, Vice President, Pacific Merchant Shipping Association; Ron L. Wood, President & CEO, The Valley Economic Alliance; Michael W. Lewis, Senior Vice-President, Construction Industry Air Quality Coalition (CIAQC); Bill Allen, President & CEO, Los Angeles County Economic Development Corporation; Hugo W. Merida, Chairman of the Board, Los Angeles Metropolitan Hispanic Chamber of Commerce; Sandy Cajas, President & CEO, Regional Hispanic Chamber of Commerce; Stuart Waldman, President, Valley Industry & Commerce Association (VICA); Michael W. Lewis, Senior Vice-President, Construction Industry Coalition on Water Quality (CICWQ); John Guerra, Director, Regional Public Affairs, SoCalGas; Michael Carroll, Regulatory, Flexibility Group; Randy Gordon, President/CEO, Long Beach Area Chamber of Commerce; LaDonna DiCamillo, Senior Manager Government Affairs, BNSF Railway; Eric Sauer, Vice President, Policy and Regulatory Affairs, California Trucking Association; Randy Gordon, President/CEO, Long Beach Area Chamber of Commerce; Eric Sauer, Vice President Policy and Regulatory Affairs, California Trucking Association; Madame M C Townsend, President & CEO, Regional Black Chamber of Commerce – San Fernando Valley; Jay McKeeman, Vice President, Government Relations & Communications, California Independent Oil Marketers Association (CIOMA); Lupe Valdez, Director of Public Affairs, Union Pacific Railroad; Bob Amano, Executive Director, Hotel Association of Los Angeles; Christina Davis, President & CEO, LAX Coastal Chamber; Fred Johring, President, Harbor Trucking Association, February 14, 2012**

77-1 The commenter is concerned with the feasibility of many mitigation measures proposed in the Draft PEIR, usage of the phrase “can and should”, and the nexus between the RTP/SCS impacts and proposed mitigations. Please see **Master Response No. 1**.



**Letter 78, Southern California Contractors Association, Inc., Larry C. Russell, Executive Vice President, February 13, 2012**

78-1 The comment states the SCCA has concerns with the number of mitigation measures in the PEIR and further states the number of mitigation measures in the 2012-2035 PEIR would result in the potential for project delays and future litigation. See **Master Response No. 1** regarding how local jurisdictions are anticipated to use the mitigation measures now included in Appendix G.

**Letter 79, Southern California Edison, Alexander Pugh, Senior Project Manager, February 14, 2012**

79-1 The commenter suggests incorporating a discussion of Southern California Edison's (SCE) investments in solar generation and distributed renewable energy, and offers a web link to a more complete listing of SCE incentives. The information is added to the discussion of renewable energy on page 3.11-45 of the Draft PEIR. This revision is included in Chapter 5.0 Corrections and Additions of the Final PEIR.

79-2 This commenter indicates that SCE will work closely with transportation providers to better understand the energy needs of projects as they come online, and that it is worth noting in the PEIR that the electrification of transportation systems will impact long-term demand for energy consumption. The changes to transportation fuel consumption were taken into consideration when calculating energy demand under Impact 3.11-11 in Section 3.11 of the Draft PEIR. However, the anticipated consumption of electricity from electric vehicles has not been quantified because sufficient information is not available. The impact to non-renewable energy resources is found significant; electrification of transportation systems would be part of the reason for which the impact is found significant. A clarifying sentence is added to page 3.11-47 of the Draft PEIR in Chapter 5 Corrections and Additions.

79-3 The commenter states that SCE would like to coordinate with SCAG regarding the placement of transportation projects as some of the projects shown in the 2012-2035 RTP/SCS are shown on SCE's rights-of-way. This comment is acknowledged. The commenter should note that SCAG does not implement the projects shown in the Plan and the commenter should coordinate with the applicable lead agency for any project within an SCE right-of-way.

79-4 The commenter asks that SCAG clearly identify the Mitigation Measures in the Draft PEIR that are optional and that SCAG should direct project proponents to comply with existing regulations and best practices set by regulatory agencies. Please see **Master Response No. 1**.

79-5 The commenter urges SCAG to consider the net positive impacts of electric vehicles to air quality and greenhouse gas emissions in the region. This comment is noted. SCAG is actively involved in a PEV readiness effort with several stakeholders, including SCE. The commenter states that Mitigation Measure MM-AQ1 should include the installation of workplace personal electric vehicle charging stations. Mitigation Measure MM-AQ1 has been revised as suggested. The commenter recommends revisions to Mitigation Measures MM-TR86 and MM-TR88 regarding electric vehicles. Please refer to **Master Response No. 1**. Mitigation Measure MM-TR86 is now TR70 and MM-TR88 is now TR72 in Appendix G, and has been revised as suggested.

**Letter 80, Southern California Gas Company, Hector Madariaga, Director Environmental Affairs, February 10, 2012**

80-1 The commenter indicates that the Draft PEIR should give meaningful consideration to cumulative impacts to air quality caused by the generation of the massive amounts of electricity that will be used to power and/ emission vehicles. It is beyond the scope of this analysis to project how increased energy demand will be met. The State is increasing the capacity to generate renewable energy (as evidenced by increasing solar energy projects). Air pollution generated by nonrenewable sources and

used to power zero emission vehicles would be partially or completely offset by the fact that zero emission vehicles do not generate air pollution in the immediate vicinity of roadways (rather emissions are associated with the power plants that provide electricity). It is not anticipated that electricity generated to power zero emission vehicles would result in a significant cumulative air quality impact. Example measures included in Appendix G (GHG2, PS58, TR30, TR31, TR34, TR71 and TR72) as well as one mitigation measure included in the PEIR (MM-GHG8) cites promotion of zero- and/or near zero emission vehicles. In all such cases, language has been revised to also include low and/or “near-zero” emission vehicles. The commenter also states that Natural Gas Vehicles (NGV’s) should be included in any mitigation measure or strategy that includes LEVs or ZEVs. NGV’s are feasible. SCAG is technology neutral within the larger goal promoting mobility and emissions reduction. See Chapter 5 Corrections and additions for changes to page 2-24 of the Draft PEIR. These modes are discussed in the 2012-2035 RTP/SCS. The PEIR analyzes the Plan as a whole and does not evaluate alternatives to different projects or components; rather it evaluates alternatives to the Plan as a whole (see Chapter 4.0 of the Draft PEIR). The focus of the environmental analysis in the PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2012-2035 RTP/SCS pursuant to CEQA Guidelines Section 15168. As such, the 2012-2035 RTP/SCS PEIR presents and analyzes a reasonable range of alternatives (see Chapter 4.0 of the Draft PEIR). The comment is acknowledged.

**Letter 81, Southern California Leadership Council, Billie Greer, President; Richard Lambros, Managing Director, February 14, 2012**

- 81-1 The commenter indicates that the 2012-2035 RTP/SCS PEIR is inconsistent with the 2012-2035 RTP/SCS due to the large number of mitigation measures. The comment further states some of the measures duplicate existing regulations. Commenter is referred to **Master Response No. 1**.
- 81-2 The commenter indicates that the number of mitigation measures included in the 2012-2035 RTP/SCS PEIR will add costs and delay into the CEQA process and will not achieve the goals of CEQA Streamlining under SB 375. Please see **Master Response No. 1**.
- 81-3 The commenter indicates the 2012-2035 RTP/SCS PEIR should honor local control. Please see **Master Response No. 1** for a complete discussion of SCAG’s responsibilities versus those of project sponsors and local agencies.

**Letter 82, State of California Department of Transportation, James J. McCarthy, Deputy District Director, Division of Planning Public Transportation and Local Assistance, February 14, 2012**

- 82-1 Commenter identifies a new mitigation measure. The measure suggested by California Department of Transportation (Caltrans) is added to Appendix G as Measure TR83.
- 82-2 The commenter states that the Draft EIR should include additional language on Naphthalene and Polycyclic Organic Matter. See Chapter 5.0 Corrections and Additions for page 3.2-5
- 82-3 The commenter states that the vinyl chloride standard listed in Table 3.2-1 should be 0.01 ppm (26 µg/m<sup>3</sup>). See Chapter 5.0 Corrections and Additions for page 3.2-11 regarding vinyl chloride standards.
- 82-4 The commenter indicates that the Draft PEIR should address health risk and impacts associated with air quality, noise, hazardous waste, and community impacts. The commenter also states that the risks and impacts should be addressed for all projects in the 2012-2035 RTP/SCS.

The Draft PEIR assesses whether the 2012-2035 RTP/SCS would have an adverse impact on air quality, noise, hazardous waste, and community impacts (in Sections 3.2 Air Quality, 3.9 Noise, 3.7 Hazardous Materials and 3.8 Land Use). The commenter provides no specific comments on the

analyses contained in the PEIR; therefore no further response is possible. As the 2012-2035 RTP/SCS is programmatic in nature, the focus of the environmental analysis in the 2012-2035 RTP/SCS PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2012-2035 RTP/SCS as a whole. It does not include site-specific analysis of any project contained in the 2012-2035 RTP/SCS. Note that the local agencies have discretion on the selection of thresholds. Please refer to **Master Response No. 2**, for a discussion about the differences between Program EIRs and Project/Site-specific EIRs.

**Letter 83, State of California Natural Resources Agency Department of Conservation, Yuko Sakano, Ph.D., Environmental Scientist, February 13, 2012**

- 83-1 The commenter provides information regarding oil/gas/geothermal wells identified within a 100-foot buffer zone of projects associated with the 2012-2035 RTP/SCS, and recommends that all existing well sites and oil production facilities within or in close proximity to proposed projects be accurately plotted on future project maps and be carefully studied before the commencement of any construction of the proposed project. The comment also provides recommendations for proper management of altering a well. Please refer to **Master Response No. 2** for a discussion of the environmental analysis on a regional scale as presented in the PEIR versus project-level environmental evaluations, which would include site-specific studies of oil production facilities within or within close proximity to the individual project site. A summary of the information provided by the commenter has been added to the PEIR. Refer to Chapter 5.0 Corrections and Additions for changes to page 3.7-12.

**Letter 84, State of California Natural Resources Agency Department of Toxic Substances Control, Al Shami, Project Manager, Brownfields and Environmental Restoration Program, February 8, 2012**

- 84-1 The commenter states that the PEIR should evaluate whether conditions within the project area may pose a threat to human health or the environment by checking several databases that contain the locations of different types of hazardous sites and provides recommendations for actions to be taken upon identification of a contaminated site within the site of a proposed individual RTP/SCS project site. Please refer to **Master Response No. 2** for a discussion of the environmental analysis on a regional scale as presented in the PEIR, versus project-level environmental evaluations, which would include project-specific site assessments to determine the risk of encountering a contaminated site.
- 84-2 The commenter indicates that health risk assessments should be completed for construction and demolition activities. Construction impacts are very site-specific in nature. As the Plan is programmatic in nature, the focus of the environmental analysis in the 2012-2035 RTP/SCS PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2012-2035 RTP/SCS as a whole. It does not include site-specific analysis of any project contained in the 2012-2035 RTP/SCS. Please refer to **Master Response No. 2**, for a discussion about the differences between Program EIRs and Project/Site-specific EIRs.
- 84-3 The commenter states that if hazardous wastes are generated by the proposed operations, wastes must be managed in accordance with the California Hazardous Waste Control Law and the Hazardous Waste Control Regulations. The comment is noted. The Hazardous Waste Control Act and other hazardous waste laws that would apply to projects in the region are summarized under the heading Regulatory Framework starting on page 3.7-1 of Section 3.7 Hazardous Materials.

**Letter 85, State of California Natural Resources Agency Department of Fish and Game, Leslie MacNair, Environmental Program Manager, South Coast Region, February 14, 2012**

- 85-1 The commenter states that they acknowledge the project, Biological Resource mitigation measures, and potential stressors to affecting wildlife and habitats within the project area. The commenter states a suggestion that a clarification of “sensitive species”, “special status species”, and “significant

biological resources” should be made; that additional sensitive species should be listed; a discussion of critical habitat and potential impacts should take place; that additional wetlands should be added to Table 3.3-1; and that “flood control” and “surface mining” should be added to the section on threats to biological resources on page 3.3-36. Additionally, the commenter suggests changes, additions, and deletions to the Existing Settings section.

A clarification has been added regarding sensitive species, special status species, and significant biological resources. Previously omitted species have been added throughout the Existing Setting section. A discussion of critical habitat and potential impacts has been added to the PEIR. Additional wetlands have been added to Table 3.3-1 on page 3.3-10 as noted by the commenter. Flood control and surface mining have been added on page 3.3-36 under threats to biological resources in the SCAG region. Changes, additions, and deletions have been made to the Existing Settings section. These revisions are included in Chapter 5, Corrections and Additions and start on page 3.3-1 of the Draft PEIR.

85-2 The commenter states an alternative method for the discussion of wetlands organized by watershed, and that, in general, discussion on wetlands should include direct and indirect impacts associated with fragmentation and lack of connectivity because of development, mining, and flood control. Additionally, the commenter requests that primary areas of vernal pools be identified. The watersheds and wetlands discussion has been expanded and organized by watershed. These revisions are included in Chapter 5.0 Corrections and Additions and start on page 3.3-9 of the Draft PEIR. Discussion on impacts associated with fragmentation takes place under **Impact 3.3-2** on page 3.3-41 of the Draft PEIR. An expanded discussion on vernal pools has been added and these revisions are included in Chapter 5.0 Corrections and Additions and start on page 3.3-9 of the Draft PEIR.

85-3 The commenter indicates that appropriate mitigation measures for Impact 3.3-6 in Section 3.3 Biological Resources and Open Space of the Draft PEIR should be proposed, developed, and implemented in urban habitats. The commenter also states that requirements of the Western Riverside County Multiple Species Habitat Conservation Plan (WRCMSHCP) and Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) should be mentioned for Impact 3.3-8 of the Draft PEIR.

Example mitigation measures have been proposed to lessen the effect of Impact 3.3-6; however, these are generic measures that are not tailored to specific locations or projects, as SCAG has no role in requiring project-specific mitigation that would be proposed, developed, and implemented at the time of project-specific approvals. See **Master Response No. 1** for further details. New third and fourth sentences have been added in the paragraph discussing Impact 3.3-8 on page 3.3-45 of the Draft PEIR. This revision is included in Chapter 5.0 Corrections and Additions.

85-4 The commenter states that references to the California tiger salamander should provide a more recent Riverside County occurrence, or be omitted throughout the document. The commenter also states a list of species that should be designated as “Fully Protected” in Table 3.3-4 of the Draft PEIR, and that mitigation measures for these species should be developed.

All references to the California tiger salamander have been removed. All species identified by the commenter to be fully protected were already listed, but have now been given an “FP” designation in Table 3.3-4 in the Draft PEIR, along with a footnote describing “FP.” Mitigation measures for an individual species would be project-specific and SCAG has no role in requiring project-specific mitigation. See **Master Response No. 1** for further details.

85-5 The commenter indicates corrections and additions for several mitigation measures. The mitigation measures identified in the Draft PEIR were generic measures that were not tailored to specific locations or projects, as SCAG has no role in requiring project-specific mitigation. This set of

- mitigation measures has been moved to a new Appendix G, and the commenter's corrections and additions have been applied. See **Master Response No. 1** for further details.
- 85-6 The commenter states a recommendation to include Mugu Lagoon and other important protected military lands into Table BIO-1 of Appendix C of the Draft PEIR, and that analysis of the WRCMSHCP and CVMSHCP. Important protected military lands have been added to Table BIO-1 of Appendix C of the PEIR. See **Response 85-3** regarding analysis of the Habitat Conservation Plans.
- 85-7 The commenter states a recommendation to include Section 1600 *et seq.* of the California Fish and Game Code into the Regulatory Framework on page 3.3-2 of the Draft PEIR. This revision is included in Chapter 5.0 Corrections and Additions.
- 85-8 The commenter states that the 20-foot buffer setback mentioned in Mitigation Measure MM-BIO/OS50 (now BIO/OS47 in Appendix G) would be insufficient to provide adequate protection for riparian resources. Examples are stated for jurisdictions within the SCAG region where buffers from 50 to 100 feet are required. The Draft PEIR mitigation measures were generic measures that were not tailored to specific locations or projects, as SCAG has no role in requiring project-specific mitigation. See **Master Response No. 1** for further details. In MM-BIO/OS 47, the mention of a 20-foot buffer setback has been removed and replaced with "to be determined as appropriate on a case-by-case basis."

**Letter 86, State of California Natural Resources Agency Department of Parks and Recreation, Ron Krueper, District Superintendent, February 14, 2012**

- 86-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.
- 86-2 The commenter indicates that the PEIR lacks a public safety mitigation measure to promote project design that minimizes urban-wildland interface, and recommends identifying mitigation that discourages extending development into high fire hazard areas and emphasizes project design strategies that reduce risk of fire hazards. Appendix G includes a number of examples of mitigation to protect public safety. Suggestions from commenter with respect to fire protection have been incorporated into PS10.

The commenter states that while local jurisdictions and partners are responsible for the planning of projects that provide access to open space, SCAG has a critical responsibility for funding by including bikeway projects within the RTP/SCS project areas. The commenter states that the greatest contribution SCAG could make towards the conservation of open space would be to include greenways that serve transportation functions. Please refer to **Master Response No. 1** for a discussion of SCAG's role with respect to individual planning, development, and transportation projects in the region.

- 86-3 The commenter states that to the extent feasible, natural methods for stormwater control, water quality improvements, and infiltration should be encouraged. Additionally, the commenter states that when evaluating projects during the environmental review process, SCAG should identify regionally significant projects that may impact downstream waters and include comments to that effect in Notice of Preparation and Environmental Impact Report responses. SCAG should participate in the development of models of natural processes for the remaining natural rivers in the SCAG region to ensure that environmental review can comprehensively evaluate project impacts based on the best available information. This comment is noted. Please also see **Master Responses Nos. 1 and 2** with respect to SCAG's lack of authority over individual projects and the relationship between this PEIR and project-specific environmental review.

**Letter 87, Stephanie Johnson, February 11, 2012**

87-1 Commenter's questions with regards to specific projects are addressed in **Master Response No. 2**.

**Letter 88, Stephen W. Rogers, P.E. Consulting, Stephen W. Rogers, P.E., February 14, 2012**

88-1 Commenter suggests three additional mitigation measures:

1. *Friendly Communities*: The commenter does not provide details of what impacts would be mitigated, how such a measure would work and who would be responsible. Nonetheless, local jurisdictions could implement this or similar measures if they so choose.

2. *Vehicle Asset Management Plant Program*: The commenter does not provide details as to what impacts would be mitigated and who would implement such a program and how it would work. Nonetheless, local jurisdictions and transportation agencies could implement this or similar measures if they so choose.

3. *Technological advances in vehicle, truck and heavy equipment lubrication, translating into significant emissions reductions and extended oil service drain intervals, can be realized by the use of Synthetic Lubricants and fleet conversion to bypass filtration. In a recent study, reported December 2011, Amsoil Synthetic Lubricants Increased Fuel Economy 6.54% in diesel trucking applications*: Advances in fuels and other materials are generally regulated at the State or National level. Neither SCAG nor local jurisdictions have the ability to implement this measure.

**Letter 89, Susan Sulsky, February 13, 2012**

89-1 Commenter's opinion that the PEIR is flawed in the same way as the SANDAG PEIR is noted. However, the commenter provides no specific comment on the PEIR. The PEIR contains extensive analysis of air quality (see Section 3.2) and air quality will be significantly better in 2035 as compared to existing conditions and better than under the No Project Alternative. See **Response 1-2** with respect to comments regarding prioritizing freeways over transit.

**Letter 90, The Kennedy Commission, Cesar Covarrubias, Executive Director, February 14, 2012**

90-1 Commenter recommends that SCAG analyze, monitor and mitigate Environmental Justice issues. Environmental Justice issues are discussed in the Environmental Justice Appendix to the Plan. As discussed in **Master Response No. 1** local jurisdictions are responsible for addressing community level analysis and mitigating impacts. MM-LU53 is now MM-LU13 and has been revised to read (new text is underlined, deleted text is shown in strike out font): SCAG shall promote infill, mixed-use, ~~and~~ higher density and other sustainable development, and ~~provide work with partners to identify~~ incentives to support the creation of affordable housing in mixed-use zones.

**Letter 91, Transportation Corridor Agencies, Scott Schoeffel, Chair, San Joaquin Hills Transportation Corridor Agency; Bill Campbell, Chair, Foothill/Eastern Transportation Corridor Agency, February 13, 2012**

91-1 The commenter states that mitigation measures in the Draft EIR can be reformatted to be more easily understood. Please refer to **Master Response No. 1** for a clarification on the reorganization of the mitigation measures.

91-2 The commenter states that State Route 241 needs to be added in all 2035 base maps, specifically Map 2.13 and 2.19. Maps 2.13 and 2.19 have been updated to include State Route 241 (SR 241). The commenter states the PEIR should clarify the relationship between congestion relief and GHG emissions. See Chapter 5.0 Corrections and Additions for page 3.6-18 regarding congestion relief and GHG emissions.

91-3 Commenters suggestion that base maps be updated to include SR 241 is noted. See Corrected Maps attached to this Final PEIR.

**Letter 92, United States Department of Agriculture, William Metz, Forest Supervisor, Cleveland National Forest; Peggy Hernandez, Forest Supervisor, Los Padres NF; Jody Noiron, Forest Supervisor, San Bernardino NF; Thomas A. Contreras, Forest Supervisor, Angeles NF, February 8, 2012**

92-1 The commenter indicates that the impact analysis of the PEIR should consider the 2006 Land Management Plans for the Angeles, Cleveland, Los Padres, and San Bernardino National Forests. Additionally, during implementation of the Plan, the commenter asks to include the Angeles, Cleveland, Los Padres, and San Bernardino National Forests as a cooperating agency as appropriate and as a Regulatory Agency where permits or easements would be required for anticipated work on the National Forest System lands.

Individual projects will be required to go through relevant CEQA review, at which time they would be analyzed for any potential conflicts to National Forest Land Management Plans. Any project taking place on National Forest lands is required coordinate with the appropriate Angeles, Cleveland, Los Padres, or San Bernardino National Forest Agency as necessary. Please also see **Master Responses Nos. 1 and 2** with respect to SCAG's lack of authority over individual projects and the relationship between this PEIR and project-specific environmental review.

**Letter 93, United States Environmental Protection Agency, Connell Dunning, Transportation Team Supervisor, Environmental Review Office, Communities and Ecosystems Division, February 14, 2012**

93-1 EPA recommends that the Final PEIR clarify how the Health Risk Assessment (HRA) informed both decision-making among Plan alternatives and mitigation for impacts to sensitive populations. The HRA was not used in Plan development. It was used as an analytic tool in the PEIR. The HRA analysis concluded that carcinogenic health impacts under each of the Plan alternatives were expected to decrease with respect to existing conditions. Thus, the HRA shows a substantial decrease in risk indicating that sensitive populations adjacent to the modeled locations would experience less health consequences compared to today. (We would note that CEQA requires comparison of future conditions with the project to existing conditions as compared to the National Environmental Protection Act (NEPA), which requires comparison of future conditions with and without the project.)

93-2 EPA also encourages SCAG to consider non-cancer risk, such as respiratory risk, in the PEIR HRA, in light of the fact that the Plan environmental justice analysis addressed both cancer and respiratory risks. The HRA could estimate non-cancer risk, or at a minimum include a discussion on the relative contribution of these different effects, especially to sensitive receptors.

As discussed in Footnote 1 to Appendix F, non-cancer risks were not addressed in the HRA because the risks from air toxics are dominated by DPM and certain organic gases, and carcinogenic risk from these compounds is considered by the California air pollution control agencies to be more significant than other potential health risks from substances emitted from on-road mobile sources. Furthermore, the findings of the analysis -- that cancer risks resulting from vehicle operation on freeways will decline in future years under all future planning scenarios as compared with the 2012 Existing Conditions -- are equally applicable to non-cancer risks. Nevertheless, summaries of chronic and acute risks for the eight selected freeway segments under each of the five RTP planning scenarios are shown in **Tables HRA1 and HRA2** below. Chronic and acute risks were assessed using the same assumptions, computer models, and emission rates as those described in Appendix F for the cancer risk assessment.

<b>TABLE HRA1: MAXIMUM CHRONIC RISK BASED ON RESIDENTIAL EXPOSURE TO VEHICLE OPERATION BY PLANNING SCENARIO AND FREEWAY CORRIDOR</b>								
<b>Planning Scenario</b>	<b>Maximum Chronic Health Hazard Index</b>							
	<b>I-405 (Orange)</b>	<b>I-710 (Los Angeles)</b>	<b>I-8 (Imperial)</b>	<b>SR 60 (San Bernardino)</b>	<b>SR 91 (Riverside)</b>	<b>US 101 (Ventura)</b>	<b>SR 60 (Los Angeles)</b>	<b>I-15 (San Bernardino)</b>
2012 Existing Conditions	0.50	0.49	0.24	0.84	0.92	0.17	0.68	0.38
2035 No Project Alternative	0.21	0.35	0.18	0.35	0.45	0.09	0.26	0.17
2035 Preferred Plan	0.22	0.22	0.19	0.34	0.31	0.09	0.25	0.17
2035 2008 RTP Updated	0.21	0.20	0.19	0.29	0.32	0.09	0.22	0.19
2035 Envision 2	0.23	0.21	0.18	0.32	0.29	0.09	0.25	0.18

<b>TABLE HRA2: MAXIMUM ACUTE RISK BASED ON RESIDENTIAL EXPOSURE TO VEHICLE OPERATION BY PLANNING SCENARIO AND FREEWAY CORRIDOR</b>								
<b>Planning Scenario</b>	<b>Maximum Acute Health Hazard Index</b>							
	<b>I-405 (Orange)</b>	<b>I-710 (Los Angeles)</b>	<b>I-8 (Imperial)</b>	<b>SR 60 (San Bernardino)</b>	<b>SR 91 (Riverside)</b>	<b>US 101 (Ventura)</b>	<b>SR 60 (Los Angeles)</b>	<b>I-15 (San Bernardino)</b>
2012 Existing Conditions	6.1E-03	6.9E-03	2.9E-03	9.2E-03	1.4E-02	4.3E-03	1.1E-02	5.8E-03
2035 No Project Alternative	2.0E-03	1.8E-03	1.8E-03	3.0E-03	4.2E-03	1.3E-03	3.4E-03	2.2E-03
2035 Preferred Plan	2.1E-03	1.9E-03	1.7E-03	3.4E-03	4.4E-03	1.2E-03	3.0E-03	1.8E-03
2035 2008 RTP Updated	2.0E-03	2.1E-03	1.8E-03	2.9E-03	4.4E-03	1.3E-03	3.4E-03	2.0E-03
2035 Envision 2	2.3E-03	2.1E-03	1.4E-03	2.9E-03	4.1E-03	1.2E-03	3.0E-03	1.6E-03



In determining potential non-cancer health risks from air toxics, it is assumed that there is a dose of the TAC below which there would be no impact on human health. The air concentration corresponding to this dose is called the Reference Exposure Level (REL). A non-cancer health impact is measured in terms of a health hazard quotient for each TAC, which is the modeled maximum concentration (annual concentration for chronic impacts, one-hour concentration for acute impacts) of each TAC divided by its REL. Health hazard quotients for TACs affecting the same target organ are typically summed, with the resulting totals expressed as health hazard indices for each organ system. A health hazard index of less than 1.0 is considered to be a less-than-significant health risk. For this assessment, as a conservative assumption that tends to over-predict risk, all hazard quotients were summed regardless of target organ. Despite the conservative and over-predictive assumptions described above, the analysis shows that chronic and acute risks due to vehicle operations on all freeway segments are well below any levels of concern. Like the cancer risks evaluated in Appendix F, future chronic and acute risks are predicted to be even lower than current risks under all of the planning alternatives.

- 93-3 EPA acknowledges that SCAG selected eight segments of freeway corridors to generally represent major transportation corridors in each SCAG county (with two selected in L.A. and San Bernardino) and roadways with the highest total traffic and highest heavy-duty diesel truck traffic in the planning area. Further the modeling focused on the freeway segments (versus the entire length of each freeway corridor) that exhibited highest daily total traffic volume to assess “probable worst case” risks. However, the EPA notes that the HRA does not describe how its limited scope relates to the broader suite of proposed transportation projects in the SCAG region.

The RTP (and each of its alternatives) is an integrated plan comprised of both policies and numerous individual projects that are modeled conceptually, rather than fully designed. SCAG uses its land use and regional travel demand models to collectively (and not individually) account for the changes in trips, vehicle miles traveled, vehicle speeds and transportation mode (walk, bike, car, transit, etc.) from the combination of projects/policies specific to each Plan alternative.

The quantitative portion of the HRA relies on travel demand model-predicted levels of traffic volume, speed and mode share on each roadway link across the six-county region from the combination of projects and policies reflected in each alternative. Thus, the HRA does not evaluate an individual project or a subset of projects explicitly, but rather it focuses on some of the most heavily impacted locations in the region currently, and after implementation of the Plan.

EPA recommends that the HRA identify: 1) what percentage of RTP projects is represented by the selected segments used in the HRA analysis when compared to the total projects included in the RTP, 2) their relative locations to the broader scope of projects, and 3) relative timeframes for construction and implementation. EPA recommends clarifying if these represent a group of projects with the most impacts, estimating the percentage of the impact, and extrapolating how the examples could potentially inform risk for the broader scope of the RTP.

SCAG understands EPA’s interest in quantifying the “portions” of project embodied within each RTP alternative reflected by the selected and quantitatively modeled segments in the HRA. However, as noted in the previous response this recommendation is not possible because travel demand model outputs used in the HRA simply quantify traffic volumes vehicle speeds and fleet mix (cars, light trucks, heavy trucks, buses, etc.) from the combination of projects and policies of each alternative along each roadway link. A count or percentage of projects that affect any given roadway link cannot be easily determined. For example, if modeling a freeway section, should a project that provides signal synchronization of an adjacent arterial corridor be counted as affecting the freeway? And how should it be weighted in conjunction with a hypothetical ramp metering project where this arterial corridor feeds the freeway? The travel model collectively quantifies, but does not individually report this interaction.

Chapter 2.0 of the PEIR provides maps of projects contained in the RTP. As they show, the projects are spread throughout the SCAG region, and the eight modeled HRA locations represent some of the most impacted locations. Relative timeframes of each project are also provided in the RTP project list contained in Appendix B to the PEIR; the PEIR analyzes the year 2035 as the horizon year for the Plan when most projects are anticipated to be built out and operating.

Thus, the HRA reasonably examines a selected set of corridors encompassing the entire six-county region corresponding to locations of probable worst-case risk from the combined package of projects and policies within each Plan alternative. As noted earlier, since many of the projects as modeled in the RTP are conceptual in nature, it is beyond the scope of the programmatic EIR to quantify or tabulate health impacts from individual projects. This type of analysis must be performed later under project-level analyses once a specific project is designed and slated for implementation.

- 93-4 EPA recommends that the RTP provide a brief summary of all the alternatives, the additional sources of emissions considered in each of them, and the mitigation proposed in each of them. EPA asks that SCAG explain how the examples of the eight operating freeways fit in with the alternatives in terms of source contribution. Section 4.2 of the PEIR provides a brief descriptions and a tabular summary of each of the RTP alternatives. The HRA (PEIR, Appendix F) clearly states the emissions it addresses in comparing health risk under each RTP alternative are those from on-road vehicle activity on the freeway segments modeled. Moreover, the HRA also discusses how the incremental risk impacts of each Plan alternative compare cumulatively to total risk across the SCAG region based on analysis performed by the South Coast Air Quality Management District (SCAQMD) under their Multiple Air Toxics Exposure Study (MATES).

Many of the transportation projects as well as land use strategies included in the Plan would serve to reduce trips and therefore emissions. Proposed mitigation measures are listed in the MMRP included as Chapter 6 of this Final PEIR. In addition Appendix G includes examples of measures that may be implemented by local jurisdictions.

As explained in the previous response, the eight operating freeway corridors analyzed under the quantitative portion of the HRA represent the locations of probable largest impacts from the combined package of projects/policies of each alternative. Based on the modeling tools used and the fact that many of the projects as modeled within the RTP are conceptual in nature, it is impossible to quantify the “source contribution” of each operating freeway corridor and alternative. Nor it is clear what source contribution the comment refers to: all vehicle emissions, all total emissions, or something else.

- 93-5 EPA indicates that the RTP should identify how the “Highest Volume” segments integrate with the alternatives. EPA recommends providing a summary comparison by volume for the corresponding projects in the RTP, the eight selected operating freeways, and the “Highest Volume” segments in the eight selected freeway and further including a percentage contribution at each level to provide the background perspective of this limited analysis, and to allow an evaluation of the scope of all the projects in the RTP.

As stated in the HRA, the “Highest Volume” segments modeled within each freeway corridor were identified as those having the largest combined (both direction, all lane) daily traffic volume along the entire corridor, based on travel model outputs for the 2025 No Project alternative. In most cases, these locations also corresponded to the highest heavy-duty diesel truck volumes as well (or were within 90-95 percent of the highest diesel volume).

Because of the use of this “Highest Volume” metric, these locations likely represented the spatial confluence of multiple projects reflected in the other Plan alternative because they reflected locations or potential “bottlenecks” where network performance needed to be maintained or improved

compared to a No Project baseline. As noted in an earlier response, project contributions cannot be quantified from the link-level travel demand modeling outputs used to reflect vehicular activity within the HRA. However, it is clear that activity at these modeled locations reflects combined travel impacts from multiple projects as modeled within the travel demand model. For example, travel model outputs for the SR60SB corridor segment (in Ontario, just west of the I-15 interchange) show additional lane capacity as well as additional modeling links that reflect the construction of Truck-Only lanes. So impacts along this segment reflect a capacity increase project and a Truck Only lane project, as well as projects on the connecting freeway ramps and adjacent arterials that collectively affect volume/flow and vehicle speed.

- 93-6 EPA recommends that the data in Tables 5 and 5 [sic] (Pages 8 and 9) should represent the “Highest Volume” emission for the corresponding segments in Table 4. EPA comments that if the results in Table 5 are for the same freeway fraction as shown in Table 4, they need to be clearly identified. EPA further requests discussion on whether these results are being used for the rest of the freeways as a conservative scenario estimate, then provide the entire length of all the corresponding freeways included in the projects in the RTP, the estimated VMT/day for them, and the corresponding emission as shown in Table 5. Additionally, EPA requests that similar information be provided for each alternative. This will give a clear picture of the scope of the additional emission sources generated by these projects.

Table 4 of Appendix F shows the segment length, daily VMT, and DPM emissions for each of the eight selected freeway corridors, specific to link type, for the 2035 Preferred Plan. The daily average emissions shown in Table 5 in Appendix F represent emissions for all five toxic air contaminants considered in the cancer risk assessment<sup>1</sup> for the same freeway segments and planning scenario. As discussed in Appendix F, the selected freeway corridors generally represent major transportation corridors in each county and specifically include roadways with the highest total traffic and highest heavy-duty Diesel truck traffic in the planning area. The freeway segments that were analyzed quantitatively in the Appendix F analysis do not represent specific projects. Instead, they were selected to represent “probable worst case risk” areas along the freeway corridors because they were predicted by SCAG traffic models to exhibit the highest daily total traffic volumes in the 2035 No Project Alternative scenario.

Because of the high volumes of traffic projected for these segments, congestion management projects are likely (but not certain) to be undertaken under the various Plan alternatives. Because the Plan alternatives do not include specific projects, we cannot “provide the entire length of all the corresponding freeways included in the projects in the RTP, the estimated VMT/day for them, and the corresponding emissions.” However, to assist the reviewer in comparing relative VMT and emissions among the various Plan alternatives, additional summary tables are provided below (**Tables HRA3 through HRA6**) that show segment length, daily VMT, and daily emissions of all five TACs for the other four Plan alternatives.<sup>2</sup> Note that the average daily vehicle volumes for each analysis scenario and freeway segment, shown in Table 6 of Appendix F, are equal to the daily average VMT divided by the length of the segment.

- 93-7 EPA suggests that SCAG should consider regularly revisiting project status of modeled projects for a selected time period (such as, every four years when RTP is updated, or two years when FTIP is updated). For example, at each new RTP update, provide a “reality check” against the previous 4 years of actual construction data impact, and update future RTP projections accordingly.

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<sup>1</sup>The five TACs considered are benzene; acetaldehyde; 1,3-butadiene; formaldehyde; and DPM.

<sup>2</sup>This information was provided for the Preferred Alternative (the 2035 Preferred Plan) in Tables 4 and 5 of Appendix F. The information for the baseline conditions and other project alternatives has been combined into a single table for each alternative.

**TABLE HRA3: 2012 EXISTING CONDITIONS TOXIC POLLUTANT DAILY SOURCE STRENGTHS BY FREEWAY SEGMENT**

Freeway Corridor	Link Type	Link Length (mi)	Fleet Composite VMT/day	Daily Average Source Strength (lb/day)				
				Benzene	Formaldehyde	Acetaldehyde	1,3-Butadiene	DPM
I15	Mixed	5.903	512,103	3.454	4.235	4.391	1.279	29.80
I405	Mixed	2.099	407,347	2.708	3.359	3.480	1.026	20.03
I405	HOV	2.104	63,466	0.389	0.515	0.532	0.166	0.09
I710	Mixed	2.684	389,298	2.577	3.207	3.322	0.982	18.15
I8	Mixed	3.009	50,704	0.529	0.705	0.743	0.207	6.46
SR60LA	Mixed	6.938	618,860	4.796	5.787	6.003	1.732	46.11
SR60LA	HOV	6.242	144,256	0.923	1.221	1.261	0.395	0.21
SR60SB	Truck	n/a	0	n/a	n/a	n/a	n/a	n/a
SR60SB	Mixed	4.543	417,898	3.581	4.170	4.335	1.196	50.02
SR60SB	HOV	4.346	100,702	0.617	0.789	0.844	0.264	0.14
SR91	Mixed	3.137	559,972	3.885	4.818	4.836	1.377	42.63
SR91	HOV	4.106	105,317	0.753	0.849	1.040	0.325	0.17
US101	Mixed	1.727	170,725	1.168	1.350	1.378	0.433	3.69

**TABLE HRA4: 2035 NO PROJECT ALTERNATIVE TOXIC POLLUTANT DAILY SOURCE STRENGTHS BY FREEWAY SEGMENT**

Freeway Corridor	Link Type	Link Length (mi)	Fleet Composite VMT/day	Daily Average Source Strength (lb/day)				
				Benzene	Formaldehyde	Acetaldehyde	1,3-Butadiene	DPM
I15	Mixed	5.903	671,373	1.438	1.615	1.653	0.527	13.75
I405	Mixed	2.099	451,760	0.972	1.099	1.124	0.360	8.25
I405	HOV	2.104	66,908	0.149	0.177	0.181	0.059	0.05
I710	Mixed	2.684	381,975	0.796	0.854	0.877	0.273	13.04
I8	Mixed	3.009	81,558	0.319	0.420	0.453	0.123	4.96
SR60LA	Mixed	6.938	701,474	1.693	1.886	1.931	0.614	18.28
SR60LA	HOV	6.242	121,334	0.342	0.407	0.415	0.136	0.12
SR60SB	Truck	n/a	0	n/a	n/a	n/a	n/a	n/a
SR60SB	Mixed	4.543	500,960	1.241	1.328	1.363	0.425	20.75
SR60SB	HOV	4.346	114,380	0.254	0.303	0.309	0.101	0.09
SR91	Mixed	3.137	688,281	1.447	1.576	1.616	0.508	20.53
SR91	HOV	4.106	25,697	0.223	0.266	0.271	0.089	0.08
US101	Mixed	1.727	186,633	0.412	0.420	0.425	0.141	2.05

**TABLE HRA5: 2035 2008 RTP TOXIC POLLUTANT DAILY SOURCE STRENGTHS BY FREEWAY SEGMENT**

Freeway Corridor	Link Type	Link Length (mi)	Fleet Composite VMT/day	Daily Average Source Strength (lb/day)				
				Benzene	Formaldehyde	Acetaldehyde	1,3-Butadiene	DPM
I15	Mixed	5.903	635,751	1.358	1.519	1.555	0.495	13.87
I405	Mixed	2.099	450,746	0.969	1.096	1.121	0.359	8.29
I405	HOV	2.104	58,492	0.130	0.155	0.158	0.052	0.04
I710	Mixed	2.684	414,255	0.892	1.010	1.033	0.331	7.37
I8	Mixed	3.009	80,189	0.308	0.404	0.436	0.118	5.18
SR60LA	Mixed	6.938	692,533	1.747	1.972	2.017	0.645	15.34
SR60LA	HOV	6.242	141,139	0.245	0.291	0.297	0.097	0.08
SR60SB	Truck	n/a	0	n/a	n/a	n/a	n/a	n/a
SR60SB	Mixed	4.543	502,812	1.262	1.379	1.414	0.445	17.29
SR60SB	HOV	4.346	92,665	0.206	0.246	0.250	0.082	0.07
SR91	Mixed	3.137	685,985	1.462	1.629	1.668	0.530	15.73
SR91	HOV	4.106	150,534	0.335	0.399	0.407	0.133	0.11
US101	Mixed	1.727	177,708	0.392	0.399	0.404	0.134	2.00

**TABLE HRA6: 2035 ENVISION 2 TOXIC POLLUTANT DAILY SOURCE STRENGTHS BY FREEWAY SEGMENT**

Freeway Corridor	Link Type	Link Length (mi)	Fleet Composite VMT/day	Daily Average Source Strength (lb/day)				
				Benzene	Formaldehyde	Acetaldehyde	1,3-Butadiene	DPM
I15	Mixed	5.903	497,896	1.061	1.183	1.211	0.385	11.40
I405	Mixed	2.099	449,265	0.962	1.080	1.105	0.352	9.26
I405	HOV	2.104	112,880	0.251	0.299	0.305	0.100	0.09
I710	Mixed	2.684	416,433	0.895	1.011	1.035	0.331	7.75
I8	Mixed	3.009	68,066	0.253	0.332	0.358	0.097	4.81
SR60LA	Mixed	6.938	730,304	1.573	1.836	1.879	0.584	12.88
SR60LA	HOV	6.242	85,374	0.190	0.226	0.231	0.076	0.06
SR60SB	Truck	3.88	36,617	0.058	0.027	0.030	0.003	5.714
SR60SB	Mixed	4.543	507,243	1.070	1.172	1.201	0.378	14.28
SR60SB	HOV	4.346	53,218	0.118	0.141	0.144	0.047	0.04
SR91	Mixed	3.137	644,118	1.374	1.534	1.571	0.500	14.41
SR91	HOV	4.106	155,929	0.347	0.413	0.421	0.138	0.12
US101	Mixed	1.727	168,398	0.371	0.377	0.381	0.126	1.96

SCAG largely addresses this issue within the analyses and information published for each RTP and FTIP update. Moreover, “compilations” of impacts from individual projects that trigger project-level environmental documentation can be developed, but they are not SCAG’s responsibility under the PEIR.

- 93-8 EPA suggests that the impact of example projects in the HRA should be extrapolated to the entire RTP scope, so that a more systematic and comprehensive health impact can be evaluated at each RTP update for the whole region to allow appropriate consideration of cumulative impacts to sensitive receptors. EPA further suggests that these projects should be included in all future MATES analyses, which can provide the previously mentioned “reality check”; and each RTP update can then revisit all the previous assumptions using the most recent MATES analysis, and provide the best estimates for the remaining projects.

Under the 2012-2035 RTP/SCS PEIR and the previous 2008 RTP PEIR, SCAG has addressed this issue on a regional level by incorporating results from the latest available MATES analyses performed by the SCAQMD. The 2008 PEIR examined cumulative risk impacts from an original set of six freeway corridors that were carried forward to the 2012-2035 RTP/SCS PEIR (with two additional corridors added in Los Angeles and San Bernardino counties). The 2008 RTP PEIR utilized the latest available MATES data (MATES-II) at the time. This 2012 RTP utilizes the latest MATES-III data published by the SCAQMD. At each RTP planning cycle, it is SCAG’s intent to continue this “time-series” analysis of total/cumulative risk by incorporating latest available MATES data from SCAQMD with freeway corridor risk analysis.

- 93-9 *Risk Emissions:* EPA comments that it is not clear how Table 6 (page 10) relates to Tables 4 and 5 and the assumptions (in Table 9) are not clearly described to support the results. Further, it is not clear how Table 14 (page 17) relates to Tables 9 and 11.

Table 6 provides average daily vehicle volumes over the modeled freeway segments for each alternative. Table 4 shows the length of each modeled freeway segment and the corresponding vehicle miles traveled per day (VMT/day) for the 2035 Preferred Plan. VMT is calculated from vehicle volume and segment length. For example, Table 4 shows a length of 5.903 miles and 565,137 VMT/day for the I-15 corridor segment for the 2035 Preferred Plan alternative. Table 6 shows an average daily volume for that same corridor segment and alternative of 97,671 vehicles/day. Daily VMT is calculated for each link in the segment as the product of the link length and the daily vehicle volume on that link (individual link lengths and volumes for each alternative were provided in Table A-3 of Appendix F).

The calculation shown in Table 14 is for a single freeway link—one of the 12 links used to model the I-15 corridor. The purpose of Table 14 is to show that cancer risk from DPM accounts for 96 percent of the total modeled risk on that particular link, compared with CARB’s estimate of approximately 70 percent of cancer risk on a typical urban freeway. Table 14 is not related directly to Tables 9 and 11, except to illustrate that, based on this sample calculation and the cited CARB report, it is likely that most of the cancer risks shown in Tables 9 and 11 are due to DPM.

EPA recommends providing a summary of the emissions for all the alternatives, which could be more useful than presenting the number of vehicles. This could provide the basis to move into the next risk calculation.

Emissions for all alternatives are summarized in the tables provided above. This same information is provided in a slightly different format in **Table HRA7** below, where daily emissions of each pollutant are shown separately for each Plan alternative.

<b>TABLE HRA7: DAILY EMISSIONS OF EACH TOXIC AIR CONTAMINANT BY FREEWAY SEGMENT FOR EACH PLAN ALTERNATIVE</b>						
Freeway Corridor	Link Type	Average Daily Emissions				
		2012 Existing	2035 No Project	2035 Preferred Plan	2035 with 2008 RTP Update	2035 Envision 2
<b>BENZENE (lb/day)</b>						
I15	Mixed	3.45	1.44	1.22	1.36	1.06
I405	Mixed	2.71	0.97	0.89	0.97	0.96
I405	HOV	0.39	0.15	0.22	0.13	0.25
I710	Mixed	2.58	0.80	0.82	0.89	0.90
I8	Mixed	0.53	0.32	0.29	0.31	0.25
SR60LA	Mixed	4.80	1.69	1.61	1.75	1.57
SR60LA	HOV	0.92	0.34	0.21	0.24	0.19
SR60SB	Truck	n/a	n/a	0.07	n/a	0.06
SR60SB	Mixed	3.58	1.24	1.20	1.26	1.07
SR60SB	HOV	0.62	0.25	0.14	0.21	0.12
SR91	Mixed	3.89	1.45	1.47	1.46	1.37
SR91	HOV	0.75	0.22	0.36	0.33	0.35
US101	Mixed	1.17	0.41	0.37	0.39	0.37
<b>FORMALDEHYDE (lb/day)</b>						
I15	Mixed	4.24	1.61	1.38	1.52	1.18
I405	Mixed	3.36	1.10	1.00	1.10	1.08
I405	HOV	0.51	0.18	0.27	0.15	0.30
I710	Mixed	3.21	0.85	0.91	1.01	1.01
I8	Mixed	0.70	0.42	0.38	0.40	0.33
SR60LA	Mixed	5.79	1.89	1.82	1.97	1.84
SR60LA	HOV	1.22	0.41	0.25	0.29	0.23
SR60SB	Truck	n/a	n/a	0.03	n/a	0.03
SR60SB	Mixed	4.17	1.33	1.33	1.38	1.17
SR60SB	HOV	0.79	0.30	0.17	0.25	0.14
SR91	Mixed	4.82	1.58	1.60	1.63	1.53
SR91	HOV	0.85	0.27	0.46	0.40	0.41
US101	Mixed	1.35	0.42	0.37	0.40	0.38
<b>ACETALDEHYDE (lb/day)</b>						
I15	Mixed	4.39	1.65	1.41	1.55	1.21
I405	Mixed	3.48	1.12	1.03	1.12	1.11
I405	HOV	0.53	0.18	0.27	0.16	0.31
I710	Mixed	3.32	0.88	0.93	1.03	1.03
I8	Mixed	0.74	0.45	0.41	0.44	0.36
SR60LA	Mixed	6.00	1.93	1.87	2.02	1.88
SR60LA	HOV	1.26	0.42	0.25	0.30	0.23
SR60SB	Truck	n/a	n/a	0.04	n/a	0.03
SR60SB	Mixed	4.34	1.36	1.36	1.41	1.20
SR60SB	HOV	0.84	0.31	0.17	0.25	0.14
SR91	Mixed	4.84	1.62	1.68	1.67	1.57
SR91	HOV	1.04	0.27	0.44	0.41	0.42
US101	Mixed	1.38	0.42	0.38	0.40	0.38

<b>TABLE HRA7: DAILY EMISSIONS OF EACH TOXIC AIR CONTAMINANT BY FREEWAY SEGMENT FOR EACH PLAN ALTERNATIVE</b>						
Freeway Corridor	Link Type	Average Daily Emissions				
		2012 Existing	2035 No Project	2035 Preferred Plan	2035 with 2008 RTP Update	2035 Envision 2
<b>1,3-BUTADIENE (lb/day)</b>						
I15	Mixed	1.28	0.53	0.45	0.49	0.38
I405	Mixed	1.03	0.36	0.33	0.36	0.35
I405	HOV	0.17	0.06	0.09	0.05	0.10
I710	Mixed	0.98	0.27	0.30	0.33	0.33
I8	Mixed	0.21	0.12	0.11	0.12	0.10
SR60LA	Mixed	1.73	0.61	0.60	0.64	0.58
SR60LA	HOV	0.39	0.14	0.08	0.10	0.08
SR60SB	Truck	n/a	n/a	0.00	n/a	0.00
SR60SB	Mixed	1.20	0.42	0.43	0.45	0.38
SR60SB	HOV	0.26	0.10	0.06	0.08	0.05
SR91	Mixed	1.38	0.51	0.53	0.53	0.50
SR91	HOV	0.33	0.09	0.14	0.13	0.14
US101	Mixed	0.43	0.14	0.12	0.13	0.13
<b>DPM (lb/day)</b>						
I15	Mixed	29.80	13.75	10.76	13.87	11.40
I405	Mixed	20.03	8.25	8.58	8.29	9.26
I405	HOV	0.09	0.05	0.08	0.04	0.09
I710	Mixed	18.15	13.04	8.31	7.37	7.75
I8	Mixed	6.46	4.96	5.12	5.18	4.81
SR60LA	Mixed	46.11	18.28	12.36	15.34	12.88
SR60LA	HOV	0.21	0.12	0.07	0.08	0.06
SR60SB	Truck	n/a	n/a	7.28	n/a	5.71
SR60SB	Mixed	50.02	20.75	13.40	17.29	14.28
SR60SB	HOV	0.14	0.09	0.05	0.07	0.04
SR91	Mixed	42.63	20.53	14.20	15.73	14.41
SR91	HOV	0.17	0.08	0.12	0.11	0.12
US101	Mixed	3.69	2.05	2.05	2.00	1.96

EPA recommends providing a summary of the assumptions used in each alternative for the estimation of the cancer risk.

Rather than reiterating all of the assumptions used in the screening health risk assessment, the following summary outlines the procedures used and references where in Appendix F the specific assumptions used in the assessment can be found. With the exception of traffic volumes, the same assumptions were used for each alternative.

- Cancer risk values represent 70-year exposure. However, due to lack of data, calendar year 2035 emission factors are assumed for years beyond 2035 in the analysis period (p. 2, paragraph 2).
- One freeway corridor was selected for each of the six counties contained in the SCAG planning area, with two additional corridors selected by SCAG as areas of “heightened interest.” Operational traffic levels vary for each corridor under alternative planning scenarios in the RTP (p. 2, paragraph 3).



- The segment within each of the eight freeway corridors that exhibited the highest daily total traffic volume (combined in both directions, and including HOV lane traffic where appropriate) was identified. The 2035 No Project Alternative scenario was used to identify the “highest volume” segments along each selected corridor for all scenarios (p. 4, paragraph 2).
- CARB’s EMFAC2007 model was used to generate TOG and DPM emission factors for 2012 and 2035. TOG was speciated (to develop emission factors for benzene, formaldehyde, acetaldehyde and 1,3-butadiene) for each vehicle class using EPA’s MOBILE6.2 model (p. 5, paragraph 1 and Table 1).
- Emission factors were developed separately for light/medium-duty and heavy-duty vehicles in the three planning areas (p. 7, paragraphs 1 and 3).
- Fleet composite emission rates for each freeway segment (in lb/day) under each project alternative were calculated based on the emission factors, the types of vehicles traveling the freeway segment (light/medium duty vs. heavy duty), the length of the freeway segment, and the daily volume of traffic (p. 7, paragraph 4).
- Emission inputs to the AERMOD dispersion model were calculated by dividing the calculated daily composite emissions (in lb/day) by the size of each roadway link -- link length by lane width (p. 9, paragraph 5).
- The AERMOD model and representative meteorological data were used to evaluate modeled impacts at receptors, including residential receptors, within 0.5 kilometers of each freeway segment. Separate impacts were generated for each planning alternative (pp. 10-12).
- The results of the AERMOD modeling runs for each planning alternative were used in the CARB HARP model to generate maximum cancer risk. Residential cancer risk was based on 24 hour per day, 7 day/week, 52 week/year, and 70-year exposure. Workplace cancer risk was based on 8 hour per day, 245 day per year, 40-year exposure (pp. 12-13).

EPA recommends that even in a limited scope, SCAG should identify areas of dense population that might be subjected to this cumulative impact, as well as the impact on any potential sensitive population.

As noted earlier, the freeway corridors for which quantitative risk analysis was performed reflect cumulative impacts of multiple projects along the locations modeled. Moreover, the modeled segments along each selected corridor exhibited population exposure locations immediately adjacent to the freeway segment along its extent. Modeling receptors (where risk was quantified spatially) were placed in each of these locations. Additional modeling receptors were also added at other locations at the edge of adjacent land use boundary (even if not a populated residential area) in order to develop grid-based risk isopleths plots for each segment and Plan alternative. These isopleths plots can be provided by SCAG upon request.

- 93-10 The commenter recommends the implementation of Mitigation Measure MM-AQ19 in plan-related projects. Please refer to **Master Response No. 1**, Mitigation Measures. Mitigation Measure MM-AQ19 is now AQ19 in Appendix G.
- 93-11 The commenter recommends revisions to Mitigation Measure MM-AQ11 regarding the use of Tier 3 emissions standards. Please refer to **Master Response No. 1**, Mitigation Measures. Mitigation Measure MM-AQ11 is now AQ11 in Appendix G. The measure has been substantially revised along the lines of the suggested revision.
- 93-12 The commenter recommends revisions Mitigation Measure MM-AQ15 regarding the idling time for commercial vehicles. Please refer to **Master Response No. 1**, Mitigation Measures. Mitigation Measure MM-AQ15 is now AQ15 in Appendix G, and has been revised as suggested.

- 93-13 The commenter states support for Mitigation Measures MM-GHG7 and MM-GHG8. This comment is noted.
- 93-14 The commenter recommends that provision “b” of Mitigation Measure MM-GHG10 be revised to state, “Solicit preference construction bids that use BACT, particularly those seeking to deploy zero emission technologies.” Please refer to **Master Response No. 1**. Mitigation Measure MM-GHG10 is now GHG2 in Appendix G, and has been revised as suggested. See also **Response 80-1**.
- 93-15 The commenter states support for Mitigation Measures MM-TR44 through MM-TR47, MM-TR50, MM-TR51, MM-TR86 through MM-TR88, and MM-TR92. This comment is noted. See also **Master Response No. 1**.
- MM-TR44 is now listed in Appendix G as TR28.
  - MM-TR45 is now listed in Appendix G as TR29.
  - MM-TR46 is now listed in Appendix G as TR30.
  - MM-TR47 is now listed in Appendix G as TR31.

**Letter 94, Wildlife Corridor Conservation Authority, Glenn Parker, Chairperson, February 10, 2012**

- 94-1 The commenter indicates agreement with most mitigation measures, and asks to be included in a regional conservation collaborative process. Additionally, the commenter stated that SCAG should develop best practices that would be applicable to new transportation corridors to prevent new development from extending into resource lands. The commenter indicates that MM-BIO/OS35 should be clarified to delete the reference to relocating active nests, as this is likely in conflict with the Migratory Bird Treaty Act. Instead, construction buffers to active nests should be established. To the extent feasible, natural methods for stormwater control, water quality improvements, and infiltration should be encouraged. In addition, the commenter states that when evaluating projects during the environmental review process, SCAG should identify regionally significant projects that may impact downstream waters and include comments to that effect in Notice of Preparation and Environmental Impact Report responses. SCAG should participate in the development of models of natural processes for the remaining natural rivers in the SCAG region to ensure that environmental review can comprehensively evaluate project impacts based on the best available information.

This comment is acknowledged. In addition, MM-BIO/OS35 (now Mitigation Measure BIO/OS34 in Appendix G) is revised to clarify the intent of the mitigation measure and to remove references to re-locating active nests. See the newly added Appendix G for specific changes.

The commenter provides a number of comments with respect to mitigation measures in the Draft PEIR. Please see **Master Response No. 1** regarding the clarifications made in this Final PEIR as to how mitigation measures are described and intended to be used.

Appendix G includes a number of examples of mitigation aimed at enhancing public safety; suggestions from commenter with respect to fire protection are incorporated in to PS10.

The commenter states that while local jurisdictions and partners are responsible for the planning of projects that provide access to open space, SCAG has a critical responsibility for funding by including bikeway projects within the RTP/SCS project areas. The commenter states that the greatest contribution SCAG could make towards the conservation of open space would be to include greenways that serve transportation functions. Please refer to **Master Response No. 1** for a discussion of SCAG's role with respect to individual planning, development, and transportation projects in the region. Please also see **Responses 74-2** and **86-2**, above.

The commenter references mitigation measures in the Draft PEIR and states that SCAG should support a parkway system that connects community facilities through transportation improvements.

The referenced mitigation measures were directed at local agencies. Please refer to **Master Response No. 1** for an explanation on SCAG's authority to implement mitigation measures and how all measures aimed at local agencies are moved to Appendix G. The Plan includes funding for active transportation including pedestrian and bicycle facilities.

**Letter 95, City of Palmdale, Richard Kite, Planning Manager, February 14, 2012**

95-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

**Letter 96, California Regional Water Quality Control Board, Santa Ana Region, Glenn Robertson, Engineering Geologist/CEQA Coordinator, March 7, 2012**

96-1 Commenter suggests a new mitigation measure for impacts to waters of the state. See **Master Response No. 1** with respect to project application of mitigation measures. This measure is added to Appendix G as measure W62. RWQCB expresses its preference to link in-kind mitigation needs to projects, but its willingness to entertain other proposals as described in Measure W62 is noted.

96-2 Regarding Mitigation Measure MM-W10 (now Measure W9 in Appendix G); Waste Discharge Requirements (WDRs) may be issued by the Regional Board where federal jurisdiction is not taken (by U.S. Army Corps of Engineers or other federal agencies) for impacts to channels and their beneficial uses, or may be issued when and where appropriate. This comment is noted.

96-3 Commenter notes that WDRs for dewatering projects are issued on a region-by-region basis. This comment is noted.

96-4 Commenter notes that Table 3.13-9 does not, and should include, the Santa Ana River. This comment is noted.

**Letter 97, Public Hearing Testimony**

97-1 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

97-2 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

97-3 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

97-4 Commenter's concerns with respect to mitigation measures are addressed in **Master Response No. 1**.

97-5 Commenter requests that information on energy efficiency be added to the PEIR on pages 3.11-38 and 3.11-44; see Chapter 5.0 Corrections and Additions for these pages.

97-6 The commenter requests that the 710 Northern Extension be removed from the Plan and PEIR. The commenter's request is noted. The 2012-2035 RTP/SCS is a Plan that is comprised of a number of conceptual projects as well as policies. The 710 Northern Extension project is currently included in the Plan.

**Letter 98, Global Land Use and Economic Council, Greg McWilliams, Chair, GLUE Council, February 14, 2012**

98-1 The commenter points out key policies with respect to the PEIR. See **Response 71-1**.

## 5.0 CORRECTIONS AND ADDITIONS

### OVERVIEW

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CEQA Guidelines section 15088.5 requires:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice of its availability . . . "Significant new information" requiring recirculation include, for example, a disclosure showing that:
  - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
  - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
  - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
  - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
- (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.
- (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

New information is "significant" if as a result of the additional information "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.*, 864 P.2d 502, 510 (1993) (*Laurel Heights II*); CEQA Guidelines § 15088.5(a). Recirculation is not mandated when the new information merely clarifies, amplifies or makes an insignificant modifications to an adequate draft EIR. (*Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*, 150 P.3d 709 (2007) (quoting *Laurel Heights II*, 864 P.2d at 510); see also *Marin Mun. Water Dist. v. KG Land California Corp.*, 235 Cal.App.3d 1652, 1667 (1991) (citing *Sutter Sensible Planning v. Board of Supervisors* 122 Cal.App.3d 813 (1981)).

In response to public comments received, minor changes to data and assumptions underlying the Plan (such as growth information – see **Master Response No. 3**) as well as staff-initiated text changes, Corrections and Addition have been made to the Draft PEIR. Additional information has been identified in comments to the Draft EIR and responded to in Chapter 3.0 of this Final PEIR. Furthermore, the RTP project list has been updated since publication of the Draft PEIR. Updates to the RTP project list are minor and include changes to funding years and minor changes in scope (for example changing the number of lanes from one to two). Readers are referred to the Final Project List Appendix of the 2012-2035 RTP/SCS for the most recent project list. These changes made since publication of the Draft PEIR do not substantially affect the analysis contained in the Draft PEIR, do not result in a substantial increase in the severity of a significant impact identified in the Draft PEIR and do not change the conclusions in any way. However, because of these minor changes, the modeling results relating to traffic and air quality were revised and the numbers presented in the Final Plan differ slightly from the numbers presented in the Draft PEIR (e.g. information within the Final

Plan demonstrates approximately: +0.3% in regional VMT in 2035 and -0.6% to +0.4% change in total criteria pollutants in 2035).

All of the public comments to the Draft PEIR, as well as these Additions and Corrections to the Draft PEIR have been carefully reviewed to determine whether recirculation of the Draft PEIR is required. All of the new information in these Corrections and Additions to the Draft PEIR and in the comments and in the responses to comments merely clarify or amplify or make insignificant modifications to an adequate Draft PEIR. While SCAG has modified the Draft EIR structurally (i.e., moved the examples of project-level mitigation measures to Appendix G) to appropriately reflect SCAG's intent to defer to local agencies' authority and expertise to determine applicable and feasible mitigation for individual projects; no additional impacts or any increase in existing impacts have been identified, and thus, the conclusions regarding the significance of the impacts were not affected. Therefore, the Draft PEIR need not be recirculated prior to certification.

In general in the following corrections and additions, new text is underlined, and deleted text is shown in strikeout font.

## GLOBAL CHANGES TO MITIGATION MEASURES THROUGHOUT THE PEIR

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All mitigation measures included in the Draft EIR for local jurisdictions and project sponsors to implement (measures phrased as "can and should" be undertaken) are moved to a new **Appendix G** entitled "Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects" (see the end of this document). The words "can and should" are replaced with the word "may" throughout Appendix G. These measures are examples of mitigation measures that may be implemented by lead agencies as they deem applicable and feasible in meeting their obligations under CEQA to reduce identified significant impacts. New mitigation measures directed at local agencies, requiring compliance with CEQA to reduce impacts as applicable and feasible to a level of less than significant and referencing the list of examples of measures in the new Appendix G) are added to each section as listed below.

In addition to these new measures minor changes are made to mitigation measures directed at SCAG – also listed below. Measures that reference both SCAG and local agencies and other parties (e.g. other agencies and project sponsors) have been duplicated so they appear as SCAG measures in the PEIR (without reference to local agencies) and as measures for local agencies and other parties in the new Appendix G (edits to SCAG measures that remove the reference to local jurisdictions are not shown below). The full list of mitigation measures remaining in the Final PEIR is included in Final PEIR Chapter 6 Mitigation Monitoring and Reporting Program.

Also, in response to comments and as a result of staff discussions changes were made to measures suggested for local agencies and project sponsors. These changes are shown in the new Appendix G in strike out underline format.

## REVISIONS TO MITIGATION MEASURES

### Aesthetics

- MM-AV1:** SCAG shall coordinate with Caltrans and local agencies as part of SCAG's outreach and technical assistance to local governments under Compass Blueprint and Toolbox Tuesdays, to ~~advocate~~ encourage that projects avoid locally designated scenic highways and/or vista points.

*Above measure clarified as to intent.*

- MM-AV2:** SCAG shall coordinate with Caltrans and local agencies as part of SCAG's outreach and technical assistance to local governments under Compass Blueprint and Toolbox Tuesdays, to ~~advocate~~ provide information concerning that projects be consistent with applicable guidelines and regulations for the preservation of scenic resources along scenic highways.

*Above measure revised to clarify that intent is not advocacy but rather providing information and best practices.*

- MM-AV3:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to aesthetics as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

### Air Quality

- MM-AQ1:** SCAG shall determine as part of its conformity finding pursuant to the Clean Air Act, that the Plan and updates provide for the timely implementation of Transportation Control Measures (TCMs) shall be implemented as appropriate by SCAG and can and should be implemented by local agencies and project sponsors as appropriate. TCMs included in the Plan are identified in the Transportation Conformity Appendix to the 2012-2035 RTP/SCS (starting on page 26). CAA Section 108(f)(1)(A) lists the following sixteen measures as illustrative of TCMs (plus a last measure recommended by SCE):

- I. Programs for improved use of public transit;
- II. Restriction of certain roads or lanes to, or construction of such roads or lanes for use by, passenger buses or HOV;
- III. Employer-based transportation management plans, including incentives;
- IV. Trip-reduction ordinances;
- V. Traffic flow improvement programs that achieve emission reductions;
- VI. Fringe and transportation corridor parking facilities, serving multiple occupancy vehicle programs or transit service;
- VII. Programs to limit or restrict vehicle use in downtown areas or other areas of emission concentration, particularly during periods of peak use;
- VIII. Programs for the provision of all forms of high-occupancy, shared-ride services, such as the pooled use of vans;
- IX. Programs to limit portions of road surfaces or certain sections of the metropolitan area to the use of non-motorized vehicles or pedestrian use, both as to time and place;
- X. Programs for secure bicycle storage facilities and other facilities, including bicycle lanes, for the convenience and protection of bicyclists, in both public and private areas;
- XI. Programs to control extended idling of vehicles;
- XII. Programs to reduce motor vehicle emissions, consistent with Title II of the CAA, which are caused by extreme cold start conditions;
- XIII. Employer-sponsored programs to permit flexible work schedules;
- XIV. Programs and ordinances to facilitate non-automobile travel, provision and utilization of mass transit, and to generally reduce the need for single-occupant vehicle travel, as part of transportation planning and development efforts of a locality, including programs and ordinances applicable to new shopping centers, special events, and other centers of vehicle activity;
- XV. Programs for new construction and major reconstruction of paths, tracks or areas solely for the use by pedestrian or other non-motorized means of transportation, when economically feasible and in the public interest; and

- XVI. Programs to encourage the voluntary removal from use and the marketplace of pre-1980 model year light duty vehicles and pre-1980 model light duty trucks.
- XVII. Programs to encourage the installation of personal electric vehicle charging stations, and other alternative fuel sources.

The Plan has been prepared to facilitate implementation of TCMs and they also serve as air quality mitigation measures for the purposes of the PEIR.

*Above measure clarified as to SCAG's role and XVII added at request of SCE.*

**MM-AQ2:** SCAG shall pursue the following activities in reducing the impact associated with health risk within 500 feet of freeways and high-traffic volume roadways:

- Participate in on-going statewide deliberations on health risks near freeways and high-traffic volume roadways. This involvement includes inputting to the statewide process by providing available data and information such as the current and projected locations of sensitive receptors relative to transportation infrastructure;
- Work with air agencies including ARB, SCAQMD, and all air districts in the SCAG region to support their work in monitoring the progress on reducing exposure to emissions of PM10 and PM2.5 for sensitive receptors, including schools and residents within 500 feet of high-traffic volume roadways;
- Work with stakeholders to identify planning and development practices that are effective in reducing health impacts to sensitive receptors; and
- Share information on all of the above efforts with stakeholders, member cities, counties and the public.

*Above is new measure added in response to issues raised by the State Attorney General's office.*

**MM-AQ3:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to air quality as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of measures to consider when appropriate in reducing environmental impacts of future projects. Appendix G contains a non-exclusive list of examples of potential mitigation that could reduce impacts to air quality. It is anticipated that regulations and actions at the federal, state and local level will be implemented to ensure that public health in the region is impacted to a less than significant level.

## **Biological Resources and Open Space**

**MM-BIO/OS1:** SCAG shall facilitate reducing future impacts to biological resources ~~shall be minimized~~ through cooperation, information sharing, and program development ~~as part of SCAG's regional planning efforts~~. SCAG shall consult with the resource agencies, such as USFWS and CDFG, as well as local jurisdictions to incorporate any local HCPs or other similar planning documents. Planning efforts shall be in accordance with the approach outlined in the California Wildlife Action Plan.

*Above measure revised for clarity and to emphasize collaboration and information sharing roles for SCAG*

**MM-BIO/OS2:** SCAG shall develop a conservation strategy (including regional mitigation policies) in coordination with local jurisdictions and agencies, including CTCs. ~~to determine~~ The conservation strategy will build from existing efforts including those at the sub-regional and local levels to identify potential priority conservation areas ~~and develop regional mitigation policies~~ based on mitigation approaches adopted by local agencies. SCAG

shall produce and maintain a list/map of potential conservation opportunity areas based on most recent land use data.

*Above measure revised to defer to locally adopted mitigation approaches in determining priorities.*

~~**MM-BIO/OS3:** SCAG shall use its IGR process to review projects with potentially significant impacts to open space and recommend impact avoidance and mitigation measures.~~

*Above measure deleted in deference to future policy consideration concerning SCAG's IGR process, as the measure raises a policy matter inconsistent with current policies and not yet acted upon by SCAG's Regional Council (this measure was numbered MM-BIO/OS46 in the Draft PEIR; the number MM-BIO/OS3 reflects the mitigation re-organization discussed above and is the number that would have been assigned to this mitigation measure had it remained in the PEIR).*

**MM-BIO/OS3:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to biological resources and open space as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

### Cultural Resources

**MM-CUL2:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to cultural resources as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

### Geology, Soils and Mineral Resources

**MM-GEO1:** SCAG shall facilitate minimizing future impacts to geological resources through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA Lots, and direct technical assistance efforts such as Compass Blueprint's Toolbox Tuesday series. Resource agencies, such as the U.S. Geology Survey, should be consulted during this update process.

**MM-GEO2:** SCAG shall coordinate with the Department of Conservation, California Geological Survey to maintain a database, if available, of 1) available resources in the SCAG region including permitted and un-permitted and 2) the anticipated 50-year demand. Based on the results of this survey SCAG should work with local agencies to develop an appropriate response to the anticipated demand, including identifying future sites that ~~should~~ may seek permitting and working with industry experts to identify ways to encourage and increase recycling to reduce the demand for aggregate.

*Above measures edited to clarify SCAG's role.*

**MM-GEO3:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts associated with geology, soils and mineral resources, as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

### Greenhouse Gas Emissions

**MM-GHG4:** SCAG shall ~~develop~~ continue coordination with other metropolitan planning organizations (MPOs) on statewide strategies and approaches to reducing GHG



emissions and facilitate the implementation of SB 375 ~~through its ongoing coordination effort with other MPOs.~~

*Above measure revised to clarify language to reflect intent of measure is for SCAG to continue coordination with MPOs on statewide strategies and approaches to reducing GHG emissions and implement SB 375.*

**MM-GHG5:** SCAG shall ~~assist~~ coordinate with ARB and air districts in efforts to implement the AB 32 Scoping Plan.

*Above measure revised to clarify measure to reflect intent that SCAG will coordinate with ARB and air districts on the implementation of the AB 32 Scoping Plan.*

**MM-GHG8:** SCAG shall work with utilities, sub-regions, and other stakeholders to promote accelerated penetration of zero (and/or near zero-) emission ~~electric~~ vehicles in the region, including developing a strategy for the deployment of public charging infrastructure.

*Above measure is clarified.*

**MM-GHG9:** SCAG shall in its capacity as a Clean Cities Coalition, ~~and local jurisdictions can and should~~ establish a coordinated, creative public outreach activities campaign, including publicizing the importance of reducing GHG emissions and steps community members ~~can~~ may take to reduce their individual impacts.

*SCAG's intent is clarified in the above measure.*

**MM-GHG10:** Pedestrian and Bicycle Promotion: SCAG shall ~~and local jurisdictions can and should~~ work with local community groups and ~~downtown~~ business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.

*Above measure is clarified.*

**MM-GHG11:** Water Conservation: SCAG shall ~~and local jurisdictions can and should~~ organize support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.

*Above measure is clarified.*

**MM-GHG13:** Climate Protection Summit/Fair: SCAG shall ~~and~~ in coordination with local jurisdictions (as practicable) ~~can and should organize an annual~~ support and/or sponsor a periodic Climate Protection Summits or Fairs, to educate the public on current climate science, projected local impacts, and local efforts and opportunities to reduce GHG emissions, including exhibits of the latest technology and products for conservation and efficiency.

*Above measure is clarified and revised to replace "annual" with "periodic" to allow for flexibility as may be appropriate in individual circumstances.*

**MM-GHG14:** Schools Programs: SCAG shall ~~and local jurisdictions can and should~~ develop and implement a program in coordination with school districts to present information to ~~school children~~ students about climate change and ways to reduce GHG emissions, and will support school-based programs for GHG reduction, such as school-based trip reduction and the importance of recycling.

*Above measure is clarified.*

**MM-GHG15:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts from greenhouse gas emissions as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

### **Hazardous Materials**

**MM-HM3:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts that result from hazardous materials as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects. Appendix G contains a non-exclusive list of examples of mitigation measures that would reduce impacts from use of hazardous materials and/or disposal of hazardous wastes. Potentially significant impacts to public health associated with the issues of handling, and proper disposal of hazardous materials and wastes are well regulated and compliance with these regulations is mandatory. Because federal, state, and local agencies regularly enforce these regulations, it is reasonable to assume that project sponsors will comply. Compliance with these regulations would reduce any potential impact to public safety to a less than significant level.

### **Land Use**

**MM-LU2:** SCAG shall ~~encourage, through regional policy comments, that~~ continue to provide targeted technical services such as GIS and data support for cities and counties to update their general plans at least every ten years, as recommended by the Governor's Office of Planning and Research.

*Above measure revised to reflect committed activities for SCAG.*

**MM-LU3:** SCAG shall work with its member cities and counties to ~~ensure~~ encourage that transportation projects and growth are consistent with the RTP and general plans.

**MM-LU4:** SCAG shall coordinate with member cities and counties to encourage that general plans consider and reflect as appropriate RTP/SCS policies and strategies. SCAG will work to ~~build consensus on how to encourage~~ address inconsistencies between general plans and RTP/SCS policies.

*Above measure revised to clarify that SCAG's lack of authority regarding land use decisions.*

**MM-LU5:** SCAG shall provide technical assistance and regional leadership to encourage implementation of the RTP/SCS goals and strategies ~~and that~~ integrate growth and land use planning with the existing and planned transportation network.

*Above measure revised to clarify lack of implementation authority for SCAG.*

**MM-LU6:** SCAG shall provide planning services to local jurisdictions through sustainability planning programs including the Compass Blueprint Demonstration Projects and the Green Region initiative. These projects will help local jurisdictions:

- Update General Plans to reflect Compass Blueprint principles and integrate land use and transportation planning.
- Develop specific plans, zoning overlays and other planning tools to enable and stimulate desired land use changes that are consistent with the future land development pattern in the 2012-2035 RTP/SCS

- Complete the economic analysis and community involvement efforts that will ensure that the planned changes are market feasible and responsible to stakeholder concerns.
- Visualize potential changes, through innovative graphics and mapping technology to inform the dialogue about growth, development and transportation at the local and regional level.

*Above measure is broadened to encompass more examples.*

**MM-LU7:** SCAG shall continue with a ~~targeted~~ public relations strategy that emphasizes ~~regional leadership~~, the benefits and implications of Compass Blueprint principles and sustainable growth, and builds a sense of common interests among Southern Californians communities.

*Measure is broadened and clarified.*

**MM-LU8:** SCAG shall continue to use its Intergovernmental Review Process to provide review and comment on large development projects regarding their consistency with the RTP with respect to the growth forecast and other regional planning efforts.

*Measure is clarified.*

~~**MM-LU9:** SCAG shall develop and implement coordinated mitigation programs for regional projects, with an emphasis on regional transportation projects.~~

*Above measure deleted in deference to future policy consideration concerning implementation of SCAG's conservation planning strategy, as the measure raises a policy matter not yet acted upon by SCAG's Regional Council (this measure was numbered MM-LU9 in the Draft PEIR; no renumbering was necessary as part of the re-organization of mitigation measures discussed above).*

~~**MM-LU10:** SCAG shall use its intergovernmental review (IGR) process to review projects with potentially significant impacts to important farmlands and recommend impact avoidance and mitigation measures.~~

*Above measure deleted in deference to future policy consideration concerning SCAG's IGR process, as the measure raises a policy matter inconsistent with current policies and not yet acted upon by SCAG's Regional Council (this measure was numbered MM-LU21 in the Draft PEIR; the number MM-LU10 reflects the mitigation re-organization discussed above and is the number that would have been assigned to this mitigation measure had it remained in the PEIR).*

**MM-LU9:** SCAG shall work with member agencies and the region's farmland interests to develop regional ~~guidelines~~ best practices information for buffering farmland from urban encroachment, resolving conflicts that prevent farming on hillsides and other designated areas, and closing loopholes that allow conversion of non-farm uses without a grading permit.

*Above measure revised to clarify that SCAG does not have authority to develop guidelines in this area.*

**MM-LU10:** SCAG shall ~~support policies~~ identify best practices for that preserving and promoting the productivity and viability of agricultural lands, including promoting the availability of locally grown and organic food in the region.

*Above measure revised to clarify appropriate policy role for SCAG.*

**MM-LU11:** SCAG's Sustainability Planning Program including the Compass Blueprint program, Green Region Initiative and other ongoing regional planning efforts will be used to ~~build a consensus in the region to support~~ encourage and provide assistance for changes in land use to accommodate future population growth while maintaining the quality of life in the region.

*Above measure revised to reflect committed activities for SCAG and to clarify lack of implementation authority.*

**MM-LU12:** SCAG shall promote infill, mixed-use, ~~and~~ higher density and other sustainable development, and provide work with partners to identify incentives to support the creation of affordable housing in mixed-use zones.

*Above measure revised to clarify lack of implementation and funding capacity for SCAG.*

**MM-LU13:** SCAG shall educate the public about the ~~many~~ benefits of well-designed, higher density and other sustainable development.

*Above measure is clarified.*

~~**MM-LU14:** SCAG and local jurisdictions shall minimize public expenditure for infrastructure and facilities to support urban type land uses in areas where public health and safety could not be guaranteed.~~

*Above measure was deleted because SCAG has determined that infrastructure expenditures and public health are not concepts necessarily in opposition to one another and as such, the measure did not clearly address potential impacts and appropriate mitigation. Appropriate actions to protect public health have been addressed by other mitigation measures including MM-AQ2, MM-AQ3, MM-GEO3, MM-HM3. (This measure was numbered MM-LU75 in the Draft PEIR; the number MM-LU14 reflects the mitigation re-organization discussed above and is the number that would have been assigned to this mitigation measure had it remained in the PEIR.)*

**MM-LU14:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to land use as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

## Noise

**MM-NO1:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to noise as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

## Population, Housing and Employment

**MM-POP1:** SCAG shall work with its member agencies to ~~implement~~ encourage and assist growth strategies to create an urban form designed to focus development in HQTAs in accordance with the policies, strategies and investments contained in the 2012-2035 RTP/SCS, enhancing mobility and reducing land consumption.

*Above measure revised to clarify lack of implementation authority for SCAG.*

**MM-POP2:** SCAG's Sustainability Planning Program such as the Compass Blueprint strategy will be used to ~~build consensus~~ coordinate and provide information in the region relating to

changes in land use to accommodate future population growth while maintaining the quality of life in the region.

*Above measure revised to clarify committed activities of SCAG and to clarify lack of implementation authority.*

**MM-POP4:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to population, housing and employment, as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

### **Public Services and Utilities**

~~**MM-PS7:** SCAG shall support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.~~

*Above measure deleted as it duplicates MM-PS5 (these duplicate mitigation measures were originally numbered MM-PS28 and MM-PS30 in the Draft PEIR; MM-PS7 refelects the reorganization of mitigation measures discussed above and is the number that would have been assigned to this mitigation measure had it remained in the PEIR).*

**MM-PS15:** SCAG shall continue to ~~develop~~ identify best practices and disseminate information to member agencies on energy efficiency and green building guidance to provide direction on specific approaches and models ~~and to specify levels of performance for regionally significant projects to be consistent with regional plans.~~

*Above measure revised for clarity and to more accurately reflect SCAG role and expertise.*

**MM-PS16:** SCAG shall build from existing efforts including those at the sub-regional and local level to encourage the federal and state government to increase clean, cost-effective, reliable, domestic renewable energy generation, such as solar and wind turbines.

*Above measure made consistent with SCAG policy.*

**MM-PS18:** SCAG shall ~~encourage the federal government to increase the Corporate Average Fuel Economy (CAFE) to a level~~ participate in discussions on fuel efficiency standards that would will reduce the region's dependence on petroleum and reduce greenhouse gas emissions.

*Above measure clarified.*

**MM-PS20:** SCAG shall ~~continue to develop, in coordination with the California Air Resources Board, a data and information collection and analysis system that provides an understanding of energy demand and greenhouse gas emissions in the SCAG region.~~ provide information on energy demand and greenhouse gas emissions, as available, to the California Air Resources Board and to other stakeholders in order to assist in policy deliberations. SCAG shall develop new data and information pending future discussions.

**MM-PS21:** SCAG shall continue to work with local jurisdictions and energy providers, through its Energy and Environment Committee, and administration of the Clean Cities Program as well as by other means, to encourage regional-scale planning for improved energy

management. Future impacts to energy ~~shall~~ may be minimized through cooperative planning, and information sharing within the SCAG region.

*Above measures are clarified.*

**MM-PS22:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to public services and utilities as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects. Appendix G contains a non-exclusive list of examples of measures that could reduce impacts to public services and utilities. Potentially significant impacts to severing utility lines that could result from construction activities are addressed through Best Management Practices and local permitting.

### Transportation, Traffic and Security

**MM-TR3:** SCAG shall conduct workshops focusing on ~~Smart Growth~~ Sustainability Planning and Development strategies.

*Measure is clarified.*

**MM-TR14:** SCAG shall provide the means for collaboration in planning, communication, and information sharing before, during, or after a regional emergency. This will be accomplished by the following:

- SCAG shall develop and incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities.
- SCAG shall offer a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.
- SCAG shall enter into mutual aid agreements with other MPOs (as feasible) to provide this data, in coordination with the California OES in the event that an event disrupts SCAG's ability to function.

*Above measure is clarified.*

**MM-TR15:** Congestion Pricing: SCAG shall ~~advocate~~ continue to analyze and develop potential implementation strategies for a regional, market-based system to price or charge for auto trips during peak hours.

*Above measure revised to clarify intent to analyze and develop implementation strategies rather than to engage in advocacy.*

**MM-TR19:** SCAG shall ~~and local jurisdictions can and should provide~~ develop a vanpool program for employees for commute trips.

*Above measure is clarified.*

**MM-TR20:** Transportation Planning: SCAG shall ~~and local jurisdictions can and should ensure~~ encourage that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.

*Above measure is clarified.*

**MM-TR23:** Local agencies can and should comply with the requirements of CEQA to transportation, traffic and security as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

**Water Resources**

**MM-W1:** SCAG shall continue to work with local jurisdictions and water quality agencies, ~~and other means,~~ to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided to the extent practical and feasible through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur as part of current and existing coordination, an integral part of SCAG’s ongoing regional planning efforts.

**MM-W2:** SCAG shall provide opportunities for information sharing with respect to wastewater treatment and program development in the region.

**MM-W3:** SCAG shall build from existing efforts including those at the sub-regional and local level and shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge, including consideration of alternative recharge technologies and practices. Future adverse impacts ~~shall~~ may be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region.

**MM-W4:** SCAG, in coordination with regional water agencies and other stakeholders, shall encourage ~~the kind of~~ regional coordination throughout California and the Colorado River Basin that develops and supports sustainable policies in accommodating growth.

**MM-W6:** SCAG shall assist in minimizing future impacts to water supply ~~shall be minimized~~ through cooperation, information sharing, and program development as part of SCAG’s on-going regional planning efforts, in coordination with regional water agencies and other stakeholders.

**MM-W8:** SCAG, as part of its on-going outreach and technical assistance efforts, shall ~~organize support and/or sponsor~~ workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.

*Above measures made consistent with SCAG policy and clarified.*

**MM-W9:** Local agencies can and should comply with the requirements of CEQA to mitigate impacts to water resources as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.

References to mitigation measures throughout the PEIR are changed in accordance with the following table.

<b>TABLE A: MITIGATION CORRESPONDENCE TABLE</b>	
<b>Measures Referenced in December 2011 Draft PEIR*</b>	<b>Corresponding Mitigation Measure in Final PEIR</b>
<b>AESTHETICS</b>	
MM-AV5 (partial)*	MM-AV1

<b>TABLE A: MITIGATION CORRESPONDENCE TABLE</b>	
<b>Measures Referenced in December 2011 Draft PEIR*</b>	<b>Corresponding Mitigation Measure in Final PEIR</b>
MM-AV7 (partial)*	MM-AV2
MM-AV1 through M-AV4; MM-AV5 (partial)*; MM-AV-6; MM-AV7 (partial)*; MM-AV8 through MM-AV12	MM-AV3
<b>AIR QUALITY</b>	
MM-AQ1 (partial)*	MM-AQ1
New Measure	MM-AQ2
MM-AQ1 (partial)*; MM-AQ2 through MM-AQ20	MM-AQ3
<b>BIOLOGICAL RESOURCES AND OPEN SPACE</b>	
BIO/OS44 (partial)*	MM-BIO/OS1
BIO/OS45	MM-BIO/OS2
BIO/OS46	Measure deleted.
MM-BIO/OS1 through MM-BIO/OS43; MM-BIO/OS44 (partial)*; MM-BIO/OS47 through MM-BIO/OS59	MM-BIO/OS3
<b>CULTURAL RESOURCES</b>	
MM-CUL17	MM-CUL1
MM-CUL1 through MM-CUL16	MM-CUL2
<b>GEOLOGY</b>	
MM-GEO10	MM-GEO1
MM-GEO11	MM-GEO2
MM-GEO1 through MM-GEO9; MM-GEO12	MM-GEO3
<b>GREENHOUSE GAS EMISSIONS</b>	
MM-GHG1	MM-GHG1
MM-GHG2	MM-GHG2
MM-GHG3	MM-GHG3
MM-GHG4	MM-GHG4
MM-GHG5	MM-GHG5
MM-GHG6	MM-GHG6
MM-GHG7	MM-GHG7
MM-GHG8	MM-GHG8
MM-GHG11 (partial)*	MM-GHG9
MM-GHG12 (partial)*	MM-GHG10
MM-GHG14 (partial)*	MM-GHG11
MM-GHG15 (partial)*	MM-GHG12
MM-GHG16	MM-GHG13
MM-GHG17 (partial)*	MM-GHG14
MM-GHG9; MM-GHG10; MM-GHG11 (partial); MM-GHG12 (partial)*; MM-GHG13; MM-GHG14 (partial)*; MM-GHG15 (partial)*; MM-GHG17 (partial)*	MM-GHG15
<b>HAZARDOUS MATERIALS</b>	
MM-HM1	MM-HM1
MM-HM2	MM-HM2
MM-3 through MM-HM16	MM-HM3
<b>LAND USE</b>	
MM-LU1	MM-LU1
MM-LU2	MM-LU2
MM-LU3	MM-LU3
MM-LU4	MM-LU4
MM-LU5	MM-LU5
MM-LU6	MM-LU6
MM-LU7	MM-LU7
MM-LU8	MM-LU8
MM-LU9	Measure deleted.
MM-LU21	Measure deleted
MM-LU22	MM-LU9



<b>TABLE A: MITIGATION CORRESPONDENCE TABLE</b>	
<b>Measures Referenced in December 2011 Draft PEIR*</b>	<b>Corresponding Mitigation Measure in Final PEIR</b>
MM-LU32	MM-LU10
MM-LU37	MM-LU11
MM-LU53	MM-LU12
MM-LU65	MM-LU13
MM-LU10 through MM-LU20; MM-LU23 through MM-LU31; MM-LU33 through MM-LU36; MM-LU38 through MM-LU52; MM-LU54 through MM-LU64; MM-LU66 through MM-LU74; MM-LU76 through MM-LU85	MM-LU14
MM-LU75	Measure deleted.
<b>NOISE</b>	
MM-NO1 through MM-NO18	MM-NO1
<b>POPULATION, HOUSING AND EMPLOYMENT</b>	
MM-POP1	MM-POP1
MM-POP5	MM-POP2
MM-POP6	MM-POP3
MM-POP2 through MM-POP4	MM-POP4
<b>PUBLIC SERVICES AND UTILITIES</b>	
MM-PS7 (partial)*	MM-PS1
MM-PS8 (partial)*	MM-PS2
MM-PS9 (partial)*	MM-PS3
MM-PS10 (partial)*	MM-PS4
MM-PS28 and MM-PS30 (duplicates)	MM-PS5
MM-PS29	MM-PS6
MM-PS31	MM-PS7
MM-PS32	MM-PS8
MM-PS33	MM-PS9
MM-PS34	MM-PS10
MM-PS114	MM-PS11
MM-PS115	MM-PS12
MM-PS116	MM-PS13
MM-PS117	MM-PS14
MM-PS118	MM-PS15
MM-PS119	MM-PS16
MM-PS120	MM-PS17
MM-PS121	MM-PS18
MM-PS122	MM-PS19
MM-PS123	MM-PS20
MM-PS124	MM-PS21
MM-PS1 through MM-PS6; MM-PS7 (partial)*; MM-PS8 (partial)*; MM-PS9 (partial)*; MM-PS10 (partial)*; MM-PS11 through MM-PS27; MM-PS35 through MM-PS113	MM-PS22
<b>TRANSPORTATION, TRAFFIC, AND SECURITY</b>	
MM-TR1	MM-TR1
MM-TR2	MM-TR2
MM-TR3 (partial)*	MM-TR3
MM-TR4	MM-TR4
MM-TR5 (partial)*	MM-TR5
MM-TR6	MM-TR6
MM-TR7	MM-TR7
MM-TR8	MM-TR8
MM-TR9	MM-TR9
MM-TR10	MM-TR10
MM-TR11	MM-TR11
MM-TR12	MM-TR12
MM-TR13	MM-TR13

<b>TABLE A: MITIGATION CORRESPONDENCE TABLE</b>	
<b>Measures Referenced in December 2011 Draft PEIR*</b>	<b>Corresponding Mitigation Measure in Final PEIR</b>
MM-TR14	MM-TR14
MM-TR15	MM-TR15
MM-TR16	MM-TR16
MM-TR17 (partial)*	MM-TR17
MM-TR19 (partial)*	MM-TR18
MM-TR20 (partial)*	MM-TR19
MM-TR21 (partial)*	MM-TR20
MM-TR26	MM-TR21
MM-TR27	MM-TR22
MM-TR3 (partial)*; MM-TR5 (partial)*; MM-TR17 (partial)*; MM-TR18; MM-TR19 (partial)*; MM-TR-20 (partial)*; MM-TR21 (partial)*; MM-TR22 through MM-TR25; MM-TR28 through MM-TR98	MM-TR23
<b>WATER RESOURCES</b>	
MM-W1	MM-W2
MM-W4 (partial)*	MM-W3
MM-W14	MM-W4
MM-W42	MM-W5
MM-W45	MM-W6
MM-W63	MM-W7
MM-W67	MM-W8
MM-W2; MM-W3; MM-W4 (partial)*; MM-W5 through MM-W13; MM-W15 through MM-W40; MM-W41, MM-W43, MM-W44; MM-W46 through MM-W62; MM-W64 through MM-W66; MM-W68	MM-W9

\* Measures indicated as partial have been split or copied so that measures either refer to SCAG or local jurisdictions but not both in one measure.

The new Appendix G, containing the examples of measures that can be used as a menu of options by local agencies is included at the end of this Final EIR (the appendix shows changes to measures as compared to the Draft PEIR in strikeout and underline font).

Numbering of mitigation measures (all measures indicating SCAG shall in the Draft PEIR) is revised to reflect the move of measures to Appendix G so that mitigation measures are numbered continuously and logically. For example measures oriented to local agencies now moved to the new Appendix G, the MM-prefix is deleted and measures are numbered continuously for each issue area.

## PAGE BY PAGE CHANGES

### EXECUTIVE SUMMARY

Page ES-10. The level of significance after mitigation for the first impact on that page (emissions of short-term criteria pollutants as a result of construction) is revised to reflect the analysis in the PEIR and correct a typographical error in the Executive Summary:

~~Less than Significant~~ Significant and Unavoidable

Page ES-49. The level of significance after mitigation for the first impact under "Police, Fire and Emergency Services" is revised to reflect the analysis in the PEIR and correct a typographical error in the Executive Summary:

~~Less than Significant~~ Significant and Unavoidable

Page ES-55. The level of significance after mitigation for the first impact under "Energy" is revised to reflect the analysis contained in the PEIR and correct a typographical error in the Executive Summary:

~~Significant and Unavoidable~~ Less than Significant

## INTRODUCTION

Page 1-5, under the heading "Mitigation Measures" the following changes are made:

### General Description and Legal Requirements

CEQA requires that SCAG identify all feasible mitigation measures in the PEIR that will avoid or substantially lessen the significant environmental effects of the project. (Public Resource Code Sections 21002, 21081(a)(1); CEQA Guidelines Section 15126.4(a).) CEQA, however, does not require a lead agency to undertake identified mitigation measures, even if those measures are necessary to address a project's significant environmental effects, if the agency finds that the measures "are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency." (Public Resource Code Section 21081(a)(2); *City of Marina v. Bd. of Trustees of the Calif. State Univ.* (2006) 39 Cal.4th 341, 366.) Under these circumstances, the lead agency may find that the measures "can and should" be implemented by the other agency or agencies said to have exclusive responsibility/jurisdiction over the measures. (*City of Marina*, 39 Cal.4th at 366.) As the CEQA Guidelines explain, the "finding in subsection (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives." (CEQA Guidelines Section 15091(c).)

SB 375 specifically provides that nothing in a SCS supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use policies and regulations, including their general plans, to be consistent with the SCS or an alternative planning strategy (Government Code Section 65080(b)(2)(K)). Moreover, cities and counties have plenary authority to regulate land use through their police powers granted by the California Constitution, art. XI, §7, and under several statutes, including the local planning law (Government Code Sections 65100-65763), the zoning law (Government Code Sections 65800-65912), and the Subdivision Map Act (Government Code Sections 66410-66499.37). As such, SCAG has no concurrent authority/jurisdiction to implement mitigation related to land use plans and projects that implement the RTP/SCS. With respect to the transportation projects in the RTP/SCS, these projects are to be implemented by Caltrans, county transportation commissions, local transit agencies, and local governments (i.e., cities and counties), and not SCAG. SCAG also has no authority/jurisdiction to require these agencies to implement project-specific mitigation measures.

~~Mitigation Measures proposed in this PEIR can be incorporated as policies in the Final 2012-2035 RTP/SCS and will help ensure that feasible mitigation measures are implemented at the project level. The implementing agencies and local lead agencies shall be responsible for ensuring adherence to the mitigation measures as 2012-2035 RTP/SCS projects are considered for approval over time. Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process.~~

This PEIR presents a region-wide assessment of existing conditions and potential impacts associated with implementation of the 2012-2035 RTP/SCS. As such, this PEIR identifies programmatic mitigation measures for which SCAG would be responsible on a regional scale (these mitigation measures are phrased as "SCAG shall"). In addition, at the end of each resource area, the PEIR has identified one mitigation measure which indicates that the local agency "can and should" comply with CEQA in assessing and mitigating project-specific impacts. Since SCAG has no authority to require specific mitigation measures at the project level, and local agencies have the discretion to determine which mitigation measures are applicable and feasible based on the location-specific circumstances, SCAG

cannot make the finding that specific project-level mitigation measures “can and should” be implemented by the local agencies. As such, to add clarity and avoid any confusion about whether the example project-specific measures are mitigation measures for this PEIR, they are set forth in Appendix G and clearly labeled “Example Measures.” The examples of mitigation measures are to be considered for implementation by local agencies in the region as applicable and feasible. These example measures are phrased as “may” to allow for tailoring to project and agency-specific conditions as may be applicable and feasible. Use of the word “may” in measures that include legal requirements, or measures that are otherwise committed to, should not be construed to mean that compliance with legal requirements and/or existing commitments is optional.

In general, the terms “local agency,” “project sponsor” and “project implementing agency” are used throughout this PEIR to identify agencies, organizations, companies and individuals that will act as lead agencies or project applicants for different types of individual projects. Individual projects that are anticipated to occur ~~pursuant to~~ during implementation of the 2012-2035 RTP/SCS consist of planning projects (general plans, specific plans, climate action plans, etc.), development projects (~~including~~ Transit Priority Projects (TPPs), ~~and~~ other similar projects, etc.), and transportation projects.

In general, “local agency” is used to refer to a public agency that would propose a planning project or a public infrastructure project and/or an agency that would be lead agency for individual projects. “Project sponsor” is typically used to refer to an applicant (~~that could be~~ public or private, an organization or an individual) that proposes a project. “Project implementing agency” is used to refer to an agency responsible for implementing a project, including. ~~In this document, project implementing agencies are those that are responsible for carrying out (reviewing, approving, or constructing) transportation projects.~~

~~This PEIR represents a region-wide assessment of existing conditions and potential impacts associated with implementation of the 2012-2035 RTP/SCS. As such, this PEIR identifies programmatic mitigation that would be implemented by SCAG or other agencies with broad scale planning jurisdiction. Mitigation measures are stated as “SCAG shall” and other local agencies (project sponsors, implementing agencies) “can and should.”~~

~~CEQA provides that an EIR can include feasible mitigation measures that are within the responsibility and jurisdiction of another agency. The appropriate CEQA finding in such instances is that such mitigation measures have been or “can and should be” adopted. (Public Resources Code §21081(a)(2); CEQA Guidelines §15092(a)(2).) When this finding is made, there is no further requirement that SCAG find that mitigation measures that are within the responsibility and jurisdiction of another agency have been incorporated into the project. That latter finding is reserved for mitigation measures within SCAG’s responsibility and jurisdiction. Nevertheless, it is reasonable to expect that the other agencies will actually implement the mitigation measures assigned to them (see discussions below of transportation and land use planning and development projects).~~

Since mitigation measures are an important component of any EIR, they are subject to the same rules regarding level of detail appropriate to the EIR being prepared. In this case, the 2012-2035 RTP/SCS PEIR addresses a large-scale region with a variety of projects spread over more than 20 years. ~~This Draft PEIR presents program-wide mitigation measures that largely will be implemented by SCAG. As such, this PEIR identifies programmatic mitigation that SCAG would carry out on a regional scale and provides examples of measures and other for local agencies to consider, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes. As authorized by the CEQA Guidelines and case law, the mitigation measures included in this Draft PEIR are less detailed than those that would be part of a project EIR and the selection of detailed mitigation measures is properly deferred to future project-specific CEQA reviews.~~

While the Draft PEIR strives to provide as much detail as possible in the mitigation measures, some flexibility must be maintained to present mitigation approaches for impacts occurring over a large

geographic scope and caused by a wide variety of transportation and land use activities. CEQA case law provides that a first-tier EIR may contain generalized mitigation criteria. (See, e.g., *Koster v. County of San Joaquin* (1996) 47 Cal.App.4th 29.)

CEQA case law has also held that deferral of the specifics of mitigation is permissible where the lead agency commits itself to mitigation and, in the mitigation measure, either describes performance standards to be met in future mitigation or provides a menu of alternative mitigation measures to be selected from in the future. (*California Native Plant Society v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603 [the details of exactly how the required mitigation and its performance standards will be achieved can be deferred pending completion of a future study]; *Endangered Habitats League Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793 [deferred mitigation acceptable when performance standards are included]; see also, *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1448-1450 [a deferred approach may be appropriate where it is not reasonably practical or feasible to provide a more complete analysis before approval and the EIR otherwise provides adequate information of the project's impacts]; *Sacramento Old City Assn. v. City Council of Sacramento*, supra, 229 Cal.App.3d at p. 1028-1029 [deferral of agency's selection among several alternatives based on performance criteria was appropriate]).

~~This Draft PEIR presents regional performance measures for some mitigation measures, e.g., transportation. For many others, e.g., biological resource mitigation measures, selection of appropriate project specific performance standards is appropriately deferred to project specific CEQA documents, since the circumstances of individual transportation and land use projects will vary widely.~~

### **Transportation Project Mitigation**

~~As discussed above, SCAG has no authority over land use plans and projects. Additionally, SCAG has limited no authority to implement approve individual second tier transportation network improvement projects in the RTP. Most individual transportation projects in the RTP will be implemented by Caltrans, county transportation commissions, local transit agencies, and local governments. These agencies may routinely implement the types of mitigation measures identified in Appendix G if applicable and feasible during project design, CEQA review, and/or project construction. These example measures directed at project sponsors and implementing agencies included in this PEIR are intended to be permissive and not mandatory. This Draft PEIR has made a preliminary determination that the proposed mitigation measures are feasible and effective therefore, it is reasonable to expect that these Local agencies retain the discretion to determine which mitigations are most applicable to each individual project and whether they are feasible under location-specific circumstances agencies will actually implement them.~~

### **Land Use Planning and Development Project Mitigation**

~~SCAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS. As described in the section below, SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties. In addition, cities and counties are not required to change their current or future land use plans and policies, including general plans, to be consistent with an RTP/SCS. (Government Code Section 65080(b)(2)(K). Local governments are the main agencies responsible for mitigation of the impacts of land use plans and projects that implement the RTP/SCS, and SCAG has no concurrent authority to mitigate the impacts of land use plans and projects. Local governments routinely implement the types of mitigation measures identified in this Draft PEIR during project design, CEQA review, and/or project construction. This Draft PEIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that local governments will actually implement them. As such, local agencies retain the discretion to consider which mitigation measures are appropriate to each individual project and whether they are feasible under the location-specific circumstances. The example measures in Appendix~~

G may be considered by local agencies at the project level, and they are not to be construed as Mitigation measures suggested in this Draft PEIR are not incorporated as policies in the 2012-2035 RTP/SCS.

Page 1-12, at the end of the second bullet under the heading “Other CEQA Streamlining” the following footnote is added:

<sup>1</sup>Note that, as previously discussed, this PEIR identifies programmatic mitigation for which SCAG would be responsible on a regional scale. Appendix G identifies example measures that may be considered by local agencies in the region and they may be implemented if the local agency determines that they are appropriate and feasible. SCAG has no authority over local land use plans and projects; that authority lies solely with local agencies. Thus, SCAG does not (and cannot) require that local agencies implement the project-specific mitigation measures. SCAG does encourage local agencies to consider these example measures with respect to individual projects.

Pages 1-12 to 1-13, the last sentence in the paragraph that begins on page 1-12 and carries over on to p. 1-13 is deleted along with the entire following paragraph:

The Development Types used in the SCS do not represent detailed, parcel-level land use designations such as those found within a local jurisdiction’s General Plan, but rather represent the aggregation of multiple land uses, densities and intensities that are expected to preponderate or average out within a neighborhood-sized area by 2035. Each Development Type is comprised of various characteristics related to employment and housing density, urban design, mix of land uses, and transportation options. Details describing the characteristics contained within each Development Type are available in Appendix: SCS Background Documentation. The lead agency, not SCAG, will be responsible for making the determination of consistency for CEQA streamlining purposes, pursuant to the provisions of SB 375, for any given proposed project. See Government Code Section 65080(b)(2). ~~One way of determining consistency is if a proposed residential/mixed use or TPP conforms to the Development Type designated for a TAZ.~~

~~The Development Types are expressed in terms of use designations, densities and building intensities; and, for any given type, there is one residential density indicated. For example, the “Town Center” Development Type reflects an estimated average density of 22 residential units per acre. However, it is important to note that the designation is a potential ultimate average for the TAZ—and is not an absolute project specific requirement that must be met in order to determine consistency with the SCS. In other words, the SCS was not developed with the intent that each project to be located within any given TAZ must exactly equal the density and relative use designations that are indicated by the SCS Development Type in order for the project to be found consistent with the SCS’s use designation, density, building intensity and applicable policies. Instead, any given project, having satisfied all of the statutory requirements of either a residential/mixed use project or TPP as described above, may be deemed by the lead agency to be consistent with the SCS so long as the project does not prevent achieving the estimated average use designations, densities and building intensities indicated by the Development Type within the TAZ, assuming that the TAZ will be built out under reasonable local planning and zoning assumptions.~~

Page 1-14, the following new sub-section is added:

### **Known Areas of Controversy**

There are a number of areas of controversy associated with the 2012-2035 RTP/SCS and associated environmental document (this PEIR). One of the biggest concerns is the fact that since SCAG has no land use authority, SCAG has no ability to impose land use regulation to implement the SCS nor does SCAG have any ability to identify project-level impacts or require project-level environmental mitigation. In addition timing of roadway improvements versus transit and active transportation projects is controversial.

## PROJECT DESCRIPTION

Page 2-2, the following changes are made to the bulleted list and paragraph beneath:

According to Section 65080 of the California Government Code, ~~in summary~~ the SCS must:

- Identify ~~existing land use~~ the general location of uses, residential densities and building intensities within the region;
- Identify areas ~~to accommodate long term housing needs within the region~~ sufficient to house all the population of the region, including all economic segments of the population, over the course of the RTP's planning horizon, taking into account net migration into the region, population growth, household formation and employment growth;
- Identify areas within the region sufficient to accommodate ~~house~~ an eight-year projection of regional housing needs for the region;
- Identify a transportation ~~needs and the planned transportation~~ network to service the transportation needs of the region;
- Gather and ~~Consider the best practically available scientific information~~ regarding resource areas and farmland in the region;
- Consider the state housing goals and objectives;
- Set forth a forecasted ~~growth and~~ development pattern for the region, which, in combination with the transportation network and other transportation measures and policies, will reduce the GHG emissions from passenger vehicles and light trucks to achieve, if it is feasible, the CARB GHG emission reduction targets in the region; and
- ~~Comply with federal law for developing an RTP.~~
- Allow the RTP to comply with the transportation conformity requirements of the federal Clean Air Act.

It is important to note that the forecasted development pattern in the SCS must be based on current planning assumptions. SCAG's SCS demonstrates the region's ability to attain the GHG emissions reduction targets set forth by the ARB. The SCS outlines SCAG's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs and changing demographics, and transportation demands.

Page 2-2, the fifth paragraph is revised as follows:

SCAG's SCS demonstrates the region's ability to attain the GHG emissions reduction targets set forth by the ARB. The SCS outlines SCAG's ~~plan~~ strategy for integrating the transportation network ~~and related strategies~~ with an overall land use pattern that ~~responds to projected~~ predicts or forecasts growth, housing needs and changing demographics, and transportation demands. ~~The SCS does not supersede a city's or county's general plan or other planning policies or authorities. Additionally, a local agency's planning policies, including the general plan, does not need to be consistent with either strategy.~~

Page 2-5, Table 2-2, first row is revised as follows:

Align the plan investments and policies ~~with~~ while improving regional economic development and competitiveness

Page 2-20, paragraph 3, the following change is made to the heading: ~~**Regional Clean Freight Corridor System**~~ to Comprehensive Zero- and/or Near Zero-Emissions Freight Corridor System

Page 2-20, paragraph 4, the following changes are made:

The East-West Freight Corridor would carry between 58,000 and 70,000 trucks per day—trucks that would be removed from adjacent general-purpose lanes and local arterial roads. The corridor would benefit a broad range of goods movement markets. Within the identified influence area, all traffic is expected to experience a delay reduction of approximately 4.35% with heavy-duty trucks seeing a nearly 11% decrease in delay. ~~Between 25–40 percent of the trucks would be port related, almost 40 percent would serve local goods movement dependent industries, and the remainder would support domestic trade. Truck delay would be reduced by up to 11 percent while speeds for autos on SR-60 would be improved by 11 to 12 percent.~~ Truck traffic on the SR-60 general purpose lanes would be reduced by 42 to 82 percent, depending on location, by as much as 33 percent on I-10, and by as much as 20 percent on adjacent arterials. Separating trucks and autos would also reduce truck-involved accidents on east-west freeways that currently have some of the highest accident levels in the region (20 to 30 accidents a year on certain segments).

Page 2-21, paragraph 4 and in Table 2-11 first row, second column, the references to 2005 are changed to 2000. Also in Table 2-11 the number of at-grade rail crossings is changed from 69 to 72.

Page 2-22, paragraph one is revised as follows:

The 2012-2035 RTP/SCS focuses on a two-pronged approach for achieving an efficient freight system that reduces environmental impacts. For the near-term, 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, upgrading switcher locomotive engines could reduce 1 to 3 percent of regional rail emissions.~~ Additionally, heavy-duty hybrid trucks are already in use, but market penetration can be increased. In the longer term, the strategy focuses on a more fundamental shift in technology—taking critical steps toward gradual phased implementation of a zero and/or near zero-emission or near zero-emission freight system. The constrained RTP includes a project for near-term demonstration and, if successful, initial operational deployment of zero- and/or near zero-emission trucks receiving wayside electric power. The project will be located in Los Angeles County along the Terminal Island Freeway and connecting routes to the Ports, (or alternative routes serving the same locations).

Additionally, SCAG’s planning efforts are cognizant of the need to incorporate evolving technologies into new infrastructure. Two of many promising technologies that merit further investigation are battery electric trucks and electrified rail systems. This latter component of the regional strategy offers the promise of longer-term environmental sustainability, including significant reductions in GHG emissions. Additionally, SCAG’s planning efforts are cognizant of the need to incorporate evolving technologies into new infrastructure. Development of both the proposed I-710 freight corridor and East-West Freight Corridor (EWFC) provides opportunities to commercialize zero- and/or near zero-emissions technologies for freight transportation and create incentives for development. Zero- and/or near zero-emission trucks, that either charge through wayside power infrastructure, at charging stations off the system, or through fuel cell systems, show promise for goods movement corridors. Wayside power offers a potential advantage to trucks that move on key freight corridors as it extends the range of the vehicle by providing a charge for batteries so that the truck can continue to operate in zero emissions mode when it leaves the freight corridor. Another alternative is to provide charging stations located at truck stops and fuel stations similar to current fueling infrastructure. Ongoing efforts are underway to evaluate the costs and operational parameters associated with either method. Though the specific technology to be used will be determined with stakeholder input as the market evolves, the EWFC offers a significant opportunity to catalyze development, deployment and commercialization of zero- and/or near zero-emission technologies for freight transport.



Page 2-22, last paragraph and in Table 2-12 the environmental benefits of the east-west corridor, the number of tons per day of CO<sub>2</sub> is changed from 4,000 to 2,401.

Page 2-24, the following is added before the heading “Chapter 4 . . .”

Transportation Fuel Technology. SCAG’s policy with regard to alternative fuels is technology neutral and does not favor any one technology over any other. SCAG’s alternative fuel goals are to promote emissions reduction, and improved mobility in ways that are effective and cost-effective. Alternative fuels for transportation include, but are not limited to:

Alternative Fuels

- Biodiesel
- Electricity
- Ethanol
- Hydrogen
- Natural Gas
- Propane

Emerging Fuels

- Biobutanol
- Biogas
- Hydrogenation-Derived Renewable Diesel (HDRD)
- Methanol
- P-Series
- xTL Fuels (Fischer-Tropsch)

Page 2-25, before the bulleted list the last sentence is revised as follows:

As described more fully on p. 2-2, in summary under SB 375, and SCS must:

Page 2-25, third paragraph, first sentence is revised as follows:

The SCS demonstrates the region’s ability to ~~attain~~ meet and exceed the GHG emission reduction targets set forth by the ARB.

Page 2-26, first paragraph, is revised as follows:

The RTP/SCS was built primarily from local General Plans and input from local governments, the sub-regional COGs, ~~from~~ from the County Transportation Commissions, and from using the Local Sustainability Planning Tool.

Page 2-26 the following is added as a new second paragraph on that page:

Both short-term job impacts from the Great Recession and its associated impacts on population and household as of 2011 were incorporated into the growth projection. The projection assumes that the regional economy will be fully recovered by 2020. In a rapidly changing and volatile economic environment, the usual economic and population projection models do not produce accurate projections. This is particularly true of the short-term projections due to the unstable nature of the economic and demographic assumptions. Expert opinion on critical factors and key economic and demographic assumptions was collected through three panels of experts meetings between 2009 and 2011. One of major questions was about the timing of the bottom of the national and regional economic recession. Generally, panel members differed on the size and timing of the recovery; the panel did not think the recession would affect the employment size of the region in 2020 or 2035. Therefore, an assumption of a

full recovery from the recession by 2020 is incorporated into the regional growth forecast analyzed in this PEIR.

Page 2-27, third sentence of the third paragraph is revised as follows:

Additionally, ~~SCAG~~ the region moves towards improving the current distribution of households by income category in the region through the allocation of projected housing needs at the local level.

Page 2-28, the last sentence of the first paragraph is revised as follows:

~~Cities such as~~ The City of Pasadena provide provides a relevant reference for the City Center community type.

Page 2-32, Table 2-20's title has been changed to: **DEMOGRAPHIC AND ECONOMIC CATEGORIES.**

### AIR QUALITY

Page 3.2-5, the following sentence is added to the end of paragraph 1:

Naphthalene and Polycyclic Organic Matter are also MSAT compounds of concern. However, these compounds cannot be analyzed until the ARB develops speciation factors.

Page 3.2-11, Table 3.2-1 is revised as follows:

Vinyl Chloride	24-hour	<del>0.01</del> <del>0-03</del> ppm ( <del>26</del> <del>42</del> µg/m <sup>3</sup> )	No Federal Standards
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Page 3.2-12, the 8-hour ozone attainment status in Imperial County is corrected from maintenance to non-attainment.

Page 3.2-18, paragraph 7, is revised as follows:

Similar to on-road vehicles and many industrial sources, rail ~~Rail~~ engines generate emissions of DPM and other cancer-causing toxics. **Map 3.2-6** located in Chapter 8.0 (Maps) shows sensitive receptors located along regional rail lines. ~~**Map 3.2-7** located in Chapter 8.0 (Maps) shows regional 2005 cancer risk as it relates to rail lines.~~ Above-average cancer risk is often located near rail lines, just as it is near freeways.

Page 3.2-26, paragraph 1, is revised as follows:

Similar to on-road vehicles and many industrial sources, rail ~~Rail~~ engines generate emissions of DPM and other cancer-causing toxics. **Map 3.2-6** located in Chapter 8.0 (Maps) shows sensitive receptors located along regional rail lines. ~~**Map 3.2-7** located in Chapter 8.0 (Maps) shows regional 2005 cancer risk as it relates to rail lines.~~ Above-average cancer risk is often located near rail lines, just as it is near freeways.

Page 3.2-31, in the first paragraph the first sentence is revised and new and second and third sentences are added as follows:

While as a result of on-going emission controls, cancer and other health risks within any given distance of mobile sources in the region would decrease substantially (see Impact 3.2-2 above), the health risks adjacent to transportation facilities would remain higher than mobile source regional averages and above desirable levels. However, average cancer risk and other health risks associated with air quality are dependent on a number of factors that are not considered here including site specific considerations such as adjacent uses, on-site air filtration, meteorological conditions, and life-style choices (e.g., smoking).

Page 3.2-31, the last sentence of the second paragraph is replaced with the following:

Federal, state, and local governments mandate the protection of public health. More specifically, US EPA, California EPA, and the local air districts are responsible for setting and achieving air quality standards with sufficient margin of safety to protect all residents. These agencies must ensure that the region complies with the medium to long-term mandates identified in the health-based NAAQS and CAAQS. Agencies periodically review the appropriateness of the NAAQS and CAAQS standards including reviewing how compliance is monitored (placement of monitors) and whether the standards allow for an adequate margin of safety to protect all people including those who are more exposed than others (such as people residing within 500 feet of freeways and high-volume roadways). Air regulators have also issued guidance on how to address proximity to sources of air pollution (e.g., ARB, *Air Quality and Land Use Handbook*; SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*; EPA, *Policy Assessment for the Review of Particulate Matter National Ambient Air Quality Standards*). While SCAG has no authority to impose mitigation measures on local agencies and project sponsors, mitigation measures will be required by lead agencies at the project level if potential air quality impacts to public health are identified. SCAG has identified some of the potential mitigation measures available to local agencies to reduce impacts from mobile and stationary sources of air pollution (see the new Appendix G to this PEIR). SCAG's role in protecting residents from health risks associated with air pollution is in helping the region meet federal and state air quality standards through preparing the RTP/SCS that facilitates reduced mobile source emissions (including encouraging zero- and/or near zero emission vehicles) and identifies strategies to meet the GHG targets set by CARB. To this end the SCS encourages development near transit facilities that results in reduction of not just GHG emissions but also all mobile source emissions in the region and even more in the 500 foot buffer area. In addition, as part of the 2012-2035 RTP/SCS performance measures, SCAG will monitor the percentage of households living within 500 feet of high-volume roadways. In summary, SCAG reasonably anticipates that regulations will be implemented and enforced at the federal, state and local level to ensure that public health is protected in the region over the timeframe of the 2012-2035 RTP/SCS resulting in a less than significant impact.

Note that courts have determined that CEQA must address the impacts of a project on the environment (for example, changes to transportation infrastructure that might be in proximity to sensitive receptors), but not the impacts of the environment on a project. See *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473 (“[T]he purpose of an EIR is to identify the significant effects of a project on the environment, not the significant effects of the environment on the project.”). Thus, impacts analysis of the air environment on new sensitive receptors in proximity to transportation facilities is not required by CEQA, but in the interest of providing information to the public, this impact is analyzed together with impacts associated with changes to transportation facilities that could impact sensitive receptors.

Page 3.2-32, the third sentence of the first paragraph is revised as follows:

Mitigation measures to reduce air quality impacts would be established in project-specific environmental documents and all projects would have to comply with rules and regulations established by the local air quality districts.

Page 3.2-35 the following is added as a new SCAG measure:

**MM-AQ2:** SCAG shall pursue the following activities in reducing the impact associated with health risk within 500 feet of freeways and high-traffic volume roadways:

- Participate in on-going statewide deliberations on health risks near freeways and high-traffic volume roadways. This involvement includes inputting to the statewide process by providing

available data and information such as the current and projected locations of sensitive receptors relative to transportation infrastructure;

- Work with air agencies including ARB, SCAQMD, and all air districts in the SCAG region to support their work in monitoring the progress on reducing exposure to emissions of PM10 and PM2.5 for sensitive receptors, including schools and residents within 500 feet of high-traffic volume roadways;
- Work with stakeholders to identify planning and development practices that are effective in reducing health impacts to sensitive receptors; and
- Share information on all of the above efforts with stakeholders, member cities, counties and the public.

The following examples of measures for local agencies are also added to the new Appendix G:

**AQ21:** As applicable and feasible, local jurisdictions may investigate the relationship between 1) any increases in PM10 and PM2.5 within 500 feet of freeways in their jurisdiction, and 2) existing sensitive receptors in that area that do not have adequate air filtration to reduce such impacts to a less than significant level. To the extent that existing sensitive receptors are identified that do not have adequate air filtration, local jurisdictions may establish a program by which Project Sponsors can mitigate significant increases in PM10 and PM2.5 (e.g., by paying in to a fund established to retrofit sensitive receptors with HEPA filters when sensitive receptors are located within 500 feet of freeways and high volume roadways that generate substantial diesel particulate emissions).

**AQ22:** As applicable and feasible, project sponsors may plant appropriate vegetation to reduce PM10/PM2.5 when constructing a sensitive receptor within 500 feet of freeways and high volume roadways generating substantial diesel particulate emissions.

**AQ23:** As applicable and feasible, for major transportation projects (especially those that generate substantial diesel particulate emissions) in the region, if health risks are shown to increase significantly at sensitive receptors within 500 feet of a transportation facility, project sponsors are required under CEQA to consider applicable mitigation. Examples include planting appropriate vegetation and retrofitting existing sensitive uses with air filtration to reduce potential health risk impacts to a less than significant level.

Page 3.2-39, the paragraph under the subheading “Increased Population” is revised as follows:

Increasing population adjacent to transportation facilities could expose more people to increased cancer and other health risks. Even though cancer and other health risks adjacent to freeways and railroads would decrease considerably as compared to existing conditions risk levels from mobile sources would remain above the average for the region. Average cancer risk and other health risks associated with air quality are dependent on a number of factors that are not considered here including site specific considerations such as adjacent uses, on-site air filtration, meteorological conditions, and life-style choices (e.g., smoking). As discussed above, it is anticipated that regulations and actions at the federal, state and local level will be implemented to ensure that public health is protected in the region. Regulatory implementation and enforcement together with Mitigation Measures MM-AQ2 and MM-AQ-3 would reduce this impact to a level of less than significant. ~~Mitigation Measure MM-AQ20 would also reduce impacts associated with stationary sources of pollutants.~~

Page 3.2-39, paragraph 7, is revised as follows:

Tables 3.2-7 and 3.2-8 ~~Tables 3.2-4 and 3.2-5~~ show the residential and workplace cancer risk, respectively.

## BIOLOGICAL RESOURCES AND OPEN SPACE

Page 3.3-1, the third sentence of the second paragraph is revised as follows:

In addition, this section describes the existing ecosystems, sensitive species (also referred to as special status species or significant biological resources), and sensitive communities that occur in the SCAG region (shown on **Map 3.3-1** located in Chapter 8 (Maps)) and discusses current threats and protection efforts for these biological resources.

Page 3.3-1, a new sentence has been added after the sentence as follows:

Sensitive species, special status species, and significant biological resources refer to those that have been identified for special reasons at the federal, State, or local levels. An example would be an animal listed on the federal Endangered Species Act.

Page 3.3-3, the third sentence in the first paragraph under Existing Setting is revised as follows:

Habitat categories appropriate for this scale of diversity will be used here, generally following Barbour and Major's (1977) description of major vegetation types, as well as vegetation and habitat descriptions from Holland (1986), Mayer and Laudenslayer (1988), ~~and~~ *California Wildlife: Conservation Challenges from* (CDFG 2007), and Sawyer, Keeler-Wolf and Evens (2009).

Page 3.3-3, the subheading of the last paragraph is revised as follows:

Colorado Desert ~~Scrub~~ Vegetation.

Page 3.3-3, the last paragraph, the following text is added after the fifth sentence as follows:

Vegetation communities found in the Colorado Desert in the SCAG region include active desert dunes, stabilized and partially-stabilized desert dunes, stabilized and partially-stabilized desert sand fields, Sonoran creosote bush scrub, Sonoran mixed woody and succulent scrub, desert saltbush scrub, desert sink scrub, desert sink scrub, desert greasewood scrub, desert dry wash woodland, desert fan palm oasis, arrowweed scrub, crucifixion thorn woodland, and all-thorn woodland.

Page 3.3-3, the seventh, eighth and ninth sentences of the last paragraph are revised as follows:

Species found in the region include creosote bush (*Larrea tridentata*), ocotillo (*Fouquieria splendens*), cholla (*Opuntia* spp.), yucca (~~Y~~*yucca* spp.), desert agave (*Agave deserti*), mesquite (*Prosopis* spp.), catclaw acacia (*Acacia greggii*), and shrubby saltbushes (*Atriplex* spp.). Rare plants found in the region include Orcutt's woody aster (*Xylorhiza orcutti*), Orocopia sage (*Salvia greatae*), ~~and~~ Coachella Valley milk\_vetch (*Astragalus lentiginosus coachellae*) and crown of thorns (*Euphorbia mili*). Desert fan palm oasies woodlands are rare ecological communities found only in the Colorado Desert.

Page 3.3-4, top of the page, the last sentence is revised as follows:

These oasis habitats attract large breeding populations of several species that are not commonly found west of central Arizona, including vermilion flycatchers (*Pyrocephalus rubinus*), brown-crested flycatchers (*Myiarchus tyrannulus*), Lucy's warbler (*Vermivora lucida*), and summer tanager (~~*Piranga*~~ *Piranga rubra*).

Page 3.3-4, the first full paragraph is revised as follows:

Resident birds of the Colorado Desert region include Gambel's quail (*Callipepla gambelii*), black-throated sparrow (*Amphispiza bilineata*), Abert's towhee (*Pipilo aberti*), cactus wren (*Campylorhynchus brunneicapillus*), Crissal thrasher (*Toxostoma dorsale crissale*), phainopepla (*Phainopepla nitens*), white-winged dove (*Zenaida asiatica*), and greater roadrunners (*Geococcyx californianus*).

Page 3.3-4, the second and third paragraphs are revised as follows:

Aside from the red-spotted toad (*Anaxyrus punctatus*) and a few species ~~of toads~~ (*Couch's spadefoot*, *Scaphiopus couchii*, and Rocky Mountain toad, *Anaxyrus woodhousii woodhousii*) along the Colorado River and its tributaries, amphibians are rare or absent from the deserts in the SCAG region. In contrast, ~~a diverse array of reptiles occur~~ diverse arrays of reptiles occur in these desert habitats. ~~Typical~~ Common species include desert night lizards (*Xantusia vigilis*), chuckwalla (*Sauromalus obesus*), desert iguana (*Dipsosaurus draconoides*), western zebra-tailed lizard (*Callisaurus draconoides rhodostictus* ~~Uma spp.~~), long-nosed leopard lizard (*Gambelia wislizenii*), Baja California collared lizard (*Crotaphytus vestigiatus* ~~collaris~~), Colorado Desert sidewinder ~~sidewinders~~ (*Crotalus cerastes laterorepens* ~~Crotalus cerastes~~), Mojave rattlesnake (*C. scutulatus*), and western diamondback rattlesnake (*C. atrox*). Other common desert vertebrates include mule deer (*Odocoileus hemionus hemionus*), bobcat (*Lynx rufus*), desert kangaroo rat (*Dipodomys deserti*), and black-tailed jackrabbit (*Lepus californicus*).

Special status vertebrate taxa found in the Colorado Desert Region ~~Some special status vertebrates found in desert scrub habitat~~ include burrowing owl (*Athene cunicularia*), American badger (*Taxidea taxus*), desert kit fox (*Vulpes macrotis*), Mojave desert tortoise (*Gopherus agassizii*), Bell's sage sparrow (*Amphispiza belli*), silvery legless lizard (*Anniella pulchra pulchra*), Palm Springs round-tailed ground squirrel (*Spermophilus tereticaudus chlorus*), and Peninsular bighorn sheep (*Ovis canadensis nelsoni* ~~dps~~), the desert slender salamander (*Batrachoseps major aridus*), Palm Springs pocket mouse (*Perognathus longimembris bangsi*), Coachella valley fringe-toed lizard (*Uma inornata*), and sandstone night lizard (*Xantusia gracilis*) ~~are special status species endemic to the Colorado Desert Region.~~

Page 3.3-4, the last full paragraph is revised as follows:

**Mojave Desert Scrub Vegetation.** The Mojave Desert covers much of San Bernardino County and extends west into northern Los Angeles County and south into portions of northern Riverside County. It lies in the rain shadow of the southern Sierra Nevada and Southern California's Transverse and Peninsular Ranges, is generally higher in elevation than other regional deserts, and experiences regular winter frosts and occasional snows. Much of the Mojave Desert vegetation and wildlife in the SCAG region is similar to that of the Colorado Desert, but also includes Mojave creosote bush scrub, Mojave mixed woody scrub, Mojave mixed steppe, Mojave wash scrub, rabbitbrush scrub, shadscale scrub, and semi-desert chaparral, Mojavean pinyon woodland, Mojavean juniper woodland and scrub, and Joshua tree woodland. Creosote bush scrub and a variety of saltbush vegetation primarily dominate the Mojave Desert. Other common habitats include desert wash, alkali scrub, and Joshua tree scrub. Joshua trees (*Yucca brevifolia*) cover large areas of the Mojave Desert and are a dominant species of Joshua Tree National Monument east of the San Bernardino Mountain range. Some plants commonly found in Joshua Tree habitat include Mojave yucca (*Y. schidegeraschidigera*), Nevada ephedra (*Ephedra nevadensis*), California buckwheat (*Eriogonum fasciculatum*), Cooper goldenbush (*Ericameria cooperi*), big galleta (*Pleuraphis pleuraphis rigida*), and desert needlegrass (*Achnatherum speciosum*). Rare plant species endemic to this region include ash-gray Indian paint brush (*Castilleja cinerea*), Parish's daisy (*Erigeron parishii*), Cushenbury milk-vetch (*Astragalus albens*), and Cushenbury buckwheat (*Eriogonum ovalifolium* var. *vineum*).

Page 3.3-5, the first full paragraph is revised as follows:

Some special status ~~in~~vertebrates endemic to the Mojave ~~D~~esert include burrowing owl, Swainson's hawk (*Buteo swainsoni*), golden eagle (*Aquila chrysaetos*), desert kit fox, American badger, Inyo California towhee (*Pipilo crissalis eremophilus*), Amargosa vole (*Microtus californicus scirpensis*), Mojave tui chub (*Gila bicolor mohavensis*), Mohave ground squirrel (*Spermophilus mohavensis*), Panamint kangaroo rat (*Dipodomys panamintinus panamintinus*), Saratoga springs pupfish (*Cyprinodon nevadensis nevadensis*), black toad (*Bufo exsul*), and Eagle Mountain scrub jay (*Aphelocoma californica cana*).

Page 3.3-5, under the heading **Beach and Dune (Coastal and Interior)**, the following sentence is added to the end of the first paragraph:

Vegetation communities associated with beach and dunes in the SCAG region includes active coastal dunes, southern foredunes, southern dune scrub, active desert dunes, and stabilized and partially-stabilized desert dunes.

Page 3.3-5, a new last sentence has been added to the fourth full paragraph as follows:

In addition, beaches and dunes provide habitat, especially winter habitat, for burrowing owls.

Page 3.3-5 under subheading **Conifer Forest and Woodland**, the first paragraph is revised as follows and split into two paragraphs after the first added sentence:

The montane and subalpine vegetation in the SCAG region consists of conifer-dominated forests and woodland. These generally occur at elevations of 3,000 feet or more in the Transverse and Peninsular Ranges. Vegetation communities associated with conifer forests and woodlands in the SCAG region includes open digger pine woodland, serpentine digger pine-chaparral woodland, non-serpentine digger pine-chaparral woodland, digger pine-oak woodland, coulter pine forest, bigcone spruce-canyon oak forest, Jeffrey pine forest, Jeffrey pine-fir forest, southern California white fir forest, desert mountain white fir forest, lodgepole pine forest, and southern California subalpine forest.

Species diversity within conifer forests and woodlands varies with elevation At the lower elevations, Coulter pine (*Pinus coulteri*) forms an open woodland, with canyon live oak (*Quercus chrysolepis*), black oak (*Quercus kelloggii*), ponderosa pine (*Pinus ponderosa*), and Jeffrey pine (*Pinus jeffreyi*). At somewhat higher elevations, yellow (ponderosa and Jeffrey) pine forest dominate. Farther upslope, upper montane conifer forests are present, consisting of white fir (*Abies concolor*) and sugar pine (*Pinus lambertiana*), followed by mountain juniper (*Juniperus occidentalis* ssp. *australis*) woodland on open slopes and ridges, and lodgepole pine (*Pinus contorta*) forest on flats and gentle slopes. The highest elevation forests are dominated by limber pine (*Pinus flexilis*). These forests are found at the highest elevations of the San Bernardino Mountains. The actual elevation range of each forest type is dependent on other site factors, such as precipitation, moisture-holding capability of the soil, slope, and aspect.

Page 3.3-6, the second, third and fourth sentences of the first paragraph is revised as follows:

However, there are southern California fell-fields, some treeless areas of talus, meadow, and exfoliating rock, — ~~Alpine vegetation is found in the talus and scree of Mount San Gorgonio and adjoining ridges at elevations over 11,000 feet. Such vegetation includes southern California draba (*Draba corrugata*), southern alpine buckwheat (*Eriogonum kennedyi* var. *alpigenum*) and silky raillardella (*Raillardella argentea*) several species of sedge, rush, and various perennial herbs.~~

Page 3.3-6, the second sentence of the third paragraph is revised as follows:

Many species, including neotropical migrant bird species, use the bark, branches and foliage of these forests, including ~~Great great~~ horned owls (*Bubo virginiana*), hairy woodpeckers, pileated woodpeckers (*Dryocopus pileatus*), olive-sided flycatchers (*Contopus borealis*), western wood pewee (*C. sordidulus*), Steller's jay (*Cyanocitta stelleri*), brown creeper (*Certhia americana*), white-breasted nuthatches (*Sitta carolinensis*), golden-crowned kinglet (*Regulus satrapa*), ~~solitary~~ vireos (*Vireo* spp.), yellow-rumped warbler (*Dendroica coronata*), western tanager (*Piranga ludoviciana*), black-headed grosbeaks, and purple finches (*Carpodacus purpureus*). Black bears (*Ursus americanus*) and black-tailed deer (*Odocoileus hemionus*) also frequent these forests.

Page 3.3-6, the fifth paragraph is deleted as follows:

~~Special status wildlife species associated with conifer forests of the SCAG region include southern rubber boas (*Charina (bottai) umbratica*), and white eared pocket mice (*Perognathus alticolus alticolus*).~~

Page 3.3-6, the first sentence of the sixth paragraph is revised as follows:

The Tecate cypress (*Cupressus forbesii* ~~Cypressus forbesii~~), is a fire-adapted conifer species found only on low fertility soils.

Page 3.3-6, following sentence is added to the end of the sixth paragraph as follows:

Special status wildlife species associated with conifer forests of the SCAG region include southern rubber boas (*Charina (bottae) umbratica*), and white-eared pocket mice (*Perognathus alticolus alticolus*).

Page 3.3-6, the first sentence in the first paragraph under the heading **Hardwood Forests and Woodlands** is revised as follows and a new second sentence is added:

~~Oak dominated w~~ Woodlands and forests are found at low- to mid-elevations of the Transverse and Peninsular Ranges, and in the coastal basins. Vegetation communities associated with hardwood forests and woodlands in the SCAG region include valley oak woodland, interior live oak woodland, coast live oak woodland, open Engelmann woodland, dense Engelmann oak woodland, island oak woodland, walnut woodland, juniper-oak cismontane woodland, coast live oak forest, canyon live oak forest, interior live oak forest, and black oak forest.

Page 3.3-6, the first sentence of the second paragraph under the heading **Hardwood Forests and Woodland** is revised as follows:

The CDFG recognizes valley oak woodland, Engelmann oak woodland, and California walnut woodland as sensitive woodland communities in the SCAG region; however, any oak woodland may be considered protected under the California State Statute Section 21083.4.

Page 3.3-7, the second and third full paragraphs are revised as follows:

Oak foliage and bark attract insects that are important to the diet of birds such as white-breasted nuthatches, ~~plain oak titmice~~ titmouse (*Baeolophus inornatus*), Bewick's wrens (*Thryomanes bewickii*), ruby-crowned kinglets (*Regulus calendula*), American robin (*Turdus migratorius*), ~~solitary vireos~~ Cassin's vireo (*Vireo solitarius cassinii*), Hutton's vireos (*V. huttoni*), warbling vireos (*V. gilvus*), orange-crowned warblers (*Vermivora celata*), Nashville warblers (*V. ruficapilla*), yellow-rumped warblers (~~*Dendroica coronata*~~), black-throated gray warblers (*D. nigrescens*), western tanagers (~~*Piranga*~~



~~Ludoviciana~~, black-headed grosbeaks, fox sparrows (*Passerella iliaca*), northern hooded orioles (*Icterus cucullatus* ~~Icterus galbula~~), and house finches (*Carpodacus mexicanus*).

The grassland understories of oak woodlands offer foraging habitat and cover for Pacific treefrogs (*Pseudacris* (= *Hyla*) *regilla*), western fence lizards (*Sceloporus occidentalis*), California quail (*Callipepla californica*), northern flickers (*Colaptes aureus*), black-tailed hares (*Lepus californicus*), deer mice (*Peromyscus maniculatus*), gray fox (*Urocyon cinereoargenteus*), and black-tailed deer (*Odocoileus hemionus*).

Page 3.3-7, the fifth full paragraph is revised as follows:

Special status wildlife that frequent hardwood forests and woodlands of the SCAG region include mountain lion (*Puma concolor*), San Diego mountain kingsnakes (*Lampropeltis zonata pulchra*), Cooper's hawks (*Accipiter cooperii*), golden eagles (*Aquila chrysaetos*), western yellow-billed cuckoos (*Coccyzus americanus occidentalis*), long-eared owls (*Asio otus*), southwestern willow flycatchers (*Empidonax traillii eximius*), brown-crested flycatchers (*Myiarchus tyrannulus*), and Santa Catalina shrews (*Sorex inornatus willetti*).

Page 3.3-7, the third sentence of the first paragraph under the heading **Grasslands** is replaced as follows:

Vegetation communities associated with grasslands in the SCAG region include valley needlegrass grassland, serpentine bunchgrass, non-native grassland, and wildflower field. ~~The following describes the vegetation and wildlife found in grassland areas, as well as the special status species found.~~

Page 3.3-8, the first full paragraph is revised as follows:

Because grasslands have been greatly reduced in extent, remaining grasslands offer important habitat for raptors, such as golden eagles, northern harriers (*Circus cyaneus*), and black-shouldered white-tailed kites (*Elanus caeruleus*). Turkey vultures (*Cathartes aura*), red-tailed hawk (*Buteo jamaicensis*), Say's phoebes (*Sayornis saya*), western kingbirds (*Tyrannus* ~~Tyrannis~~ *verticalis*), water pipits (*Anthus spinoletta*), horned larks (*Eremophila alpestris*), American crows (*Corvus brachyrhynchos*), lark sparrows (*Chondestes grammacus*), western meadowlarks (*Sturnella neglecta*), black-tailed hares (*Lepus californicus*), California ground squirrels (*Spermophilus beecheyi* ~~beecheyi~~), and black-tailed deer (*Odocoileus hemionus*) are typical wildlife observed in grasslands.

Page 3.3-8, the third full paragraph is revised as follows:

A variety of special status wildlife species occur in grassland habitats of the SCAG region, including mountain plover (*Charadrius montanus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), American badger, western spadefoot toads (*Spea hammondi*), Swainson's hawks (*Buteo swainsoni*), prairie falcons (*Falco mexicanus*), white-tailed kites (*Elanus leucurus*), golden eagles (*Aquila chrysaetos*), burrowing owls (*Athene cunicularia*), Los Angeles pocket mice (*Perognathus longimembris brevinasus*), Stephen's kangaroo rats (*Dipodomys stephensi*), and the Palos Verde blue (*Glaucopsyche* ~~Glaucopsyche~~ *lygdamus palosverdesensis*) and Quino checkerspot (*Euphydryas editha quino*) butterflies.

Page 3.3-8, the subheading **California Chaparral** is revised as follows:

**California Chaparral.**

Page 3.3-8, a new last sentence is added onto the first paragraph under the new subheading **Chaparral** as follows:

Vegetation communities associated with chaparral in the SCAG region includes chamise chaparral, redshank chaparral, semi-desert chaparral, mixed montane chaparral, montane manzanita chaparral, montane ceanothus chaparral, island chaparral, *Ceanothus crassifolius* chaparral, *Ceanothus megacarpus* chaparral, scrub oak chaparral, interior live oak chaparral, and poison oak chaparral.

Page 3.3-8, the first sentence of the fifth full paragraph is revised as follows:

~~One of the~~ The most common chaparral plant species is chamise (*Adenostoma fasciculatum*); other important shrubs include scrub oak (*Quercus berberidifolia*), manzanita (*Arctostaphylos* spp.), and ceanothus (*Ceanothus* spp.) species.

Page 3.3-9, the last sentence of the first partial paragraph is revised and a new last sentence is added as follows:

The CNDDDB lists only the desert monkey grasshopper (*Psychomastix deserticola*) and the Santa Monica shieldback katydid (*Aglaothorax longipennis*) as sensitive species occurring only in this habitat. However, mountain lion, American badger, and San Diego black-tailed jackrabbit also inhabit all coastal scrub communities.

Page 3.3-9, the first sentence of the first paragraph under the subheading **Southern Coastal Scrub** is revised as follows:

**Southern Coastal Scrub.** ~~Coastal sage scrub~~ Southern coastal scrub is a drought-deciduous Mediterranean climate community characterized by soft-leaved, shallow-rooted shrubs.

Page 3.3-9, a new fourth and fifth sentence has been added to the first paragraph under the subheading **Southern Coastal Scrub** and the paragraph split into two after the new fifth sentence as follows:

Vegetation communities associated with southern coastal scrub in the SCAG region includes southern coastal bluff scrub, Venturan coastal sage scrub, maritime succulent scrub, Diegan coastal sage scrub, Riversidean sage scrub, and Riversidean fan sage scrub. The CNDDDB lists three sensitive coastal scrub communities for the SCAG region: southern coastal bluff scrub at localized points along the coast, maritime succulent scrub which occurs on San Clemente and Catalina Islands, and Riversidean alluvial fan sage scrub.

Page 3.3-9, the first sentence of the second full paragraph is revised as follows:

The ~~San Diego~~ Blainville's horned lizard (*Phrynosoma ~~eoronatum~~ blainvillei*), coastal western whiptail (*Aspidoscelis tigris stejnegeri*), orange-throated whiptail (*Aspidoscelis* (~~=*Cnemidophorus*~~) *hyperythra*), San Bernardino kangaroo rat (*Dipodomys merriami parvus*), northwestern San Diego pocket mouse (*Chaetodipus* (~~=*perognathus*~~) *fallax*), and California gnatcatcher (*Polioptila californica*) occur nearly exclusively in coastal sage scrub.

Page 3.3-9, the **Wetlands** heading is revised as follows:

### Watersheds and Wetlands

Page 3.3-9, the seventh sentence of the first paragraph under the new heading **Watersheds and Wetlands** is revised as follows:

This chapter focuses on the habitats and species that occur in the major watersheds in the SCAG region ~~se water bodies~~.

Page 3.3-9, the following text is added after the first paragraph under the new heading **Watersheds and Wetlands** as follows:

**Ventura River.** The Ventura River watershed comprises an area of approximately 223 square miles with a little less than half of it within the Los Padres National Forest. The Ventura River outlets into the Pacific Ocean and has several major tributaries including Matilija Creek, North Fork Matilija Creek, San Antonio Creek, Coyote Creek and Canada Larga. The watershed topography is characterized by rugged mountains in the upper basins transitioning to relatively flat valleys in the lower downstream areas. Over 75 percent of the Ventura River Watershed is classified as rangeland covered with shrub and brush and 20 percent of the basin is classified as forested.<sup>3</sup> Special status species found in the watershed include southern California steelhead (*Oncorhynchus mykiss*), tidewater goby (*Eucyclogobius newberryi*), California red-legged frog (*Rana draytonii*), and least Bell's vireo (*Vireo bellii pusillus*).

**Santa Clara River.** The Santa Clara River is the largest river system in southern California that remains in a relatively natural state. The river originates in the northern slopes of the San Gabriel Mountains in north Los Angeles County, traverses in a westerly direction into Ventura County and discharges into the Pacific Ocean. The river runs approximately 100 miles from its headwater near Acton, California to its outlet, the ocean, and drains an area approximately 1,634 square miles. Approximately forty percent of the watershed is contained in Los Angeles County and 60 percent in Ventura County.<sup>4</sup> Major tributaries include Castaic Creek and San Francisquito Creek in Los Angeles County, and the Sespe, Piru and Santa Paula Creeks in Ventura County. Approximately 60 percent of the watershed is located within Ventura County. About 90 percent of the watershed is located in mountainous terrain, with the remainder consisting of the relatively flat floodplain areas of the Oxnard Plain, Santa Clarita Valley, Castaic Valley, the Santa Clara River Valley, and the floors of the larger canyons including the upper Soledad, lower Sand, Mint, Bouquet, Placerita, San Francisquito, Piru, Santa Paula, and Sespe Canyons.<sup>5</sup>

The biological resources of the Santa Clara River are impressive. Downstream from Santa Clarita there are still very extensive riparian woodlands of willow (*Salix* spp.) and cottonwood (*Populus fremontii*), changing to riparian scrub in Ventura County. The river contains at least six recognized natural communities, many of which are very rare: southern coastal salt marsh, subtidal estuarine, southern riparian scrub, cottonwood-willow riparian woodland, alluvial fan sage scrub and riverine. The riparian forest is home for a host of bird species, including the endangered least Bell's vireo, and the unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*), a small endangered fish, and California red-legged frog inhabits the river's upper reaches (San Francisquito Creek). The estuary supports the western snowy plover (*Charadrius alexandrinus nivosus*), least tern (*Sternula antillarum*), and tidewater goby, all federally listed as endangered. Other special status fish that are found in the river include Pacific lamprey (*Lampetra tridentata*), steelhead trout, Santa Ana sucker (*Catostomus santaanae*), and arroyo chub (*Gila orcutti*). Arroyo toad (*Anaxyrus californicus*) is found within Sespe and Piru creeks. Overall,

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<sup>3</sup>Ventura County Watershed Protection District, Ventura River, 2011, available at: [http://portal.countyofventura.org/portal/page/portal/PUBLIC\\_WORKS/Watershed\\_Protection\\_District/Watersheds/Ventura\\_River](http://portal.countyofventura.org/portal/page/portal/PUBLIC_WORKS/Watershed_Protection_District/Watersheds/Ventura_River), accessed March 9, 2012.

<sup>4</sup>Los Angeles Department of Water and Power, Upper Santa Clara River Watershed Integrated Regional Water Management Plan, 2007, available at: <http://www.ladpw.org/wmd/scr/>, accessed March 9, 2012.

<sup>5</sup>Ventura County Watershed Protection District, Santa Clara River, 2011, available at: [http://portal.countyofventura.org/portal/page/portal/PUBLIC\\_WORKS/Watershed\\_Protection\\_District/Watersheds/Santa\\_Clara\\_River](http://portal.countyofventura.org/portal/page/portal/PUBLIC_WORKS/Watershed_Protection_District/Watersheds/Santa_Clara_River), accessed March 9, 2012.

14 resident bird species are listed as endangered or of special concern, and 6 plant species are endangered or candidates for listing.<sup>6</sup>

Threats to the ecological health of the river include urban development, channelization, oil spills, stormwater runoff pollution, and the possible resumption of large-scale aggregate mining in the channel. In addition, we need to consider the valuable agriculture of the valley. Orchards and row crops stretch across the wider valley floor in Ventura County, extending up adjacent slopes. The California coast is the third most threatened agricultural region in the nation. The long-term protection of these rich farmlands is of great importance to society (The River Project 2011a).

**Calleguas Creek.** The Calleguas Creek Watershed is located in coastal southern California, primarily in Ventura County, with the easternmost end of the watershed in western Los Angeles County. The watershed is approximately 30 miles long and 14 miles wide with a drainage area of approximately 344 square miles. Currently, surface water flow is discharged to Mugu Lagoon through Calleguas Creek, which drains approximately 264 sq. miles, Revolon Slough, which drains approximately 59 sq. miles, and the southwestern Oxnard Plain, which drains approximately 21 sq. miles. Vegetation found in the creek includes mulefat scrub, mixed willow Scrub, blue elderberry scrub, arroyo willow woodland, California sycamore woodland, mixed willow woodland, scalebroom (*Lepidospartum squamatum*) scrub, and freshwater marsh and salt marsh.<sup>7</sup>

Special status species from the Calleguas Creek watershed includes Santa Ana sucker, California red-legged frog, and least Bell's vireo. The salt marsh and intertidal mudflats of Mugu Lagoon are important habitats for species using the lagoon and offshore area. Mugu Lagoon, which forms an integral part of the Pacific Flyway, is vital for 7 federally and/or state threatened and/or endangered species; 3 protected marine mammals, 30 species which are candidates for listing, and 36 state species of special concern. Some of the endangered species in the area are the California brown pelican (*Pelicanus occidentalis californicus*), light-footed clapper rail (*Rallus longirostris levipes*), California least tern (*Sterna antillarum browni*), American peregrine falcon (*Falco peregrinus*), and Belding savanna sparrow (*Passerculus sandwichensis beldingi*).<sup>8</sup>

**Malibu Creek.** The Malibu Creek Watershed is located in the northwest corner of Los Angeles County. It is bounded on the north, west, and east by the Santa Monica Mountains and on the south by the Pacific Ocean. The watershed area is comprised of approximately 109 square miles. Its major tributaries are Las Virgenes Creek., Triunfo Creek, and Cold Creek. The watershed is comprised of all or parts of the Cities of Agoura Hills, Calabasas, Malibu, Thousand Oaks, Westlake Village, unincorporated Los Angeles County, and Ventura County. Three special status species are found in the creek: tidewater goby (Malibu Lagoon), southern California steelhead, and California red-legged frog (Upper Las Virgenes Creek).<sup>9</sup>

**Ballona Creek.** Ballona Creek is a nine-mile long flood protection channel that drains the Los Angeles basin, from the Santa Monica Mountains on the north, the Harbor Freeway (110) on the east, and the Baldwin Hills on the south. The Ballona Creek Watershed totals about 130 square miles. Its land use consists of 64 percent residential, 8 percent commercial, 4 percent industrial, and 17 percent open space. The major tributaries to the Ballona Creek include Centinela Creek, Sepulveda Canyon Channel,

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<sup>6</sup>The River Project, The Santa Clara River Watershed, 2011, available at: <http://www.theriverproject.org/learn/know-your-watershed/the-santa-clara-river-watershed>, accessed March 9, 2012.

<sup>7</sup>David Magney Environmental Consulting, 2000, Calleguas Creek Watershed Wetland Restoration Plan, October 2000, (PN 97-0141.) Ojai, California, with Geo InSight International, Secor International Incorporated, and Wildlands, Inc. Prepared for California State Coastal Conservancy, Oakland, California and U.S. Environmental Protection Agency, San Francisco, California.

<sup>8</sup>Calleguas Municipal Water District. 2004, Calleguas Creek Watershed Management Plan Phase 1, available at: <http://www.calleguas creek.org/ccwmp/index.asp>, accessed on March 9, 2012.

<sup>9</sup>The River Project, 2011, The Malibu creek Watershed, available at: <http://www.theriverproject.org/learn/know-your-watershed/the-malibu-creek-watershed>, accessed March 9, 2012.

Benedict Canyon Channel, and numerous storm drains.<sup>10</sup> The Ballona Wetlands once stretching from Playa del Rey to Venice, occupied a 2,000-acre expanse of critical coastal habitat. Now covering a 600-acre area, the Ballona Wetlands Ecological Reserve represents the largest opportunity for coastal wetland restoration in Los Angeles County. The site is owned by the state of California and managed by the California Department of Fish and Game as an ecological reserve. The State Coastal Conservancy and the California State Lands Commission are participating partners in the planning and restoration of the wetlands.<sup>11</sup>

**Los Angeles River.** The Los Angeles River Watershed covers a land area of 834 square miles. The eastern portion spans from the Santa Monica Mountains to the Simi Hills and in the west from the Santa Susana Mountains to the San Gabriel Mountains.<sup>12</sup> The Los Angeles River begins just beyond the Canoga Park High School football field in the San Fernando Valley, at the confluence of Bell Creek and Calabasas Creek, which flow down from the Santa Susana and Santa Monica Mountains. The river flows southeast, joined by Santa Susana, Browns, Dayton, Chatsworth, Limekiln, Wilbur, Aliso, Woodley, Pacoima and Burbank creeks, that drain the mountains ringing the Valley. The river in the west valley is a now a concrete trapezoid channel.<sup>13</sup>

The watershed encompasses and is shaped by the path of the Los Angeles River, which flows from its headwaters in the mountains eastward to the northern corner of Griffith Park. Here the channel turns southward through the Glendale Narrows before it flows across the coastal plain and into San Pedro Bay near Long Beach. The Los Angeles River has evolved from an uncontrolled, meandering river providing a valuable source of water for early inhabitants to a major flood protection waterway (LADWP, 2012). The Los Angeles River Watershed has diverse patterns of land use. Forest or open space covers the upper half of the watershed, while the remaining watershed is highly urbanized with commercial, industrial, or residential uses. There are 22 lakes within its boundaries. In addition, there are a number of spreading grounds in the watershed including sites at Dominguez Gap, the Headworks, Hansen Dam, Lopez Dam, and Pacoima Dam. The Los Angeles River is hydraulically connected to the San Gabriel River through the Rio Hondo, although this occurs primarily during large storm events.<sup>14</sup>

At the Sepulveda Basin more than three miles of the river are all but undisturbed, allowing the growth of willows, reeds and other vegetation and giving us a glimpse of the natural river. The Sepulveda Basin is a dry reservoir, a 2.25-square mile emergency flood-control feature behind a 57-foot earthen dam. Tributaries joining the river in the Basin are Bull Creek, Hayvenhurst Creek and Haskell Creek. Along Haskell Creek is a 225-acre wildlife reserve that serves as protected habitat for hundreds of species. From the Sepulveda Basin, the river flows as a concrete box channel east through the San Fernando Valley. Big Tujunga Wash drains the northwestern San Gabriel Mountains. Starting high in the Angeles National Forest and running wild until it encounters Hansen Dam in Sun Valley, it then becomes a concrete box channel. The Arroyo Seco drains the southwestern section of the San Gabriel Mountains. Starting high in the San Gabriel Mountains and running through Pasadena near the Rose Bowl, it continues through South Pasadena to meet the LA River just north of Downtown Los Angeles.<sup>15</sup>

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<sup>10</sup>Los Angeles Department of Water and Power, 2012, Ballona Creek Watershed, available at: <http://ladpw.org/wmd/watershed/bc/>, accessed March 9, 2012.

<sup>11</sup>Ballona Wetlands Restoration Project 2012, Project Overview, available at: <http://www.santamonicaabay.org/smbay/ProgramsProjects/HabitatRestorationProject/BallonaProjectOverview/tabid/184/Default.aspx>, accessed on March 9, 2012.

<sup>12</sup>(Los Angeles Department of Water and Power, 2012, Los Angeles River Watershed, available at: <http://ladpw.org/wmd/watershed/la/>, accessed March 9, 2012.

<sup>13</sup>The River Project, 2011, The Santa Clara River Watershed, available at: <http://www.theriverproject.org/learn/know-your-watershed/the-los-angeles-river-watershed>, accessed March 9, 2012.

<sup>14</sup>The River Project, 2011, The Santa Clara River Watershed, available at: <http://www.theriverproject.org/learn/know-your-watershed/the-los-angeles-river-watershed>, accessed March 9, 2012.

<sup>15</sup>*Ibid.*

While the majority of the Los Angeles River is a concrete channel, existing natural vegetation communities include coastal and valet freshwater marsh (dominated by *Typha* spp. and *Scirpus* spp.), southern cottonwood-willow forest (dominated by open *Salix* spp. and *Populus fremontii*), riparian forest, southern willow scrub (dominated by dense *Salix* spp.), and mulefat scrub (dominated by *Baccharis salicifolia*).<sup>16</sup> Special status species found in the river and its tributaries include arroyo toad (Big Tujunga, Mill, and Alder creeks), least Bell's vireo (Sepulveda Basin, Big Tujunga Wash, and Glendale Narrows), and two-striped gartersnake (*Thamnophis hammondi*).

**San Gabriel River.** The San Gabriel River flows from the San Gabriel Mountains, in the Angeles National Forest. Its tributaries drain portions of the Chino, San Jose, and Puente Hills. The major tributaries of the San Gabriel River include the West Fork of the San Gabriel, Walnut Creek, San Jose Creek, and Coyote Creek. The most substantial remaining historic wetlands associated with the river include El Dorado wetlands near the confluence of Coyote Creek and the San Gabriel River, and Los Cerritos wetlands near the mouth of the San Gabriel River (Bixby Ranch and Hellman Ranch), which are degraded from oil drilling operations. The upper San Gabriel River and its tributaries remain in a relatively pristine state. However, the river has been extensively modified in the middle and lower reaches for flood management. The lowest reach of the river is concrete-lined channel for approximately eight miles, with riprap banks and soft-bottom channel upstream of the concrete-lined channel and near the river mouth where it is under tidal influence. Flood protection efforts began along the San Gabriel River in 1932 with construction beginning on three dams in the upper reaches of the river. Cogswell Dam, on the West Fork, was completed in 1934. Morris Dam was completed in 1935 and San Gabriel Dam was completed in 1939. Two dams on the coastal plain, the Santa Fe Dam and the Whittier Narrows Dam, were completed in 1949 and 1957, respectively.<sup>17</sup>

Riparian corridors occur along streams in the San Gabriel Mountains and the upper and middle reaches of the San Gabriel River, including Walnut and San Jose Creeks. Freshwater stream habitat also occurs in the upper San Gabriel River and streams in the San Gabriel foothills, Puente and Chino Hills, and the Whittier Narrows. The estuaries of the river provide habitat for fish and a variety of birds. The upper San Gabriel River basin supports high quality riparian habitat and oak woodland. Riparian areas in the Whittier Narrows reach of the San Gabriel River contain freshwater marsh communities and riparian forest, although non-native species are increasingly prevalent. These riparian habitats support hundreds of species of birds, dozens of native plants, and a variety of mammals and reptiles. Native fish species vary. The upper San Gabriel River and the creeks in the mountains and foothills support trout, arroyo chub, Santa Ana sucker and Santa Ana speckled dace (*Rhinichthys osculus*) (The California Resources Agency, 2001). Additional special status species associated with riparian habitats include western pond turtle (*Actinemys marmorata*) and least Bell's vireo.

**Santa Ana River.** The Santa Ana River watershed, depicted in Figure 2-2, catches stormwater draining a 2,847-square-mile area and channels it into the Pacific Ocean at the City of Huntington Beach. The Santa Ana River, flowing over 100 miles, drains the largest coastal stream system in Southern California including parts of Orange, Riverside, and San Bernardino Counties, as well as a sliver of Los Angeles County. The total length of the River and its major tributaries are about 700 miles. Major tributaries include Bear Creek, Mill Creek, City Creek, Lytle Creek, Temescal Creek, Chino Creek, Aliso Creek, and Santiago Creek. The San Jacinto River, part of the Santa Ana Watershed, starts in the San Jacinto Mountains, runs westerly through Canyon Lake and normally ends in Lake Elsinore. In wet years, the San Jacinto River will overflow the lake and connect with the Santa Ana River. Flood flows produce a

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<sup>16</sup>Sapphos Environmental, 1996, Los Angeles River Master Plan, available at: <http://dpw.lacounty.gov/wmd/watershed/LA/LARMP/>, accessed March 9, 2012.

<sup>17</sup>The California Resources Agency, 2001, Common Ground-from the Mountains to the Sea-Watershed and Open Space Plan-San Gabriel and Los Angeles Rivers, available at: [http://www.rmc.ca.gov/plans/common\\_ground/Common%20Ground.pdf](http://www.rmc.ca.gov/plans/common_ground/Common%20Ground.pdf), accessed March 9, 2012.

broad, shallow wetlands area called Mystic Lake near the northernmost point of the river.<sup>18</sup> Its headwaters are located high above the valley floors of the Inland Empire, in the peaks of the San Bernardino National Forest. The watershed is divided into two sections the Upper and Lower Watershed. Between the San Gorgonio Peak east of Big Bear and Prado Basin at the 91 and 71 freeways is the Upper Watershed. South of the Prado Basin to the Pacific Ocean is the Lower Watershed. The Orange County Water District owns 2,150 acres behind Prado Dam in Riverside County, California.<sup>19</sup>

The Santa Ana River's outlet to the ocean was relocated in 1890 and is presently found in Huntington Beach. However it has been as far north as Anaheim Bay and as far south as Newport Bay. This change in the outlet's location was due to significant weather events. Concrete lines the channel from just north of Imperial Highway to the Pacific Ocean and unfortunately most of Orange County's portion of the River is channelized. In more pristine areas of the River it is bound by natural features such as willows, cottonwoods and live oaks (Santa Ana River Alliance, 2012).

The varied geography and natural features of the Santa Ana Watershed provide habitat for a number of federally and/or State-listed species. The Santa Ana River aquatic, wetland, riparian, or riparian-adjacent habitats support, a variety of species. Of these, two are plants, the Santa Ana River woolly star (*Eriastrum densifolium*) and slender-horned spine flower (*Dodecahema leptoceras*); one fish, the Santa Ana River sucker; one amphibian, the arroyo toad; three birds, the least Bell's vireo, southwestern willow flycatcher (*Empidonax traillii extimus*), and bald eagle (*Haliaeetus leucocephalus*); two mammals, the San Bernardino kangaroo rat (*Dipodomys merriami parvus*) and Stephen's kangaroo rat (*Dipodomys panamintinus*); and one insect, the Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*).

**Newport Bay Watershed.** The Newport Bay Watershed is sandwiched between the San Joaquin Hills to the north and the Santiago Hills to the south, which force surface flow onto the central, flat Tustin plain. The Pacific Ocean comprises 13.5 miles of the watershed's western border. Coastal foothills accent the alluvial and coastal plains between the two mountain ranges. In total, the watershed drains 150 square miles, which encompasses all water draining to Newport Bay. Peters Canyon Wash, San Diego Creek, and Santa Ana Delhi Channel are the watershed's major tributaries. Newport Bay Watershed falls within the South Coast Hydrologic Region. Land in the Newport Bay Watershed is highly developed. Forty-seven percent of the landscape is urban, four percent agriculture, and forty-nine percent open space. Major cities include Santa Ana, Tustin, Irvine, Costa Mesa, and Newport Beach.<sup>20</sup>

Upper Newport Bay Ecological Reserve is a shallow 752-acre estuary, a place where saltwater from the Pacific Ocean flows and mixes with fresh water from San Diego Creek. It is also here that plants, insects, fish and other inhabitants long ago adapted to Newport Bay's climate, landforms and soils. Six threatened or endangered bird species inhabit the area and the Bay is Southern California's largest estuary and a major stopping place for birds migrating along the Pacific Flyway. The six endangered species that take refuge in Upper Newport Bay are the California least tern, Belding's Savannah sparrow, brown pelican (*Pelecanus occidentalis*), coastal California gnatcatcher, peregrine falcon (*Falco peregrinus*), and light-footed clapper rail (*Rallus longirostris levipes*).<sup>21</sup>

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<sup>18</sup>EIP Associates, 2002, Santa Ana Integrated Watershed Plan, Volume 2: Environmental and Wetlands Component, available at: [http://www.swrcb.ca.gov/waterrights/water\\_issues/programs/hearings/santa\\_ana\\_river/exhibits/all\\_applicants/app\\_joint2\\_20\\_4.pdf](http://www.swrcb.ca.gov/waterrights/water_issues/programs/hearings/santa_ana_river/exhibits/all_applicants/app_joint2_20_4.pdf), accessed March 9, 2012.

<sup>19</sup>Santa Ana River Alliance, 2012, About the Watershed, available at: <http://www.santaanariverwatershed.org/sar-watershed.html>, accessed March 9, 2012.

<sup>20</sup>See Section 3.13 Water Resources of this PEIR.

<sup>21</sup>Andersen, C. 2012, Upper Newport Bay Ecological Reserve, available at: <http://www.dfg.ca.gov/lands/articles/upnewpbay01.html>, accessed March 9, 2012.

**San Juan Creek.** The San Juan Creek Watershed covers 159.98 square miles and includes portions of the cities of Dana Point, Laguna Hills, Laguna Niguel, Mission Viejo, Rancho Santa Margarita, and San Juan Capistrano. Its main tributary, San Juan Creek, originates in the Santa Ana Mountains district of the Cleveland National Forest in the easternmost part of Orange County. The Arroyo Trabuco, Oso Creek, and are smaller tributaries.<sup>22</sup> Special status species associated with riparian habitats of San Juan Creek include tidewater goby, arroyo toad, and least Bell's vireo.

**Whitewater River and the Salton Sea.** The Whitewater River begins on the slopes of San Gorgonio Mountain in the San Bernardino National Forest. Certain reaches of the river are perennial (primarily in the upper reaches), while other portions are intermittent or ephemeral. The river winds through rugged canyons in the San Bernardino Mountains and for a short distance across the western portion of the Coachella Valley. Tributaries include San Gorgonio River, Chino Creek, Tahquitz Creek, Palm Canyon Creek and Deep Creek. The surface water of the river disappears beneath the highly permeable alluvial soils a short distance south of I-10. Southerly water flow is limited to subsurface flow except after heavy rain events. Portions of the lower reaches have been channelized to control flooding and to convey floodwaters to the Salton Sea. Special status species associated with the Whitewater River include Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae*) and triple-ribbed milk-vetch (*Astragalus tricarinatus*).

The Salton Sea is California's largest lake and famous for its sport fishery and recreational uses. It is about 35 miles long and 9-15 miles wide with approximately 360 square miles of water surface and 105 miles of shoreline. The surface of the sea lies approximately 232 feet below sea level. One of the major functions of the Salton Sea is to serve as a sump for agricultural wastewater for the Imperial and Coachella Valleys. Executive Order of Withdrawal (Public Water Reserve No. 114, California No. 26), signed in 1928, designated lands within the Salton Basin below elevation 220 feet below MSL as storage for wastes and seepage from irrigated lands in the Imperial Valley. Approximately 75 percent of the freshwater inflow to the sea is agricultural drain water from Imperial Valley. As the sea has no outlets, salts concentrate in it and nutrients increase the formation of eutrophic conditions. Currently, the Sea is 25 percent saltier than the ocean, with salinity increasing at approximately one percent per year. The sea supports a National Wildlife Refuge and is a critical stop on the Pacific Flyway for migrating birds, including several state and federal listed endangered and threatened species. The Salton Sea National Wildlife Refuge was established in 1930 to preserve wintering habitat for waterfowl and other migratory birds.<sup>23</sup> Special status species associated with the Salton Sea include desert pupfish (*Cyprinodon macularius*) and Yuma clapper rail (*Rallus longirostris yumanensis*).

**Mojave River.** The Mojave River Watershed encompasses approximately 4,500 square miles and is located entirely within San Bernardino County and includes the West Fork of Mojave River and Deep Creek. The primary geographic and hydrologic feature of the watershed is the Mojave River. The headwaters of the Mojave River are in the San Bernardino Mountains, which annually receives greater than 40 inches of precipitation at its highest elevations. The Mojave River channel, through both surface and subsurface flow, transects the watershed a linear distance of approximately 120 miles to its terminus at Silver Dry Lake near the Community of Baker. Aside from intense storm events, the Mojave River channel is typically dry downstream of the Mojave Forks Dam except in select locations where ground water is forced to the surface by geologic structures.<sup>24</sup> This includes Mojave Narrows near Victorville and Afton Canyon, where willow-cottonwood woodlands provide a stark contrast. Special status species associated with the Mojave River habitat includes Mohave tui chub (*Gila bicolor mohavensis*), arroyo

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<sup>22</sup>Orange County Public Works, 2012, San Juan Creek Watershed, available at: <http://www.ocwatersheds.com/SanJuanCreek.aspx>, accessed March 9, 2012.

<sup>23</sup>State Water Resources Control Board, 2011, Salton Sea Transboundary Watershed, available at: [http://www.waterboards.ca.gov/rwqcb7/water\\_issues/programs/salton\\_sea/watershed.shtml](http://www.waterboards.ca.gov/rwqcb7/water_issues/programs/salton_sea/watershed.shtml), accessed March 9, 2012.

<sup>24</sup>Lahontan Regional Water Quality Control Board, 2005, Watershed Management Initiative Chapter, available at: [http://www.waterboards.ca.gov/rwqcb6/water\\_issues/programs/watershed\\_management](http://www.waterboards.ca.gov/rwqcb6/water_issues/programs/watershed_management), accessed March 9, 2012.



toad, least Bell's vireo, southwestern willow flycatcher, and Mojave River vole (*Microtus californicus mohavensis*).

**Antelope-Fremont Valleys Watershed.** The Antelope-Fremont Valley Watershed straddles Kern and Los Angeles County, and is bordered on the southwest by the San Gabriel Mountains, on the northwest by the Tehachapi Mountains, and on the east by a series of hills and buttes that follow the San Bernardino County line. Numerous streams originate in the mountains and foothills surrounding the valley and flow across the valley floor before eventually pooling in the dry lakes adjacent to the county line. It's located in the South Lahontan Hydrologic region. The watershed drains a total of 12,000 square miles within Los Angeles County. Three of the major tributaries are Big Rock Creek and Little Rock Creek (supports arroyo toad) that run from the San Gabriel Mountains. The Los Angeles Aqueduct also runs 180 miles through the watershed. Reservoirs include the California Aqueduct, Fairmont Reservoir, and Littlerock Reservoir. Major cities within the Los Angeles County portion of the watershed include Lancaster and Palmdale (TAHA, 2010).

**Colorado River.** The SCAG region is bounded on the east by the lower portion of the Colorado River. This portion has habitats that support special status species that includes razorback sucker (*Xyrauchen texanus*) Arizona Bell's vireo (*Vireo bellii arizonae*), California black rail (*Laterallus jamaicensis coturniculus*), Gila woodpecker (*Melanerpes uropygialis*), western yellow billed cuckoo (*Coccyzus americanus occidentalis*), and Yuma clapper rail.

### **Vernal Pools**

The necessary conditions—climate, topographic depressions and soils with poor drainage—for the formation of the ephemeral wetlands known as vernal pools, are all present in southern California and northern Baja California, Mexico, as they are in other parts of California and southern Oregon. Pools occur either on gently sloping mesas standing above the primary drainages or in valleys at the low end of a watershed. In the latter case, the pools may be quite large and warrant the name “vernal lake” rather than “vernal pool.” Unlike the Great Valley, southern California and Baja California never had expanses of pools stretching for hundreds of miles. Pool landscapes are, and always have been, fragmented by mountains and the discontinuity of suitable soils and/or microtopography. This, coupled with a complex regional geology, produces great variation among pool groups in underlying parent material, soil properties, hydrology, micro- and landscape-level topography and sub-regional climate. Not surprisingly, distribution of the floral and faunal elements reflects the wide array of habitat conditions.<sup>25</sup>

Within the SCAG region, larger vernal pool complexes are known from Ventura, Los Angeles, and Riverside counties. The description of each is from Keeler-Wolf et al.<sup>26</sup>

The Santa Barbara Vernal Pool Region covers all of southern and western Santa Barbara County from the Santa Maria area south and east to the western portion of Ventura County adjacent to Ojai and the Ventura River drainage. Two small outlier areas are also included: the upper Santa Clara River Basin (Los Angeles County) and the Simi Valley. Further research may link some of these outliers more closely with other southern California regions. This region includes portions of two geomorphic provinces, the South Coast Ranges and the Transverse Ranges. However, pools in both provinces occur on soils derived from similar sedimentary and weakly metamorphosed sedimentary rocks. Some of the largest pools in the region occur in shallow basins in the outlier areas of Simi Valley and the Upper Santa

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<sup>25</sup>Bauder, E.T. and S. McMillan, 1998, Current distribution and historical extent of vernal pools in southern California and Baja California, Mexico. Pages 56-70 in: C.W. Witham, E. Bauder, D. Belk, W. Ferren, and R. Ornduff (Editors). Ecology, Conservation, and Management of Vernal Pool Ecosystems – Proceedings from a 1996 Conference, California Native Plant Society, Sacramento, CA.

<sup>26</sup>Keeler-Wolf, T., D.R. Elam, K. Lewis, and S.A. Flint, 1998, California Vernal Pool Assessment Preliminary Report, available at: <http://www.dfg.ca.gov/biogeodata/wetlands/pdfs/VernalPoolAssessmentPreliminaryReport.pdf>, accessed March 9, 2012.

Clara River. Due to their geographic proximity to the Los Angeles Basin and the Peninsular Ranges they are more similar floristically to pools in those areas than to other pools in the region. Hydrology is likely to be flashy in the smaller pools and in pools with sandy soils and more persistent in the larger, deeper clay-soil pools. Special status species associated with these pools include California Orcutt grass (*Orcuttia californica*), spreading navarretia (*Navarretia fossalis*), and San Diego fairy shrimp (*Branchinecta sandiegonensis*).

The Western Riverside County Vernal Pool Region encompasses the western part of Riverside County including the Perris Basin of the lower San Jacinto River Valley, several small basins in the area between Temecula and Lake Skinner, and the Santa Rosa Plateau area southwest of Lake Elsinore. Also included is the Hidden Lake pool in the montane zone of the San Jacinto Mountains. The region lies between the Santa Ana Mountains to the west and the Santa Rosa and San Jacinto mountains to the east. The area is geographically defined as part of the Peninsular Range but contains a variety of vernal pool situations ranging from alkali alluvial clay bottom lands, to high montane basins, and volcanic plateaus. A reduced subset of pools is scattered in the few remaining non-developed areas of the region. The Santa Rosa Plateau portion of this region contains several rare south coast vernal pool species including the recently described Santa Rosa Plateau fairy shrimp (*Linderiella santarosae*). It also contains the southern-most population of the vernal pool fairy shrimp (*Branchinecta lynchii*). The Hidden Lake pool is the only known locality for the Hidden Lake bluecurls (*Trichostema austromontanum* ssp. *compactum*). The pools and adjacent vernal moist alkali flats of the San Jacinto Valley near Hemet have the rare endemic San Jacinto Valley crownscale (*Atriplex coronata* ssp. *notatior*). All of these endemic species are characteristic restricted species for this region (Keeler-Wolf et al. 1998).

Page 3.3-10, Table 3.3-1, the wetlands of Baldwin Lake, Big Bear Lake, Diamond Valley, Lake Skinner, and Prado Basin have been added.

Page 3.3-10, the first paragraph is deleted as follows:

~~Vernal pools are a special example of interior wetlands. They are seasonal freshwater pools that form in depressions over an impermeable soil layer (claypan or hardpan) or parent material. Annual species with low cover and a short life cycle primarily comprise the vegetation in vernal pools. The vernal pools of the Santa Rosa Plateau are isolated from other areas of California in the Central Valley and San Diego County, and they support a distinctive flora with a number of endemic species. Special status invertebrates found in Riverside County vernal pools include the vernal pool fairy shrimp (*Branchinecta lynchi*) and the Riverside fairy shrimp (*Streptocephalus woottoni*).~~

Page 3.3-11, the first sentence of the third full paragraph is revised as follows:

Special status wildlife associated with freshwater marshes of the SCAG region include California red-legged frogs (*Rana aurora draytonii*), southwestern pond turtles (*Actinemys* (= *Clemmys*) *marmorata pallida*), great blue herons (*Ardea herodias*), great egrets (*A. alba*), tricolored blackbirds (*Agelaius tricolor*), and bald eagles (*Haliaeetus leucocephalus*).

Page 3.3-13, the second sentence of the second full paragraph is revised as follows:

Riparian habitats in the SCAG region support small populations of special status wildlife species such as mountain lion, least Bell's vireos (*Vireo bellii pusillus*), burrowing owls, southwestern willow flycatchers (*Empidonax traillii extimus*), yellow warblers (*Dendroica petechia brewsteri*), arroyo toads (*Bufo californicus*), spadefoot toads (*Spea hammondi*), and southwestern pond turtles (*Actinemys* (= *Clemmys*) *marmorata pallida*).

Page 3.3-13, the third sentence of the second paragraph under the heading **Coastal Marine Resources** is revised as follows:

These include the federally endangered brown pelican and ~~(*Pelecanus occidentalis*)~~, gray whale ~~(*Eschrichtius robustus*)~~ and the sea otter (*Enhydra lutris*).

Page 3.3-14, the second full paragraph a new second sentence is added as follows:

Agricultural lands provide nesting and/or foraging habitat for burrowing owls, tricolored blackbirds, Swainson's hawks and other raptors, mountain plovers, shorebirds, waterfowl, several species of passerines, and mule deer.

Page 3.3-36, the first sentence is revised as follows:

Major threats to biological resources in the SCAG region include habitat loss, fragmentation and degradation, increased urbanization, water diversion projects, flood control, surface mining, encroachment of non-native, invasive species, and other human activities, such as off-road vehicle activity.

## **GREENHOUSE GASES**

Page 3.6-6, paragraph 4, is revised as follows:

**Assembly Bill 811 (AB 811).** AB 811 (2008) authorizes California cities and counties to designate districts within which willing property owners may enter into contractual assessments to finance the installation of renewable energy generation and energy efficiency improvements that are permanently fixed to the property. These financing arrangements would allow property owners to finance renewable generation and energy efficiency improvements through low-interest loans that would be repaid as an item on the property owner's property tax bill. The contractual assessments could not be used to finance the purchase or installation of appliances that are not permanently fixed to the real property.

Page 3.6-7, paragraph 3, is revised as follows:

**Riverside County.** Riverside County is in the process of developing a Climate Action Plan. The Draft Climate Action Plan was not available when this discussion was completed. Riverside County has created a Green Action Plan to establish a clear path to sustainability and GHG reduction. The Green Action Plan focuses on seven key areas: Energy, Greenhouse Gas Emissions, Waste, Urban Design, Urban Nature, Transportation and Water. The Energy section of the guidebook includes goal to increase the use of non-greenhouse gas emitting energy to 70 percent with at least 50 percent coming from renewable sources by 2020. The Plan has established a target to reduce GHG emissions by 7 percent below 1990 baseline and 15 percent below the baseline by 2020. The County aims to reduce waste by 75 percent by 2020 based on the 2007 per capita baseline. The Plan also provides incentives to increase green development and encourage the planting of at least 3,000 shade trees on private property and 1,000 trees in parks annually. For Transportation, the Plan envisions a 15 percent decrease in vehicle miles traveled by 2015 based on the 2009 baseline. The waters section specifies a 20 percent water usage reduction by 2020 while increasing the use of recycled water by 30 percent by 2020 based on the 2008 baseline.

Page 3.6-15, the second sentence of the fifth (and final) paragraph is revised as follows:

Baseline (2005) emissions are estimated to be 132 ~~142~~ million metric tons (MMT) of CO<sub>2</sub>e compared to an estimated 130 ~~144~~ MMT of CO<sub>2</sub>e under existing (2011) conditions.

Page 3.6-18, the first complete paragraph, the following is added after the first sentence:

Congestion relief projects reduce transportation network GHG emissions due to reduced idling. Consistent with the SB 375 Regional Targets Advisory Committee's recommendation in its final report to the ARB, the 2012-2035 RTP/SCS includes projects and strategies designed to smooth extreme congestion to reduce GHG emissions. These include toll roads, express lanes, HOT lanes, HOV lanes, and dedicated truck toll lanes. In addition, congestion pricing is a powerful transportation demand management tool incorporated in the 2012-2035 RTP/SCS for reducing GHG emissions. SCAG has launched a two-year study of congestion pricing strategies that can provide needed transportation facilities, while reducing the region's GHG emissions associated with vehicle trips. Orange County's toll road network is a prime example of priced congestion relief projects. The toll roads have variable pricing incentives that spread out vehicle use to limit peak-hour congestion that leads to increased GHG emissions. Other examples of projects that reduce GHG emissions on the regional transportation network include express lanes, HOT lanes, HOV lanes and dedicated truck toll lanes for goods movement.

## HAZARDOUS MATERIALS

Page 3.7-1, the following sentence is added to the end of the first paragraph:

A number of federal state, and local agencies are responsible for enforcing the regulations listed below as well as myriad other regulations designed to protect public health, these agencies include the US and State Environmental Protection Agencies (EPA), California Department of Toxic Substances Control (DTSC), Regional Water Quality Control Boards (RWQCBs) and local fire departments.

Page 3.7-2, the following new paragraph is added before the subheading "State:"

**Emergency Planning and Community Right-to-Know Act (EPCRA).** EPCRA of 1986 was created to help communities plan for emergencies involving hazardous substances. The Act establishes requirements for federal, state and local governments, Indian tribes, and industry regarding emergency planning and "Community Right-to-Know" reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety and protect public health and the environment.

Page 3.7-11, first paragraph, last sentence, the reference to mitigation measures is revised as follows:

Therefore, without Mitigation Measures **MM-HM1** ~~through~~ and **MM-HM23**, impacts could be significant.

Page 3.7-12, as a new second to last paragraph the following is added:

The Department of Conservation has determined that there are: 44 oil/gas/geothermal wells within 100 feet of proposed urban rail; 131 oil/gas/geothermal wells within 100 feet of proposed HOV lanes, toll facilities and mixed flow lanes, and 2,643 oil/gas/geothermal wells within 100 feet of proposed local and express bus routes. Any well within 100 feet of dedicated public streets or operating railway (or any other area of periodic high-density population is considered a critical well requiring higher blowout prevention equipment.

## LAND USE AND AGRICULTURAL RESOURCES

Page 3.8-5, the first sentence of the last paragraph is revised as follows:

As shown in **Map 3.8-6**, urban centers in the SCAG region ~~is~~ are in the form of clusters, linked by freeways and commercial corridors interspersed with identifiable activity centers.

Page 3.8-6 the following sentence is added as a new first sentence to the first full paragraph:

According to the 2010 US Census, Orange County is the most densely populated county in the SCAG region, and has the highest residential density per square mile.

## PUBLIC SERVICES

Page 3.11-6, the third sentence of the last paragraph is revised as follows:

In addition, some climate change studies suggest that Southern California will continue to experience more extreme weather scenarios, including longer and hotter heat waves.

Page 3.11-6, the following is added as a new fifth sentence in the last paragraph on this page:

In 2008, the number of existing households exposed to extreme wildfire threat was 46,052.

Page 3.11-13, the following is added as a new last sentence to the paragraph under Impact 3.11-5:

Therefore, although region-wide school impacts are not anticipated, because individual schools and districts may be impacted, this impact is considered significant.

Page 3.11-22, the following is added to the end of the second paragraph (regarding the California Integrated Waste Management Act):

In 2011, the California Legislature passed and the Governor signed into law AB341, which established a statewide policy goal of diverting 75 percent of all waste generated in the State by 2020. AB341 builds upon AB939 and establishes a nexus between recycling and AB32, the Global Warming Solutions Act, by reducing five million metric tons of CO<sub>2</sub>, equivalent by diverting approximately two million metric tons of solid waste per year. This will be achieved by requiring cities and counties to work with the business community and multi-family dwelling units to implement commercial recycling programs, thereby avoiding the extraction of raw materials, preprocessing, and manufacturing of virgin materials. In effect, this ensures that only residual waste that has no economic value will be landfilled. The policy implication of AB341 is the development of new recycling programs and infrastructure while preserving the capacity of the landfills throughout the State.

Page 3.11-22, in the third paragraph California Integrated Waste Management Board (CIWMB) is replaced by California Department of Resources Recycling and Recovery (Cal Recycle).

Page 3.11-23, the first paragraph the acronym CIWMB is replaced with Cal Recycle.

Page 3.11-24, the fifth paragraph is revised and a new discussion is added as follows:

In addition to the CIWMP, Orange County's Integrated Waste Management Department has initiated a long-term strategic planning project—the Regional Landfill Options for Orange County (RELOOC)—which assesses the solid waste disposal needs of Orange County for the next 40 years. ~~RELOOC's 2007 Strategic Plan Update summarizes progress to maximize capacity at existing landfills, assess alternative technologies and potential out-of-county disposal sites, and expand the Frank R. Bowerman and Olinda Alpha landfills.~~ Cal Recycle approved Orange County's 5-year update of the Orange County CIWMP in

January 2011. There is now an operational materials recovery facility in south Orange County, at the Prima Deshecha Landfill. This facility accepts construction and demolition waste materials and has a mandatory diversion rate of 80 percent. The Frank R. Bowerman Landfill and the Olinda Alpha Landfill have received all necessary permits and entitlements for their expansions. Orange County can only accept imported solid waste materials from outside of Orange County under the specific terms and conditions of Orange County's bankruptcy recovery, in which importation of solid waste materials will end in June 2016.

Page 3.11-26, Table 3.11-8, rows in the table (including the totals at the bottom) are revised as follows:

Frank R. Bowerman Sanitary LF	Orange	4/31/2022	8,500	427,000,000	59,411,872
		12/31/2053	11,500	266,000,000	198,000,000
Olinda Alpha Sanitary Landfill	Orange	12/31/2021	8,000	74,900,000	38,578,383
				148,000,000	47,700,000
Prima Deshecha Sanitary Landfill	Orange	12/31/2067	4,000	472,900,000	87,384,799
				172,000,000	133,000,000
<b>Total</b>			<b>126,829</b>	<b>4,454,596,955</b>	<b>861,731,562</b>
			<b>129,829</b>	<b>1,665,796,955</b>	<b>1,055,056,508</b>

Page 3.11-29, the second paragraph, starting with the third sentence is revised as follows:

Considering an average diversion rate of ~~50~~ 65 percent, this equates to approximately ~~2.3~~ 1.6 pounds of trash per day.<sup>27</sup> Assuming a similar generation rate, residents in Los Angeles County would generate approximately ~~26~~ 18 million pounds of waste per day in 2035. Residents in the remaining counties in the SCAG region would generate approximately ~~25~~ 17 million pounds of waste per day in 2035 for a regional total of approximately ~~51~~ 35 million pounds per day, requiring landfilling.<sup>28</sup> Non-residential land uses also generate waste, and generally at a higher rate than residential uses. Based on data from Cal Recycle, the average California employee generates 5.8 pounds of trash, assuming a ~~50~~ 63 percent diversion rate. According to this data, the estimated 9.44 million employees within the SCAG region in 2035 would generate approximately ~~54.7~~ 38.6 million pounds of waste per day, requiring landfilling.<sup>29</sup>

Page 3.11-29, the first sentence in the fourth paragraph is revised as follows:

Transporting ~~405.7~~ 74 million pounds of waste per day to appropriate disposal areas would result in significant truck and rail trips and associated emissions.

Page 3.11-38, the following is added before the heading "EXISTING SETTING:"

**Other Energy Efficiency Partnerships.** Similar to the San Gabriel Valley Energy Efficiency Partnership, a number of other energy efficiency partnerships with SCE exist in the region including with the South Bay Cities Council of Governments, Coachella Valley Area Governments, Ventura County and cities (Ventura County Regional Energy Alliance) and with the County of Los Angeles.

Page 3.11-44, the following is added to the end of the first paragraph:

In 2011, almost 20,000 units of Chevrolet Volt and Nissan Leaf were sold nationwide according to Automotive News. The US Department of Energy ([www.fueleconomy.gov](http://www.fueleconomy.gov)) indicates that more than a dozen PEV models are slated to come on the market in the next two years.

<sup>27</sup> Assuming all jurisdictions meet the AB 939 diversion rate of 50 percent.

<sup>28</sup> CalRecycle, *California's Statewide Per Resident, Per Employee, and Total Disposal Since 1989*, available at: <http://www.calrecycle.ca.gov/Igcentral/goalmeasure/disposalrate/graphs/disposal.htm>, accessed December 2011.

<sup>29</sup> *Ibid.*

Page 3.11-45, the following is added to the end of the fifth paragraph:

SCE is investing hundreds of megawatts of distributed solar generation through a reverse auction mechanism for photovoltaic systems up to 10 megawatts. This is one of many programs that SCE offers to distribute renewable energy. A more complete listing of SCE incentives can be found on the SCE website: <http://www.sce.com/PowerandEnvironment/Renewables/Solar/default.htm>.

Page 3.11-47, the last sentence of the paragraph under Table 3.11-10 is revised as follows:

As indicated in **Table 3.11-11**, forecast urban development and growth that would be accommodated by the transportation investments in the 2012-2035 RTP/SCS would result in less per capita overall use of energy resources used for non-transportation-related uses in 2035 than in 2011 (natural gas consumption would in total increase incrementally from 2011 to 2035 under the Plan, but electricity use is anticipated to decrease). Electrification of transportation systems would add to the electricity use shown in Table 3.11-11.

## TRANSPORTATION, TRAFFIC AND SAFETY

Page 3.12-15, paragraph 2, the following changes are made:

In particular, the San Pedro Bay Ports (Long Beach and Los Angeles) dominate the container trade in the Americas by shipping and receiving more than ~~11.8~~ 15.8 million twenty-foot equivalent units (TEUs) of containers in 2011 ~~2009~~. Together these two ports rank ~~third~~ as the sixth busiest in the world, behind Singapore, Hong Kong, Shanghai, and Shenzhen.<sup>30</sup> ~~Rotterdam and Hong Kong, as the busiest maritime ports.~~

Page 3.12-30, the first impact heading is corrected as follows: ~~Impact 3.14-6~~ Impact 3.12-6

## WATER RESOURCES

### REGULATORY FRAMEWORK

Page 3.13-2 (subheading **Federal**), the description of the United States Bureau of Reclamation (USBR) is replaced as follows:

The USBR's Lower Colorado Region serves as the "watermaster" for the last 288 miles of the Colorado River within the United States on behalf of the Secretary of the Interior. The Lower Colorado Region also maintains Hoover, Davis, and Parker Dams, annually measures and accounts for the water's use, and maintains the river channel and protective levees. In the Lower Colorado Region, USBR's Water Conservation Field Services Program helps residents and agencies in Southern California achieve local water conservation goals. The USBR operates the Colorado River project, an extensive network of dams, canals, and related facilities. The USBR serves as Watermaster, overseeing contentious water rights issues, and running drought protection programs.

### Hydrologic Regions

Page 3.13-5 (subheading **South Lahontan Hydrologic Region**), the second and third sentences of the third full paragraph are revised as follows:

The ~~initial~~first ~~223~~233-mile long aqueduct was completed by the Los Angeles Department of Water and Power (LADWP) and began diverting water from Owens Valley into the City of Los Angeles in 1913. The aqueduct was extended 115 miles in 1940 and a second 137-miles aqueduct was added in 1970.

<sup>30</sup> SCAG. *Port Activity and Competitiveness Tracker (PACT)*, 2011. Data from Port of Long Beach Representative, February 2012.

## Colorado River Hydrologic Region

Page 3.13-6 (subheading **Colorado River Hydrologic Region**), the third sentence of the fifth paragraph is replaced as follows:

The Colorado River is an interstate and international river whose use is apportioned among the seven Colorado River Basin states and Mexico by an international treaty, interstate compacts, court decrees, statutes, regulations, contracts and other legal documents and agreements known collectively as the “Law of the River.” ~~The Colorado River is an interstate and international river whose use is apportioned among the seven Colorado River Basin states and Mexico by a complex body of statutes, decrees, and court decisions known collectively as the “Law of the River.”~~

Page 3.13-10, the second paragraph under *Lower Colorado Watershed (HUC 15030107)* is replaced as follows:

Imperial and Morelos Dams on the Lower Colorado River serve as diversion dams for agricultural, municipal, and industrial uses, while Laguna Dam serves as a regulating dam. Water is diverted from Imperial Dam into the All-American Canal, which carried over 4.2 million acre-feet of water into California for use in Arizona and California and for hydroelectric energy generation prior to discharge back to the Colorado River in 2010. ~~The lower Colorado River is heavily dammed for agricultural, municipal, and industrial uses, including the Imperial, Laguna, and Morelos Dams. The Imperial Dam provides water for the All American Canal, which carries over five million acre-feet of water into California every year, mostly for agricultural uses.~~

## Surface Hydrology

Page 3.13-10, the second paragraph under *Salton Sea Watershed (HUC 18100200)* is deleted as follows:

~~In 2001, the Imperial Valley Irrigation District, the largest recipient of Colorado River water in California, agreed to a plan to transfer up to 200,000 acre feet of water per year to San Diego for municipal water uses.~~

Page 3.13-12 (subheading **Lakes and Reservoirs**), the fifth sentence of the sixth paragraph is revised as follows:

The lake is connected to the MWD’s existing water infrastructure ~~of the SWP.~~

Page 3.13-12 (subheading **Lakes and Reservoirs**), the first sentence of the eighth paragraph is revised as follows:

The ~~principal principle~~ inflow to the Sea is from agricultural drainage, which is high in dissolved salts; approximately four million tons of dissolved salts flow into the Sea every year.

Page 3.13-12 (subheading **Lakes and Reservoirs**), the second sentence of the eighth paragraph is deleted as follows:

~~The evaporation of the Sea’s water, plus the addition of highly saline water from agriculture, has created one of the saltiest bodies of water in the world.~~

Page 3.13-12 (subheading **Lakes and Reservoirs**), the first sentence of the ninth paragraph is revised as follows:



The ~~1998 2001~~–agriculture-to-urban water transfer agreement between the Imperial ~~Valley~~ Irrigation District and San Diego County Water Authority will have significant implications for the Salton Sea, and the watershed.

Page 3.13-13 (subheading **Lakes and Reservoirs**), Table 3.13-3, the spelling of “Lake Matthews” under the Lakes and Reservoirs column in the Santa Ana Basin (Region 8) category is replaced with “Lake Mathews”.

### Groundwater Hydrology

Page 3.13-14, the first sentence of the second paragraph is deleted as follows:

~~Groundwater represents most of the SCAG region’s fresh water supply, making up approximately 30 percent of total water use, depending on precipitation levels.<sup>31</sup>~~

Page 3.13-14, paragraph 6 is replaced as follows:

Groundwater basins within the SCAG region are highly managed. Over 80 percent of the groundwater resources were produced from adjudicated and formally managed basins with adopted groundwater management plans. Much of the balance of the groundwater within the region is currently moving toward adjudication or formal management. Watermasters and groundwater management agencies have been monitoring the production and conditions of their respective basins.

~~On November 4, 2009, the State Legislature amended the Water Code with SBx7-6, which mandates a statewide groundwater elevation monitoring program to track seasonal and long-term trends in groundwater elevations in California's groundwater basins. In accordance with this amendment to the Water Code, the California Department of Water Resources (DWR) developed the California Statewide Groundwater Elevation Monitoring (CASGEM) program to establish a permanent, locally-managed program of regular and systematic monitoring in all of California's alluvial groundwater basins. Many of the groundwater management agencies and watermasters in the region have been designated to continue the monitoring responsibilities under CASGEM. A comprehensive assessment of overdraft in California groundwater basins has not been conducted since 1980. The most recent (2003) DWR report on California’s groundwater found that in most cases, there is insufficient quantitative information to identify overdrafted groundwater basins.<sup>32</sup> The report encourages local groundwater managers and DWR to seek funding and work cooperatively to evaluate groundwater basins for overdraft. The report recommends that local agencies take the lead in collecting and analyzing data to understand groundwater basin conditions, and points out that much of the data are needed by the agencies to effectively manage groundwater. Despite the lack of local data, DWR does provide overdraft estimates for the State as a whole, which are on the order of one to two million acre feet per year, during average precipitation years.~~

### Water Demand and Supply

Page 3.13-15, the third, fourth, and fifth sentences in the first paragraph under the subheading **Water Demand** are revised as follows:

Annual water demand fluctuates in relation to multiple factors such as weather, economy, and water rates increases available supplies. During prolonged periods of drought, water demand can be reduced significantly through aggressive conservation campaigns measures, local drought ordinances, and

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<sup>31</sup>DWR, *California’s Groundwater Bulletin 118*, Update 2003, available at: [http://www.water.ca.gov/pubs/groundwater/bulletin\\_118/california's\\_groundwater\\_bulletin\\_118\\_update\\_2003\\_bulletin118\\_entire.pdf](http://www.water.ca.gov/pubs/groundwater/bulletin_118/california's_groundwater_bulletin_118_update_2003_bulletin118_entire.pdf), accessed August 10, 2011.

<sup>32</sup>DWR, *California’s Groundwater Bulletin 118*, Update 2003, available at: [http://www.water.ca.gov/pubs/groundwater/bulletin\\_118/california's\\_groundwater\\_bulletin\\_118\\_update\\_2003\\_bulletin118\\_entire.pdf](http://www.water.ca.gov/pubs/groundwater/bulletin_118/california's_groundwater_bulletin_118_update_2003_bulletin118_entire.pdf), accessed August 10, 2011.

mandatory water allocation measures, while—In years of above average rainfall, demand for imported water usually declines due to abundance of local supplies.

Page 3.13-15, the first sentence under **Demographics, Land Use, and Water Use** is revised as follows:

Water demand is influenced not only by population size, but also by socio-economic characteristics, geographical distribution of the population, variation in precipitation and temperature levels, and water conservation practices.

Page 3.13-16 (subheading **Water Conservation**), the footnote referencing MWD's 2004 Annual Progress Report to the California State Legislature has been updated as follows:

Metropolitan Water District, Annual Progress Report to the California State Legislature, 2012 ~~2004~~, available at: [http://www.mwdh2o.com/mwdh2o/pages/yourwater/SB60/SB60\\_2012.pdf](http://www.mwdh2o.com/mwdh2o/pages/yourwater/SB60/SB60_2012.pdf) ~~[http://www.mwdh2o.com/mwdh2o/pages/yourwater/sb60/archive/SB60\\_04.pdf](http://www.mwdh2o.com/mwdh2o/pages/yourwater/sb60/archive/SB60_04.pdf)~~, accessed February 29, 2012 ~~August 10, 2011~~.

Page 3.13-16 (subheading **Water Conservation**), at the end of the first full paragraph, the following sentence and subsequent paragraph are added:

As a result, water conservation has shifted from a purely temporary measure to mitigate for droughts to a long-term water management strategy.

On November 10, 2009, the Legislature enacted SBx7-7, which became effective on February 3, 2010. SBx7-7 requires all retail urban water suppliers to increase water use efficiency, with a goal of reducing per person daily water use of potable water 20 percent by 2020 from an established baseline through water conservation and recycled water uses.

Page 3.13-16 (subheading **Water Conservation**), the second sentence of the original second paragraph is replaced as follows:

As a result of this drought, combined with the drought in the Colorado River basin and pumping restrictions for State Water Project supplies due to endangered species protection, many local jurisdictions adopted ordinances to prohibit wasteful water use and promote water use efficiencies. As a result of this drought, combined with ongoing drought in the Colorado River basin and unpredictability of future water supply due to global warming, conservation has shifted from a purely temporary measure to a long term water management strategy.

Page 3.13-16 (subheading **Water Conservation**), the third paragraph is replaced as follows:

On March 29, 2011, Governor Jerry Brown declared the “end of California’s drought.” Earlier, however, two biological opinions by the U.S. Fish and Wildlife Service and the National Marines Fisheries Service for the delta smelt and the salmonids, respectively, resulted in reductions in the pumping of SWP water. Currently, those opinions are being reviewed. Southern California water agencies are continuing to manage their available water supplies in an integrated manner to provide for water needs in dry periods. However, Southern California is still experiencing a shortage of water. MWD lost 1/3 of its supply since 2009 due to court rulings limiting the pumping of water to protect and endangered species of fish, in addition to three years of below average rainfall. As a result, all cities and agencies in Southern California were asked to reduce the amount of water they buy from MWD.

## Water Supply

Page 3.13-16, the third sentence under **Local Surface Water (within each HU Region)** is revised as follows:

The arid climate, ~~summer drought~~, and increased impervious surface associated with urbanization contribute to this reduction in natural recharge.

Page 3.13-16, the sixth sentence under **Local Surface Water (within each HU Region)** is revised as follows:

On average, local water supplies contribute approximately 40,000 acre-feet per year (afy) ~~precipitation contributes approximately 38,000 acre-feet per year (afy)~~ within the MWD service area (not including San Diego County).

Page 3.13-17 (subheading **Local Groundwater**), the first sentence of the first paragraph is revised as follows:

Groundwater represents most of the SCAG region's fresh water supply, making up approximately 30 percent of total water use, ~~depending on precipitation levels~~.

Page 3.13-17 (subheading **Local Groundwater**), the last sentence of the first paragraph (including the footnote) are deleted as follows:

~~The California Department of Water Resources estimates that the State has a groundwater overdraft of approximately 1 to 2 maf in average years.<sup>33</sup>~~

Page 3.13-17 (subheading **Local Groundwater**), the second sentence of the second paragraph is replaced as follows:

MWD has agreements with various water agencies for groundwater storage, resulting in approximately 211,900 acre-feet of added storage capacity and 70,300 afy of dry year supplies. MWD has 10 projects with various water agencies for groundwater storage, resulting in approximately 421,900 af of added capacity per year.<sup>34</sup>

Page 3.13-17 (subheading **Reclaimed/Recycled Water (Regional Wastewater Management)**), the last sentence of the third paragraph is revised as follows:

According to MWD, current recycled water projects, either planned expansion, or in operation in the SCAG region, will account for approximately 430,000 751,384 af annually by the year 20352020.

Page 3.13-17, the following is added to the end of the third paragraph:

For example, the San Bernardino Municipal Water Department is in the initial stages for a Recycled Water Project at its San Bernardino Water Reclamation Facility. The Department expects to recycle up to 24 million gallons of treated wastewater per day within the Upper Santa Ana River Watershed using a combination of tertiary and advanced treatment technology.

Page 3.13-17 (subheading **Reclaimed/Recycled Water (Regional Wastewater Management)**), new sixth and seventh sentences have been added to the third paragraph as follows:

In addition, local water agencies have plans to increase water use efficiency through water recycling and conservation in compliance with SBx7-7 and reduce per person daily potable water use by 20 percent by 2020 from an established baseline. For example, the San Bernardino Municipal Water Department is in the initial stages for a Recycled Water Project at its San Bernardino Water Reclamation Facility. The

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<sup>33</sup>DWR, California Water Plan Update, Volume 1, 2009.

<sup>34</sup>MWD, Regional Urban Water Management Plan, November 2010.

Department expects to recycle up to 24 million gallons of treated wastewater per day within the Upper Santa Ana River Watershed using a combination of tertiary and advanced treatment technology.

Page 3.13-17 (subheading **Storage**), the second sentence of the fifth paragraph is revised as follows:

In 1999, MWD has completed filling Diamond Valley Lake near Hemet in Riverside County.

Page 3.13-18 (subheading **Storage**), the first full paragraph is replaced as follows:

The SCAG region currently has more than 3.5 maf of storage capacity in all of its reservoirs. Some water agencies within the region have also contracted for additional storage capacities outside the region. Effective management of storage is a priority for the region, due to the anticipated increase in the region's population and variations in water supplies due to hydrology (variations may further be intensified by climate change). ; however, the anticipated increase in the region's population and growing uncertainty regarding water imports make increasing storage capacity a priority for the region. Increasing storage capacity can be a difficult process, with associated social and environmental impacts.

Page 3.13-18 to 3.13-19, the discussion under **Imported Water, Colorado River, and State Water Project (SWP)** is replaced as follows, and **Maps 3.13-6 through 3.13-8** have been deleted:

**Imported Water.** Water agencies within the SCAG region currently receive imported water from the Colorado River system, the State Water Project, and from the Mono Basin and Owens Valley via the LAA. Since the early 1900's, local governments within the region recognized that local supplies alone would not be able to support the desired development at the time. Beginning with the completion of the first LAA in 1913 by the City of Los Angeles, water agencies within the region and the DWR have imported water from other parts of the state to supplement local supplies. Imported sources of water (including the Colorado River Aqueduct, the State Water Project's California Aqueduct, and the Los Angeles Aqueduct) currently supply approximately 3 maf of water to the SCAG region annually, accounting for nearly two thirds of the total water used in the region.<sup>35</sup> Access to water in the SCAG region has traditionally been a potential constraint to growth, since local supplies alone are unable to support expansive development. Beginning with the completion of the Los Angeles Aqueduct (LAA) in 1913, the region has imported water from other parts of the state to supplement local supplies. The All-American Canal and Coachella Canal were completed in 1940, supplying water to irrigation districts in the Imperial and Coachella Valleys for agricultural operations. The Colorado River Aqueduct, completed in 1941 by MWD, brings Colorado River water to the urban coastal areas, ranging from Ventura County to San Diego County. The California Aqueduct, completed in the 1970s, delivers water from the Sacramento Delta to MWD for distribution to retail agencies throughout Southern California. ~~Maps 3.13-6 through 3.13-8, located in the map chapter, depict the areas served by these imported water supplies.~~

**Colorado River.** The Colorado River is a major source of water for Southern California. Palo Verde Irrigation District diverts water from the Colorado River northeast of the city of Blythe. The All-American Canal and Coachella Canal were completed in 1940 and 1948, respectively, supplying water to the Imperial Irrigation District and Coachella Valley Water District (CVWD) in the Imperial and Coachella valleys for irrigation and potable purposes. The Colorado River Aqueduct, completed in 1941 by MWD, brings Colorado River water to the southern California coastal plain. In addition, MWD has an exchange agreement with the CVWD, in Riverside and Imperial counties, and Desert Water Agency (DWA), also in Riverside County, where MWD exchanges Colorado River water for CVWD and DWA's SWP deliveries as the two agencies do not have facilities to receive SWP water.

An international treaty, interstate compacts, court decrees, statutes, regulations, contracts, agreements, federal guidelines, and federal policies, beginning with the 1922 Colorado River Compact, affect the

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<sup>35</sup>*Ibid.*

amount of Colorado River water available to California. California is entitled to 4.4 maf, as well as half of any surplus, as defined by the federal Department of the Interior, and any water apportioned to but unused in Arizona and Nevada made available by the Secretary of the Interior. Typically, the river's surplus had allowed California entities to take over 800,000 af annually as needed through 2002.

Given the execution of the 2003 Colorado River Water Delivery Agreement and the Quantification Settlement and related agreements, California water agencies are implementing various strategies to offset the reduced availability of water from the Colorado River. Between 2003 and 2010, California's use of Colorado River water was limited to 4.4 maf annually. Through implementation of transfers and exchanges, MWD has been able to increase its available Colorado River water from 700,000 af in 2003 to over 1.1 maf in 2010. and is imported via the Colorado River Aqueduct, owned and operated by MWD. Under water delivery contracts with the United States, California entities have enjoyed legal entitlements to Colorado River water since the early 20<sup>th</sup> century. There have been several compacts, treaties, and negotiations between the seven states that use Colorado River water, beginning with the 1922 Colorado River Compact. California was entitled to 4.4 maf, as well as half on any surplus, as defined by the Federal Department of the Interior. Typically, the river's surplus has allowed California entities to take an additional 800,000 af annually. However, with increased urbanization in the Colorado River Basin states and limitation agreements between those states, surplus water for California was eliminated; the State will gradually return to its original allotment of 4.4 maf. Given these new terms, California water agencies are pursuing various strategies to offset this gradual, but certain loss of future water supply. Examples of these strategies include additional reservoir and storage agreements, new water transfers between agricultural and urban users, and more water conservation and recycling.<sup>36</sup>

**State Water Project (SWP).** The SWP supplies water to Southern California via the California Aqueduct, with delivery points in Los Angeles, San Bernardino, and Riverside counties. The SWP was constructed and is managed by DWR, and is the largest state-owned, multi-purpose water project in the country. There are 13 State Water Contractors in the SCAG region that have contracted for maximum annual deliveries of almost 2.5 maf. The State Water Contractors are: Antelope Valley-East Kern Water Agency, Castaic Lake Water Agency, CVWD, Crestline-Lake Arrowhead Water Agency, DWA, Littlerock Creek Irrigation District, MWD, Mojave Water Agency, Palmdale Water District, San Gabriel Valley Municipal Water District, San Geronio Pass Water Agency, and Ventura County Flood Control District. Annual deliveries to the region fluctuate in relation to multiple factors such as water demands of the State Water Contractors, hydrology affecting available supplies, regulations, litigations, and decisions by state and federal agencies. Historic SWP annual deliveries to the SCAG region ranged from about 600,000 af to 1.16 maf over the last 25 years.

In 2007, a federal judge ruled that the existing biological opinions in force at that time to protect endangered fish species, including the Delta smelt and winter-run salmon, were inadequate. In response, new biological opinions were developed in 2008 and 2009 by federal fisheries agencies, which restricted the amount of water coming into Southern California through that system. Most recently, the same federal judge ruled that the 2008-2009 biological opinions were arbitrary and capricious, ordering that they be redone to address numerous issues resulting in high water losses and to consider impacts on the human environment. New biological opinions are being developed, with an estimated completion by 2013 and 2016, which may reduce water supply impacts. Additionally, the Bay Delta Conservation Plan is being developed to address habitat impacts generally. In the meantime, southern California water agencies are managing their available water supplies in an integrated manner to provide for water needs in dry periods. SWP has historically provided 25 to 50 percent of MWD's water, anywhere from 450,000 af to 1.75 maf annually.<sup>37</sup> Southern California's maximum SWP yield is about 2.0 maf per year. SWP provides water to approximately 25 million people and irrigation water for roughly 750,000 acres of agricultural lands annually.

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<sup>36</sup>*Ibid.*

<sup>37</sup>*Ibid.*

~~In 2007, a federal judge ordered the pumps that bring water from the Sacramento Bay Delta into Southern California be shut off, to protect an endangered fish species, the Delta smelt. Although pumping later resumed, it did so at only two thirds of capacity, reducing by one third the amount of water coming into Southern California through that system. It is unclear when, or even if, full capacity pumping will resume. The situation in the Bay Delta highlights the uncertainty and vulnerability of the region's dependence on imported water. Although the situation in the Delta will eventually be resolved, it will likely be a matter of decades before a satisfactory new system is in place.~~

Page 3.13-19 (subheading **Los Angeles Aqueduct**), the first sentence of the second full paragraph is revised as follows:

The Los Angeles Aqueduct, originally built in 1913, carries water ~~233 miles~~ south from Owens Valley to Los Angeles.

Page 3.13-19 (subheading **Los Angeles Aqueduct**), the fourth and fifth sentences of the second full paragraph are revised as follows:

These two aqueducts have historically supplied an average of approximately ~~254,000~~<sup>256,000</sup> af per year in normal years, and as little as ~~108,500~~<sup>106,000</sup> af per year in drier years. Recent deliveries have been cut almost in half due to ~~dwinding Sierra snowpack and a court decision restricting the amount of water that can be removed from the Owens Valley and Mono Basin in order to restore their damaged ecosystems.~~

Page 3.13-19 (subheading **Transfers**), the last sentence of the third full paragraph is deleted as follows:

~~Water banking is also done during wet years, when rainwater is collected and directed toward recharge facilities for future use.~~

Page 3.13-19 (subheading **Water Suppliers**), the second sentence of the fourth full paragraph is revised as follows:

~~Created by the California State legislature in 1931, Formed by 11 cities in 1928,~~ MWD serves the urbanized coastal plain from Ventura to the Mexican border in the west to parts of the rapidly urbanizing counties of San Bernardino and Riverside in the east.

## Water Quality

Page 3.13-20 (subheading **Surface Water**), the first four sentences of the first paragraph are replaced as follows:

The Colorado River Basin includes portions of seven states from the western slope of the Rocky Mountains, with the river traversing the arid southwest. The river and its tributaries supply water to 32.9 million people and form the eastern border of the SCAG region. The Salton Sea, the largest inland body of water in California, was formed in 1905 when Colorado River winter flooding breached the Imperial Canal diversion structure. At present, the Sea serves as a drainage reservoir for agricultural runoff from the Imperial Valley, Coachella Valley, and Mexico as well as stormwater runoff. The Colorado River watershed includes seven states on the western slope of the Rocky Mountains, traversing the arid southwest to the Gulf of California in Mexico. The river supplies water to 25 million people in both the U.S. and Mexico and forms the eastern border of the SCAG region. The Salton Sea, the largest inland body of water in California, was formed around 1905 when the Colorado River was diverted from its natural course. At present, the Sea serves as a drainage reservoir for agricultural runoff in the Imperial Valley and Mexico.

Page 3.13-20, Table 3.13-5 is revised to indicate “San Bernardino Valley Municipal Water District,” in the second row from the bottom.

Page 3.13-22, the two paragraphs under the subheading **Perchlorate** are replaced as follows:

Ammonium perchlorate is a primary ingredient of solid rocket propellant and has been used in the manufacture of some types of munitions and fireworks. The primary human health concern related to perchlorate is its effect on thyroid functioning.<sup>38</sup> Perchlorate compounds are a concern to drinking water sources because they are readily soluble and highly mobile in groundwater.

Low levels of perchlorate are found in the Colorado River, resulting from past chemical manufacturing practices and groundwater contamination in Henderson, Nevada. Remediation efforts have reduced perchlorate levels to well below current drinking water standards. Local sources of perchlorate have contributed to contamination of some Southern California groundwater basins, resulting in agencies developing alternate strategies to recover groundwater such as shutting down and/or installing new wells, blending water sources, or installing treatment systems. Biological treatment and ion exchange have shown to be effective treatment technologies for perchlorate; nanofiltration and reverse osmosis have also shown to be effective but at a high cost. Ammonium perchlorate and other perchlorate salts are readily soluble in water, dissociating into the perchlorate ion that is highly mobile in groundwater. Small amounts of perchlorate have been found in the Colorado River with higher concentrations in a number of groundwater basins in Southern California. The primary human health concern related to perchlorate is its effects on the thyroid.<sup>39</sup> While perchlorate cannot be removed using conventional water treatment, nanofiltration and reverse osmosis do work effectively, but at very high cost. Rancho Cordova is using a fluidized bed biological treatment and is re-injecting the treated water back into the ground. A number of companies have developed an ion exchange process that removes perchlorate but creates hazardous waste brine. Nonetheless, a number of sites in Southern California have successfully installed ion exchange systems. Thus, while effective treatment options are available, the overriding consideration in decisions about whether to recover perchlorate-contaminated groundwater is the cost-effectiveness of available technologies.

Page 3.13-23, the three paragraphs under the subheading **Uranium** are replaced as follows:

A 16-million-ton pile of uranium mill tailings at Moab, Utah, lies 750 feet from the Colorado River. Excess water in the tailings pile has infiltrated the groundwater, causing a flow of contaminants, mainly ammonia and uranium, into the river. A catastrophic flood has the potential to wash millions of tons of the mill tailings into the Colorado River.

Interim remedial action activities at the Moab site, which is owned by the U.S. Department of Energy (DOE), include intercepting some of the contaminated groundwater before it discharges to the river. To date, more than 172 million gallons of groundwater have been extracted through the interim action system. Freshwater (diverted river water) is also injected through groundwater wells near the river as an additional way of reducing the discharge of ammonia and uranium to the river. Almost 11 million gallons of freshwater was injected during 2011.

In 2001, the license issued by the Nuclear Regulatory Commission for the materials at the Moab site was terminated and that title and responsibility for cleanup was transferred to the DOE. In July 2005, DOE published the final EIS that presented the preferred alternative of active groundwater remediation and

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<sup>38</sup> As stated in the 2010 RUWMP, “Perchlorate interferes with the thyroid gland’s ability to produce hormones required for normal growth and development.” MWD, *Regional Urban Water Management Plan 2010*, Chapter 4, page 4-8, available at: [http://www.mwdh2o.com/mwdh2o/pages/yourwater/RUWMP/RUWMP\\_2010.pdf](http://www.mwdh2o.com/mwdh2o/pages/yourwater/RUWMP/RUWMP_2010.pdf), accessed August 11, 2011.

<sup>39</sup> As stated in the 2010 RUWMP, “Perchlorate interferes with the thyroid gland’s ability to produce hormones required for normal growth and development.” MWD, *Regional Urban Water Management Plan 2010*, Chapter 4, page 4-8, available at: [http://www.mwdh2o.com/mwdh2o/pages/yourwater/RUWMP/RUWMP\\_2010.pdf](http://www.mwdh2o.com/mwdh2o/pages/yourwater/RUWMP/RUWMP_2010.pdf), accessed August 11, 2011.

~~offsite disposal of the tailings pile and other contaminated materials at the Crescent Junction, Utah site using rail transportation. DOE began removing the mill tailings from the Moab site in 2009. By the end of February 2012, 5 million of the 16 million tons will have been removed. Based on funding projections, DOE expects to complete the project by 2025. The remediation project receives funding annually through Congressional appropriations, and maintaining continued support for funding the cleanup requires close coordination and cooperation with downstream Colorado River users. A ten and a half million ton pile of uranium mine tailings at Moab, Utah lies 600 feet from the Colorado River. Rainwater has been seeping through the pile and contaminating the local groundwater, causing a flow of contaminants into the river. It also has the potential to wash millions of tons of material containing uranium into the Colorado River as a result of a flood or other natural disaster.~~

~~Operations and maintenance activities at the site include intercepting some of the contaminated groundwater before it discharges into the river. The interim action became fully active in September 2003 and is currently being evaluated. As of 2010, 1,408,000 gallons of contaminated water had been collected and evaporated.<sup>40</sup>~~

~~At the recommendation of the National Research Council, the Department of Energy (DOE) conducted a study to evaluate remediation actions and released an environmental impact statement in July 2005. The DOE has agreed to move the tailings, but remediating the site will require Congressional appropriations, and maintaining support for a cleanup will require close coordination and cooperation with other Colorado River users.~~

Page 3.13-25, Table 3.13-6 is revised to show 34 mgd of current flow for the City of Riverside Wastewater Plant (rather than 36 mgd).

## IMPACTS

Page 3.13-32 (regarding impacts to wastewater treatment) the second to last sentence of the first paragraph is revised as follows:

Therefore, region-wide cumulative impacts to wastewater treatment capacity would be less than significant, however, local wastewater distribution and treatment facilities could be significantly impacted.

Page 3.13-33, the discussion of **Impact 3.13-5: Potential to contribute to an increased demand for water supply and its associated infrastructure**, is replaced as follows (new text is shown as underlined and deleted text as strike out but the text has been re-organized, moved text is not highlighted):

**Impact 3.13-5: Potential to contribute to an increased demand for water supply and its associated infrastructure. Water agencies in the SCAG region produce many long-range planning studies to provide a system adequate to supply water demand, however the existing water supplies and infrastructure would not be sufficient to meet the expected demand in 2035.**

Meeting future water demand is the responsibility of local and regional water agencies. Water supplies are either produced locally from groundwater and surface water sources or are imported via the Los Angeles Aqueduct, the California Aqueduct, the Colorado River Aqueduct, the All American Canal, or the Coachella Canal. Other means of providing water without increasing imported supplies include reclamation and recycling, conservation, water transfers, groundwater banking, developing brackish groundwater, and ocean desalination.

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<sup>40</sup>Department of Energy, Uranium Mill Tailings Remedial Action website, available at: [http://www.gjem.energy.gov/moab/project\\_docs/tailings\\_dewatering.htm](http://www.gjem.energy.gov/moab/project_docs/tailings_dewatering.htm), accessed August 11, 2011.



The Urban Water Management Plan Act of 1990, as amended, requires every urban water supplier that either provides over 3,000 acre-feet of water annually or serves more than 3,000 or more connections to assess the reliability of its water sources over a 20-year planning horizon considering normal, dry, and multiple dry years. ~~that local water agencies prepare plans showing projected water supplies and demands for average years and multiple dry years.~~ Therefore, water agencies in the SCAG region produce Urban Water Management Plans (UWMPs) and other long-range planning studies to ensure adequate water supply to meet projected water demand ~~provide a system adequate to supply water demand.~~ These long-range plans account for growth that is planned for and approved by local planning agencies, and are updated every five years.

For example, MWD has prepared the 2010 Integrated Water Resources Plan (IRP) that provides a roadmap for maintaining regional water supply reliability over the next 25 years. The framework places an increased emphasis on regional collaboration. Earlier plans dating back to 1996 set a regional reliability goal of meeting full-service demands at the retail level under all foreseeable hydrologic conditions. This updated plan seeks to stabilize Metropolitan's traditional imported water supplies and to continue developing additional local resources.

It also advances long-term planning for potential future contingency resources, such as storm water capture and large-scale seawater desalination, in close coordination with MWD's 26 member public agencies and other utilities. The updated IRP strikes a balance through a three-component approach:

- A core resources strategy represents baseline efforts to manage water supply and demand conditions and to stabilize MWD's traditional imports from the Colorado River and Northern California through the Sacramento-San Joaquin Delta. This strategy is based on known factors, including detailed planning assumptions about future demographic scenarios, water supply yields, and a range of observed historical weather patterns. Under this strategy, MWD and its member agencies will advance water use efficiency through conservation and recycling, and with further local development such as groundwater recovery and seawater desalination.
- A cost-effective "supply buffer" will enable the region to adapt to future circumstances and foreseeable challenges. The buffer seeks to help protect the region from possible shortages caused by conditions that exceed the core resources strategy, starting with increased conservation and water-use efficiency on a region-wide basis.
- Foundational actions guide the region in determining alternative supply options for long-range planning. If future changed conditions—such as climate change or the availability of resources—exceed what is covered by MWD's core resources and supply buffer, these alternatives would provide a greater contribution to water reliability than MWD's imported water sources or any other single supply. These actions - including feasibility studies, research and regulatory review - would provide the foundation to develop alternative resources, if needed.

However, even with these long-range plans, some water agencies project could experience average year water supply deficits by the year 2020 if current management and supply efforts are not augmented. Other agencies project no deficits owing to the development of new supplies and management efforts. These projections all face the same uncertainty in regard to the long-term effect of global climate change on the region's water supply. Reduction in water supply, as well as uncertainty in the reliability of that supply, could result from increased temperatures due to global climate change, as well as regulatory or legislative decisions that affect the availability of imported water.

The long-range plans are necessary, At existing usage rates, as the existing water supplies and infrastructure may ~~would~~ not be sufficient to meet projected demand in 2035. Given the projected increase in population and that development will inevitably be built where none currently exists, the volume of water and water delivery infrastructure currently available within the SCAG region would not

be sufficient to meet the future multiple dry year or average year water demand in 2035. As population increases in the SCAG region, the demand for municipal water could increase. Increased commercial and industrial land uses could also increase water demand. However, many agencies are implementing aggressive water conservation, recycling and planning strategies (water transfer and water banking) to reduce demand and even out supply in wet and dry years. The City of Los Angeles, for example, has maintained relatively constant water demand over the past ten years as a result of water conservation, and ~~the MWD's 2010 RUWMP anticipates that water demand will continue to remain relatively constant through the year 2035, despite an increase in projected population for the SCAG region~~increasing population.

~~Reduction in water supply, as well as uncertainty in the reliability of that supply, could result from increased temperatures due to global climate change, as well as regulatory or legislative decisions that affect the availability of imported water. Over 80 percent of the projected population in the SCAG region in 2035 is within the MWD service area. Supplying the water necessary to meet future demand and/or minimizing that demand would mitigate anticipated impacts. Each water district develops its own policy for determining its planning horizon and for acquiring and building water facilities. Water districts provide water for the growth planned and authorized by the appropriate land use authority. However, as noted above, some water agencies predict normal year water deficits, and the uncertainty of future supply due to climate change and legislative actions could result in water shortfall impacts as a result of the 2012-2035 RTP/SCS's induced population growth given the challenges to imported water supplies, meeting future demand is difficult.~~ Implementation of Mitigation Measures ~~MM-W139~~ through ~~MM-W968~~ would reduce water supply impacts, however, impacts would remain potentially significant as a result of uncertainties in water supply availability.

Page 3.13-34, the paragraph under **Impact 3.13-6: Potential to contribute to cumulatively considerable demand on water resources**, has been revised as follows:

As described in the existing setting, much of the water that is consumed in the SCAG region is imported from other parts of the State. These imported sources can be a result of international treaties, interstate compacts, court decrees, statutes, regulations, contracts, and other legal documents and agreements. ~~As a result,~~ Any increase in water demand in the SCAG region that would exceed the supply determined by existing regulations, contracts, and legislation would require new or amended regulations, contracts, or legislation for the additional water supply. Therefore, this could affect areas outside the region by limiting the potential for new or amended regulations, contracts, or legislation ~~consuming water that could be used in other areas.~~ As noted above, it is anticipated that aggressive water conservation, as well as other water management strategies (water transfers, water banking, etc.), will result in adequate supplies to the region. However, due to the uncertainties associated with water supply and management, this impact is considered cumulatively considerable.

#### COMPARISON WITH THE NO PROJECT ALTERNATIVE

Page 3.13-48 (subheading **Cumulative Impacts**), the second to last sentence of the first paragraph is deleted:

~~This increase in water consumption would pull additional water from imported sources, thereby limiting water available for other parts of the State.~~

#### ALTERNATIVES

Page 4-1, the following is added after the last paragraph:

SCAG lacks the legal authority to require the elected decision makers of cities and counties to adopt or amend their respective land use policies, such as General Plan and Zoning Code amendments that

would be required to implement the land use patterns included in the Sustainable Communities Strategy of the Plan. Furthermore, SCAG lacks the legal authority to implement land use designations in the SCS component of the Plan or the alternatives. Nevertheless, pursuant to CEQA, the range of alternatives considered in the PEIR illustrates the different environmental consequences of potential alternatives to the Plan.

SCAG also does not have any legal jurisdiction to control population and employment levels in the region. The accuracy of growth projections at the regional scale, over both the short and long term, are inherently estimates that are subject to a wide variety of factors outside of the control of SCAG or any of its member counties and cities, such as the global recession. Accordingly, all alternatives assume the same forecasted regional growth in population and employment.

Estimating the environmental consequences of regional growth within the SCAG region is also subject to a wide variety of uncertainties that are outside of the control of SCAG, and for many topical areas are outside the control of SCAG's member counties and cities.

For example, assessing the effects of global climate change impacts from regional GHG emissions is well beyond the scale of any other types of impacts considered under CEQA, such as regional conditions relating to air basins, streams or watersheds, or localized conditions such as cultural and biological resources. The global consequences of regional GHG emissions are also dependent on a wide range of factors such as the willingness of federal, state, regional and local governments in the United States and worldwide to adopt or implement meaningful measures to reduce their own GHG emissions; the development and deployment of technologies that reduce GHG emissions; and the many factors that affect the pricing and availability of fuels that result in GHG emissions such as war and taxes. On the other end of the CEQA analytical spectrum, many CEQA thresholds in most topical areas relate to localized environmental conditions and Plan impacts, such as:

- aesthetics (e.g., degradation of existing visual character of the site and/or creation of new sources of light or glare that affect day or nighttime views);
- air quality (e.g., localized air toxic pollutant effects from residential or other sensitive uses next to high utilization roadways such as transit corridors, and freeways);
- biological resources (e.g., conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance);
- cultural resources (e.g., change historic resources);
- geology (e.g., exposing people or structures to seismic hazards);
- hazardous and hazardous materials (e.g., be located on a site with pre-existing contamination conditions or within two miles from a public airport);
- hydrology and water quality (e.g., provide substantial additional sources of polluted runoff);
- land use (e.g., conflict with adopted land use plans such as General Plans and zoning codes);
- noise (e.g., cause a substantial permanent or even temporary increase in ambient noise above pre-existing levels);
- population and housing (e.g., induce substantial population growth in an area, or displace substantial numbers of people and/or housing units);
- public services (e.g., cause a need for new or physically altered physical facilities to maintain acceptable service ratios for recreational parks, schools, and other public services);
- recreation (e.g., result in an increase in the use of existing neighborhood and regional parks);
- transportation/traffic (e.g., conflict with applicable plans or standards for roadway effective performance metrics or conflict with a congestion management plan designed to achieve effective traffic flow); and
- utilities and service systems (e.g., require the construction of new wastewater and stormwater facilities).

These and other examples of CEQA thresholds are aimed at protecting the local environment in which projects occur. At the regional scale of the Plan and in this PEIR, it is not possible to identify with specificity any of these impacts. It is possible, however, to generally conclude that increasing density in developed or previously-developed urbanized areas within the region, above existing baseline levels would result in significant unavoidable adverse impacts under many of the foregoing thresholds. That is, when population and employment growth is held constant, many adverse environmental impacts will be significant and unavoidable for CEQA purposes regardless of whether the Plan or any of the alternatives is approved by SCAG.

The following Table 4-0, Natural Land Consumption by Alternative summarizes the key differences in consumption of natural lands. This is the main differential examined to determine impacts together with anticipated population growth.

<b>TABLE 4-0: VACANT LAND CONSUMPTION BY ALTERNATIVE</b>	
<b>Planning Scenario</b>	<b>Projected Development on Vacant Land</b>
Plan	334 square miles
Alternative 1: No Project	742 square miles
Alternative 2: Modified 2008 RTP	355 square miles
Alternative 3: Envision 2	75 square miles

Starting on page 4-5, Table 4-1, the following changes are made to the Alternative 1—No Project column:

**Aesthetics**

Light and Glare/Shade and Shadow: ~~Similar~~ Light/Glare – Greater, Shade/Shadow -- Less

**Cultural Resources**

Historical Resources: ~~Greater~~ Less

**Hazardous Materials**

Routine Transport, Use or Disposal of Hazardous Materials: ~~Greater~~ Less

Disturbance of Contaminated Property During Construction: ~~Greater~~ Less

Starting on page 4-5, Table 4-1, the following changes are made to the Alternative 2—2008 RTP column:

**Aesthetics**

Scenic Vistas: ~~Similar~~ Less

Scenic Highways: ~~Similar~~ Less

Light and Glare/Shade and Shadow: ~~Similar~~ Light/Glare – Greater, Shade/Shadow -- Less

**Cultural Resources**

Historical Resources: ~~Greater~~ Less

Starting on page 4-5, Table 4-1, the following changes are made to the Envision 2 column:

**Aesthetics**

Scenic Vistas: ~~Less~~ Similar

Scenic Highways: ~~Less~~ Similar

Visual Character: ~~Less~~ Similar

Light and Glare/Shade and Shadow: ~~Less~~ Greater in urban areas

**Air Quality**

Change in Risk Levels Adjacent to Freeways: ~~Similar~~ Greater in some areas

Increased Population Adjacent to Freeways and Railways: ~~Similar~~ Greater

**Geology, Soils and Mineral Resources**

Soil erosion: ~~Similar~~ Less

**Hazardous Materials**

Upset and Accident Conditions: ~~Less~~ Greater  
Schools: ~~Less~~ Greater  
Disturbance of Contaminated sites: ~~Similar~~ Greater

**Noise**

Construction and Vibration: ~~Similar~~ Greater  
Land Use Compatibility: ~~Similar~~ Greater in urban areas  
Vibration: ~~Similar~~ Greater

**Population Housing and Employment**

Displacement: ~~Similar~~ Greater

**Public Services and Utilities**

Police, fire and emergency services: ~~Similar~~ Greater in urban areas  
Recreational Facilities: ~~Less~~ Greater in urban areas  
Solid Waste: ~~Less~~ Similar  
Utility Lines: ~~Similar~~ Greater in urban areas

**Cumulative Impacts**

Aesthetics: ~~Less~~ (natural lands); greater (urban areas)  
Air Quality: Greater (urban areas); less (region-wide) ~~Similar~~  
Cultural Resources: ~~Less~~ Greater (Historical)  
Hazardous materials: ~~Similar~~ Greater  
Noise: ~~Similar~~ Greater  
Public Services and Utilities: ~~Similar~~ Greater in urban areas  
Transportation, Traffic and Security: ~~Similar~~ Greater

The following changes are made to the text of the Envision 2 analysis (tables would remain the same except as noted) starting on page 4-31:

**Aesthetics**

Under the Envision 2 Alternative more aggressive growth strategies would be applied to the region. This would ~~result in higher densities and intensities of development in existing communities, contributing to would potentially result in~~ greater impacts related to light and glare, shade and shadow, and ~~changes to the~~ visual character of neighborhoods as more intense development occurs within urban centers. ~~However, existing undeveloped areas would remain in their natural state~~ Taller buildings could be incongruous with existing surroundings and could overwhelm historic buildings and/or existing neighborhoods, and cast shade and shadow on existing buildings as well as open space uses such as urban parks. ~~Nighttime glare in these areas would also increase with taller buildings. Further, glare impacts and shade and shadow impacts could be increased due to increase density.~~ However, as more development is focused in urban areas, fewer nighttime lighting impacts would occur in undeveloped areas. Lastly, impacts related to scenic highways and vistas would generally be the same as both alternatives include similar transportation networks. ~~Overall, aesthetic impacts would be greater in existing communities under this alternative (impacts to historic buildings, night-time lighting and shading) than the Plan but would be less in undeveloped areas (visual character would remain the same in 259 more undeveloped acres than under the Plan, likely fewer rocks and trees would be impacted, introduction of new light sources in 259 fewer acres).~~ On balance it is difficult to determine whether aesthetic impacts of the Envision Alternative would be better or worse than the Plan since the impacts are different. However, ~~shade/shadow impacts would be greater under this alternative as shading concerns are associated with the built environment.~~

### **Air Quality, including Cancer Risk and Other Health Incidences Related to VMT**

**Table 4-14** compares the Envision 2 Alternative criteria pollutant emissions by county to the Plan emissions. These emission changes result from the development pattern that focuses residential and employment growth in High Quality Transportation Areas. Compared to the Plan, the analysis shows that the Envision 2 Alternative would slightly increase regional emissions in the most densely populated areas, Los Angeles County, while although overall regional air emissions would decrease.

**Tables 4-15** and **4-16** show the residential and workplace cancer risk, respectively. The maximum residential and workplace risks due to vehicle operation on all freeway segments are much higher under existing conditions than under the Plan or the Envision 2 Alternative. The declines in cancer risk across all freeway segments are the result of continued decreases in per-vehicle mile fleet emissions projected to occur due to continued emission control technology improvements in new vehicles, and these technology improvements are projected to occur under the Plan as well as all alternatives.

As compared to the Plan, Envision 2 would result in higher cancer risk than the Plan for 2/4 of the 8 corridors segments modeled: I-15 in San Bernardino, I-8 in Imperial, SR 91 in Riverside, and US 101 in Ventura, ~~and I-405 in Orange.~~ Additionally, ~~due to the increased density in urban areas, heavy truck volumes on these segments would be higher under Envision 2. (On the I-405, both heavy truck and total vehicle volumes would be higher).~~ Populations living along these segments, ~~would also increase more under Envision 2 as compared to the proposed Plan - and these increased populations would be subject to higher health risks than those that would occur under the proposed Plan.~~

~~In addition,~~ It is estimated that the Envision 2 Alternative would result in 266,340 annual health incidences leading to \$4,329,661,096 spent on healthcare, whereas the Plan would result in 293,633 annual health incidences leading to \$4,952,996,222 spent on healthcare. Therefore, the Envision 2 Alternative would result in a fewer health risks.

Increasing population adjacent to transportation facilities could expose more people to increased cancer and other health risks. Even though cancer and other health risks adjacent to freeways and railroads would decrease considerably under the Envision 2 Alternative, regional risk levels would remain above average for the region and would be similar to the Plan. Impacts to increasing population adjacent to transportation facilities would similar to the Plan as both include similar transportation networks.

The Envision 2 Alternative would involve construction activity throughout the transportation system and in HQTAs across the region (as well as some construction outside HQTAs). Construction emissions of many projects would likely exceed the significance thresholds established in the CEQA Guidelines. Similar to the Plan, construction emissions would result in significant short-term impacts for individual projects. Projected long-term mobile source emissions are considered to be cumulatively significant if they are not consistent with the local air quality management plans and state implementation plans. Some regional emissions under the Envision 2 Alternative are greater than under the Plan (**Table 4-14**). The Plan conforms to the local air quality management plans, and cumulative impacts are considered less than significant. The Envision 2 Alternative would be expected to meet conformity requirements.

Overall, the Envision 2 Alternative could result in higher health risks (although still less than existing levels) and higher air pollutant exposures to criteria and toxic air contaminants in some areas that are proposed for high-density development adjacent to some freeways, disproportionately affecting populations located in these areas. These higher health risks and higher emissions would occur both during construction activities, and on an ongoing basis.

### **Biological Resources and Open Space**

Under the Envision 2 Alternative, fewer undeveloped areas would be impacted by excavation and construction activities as compared to the Plan. The Envision 2 Alternative focuses on TOD and further expansion of non-motorized transportation. Under the Envision 2 Alternative, transportation improvement projects would result in 75 square miles of new land consumption as compared to 334 square miles under the Plan, thereby reducing the impacts to biological resources and open space as compared to the 2012-2035 RTP/SCS. Increasing the density and intensity of development within existing communities may potentially increase impacts to urban area "pockets" of protected habitat areas for sensitive species and open space areas used as wildlife corridors within urbanized areas. While the Envision 2 alternative would affect fewer acres of natural lands, impacts to biological resources in and near the urban area may be more significant because they may impact more protected species as they could affect areas that are currently protected. However, the degree of relative impacts between the Proposed Plan and Envision 2 is difficult to determine. Given that the Envision 2 Alternative would redevelop more existing areas than the Plan, the Envision 2 Alternative would result in greater impacts to historic resources.

### **Cultural Resources**

Under the Envision 2 Alternative, fewer undeveloped areas would be impacted by excavation and construction activities related to transportation projects as compared to the Plan. The Envision 2 Alternative focuses on TOD and further expansion of non-motorized transportation. Under the Envision 2 Alternative, anticipated development would result in 75 square miles (48,000 acres) of new land consumption as compared to 334 square miles (213,800 acres) under the Plan, thereby exposing fewer previously undisturbed cultural resources. As with the Plan, increased focus on redevelopment of existing communities could result in increased impacts to historic buildings. Further, increases in the density and intensity of development within existing communities could result in an increased likelihood of adverse direct and indirect impacts to cultural resources (including historic, archeological and paleontological resources) located within the existing urbanized areas, particularly within established communities in the region.

Historic and archeological resources frequently occur within the region based on pre-historic and historic use patterns that concentrated development near the reliable water resources and trade routes that formed the framework for the existing regional development pattern. Archeological resources have been discovered (and often disturbed) in infill and urbanized areas (such as Playa Vista). Envision 2 Alternative could result in greater impacts than may be anticipated under a strict comparison of acres impacted. With less pressure to re-develop, the Plan may provide greater flexibility for preservation of significant cultural resources within urbanized areas and avoidance of such resources in future development and redevelopment areas.

### **Geology and Soils**

The Envision 2 transportation network is similar to the Plan network with minor changes to goods movement and transit projects. Construction and excavation impacts would therefore be generally the same as for the Plan. The Plan and the Envision 2 Alternative would have similar construction related impacts.

The Envision 2 Alternative focuses residential and employment growth in HQTAs. Development is anticipated to be more compact (more multi-family as compared to single-family housing). Some HQTAs are located near known faults and other geologic hazards which could increase the number of people and structures exposed to potential surface rupture, ground-shaking liquefaction, and landsliding due to seismic events. ~~However, b~~Both the Envision 2 Alternative and the Plan would likely result in geological and mineral resources impacts as the transportation networks would be

very similar, with some expansion to the transit networks under the Envision 2 Alternative. By limiting future development to 75 instead of 355 acres within the region, Envision 2 Alternative would result in fewer impacts to topsoil relative to the Plan. Cumulative geologic and mineral resources impacts for the Envision 2 Alternative would also be similar to those from implementation of the Plan. Geological and mineral resources impacts would be similar between the two alternatives. The Plan would have similar cumulative geological and mineral resources impacts to the Envision 2 Alternative.

### Greenhouse Gas Emissions

**Table 4-17** compares the Envision 2 Alternative GHG emissions by county to the Plan emissions. It is estimated (based on simplified gross estimates of construction, energy use and water use) that in 2035, the Plan would result in 3 million metric tons more of GHG emissions than the Envision 2 Alternative. The Envision 2 Alternative would improve regional GHG emissions compared to the Plan.

AB 32 calls for GHG emissions to be reduced to 1990 levels by 2020. In the absence of reliable 1990 GHG emissions estimates, ARB recommends an equivalent metric of 15 percent below 2005 GHG emissions. Under the Plan, GHG emissions in 2020 are expected to be greater than the GHG emissions reduction target set by AB 32. Because SCAG has no control over many future emissions factors (e.g., energy and water demand), SCAG made extremely conservative assumptions regarding these factors. An estimate of 2020 emissions was not completed for the Envision 2 Alternative because the increased land use effects included in Envision 2 are not projected to don't occur until after 2020. As demonstrated above, the Envision 2 Alternative would generate less GHG emissions than the Plan. However, similar to the Plan, the Envision 2 Alternative would not achieve the AB 32 targets.

As described in the Regulatory Setting above, SB 375 requires ARB to develop regional CO<sub>2</sub> emission reduction targets, compared to 2005 emissions, *for cars and light trucks only*, for 2020 and 2035 for each of the State's MPOs. Significantly, where SCAG has control over transportation network improvements and growth distribution as part of its Plan, it is able to meet the SB 375 target with the SCS. **Table 4-18** shows that regional per capita GHG emissions would decrease under the Envision 2 Alternative. As a result, the Envision 2 Alternative would achieve the SB 375 emissions targets (the Plan would also meet the targets).

### Hazardous Materials

The Envision 2 Alternative would result in similar impacts related to the accidental release of hazardous materials as compared to the Plan, but accident release risks for both construction and operational hazardous materials handling activities in areas with greater densities and intensities of development result in larger populations at risk of hazardous materials release exposures and consequential adverse health impacts. This development pattern would also result in more construction and operational activities near schools, including within the 1/4 mile radius of a school identified in one of the five hazardous materials thresholds. Envision 2 would ~~include increased transportation projects~~ require increased transportation improvements in previously-developed locations that are or may be contaminated by hazardous materials. The Envision 2 Alternative focuses on TOD and further expansion of non-motorized transportation. Under the Envision 2 only 75 square miles of land would be consumed (as compared to 334 square miles under the Plan). The Envision 2 Alternative could result in greater impacts related to disturbance of contaminated sites as compared with the Plan because of the increased focus on urban redevelopment, and the likelihood that previously-contaminated sites would be encountered and require cleanup (with associated higher rates of hazardous materials handling and transportation, the potential for onsite treatment and air/water emissions, and increased accident risks from these contaminated site management activities).



~~Because the land use patterns associated with the Envision 2 Alternative would maximize urban centers and focus on urban infill, and result in more construction and operational activities occurring in areas with higher populations that would be affected by hazardous materials accidents and other risks, this Alternative has a greater overall hazardous materials risk. This would increase the potential for disturbance of contaminated sites, as there is a greater likelihood for urban redevelopment sites to be previously exposed to hazardous materials.~~

### **Land Use and Agricultural Resources**

Current land use practices, including current General Plans, Zoning Codes, and other practices, would have to be substantially revised ~~changed~~ to accommodate the Envision 2 Alternative because the Envision 2 Alternative focuses considerable growth onto the existing urban areas around transit station and existing activity centers. The Envision 2 Alternative would also minimize or limit the further use of land for single-family development, even in infill locations within established neighborhoods of single-family homes. To achieve the densities of the Envision 2 Alternative, there would be a greater chance of conflicting with general plans in the Envision 2 Alternative than in the Plan. Because of this, the Envision 2 Alternative would have greater land use impacts than the Plan.

The Envision 2 Alternative would focus development in urban areas and existing communities and would have a greater emphasis on infill development. As a result, the Envision 2 Alternative could result in increased division of existing communities as a result of aggressive redevelopment, since a significantly higher percentage of the region's development is slated to occur there rather than distributed more broadly through the region.

Due to the compact land use development of the Envision 2 Alternative fewer agricultural resources would be impacted from transportation projects. As such, the Envision 2 Alternative would have fewer agricultural resources impacts than the Plan. However, neither the Plan nor the Envision 2 Alternative are expected to result in the loss of forest land or the conversion of forest land to non-forest use. Overall, under the thresholds used in the PEIR, the Envision 2 alternative would result in greater land use impacts and lesser agricultural impacts than the proposed Plan.

### **Noise**

The transportation improvements in the Envision 2 Alternative are similar to those in the Plan. The Envision 2 transportation network is similar to the Plan network with changes to goods movement and transit projects. Construction noise and vibration related to activities such as grading, power tools, and earth moving would therefore be generally the same as for the Plan. The Plan and the Envision 2 Alternative would have similar construction related impacts from transportation projects.

Regarding construction and operational noise impacts from both transportation and development activities ~~noise~~, the Envision 2 Alternative focuses residential and employment growth in High Quality Transportation Areas. Development is anticipated to be more compact (more multi-family as compared to single-family housing), therefore result in more intense areas of development and higher noise levels than under the Plan. Additionally, there will be larger populations exposed to construction and operational noise levels within the HQTAs. However, both the Envision 2 Alternative and the Plan would likely result in a comparable number of sensitive receptors being impacted by transportation noise.

Concentrating development within HQTAs will also result in higher numbers of people being exposed to groundborne vibration and noise levels, particularly from development construction.

Cumulative noise impacts for the Envision 2 Alternative would also be similar or greater to those from implementation of the Plan. Construction, ambient, aviation and port noise would be the same between

the two alternatives. The Plan would have similar cumulative noise impacts to the Envision 2 Alternative.

### **Population, Housing and Employment**

The Envision 2 Alternative would have the same number of households, employment and population as the Plan. The impact of the ~~indeed~~ population growth on a regionalized basis would be similar to the Plan, as both accommodate the same population increase. However, on a localized basis the Envision 2 Alternative would result in much higher population growth in designated communities and in existing urbanized areas relative to the proposed Plan. Additionally, because ~~the~~ the Envision 2 Alternative would focus development in urban areas and existing communities and would have a greater emphasis on infill development, it is projected to result in ~~As a result, the Envision 2 Alternative could result in an~~ increase in the number of homes or businesses that are displaced as a result of aggressive redevelopment. Overall, impacts to Population, Housing and Employment is higher under the Envision 2 Alternative than the proposed Plan.

### **Public Services and Utilities**

#### ***Fire and Police Protection and Emergency Services***

The Envision 2 Alternative would include the same number of population, housing and jobs that would require police, fire and emergency personnel; however more of these people would be located in urban areas and more people would live and work in high density buildings, including high rise buildings, under this Alternative. In general urban areas are well served by police, fire and emergency services, although the economic recession and structural financing challenges for municipal services have forced some curtailments in services.

Substantially increasing population densities and building intensities would place new challenges on existing fire, police protection and emergency services. For example, fire trucks and other response equipment that is designed to service traditional suburban development patterns with wider streets (allowing larger trucks) in communities with few if any buildings higher than 3-4 stories, would not be suitable for narrower, walkable street designs and mid- and high-rise construction. Firefighter training for different types of structural fires, and different fire pattern risks in high-density building areas, would also be required.

Similarly, suburban policing models and facilities generally are very automobile-dependent, with a central station and patrol car service as the backbone of suburban community policing. Police services in higher density, urbanized areas often require (or benefit from) different deployment models including more substations and more foot and bicycle patrols.

Under the Envision 2 Alternative, there would be significant new demands for police, fire, and emergency response services in the areas planned for the highest rates of population growth and development. Given current structural challenges with financing these types of municipal services, it is anticipated that the impact on these services would be greater under the Envision 2 Alternative than the proposed Plan because the change to high density urbanized forms is more intense under Envision 2.

~~and as personnel would travel shorter distances to calls response times would not be substantially affects. Further, fewer emergency service personnel would be needed to serve previously inaccessible areas of the SCAG region.~~

The Envision 2 Alternative would result in fewer impacts related to wildfire threats as compared to the Plan, because there would be greater focus on urban centers and fewer homes and communities would locate in rural areas with a greater risk of wildfire.

### ***Educational Facilities***

~~The Envision 2 Alternative would have greater impacts to existing school districts in communities slated for the highest growth levels similar impacts to educational facilities as relative to the Plan. The 2035 population is expected to be similar under the Envision 2 Alternative than under the Plan; however, Similarly, because the Envision 2 Alternative includes more aggressive population densities than the Plan, it and would result in the need for additional school facilities in the areas targeted for increased population densities, such as TOD areas, HQTAs and urban infill areas. School sites and school facilities tend to be smaller in urbanized areas than the standard suburban school model that is the dominant school pattern in the region, so the Envision 2 Alternative could result in greater numbers of schools that are smaller than the regional suburban norm.~~

### ***Recreational Facilities***

~~The Envision 2 Alternative would have greater impacts on recreational resources closest to areas slated for high density development, and fewer impacts related to recreational facilities in rural areas not slated for significant population growth as compared to the Plan. The Envision 2 Alternative focuses on increased densities, especially in HQTAs, and limits the development of new single-family housing that would be built in the region. The Envision 2 Alternative would result in approximately 75 square miles of new land consumption, as compared with 334 square miles under the Plan, thereby decreasing the potential to create ~~disturb existing~~ new recreational facilities on the smaller footprint allowed for development. However, ~~e~~Existing urban and community parks would be more severely impacted under the Envision 2 alternative, and fewer communities with planned high-density growth would be able to meet Quimby Act targets for parks than under the proposed Plan.~~

### ***Solid Waste Disposal and Transfer Facilities***

~~Solid waste generation rates are generally lower for multi-family units than single-family units, and since ~~t~~The Envision 2 Alternative limits future new single-family home construction in the region solid waste generation rates would be lower than under the proposed Plan. Less garden and "green" compostable materials would be generated under the Envision 2 Alternative. Higher concentrations of population in select communities would increase the demand for transfer facilities and related waste handling capacity in those communities. Overall, however, Envision 2 would result in fewer impacts related to solid waste disposal and transfer facilities than the Plan. The Envision 2 transportation network would require a similar amount of solid waste disposal and transfer facilities during project construction. However, the growth scenario associated with Envision 2 maximizes urban centers, TODs and HQTAs; it also includes a more progressive jobs/housing distribution optimized for TOD and infill.~~

### ***Energy***

~~Because the Envision 2 Alternative would result in greater development in urban areas, the potential to disrupt or sever underground utility lines would be greater in urban areas than the Plan. The Envision 2 Alternative would result in lower energy consumption than the Plan because it would limit new single-family home products in favor of smaller, multi-family and attached housing product types. In fewer impacts related to energy than the Plan. It includes far more aggressive~~

~~densities than the Plan, especially around HQTAs, increases mobility, reduces emissions, and limits the development of single family housing that would be built in the region. More progressive jobs and housing distribution would result in more energy efficient building types, and mixed Mixed-use/walkable communities would reduce reliance on automobiles for transportation, which would also occur under the Plan. The land use strategies under the Envision 2 Alternative would result in fewer~~

daily VMT. By 2035, under the Envision 2 Alternative, daily VMT would be approximately 498 million miles per day, as compared to 517 million miles under the Plan. In addition, total building energy usage under the Envision 2 Alternative would be approximately 577 trillion Btu by 2035, as compared to 589 trillion Btu under the Plan.

### **Transportation, Traffic and Security**

The Envision 2 Alternative would result in different less transportation impacts than the Plan. On a regional scale, ~~the Envision 2 Alternative would result in 498.3 million daily VMT, less than the Plan's 517.0 million daily VMT and the VMT in the base year—making it a beneficial impact.~~ Traffic congestion, and delays relating to congestion, would be greater under the Envision 2 Alternative. proposed plan. Daily hours of delay under the Envision 2 Alternative would be 3.4 million vehicle-hours for all vehicles and 0.159 million vehicle-hours for heavy-duty trucks. Comparatively, the Plan would produce 3.1 million vehicle-hours of delay for all vehicles and 0.158 million vehicle-hours of delay for heavy-duty trucks. The effects of growth and other external factors are included in the Regional Travel Demand Model that produces the results reported above. Because these external factors are modeled, the cumulative effects of regional growth are captured in the VMT, VHD, and heavy-duty truck VHD data reported for the Envision 2 Alternative above. The Envision 2 Alternative would have less regionalized VMT cumulative impacts than the Plan but would have greater congestion-related impacts than the Plan.

### **Water Resources**

Under the Envision 2 Alternative, fewer undeveloped areas would be impacted by excavation and construction activities related to transportation projects as compared to the Plan. The Envision 2 Alternative focuses on Transportation Oriented Development and further expansion of non-motorized transportation. Under the Envision 2 Alternative, anticipated development would result in 75 square miles (48,000 acres) of new land consumption as compared to 334 square miles (213,800 acres) under the Plan, thereby reducing the amount of impervious surfaces and decreasing impacts to water resources as compared to the 2012-2035 RTP/SCS.

Although fewer impacts would occur in the areas that would remain undeveloped under the Envision 2 Alternative, greater hydrological impacts would occur in existing communities slated for high-density development. Substantially increasing densities above planned levels may exceed the capacity of existing water and wastewater pipelines and infrastructure systems, again at a disproportionately higher level in the communities slated for very high-density development under the Envision 2 Alternative. Furthermore, available water supplies for the region would continue to present a challenge although the Envision 2 Alternative would have less water demand than the Plan. The Envision 2 Alternative could result in greater adverse impacts than the Plan in communities slated for high-density development.

### **ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the PEIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

A summary of the alternatives’ impacts relative to the proposed project are shown in **Table 4-19**.

For purposes of this PEIR, the impacts associated with reducing global GHG emissions and regional air pollutants must be examined alongside the other adverse impacts that are caused by increasing the density and intensity of the region's development patterns and, for example, bringing people closer to higher sources of air pollutants such as transit corridors and freeways. The tension between CEQA's

mandate to reduce all types of impacts to the maximum extent feasible, and the statutory mandates of reducing GHG emissions under AB 32 and SB 375, is a well-recognized CEQA compliance challenge. [Tackling California's Global Warming Challenge: A Guide to SB 375, by Tom Adams (California League of Conservation Voters), Amanda Eaken and Anne Nothoff (Natural Resources Defense Council), 2010, p. 24.] CEQA does not provide any legal mechanism for "weighting" environmental impacts, and scoring some categories of impacts as "more important" and others as "less important." Instead, CEQA is structured to require the disclosure of all impacts for each Alternative and the Plan, to foster informed decision making and to disclose the inherent trade-offs between different types and magnitudes of impacts associated with different Alternatives.

As depicted in Table 4-1, both the Plan and each Alternative result in many impacts that are "significant and unavoidable" under CEQA. Envision 2 would result in fewer impacts to four CEQA impact categories (global GHG emissions, regional air emissions, agricultural/open space, and biological resources). The anticipated increases in the density and intensity of development within the region's established communities under the Envision 2 Alternative would result in more localized impacts that are greater than the proposed Plan.

Of the three alternatives, the Envision 2 Alternative would be considered the environmentally superior alternative from the perspective of fewer impacts to natural lands and reduced greenhouse gas emissions because it does not allow further use of land for single-family development. The Envision 2 Alternative concentrates development in existing urban centers around transit stations and activity centers, and therefore, has less impact on rural and undeveloped areas. However, Envision 2 would have much more severe impacts on the built environment (i.e. seven CEQA impact categories: localized air quality, historic resources, exposure to accident and upset and hazards in proximity to schools, noise and vibration, displacement, public services and utilities, traffic delay).

The Plan would result in fewer impacts in urbanized areas and would be the environmentally superior from the perspective of the urban environment.

Page 4-39, for Envision 2, in Table 4-19, to the "Better than Proposed Project Column" the following changes are made: Biological Resources and Open Space (natural land), and Land Use and Agricultural Resources (agricultural lands). Under the column "Worse than the Proposed Project" the following changes are made: health risk along some corridors could be greater Localized Air Pollution, Aesthetics (shadow impacts), Historic Resources, Hazardous Materials, Public Services and Utilities, Traffic (delay).

## **LONG TERM EFFECTS**

### **5.3 Growth Inducing Impacts**

Page 5-4, the third paragraph is revised as follows:

Potential inducements to population growth include roads that provide access, ~~the availability of adequate water supplies,~~ the availability of sewage treatment facilities, the availabilities of developable land, the types and availability of employment opportunities, housing costs and availability, commuting distances, cultural amenities, climate, and local government growth policies contained in general plans and zoning ordinances.

## MAPS

The following maps are revised; Maps 3.2-7, 3.13-6 and 3.13-8 are deleted and map numbering following each deleted map is changed to reflect these deletions. Revised maps are included on CD in the back of printed copies of the Final PEIR.

Map 2-3: Regional Highway Projects Proposed by Counties  
Map 2-12: Regional Goods Movement System  
Map 2.13: 2035 Grade Separation Projects  
Map 2-18: Land Use Pattern LA County  
Map 2-19: Land Use Patterns in Orange County  
~~Map 3.2-7: 2005 Regional Cancer Risk along Rail Lines~~  
Map 3.3-1: Listed and Sensitive Species Habitat  
Map 3.3-5: Special Status Natural Communities in the SCAG Region  
Map 3.8-1: Regional Distribution of Important Farmlands  
~~Map 3.13-6: Imported Water Areas Serviced by State Water Project~~  
~~Map 3.13-7: Imported Water Areas Serviced by Colorado River Aqueduct~~  
~~Map 3.13-8: Metropolitan Water District Service Areas~~-(following map re-numbered and references updated)

The titles of the following maps are changed as follows:

Map 3.8-9: Household Density Growth by ~~Census Tract~~ TAZ (Traffic Analysis Zone)  
Map 3.8-10: Employment Density Growth by ~~Census Tract~~ TAZ (Traffic Analysis Zone)

The following note is added to maps in the Map Chapter showing biological, geological, and water resources, as well as maps showing farmlands and open spaces: This map is intended for use in broad-scale regional analysis and is not intended to be used in assessing project level impacts.

## APPENDICES

The RTP project list, presented in Appendix B of the PEIR, has been updated since publication of the Draft PEIR. Updates are minor and include changes to funding years and minor changes in scope (for example changing the number of lanes from one to two). Readers are referred to the Project List Appendix of the 2012-2035 RTP/SCS for the most recent project list. Changes made since publication of the Draft PEIR would not substantially affect the analysis contained in the draft PEIR and would not change the conclusions in any way.

The Puente Hills Preserve (in Los Angeles County, managed by the Puente Hills Habitat Preservation Authority) is added to Appendix C of the PEIR.

Appendix E is renamed: Greenhouse Gas Assumptions and Rapid Fire Analysis

## **6.0 MITIGATION MONITORING AND REPORTING PROGRAM**

The California Environmental Quality Act (CEQA) requires that an agency adopt a Mitigation Monitoring or Reporting Program (MMRP) prior to approving a project that includes mitigation measures. This MMRP has been prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the CEQA Guidelines.

The purpose of this MMRP is to ensure compliance with the adopted mitigation measures included in the 2012-2035 RTP/SCS PEIR, in accordance with CEQA requirements. The 2012-2035 RTP/SCS PEIR evaluates the transportation plan on a system-wide, regional scale, and includes feasible mitigation measures to reduce environmental impacts. Mitigation measures are generally directed at SCAG and will be implemented with appropriate funding. It should be noted that SCAG does not construct or operate transportation projects. In addition, the PEIR has identified one mitigation measure, at the end of each resource area, which indicates that the local agency “can and should” comply with CEQA in assessing and mitigating project-specific impacts.

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>AESTHETICS AND VIEWS</b>			
<b>MM-AV1:</b> SCAG shall coordinate with Caltrans and local agencies as part of SCAG's outreach and technical assistance to local governments under Compass Blueprint and Toolbox Tuesdays, to encourage that projects avoid locally designated scenic highways and/or vista points.	Ongoing over the life of the Plan	X	
<b>MM-AV2:</b> SCAG shall coordinate with Caltrans and local agencies as part of SCAG's outreach and technical assistance to local governments under Compass Blueprint and Toolbox Tuesdays, to provide information concerning applicable guidelines and regulations for the preservation of scenic resources along scenic highways.	Ongoing over the life of the Plan	X	
<b>MM-AV3:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to aesthetics as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X
<b>AIR QUALITY</b>			
<b>MM-AQ1:</b> SCAG shall determine as part of its conformity finding pursuant to the Clean Air Act, that the Plan and updates provide for the timely implementation of Transportation Control Measures (TCMs) as appropriate TCMs included in the Plan are identified in the Transportation Conformity Appendix to the 2012-2035 RTP/SCS (starting on page 26). CAA Section 108(f)(1)(A) lists the following sixteen measures as illustrative of TCMs (plus a last measure recommended by SCE):  I. Programs for improved use of public transit; II. Restriction of certain roads or lanes to, or construction of such roads or lanes for use by, passenger buses or HOV; III. Employer-based transportation management plans, including incentives; IV. Trip-reduction ordinances; V. Traffic flow improvement programs that achieve emission reductions; VI. Fringe and transportation corridor parking facilities, serving multiple occupancy vehicle programs or transit service; VII. Programs to limit or restrict vehicle use in downtown areas or other areas of emission concentration, particularly during periods of peak use; VIII. Programs for the provision of all forms of high-occupancy, shared-ride services, such as the pooled use of vans; IX. Programs to limit portions of road surfaces or certain sections of the metropolitan area to the use of non-motorized vehicles or pedestrian use, both as to time and place; X. Programs for secure bicycle storage facilities and other facilities, including bicycle lanes, for the convenience and protection of bicyclists, in both public and private areas; XI. Programs to control extended idling of vehicles; XII. Programs to reduce motor vehicle emissions, consistent with Title II of the CAA, which are caused by extreme cold start conditions; XIII. Employer-sponsored programs to permit flexible work schedules; XIV. Programs and ordinances to facilitate non-automobile travel, provision and utilization of mass	Ongoing over the life of the Plan	X	



Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<p>transit, and to generally reduce the need for single-occupant vehicle travel, as part of transportation planning and development efforts of a locality, including programs and ordinances applicable to new shopping centers, special events, and other centers of vehicle activity;</p> <p>XV. Programs for new construction and major reconstruction of paths, tracks or areas solely for the use by pedestrian or other non-motorized means of transportation, when economically feasible and in the public interest; and</p> <p>XVI. Programs to encourage the voluntary removal from use and the marketplace of pre- 1980 model year light duty vehicles and pre-1980 model light duty trucks.</p> <p>XVII. Programs to encourage the installation of personal electric vehicle charging stations, and other alternative fuel sources.</p> <p>The Plan has been prepared to facilitate implementation of TCMs and they also serve as air quality mitigation measures for the purposes of the PEIR.</p>			
<p><b>MM-AQ2:</b> SCAG shall pursue the following activities in reducing the impact associated with health risk within 500 feet of freeways and high-traffic volume roadways:</p> <ul style="list-style-type: none"> <li>• Participate in on-going statewide deliberations on health risks near freeways and high-traffic volume roadways. This involvement includes inputting to the statewide process by providing available data and information such as the current and projected locations of sensitive receptors relative to transportation infrastructure;</li> <li>• Work with air agencies including ARB, SCAQMD, and all air districts in the SCAG region to support their work in monitoring the progress on reducing exposure to emissions of PM10 and PM2.5 for sensitive receptors, including schools and residents within 500 feet of high-traffic volume roadways;</li> <li>• Work with stakeholders to identify planning and development practices that are effective in reducing health impacts to sensitive receptors; and</li> <li>• Share information on all of the above efforts with stakeholders, member cities, counties and the public.</li> </ul>	Ongoing over the life of the Plan.	X	
<p><b>MM-AQ3:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to air quality as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects. Appendix G contains a non-exclusive list of examples of measures that could reduce impacts to air quality. It is anticipated that regulations and actions at the federal, state and local level will be implemented to ensure that public health in the region is impacted to a less than significant level.</p>	Ongoing over the life of the Plan.		X
<b>BIOLOGICAL RESOURCES AND OPEN SPACE</b>			
<p><b>MM-BIO/OS1:</b> SCAG shall facilitate reducing future impacts to biological resources through cooperation, information sharing, and program development. SCAG shall consult with the resource agencies, such as USFWS and CDFG, as well as local jurisdictions to incorporate any local HCPs or other similar planning documents. Planning efforts shall be in accordance with the approach outlined in the California Wildlife Action Plan.</p>	Ongoing over the life of the Plan	X	

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>MM-BIO/OS2:</b> SCAG shall develop a conservation strategy (including regional mitigation policies) in coordination with local jurisdictions and agencies, including CTCs. The conservation strategy will build from existing efforts including those at the sub-regional and local levels to identify potential priority conservation areas based on mitigation approaches adopted by local agencies. SCAG shall produce and maintain a list/map of potential conservation opportunity areas based on most recent land use data.	Ongoing over the life of the Plan	X	
<b>MM-BIO/OS3:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to biological resources and open space as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan	X	
<b>CULTURAL RESOURCES</b>			
<b>MM-CUL1:</b> Impacts to cultural resources shall be minimized through cooperation, information sharing, and SCAG's ongoing regional planning efforts such as web-based planning tools for local government including CA Lots, and direct technical assistance efforts such as Compass Blueprint's Toolbox Tuesday series. Resource agencies, such as the Office of Historic Preservation, shall be consulted during this process.	Ongoing over the life of the Plan	X	
<b>MM-CUL2:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to cultural resources as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X
<b>GEOLOGY</b>			
<b>MM-GEO1:</b> SCAG shall facilitate minimizing future impacts to geological resources through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA Lots, and direct technical assistance efforts such as Compass Blueprint's Toolbox Tuesday series. Resource agencies, such as the U.S. Geology Survey, should be consulted during this update process.	Ongoing over the life of the Plan	X	
<b>MM-GEO2:</b> SCAG shall coordinate with the Department of Conservation, California Geological Survey to maintain a database, if available, of 1) available resources in the SCAG region including permitted and un-permitted and 2) the anticipated 50-year demand. Based on the results of this survey SCAG should work with local agencies to develop an appropriate response to the anticipated demand, including identifying future sites that may seek permitting and working with industry experts to identify ways to encourage and increase recycling to reduce the demand for aggregate.	Ongoing over the life of the Plan	X	
<b>MM-GEO3:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts associated with geology, soils and mineral resources as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>GREENHOUSE GAS EMISSIONS</b>			
<b>MM-GHG1:</b> SCAG shall update any future Regional Transportation Plans/Sustainable Communities Strategy and Regional Comprehensive Plans to incorporate policies and measures that lead to reduced greenhouse gas (GHG) emissions. Such policies and measures may be derived from the General Plans, local jurisdictions' Climate Action Plans (CAPs), and other adopted policies and plans of its member agencies that include GHG mitigation and adaptation measures or other sources.	Ongoing over the life of the Plan	X	
<b>MM-GHG2:</b> SCAG shall, through its ongoing outreach and technical assistance programs, work with and encourage local governments to adopt policies and develop practices that lead to GHG emission reductions. These activities will include, but are not limited to, providing technical assistance and information sharing on developing local Climate Action Plans.	Ongoing over the life of the Plan	X	
<b>MM-GHG3:</b> SCAG shall work with the business community, including the Southern California Leadership Council and the Global Land Use and Environment Council, to develop regional economic strategies that promote energy savings and GHG emission reduction.	Ongoing over the life of the Plan	X	
<b>MM-GHG4:</b> SCAG shall continue coordination with other metropolitan planning organizations (MPOs) on statewide strategies and approaches to reducing GHG emissions and facilitate the implementation of SB 375.	Ongoing over the life of the Plan	X	
<b>MM-GHG5:</b> SCAG shall coordinate with ARB and air districts in efforts to implement the AB 32 Scoping Plan.	Ongoing over the life of the Plan	X	
<b>MM-GHG6:</b> SCAG shall develop a regional climate and economic development strategy that assesses the cost effectiveness of GHG reduction measures and prioritizes strategies that have greatest overall benefit to the economy.	Ongoing over the life of the Plan	X	
<b>MM-GHG7:</b> SCAG, in its capacity as a Clean Cities Coalition, shall work with member local governments to promote the use of alternative fuel technology.	Ongoing over the life of the Plan	X	
<b>MM-GHG8:</b> SCAG shall work with utilities, sub-regions, and other stakeholders to promote accelerated penetration of zero (and/or near zero) emission vehicles in the region, including developing a strategy for the deployment of public charging infrastructure.	Ongoing over the life of the Plan	X	
<b>MM-GHG9:</b> SCAG shall in its capacity as a Clean Cities Coalition establish coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.	Ongoing over the life of the Plan	X	
<b>MM-GHG10:</b> Pedestrian and Bicycle Promotion: SCAG shall work with local community groups and business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.	Ongoing over the life of the Plan	X	
<b>MM-GHG11:</b> Water Conservation: SCAG shall support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.	Ongoing over the life of the Plan	X	

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>MM-GHG12:</b> Energy Efficiency: SCAG shall organize workshops on steps to increase energy efficiency in the home or business, such as weatherizing the home or building envelope, installing smart lighting systems, and how to conduct a self-audit for energy use and efficiency.	Ongoing over the life of the Plan	X	
<b>MM-GHG13:</b> Climate Protection Summit/Fair: SCAG shall in coordination with local jurisdictions (as practicable) support and/or sponsor periodic Climate Protection Summits or Fairs, to educate the public on current climate science, projected local impacts, and local efforts and opportunities to reduce GHG emissions, including exhibits of the latest technology and products for conservation and efficiency.	Ongoing over the life of the Plan	X	
<b>MM-GHG14:</b> Schools Programs: SCAG shall develop and implement a program in coordination with school districts to present information to students about climate change and ways to reduce GHG emissions, and will support school-based programs for GHG reduction, such as school based trip reduction and the importance of recycling.	Ongoing over the life of the Plan	X	
<b>MM-GHG15:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts from greenhouse gas emissions as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X
<b>HAZARDOUS MATERIALS</b>			
<b>MM-HM1:</b> SCAG shall encourage the United States Department of Transportation (USDOT), the Office of Emergency Services, and California Department of Transportation (Caltrans) and the private sector to continue to conduct driver safety training programs.	Ongoing over the life of the Plan	X	
<b>MM-HM2:</b> SCAG shall encourage the USDOT and the California Highway Patrol to continue to enforce speed limits and existing regulations governing goods movement and hazardous materials transportation.	Ongoing over the life of the Plan	X	
<b>MM-HM3:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts that result from hazardous materials as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects. Appendix G contains a non-exclusive list of examples of mitigation measures that would reduce impacts from use of hazardous materials and/or disposal of hazardous wastes. Potentially significant impacts to public health associated with the issues of handling and proper disposal of hazardous materials and wastes are well regulated and compliance with these regulations is mandatory. Because federal, state, and local agencies regularly enforce these regulations, it is reasonable to assume that project sponsors will comply. Compliance with these regulations would reduce any potential impact to public safety to a less than significant level.	Ongoing over the life of the Plan		X
<b>LAND USE AND AGRICULTURAL RESOURCES</b>			
<b>MM-LU1:</b> SCAG shall encourage cities and counties in the region to provide SCAG with electronic versions of their most recent general plan (and associated environmental document) and any updates as they are produced.	Ongoing over the life of the Plan	X	

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>MM-LU2:</b> SCAG shall continue to provide targeted technical services such as GIS and data support for cities and counties to update their general plans at least every ten years, as recommended by the Governor's Office of Planning and Research.	Ongoing over the life of the Plan	X	
<b>MM-LU3:</b> SCAG shall work with its member cities and counties to encourage that transportation projects and growth are consistent with the RTP and general plans.	Ongoing over the life of the Plan	X	
<b>MM-LU4:</b> SCAG shall coordinate with member cities and counties to encourage that general plans consider and reflect as appropriate RTP/SCS policies and strategies. SCAG will work to encourage consistency between general plans and RTP/SCS policies.	Ongoing over the life of the Plan	X	
<b>MM-LU5:</b> SCAG shall provide technical assistance and regional leadership to encourage implementation of the RTP/SCS goals and strategies that integrate growth and land use planning with the existing and planned transportation network.	Ongoing over the life of the Plan	X	
<b>MM-LU6:</b> SCAG shall provide planning services to local jurisdictions through sustainability planning programs including the Compass Blueprint Demonstration Projects and the Green Region initiative. These projects will help local jurisdictions: <ul style="list-style-type: none"> <li>• Update General Plans to reflect Compass Blueprint principles and integrate land use and transportation planning.</li> <li>• Develop specific plans, zoning overlays and other planning tools to enable and stimulate desired land use changes that are consistent with the future land development pattern in the 2012-2035 RTP/SCS</li> <li>• Complete the economic analysis and community involvement efforts that will ensure that the planned changes are market feasible and responsible to stakeholder concerns.</li> <li>• Visualize potential changes, through innovative graphics and mapping technology to inform the dialogue about growth, development and transportation at the local and regional level.</li> </ul>	Ongoing over the life of the Plan	X	
<b>MM-LU7:</b> SCAG shall continue with a public relations strategy that emphasizes the benefits and implications of Compass Blueprint principles and sustainable growth, and builds a sense of common interests among Southern California communities.	Ongoing over the life of the Plan	X	
<b>MM-LU8:</b> SCAG shall continue to use its Intergovernmental Review Process to provide review and comment on large development projects regarding their consistency with the RTP with respect to the growth forecast.	Ongoing over the life of the Plan	X	
<b>MM-LU9:</b> SCAG shall work with member agencies and the region's farmland interests groups to develop regional best practices information for buffering farmland from urban encroachment, resolving conflicts that prevent farming on hillsides and other designated areas, and closing loopholes that allow conversion of non-farm uses without a grading permit.	Ongoing over the life of the Plan	X	
<b>MM-LU10:</b> SCAG shall identify best practices for preserving and promoting the productivity and viability of agricultural lands, including promoting the availability of locally grown and organic food in the.	Ongoing over the life of the Plan	X	

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>MM-LU11:</b> SCAG's Sustainability Planning Program including the Compass Blueprint program, Green Region Initiative and other ongoing regional planning efforts will be used to encourage and provide assistance for changes in land use to accommodate future population growth while maintaining the quality of life in the region.	Ongoing over the life of the Plan	X	
<b>MM-LU12:</b> SCAG shall promote infill, mixed-use, higher density and other sustainable development, and work with partners to identify incentives to support the creation of affordable housing in mixed-use zones.	Ongoing over the life of the Plan	X	
<b>MM-LU13:</b> SCAG shall educate the public about the benefits of well-designed, higher density and other sustainable development.	Ongoing over the life of the Plan	X	
<b>MM-LU14:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to land use as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X
<b>NOISE</b>			
<b>MM-NO1:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to noise as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X
<b>POPULATION, HOUSING AND EMPLOYMENT</b>			
<b>MM-POP1:</b> SCAG shall work with its member agencies to encourage and assist growth strategies to create an urban form designed to focus development in HQTAs in accordance with the policies, strategies and investments contained in the 2012-2035 RTP/SCS, enhancing mobility and reducing land consumption.	Ongoing over the life of the Plan	X	
<b>MM-POP2:</b> SCAG's Sustainability Planning Program such as the Compass Blueprint strategy will be used to coordinate and provide information in the region relating to changes in land use to accommodate future population growth while maintaining the quality of life in the region.	Ongoing over the life of the Plan	X	
<b>MM-POP3:</b> SCAG shall work with neighboring planning agencies and MPOs to ensure plans and strategies can accommodate future population growth beyond SCAG's borders.	Ongoing over the life of the Plan	X	
<b>MM-POP4:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to population, housing and employment as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X
<b>PUBLIC SERVICES AND UTILITIES</b>			
<b>MM-PS1:</b> SCAG shall discourage development on potentially hazardous developments in hillsides, canyons, areas with steep slopes or that are susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.	Ongoing over the life of the Plan	X	

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>MM-PS2:</b> SCAG shall promote Fire-wise Land Management: by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat.	Ongoing over the life of the Plan	X	
<b>MM-PS3:</b> SCAG shall promote Fire Management Planning that help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts.	Ongoing over the life of the Plan	X	
<b>MM-PS3:</b> SCAG shall promote Fire Management Planning that help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts.	Ongoing over the life of the Plan	X	
<b>MM-PS4:</b> SCAG shall encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.	Ongoing over the life of the Plan	X	
<b>MM-PS5:</b> SCAG shall support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.	Ongoing over the life of the Plan	X	
<b>MM-PS6:</b> SCAG shall encourage member jurisdictions to work as partners to address regional outdoor recreation needs and to acquire the necessary funding for the implementation of their plans and programs. This shall be done, in part, by consulting with agencies and organizations that have active open space work plans.	Ongoing over the life of the Plan	X	
<b>MM-PS7:</b> SCAG shall coordinate with local agencies to facilitate planning and funding opportunities for regional open space.	Ongoing over the life of the Plan	X	
<b>MM-PS8:</b> SCAG shall continue to work with the State to develop approaches for evaluating environmental impacts within the Compass Blueprint program, particularly energy, air quality, water, and open space and habitat.	Ongoing over the life of the Plan	X	
<b>MM-PS9:</b> SCAG shall encourage member jurisdictions that have trails and trail segments determined to be regionally significant to work together to support regional trail networks. SCAG may encourage the joint use of utility, transportation and other rights-of-way, greenbelts, and biodiversity areas	Ongoing over the life of the Plan	X	
<b>MM-PS10:</b> SCAG shall consider consistency with ongoing regional open space planning in funding opportunities and programs administered by SCAG.	Ongoing over the life of the Plan	X	
<b>MM-PS11:</b> SCAG shall encourage methane recovery in local landfills and wastewater treatment plants to generate electricity.	Ongoing over the life of the Plan	X	

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<p><b>MM-PS12:</b> SCAG shall continue to consider energy uncertainty impacts prior to the development of the next RTP/SCS. Topics that shall be considered include:</p> <ul style="list-style-type: none"> <li>• How the price and availability of transportation fuels affects revenues and demand;</li> <li>• How increases in fuel efficiency could affect revenues and emissions;</li> <li>• How the cost of commuting and personal travel affects mode choice and growth patterns;</li> <li>• How the cost of goods movement affects international trade and employment; or</li> <li>• How the escalation of fuel prices affects the cost of infrastructure construction, maintenance and operation.</li> </ul>	Ongoing over the life of the Plan	X	
<p><b>MM-PS13:</b> SCAG shall convene key stakeholders to evaluate and where feasible, recommend transportation measures such as congestion pricing, a refined regional goods movement system and technologies that reduce fossil fuel consumption.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-PS14:</b> SCAG shall encourage clean post-recycle conversion technologies to produce energy or technologies that offset energy use or air emissions.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-PS15:</b> SCAG shall continue to identify best practices and disseminate information to member agencies on energy efficiency and green building to provide direction on specific approaches and models.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-PS16:</b> SCAG shall build from existing efforts including those at the sub-regional and local level to encourage the federal and state government to increase clean, cost-effective, reliable, domestic renewable energy generation, such as solar and wind turbines,</p>	Ongoing over the life of the Plan	X	
<p><b>MM-PS17:</b> SCAG shall continue to promote electric vehicle penetration throughout the region through on-going electric vehicle readiness efforts.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-PS18:</b> SCAG shall participate in discussions on fuel efficiency-standards-that would reduce the region's dependence on petroleum and reduce greenhouse gas emissions.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-PS19:</b> SCAG shall continue to pursue partnerships with Southern California Edison, municipal utilities, and the California Public Utilities Commission to promote energy efficiency and reduce greenhouse gas emissions in the region.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-PS20:</b> SCAG shall provide information on energy demand and greenhouse gas emissions, as available, to the California Air Resources Board and to other stakeholders in order to assist in policy deliberations.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-PS21:</b> SCAG shall continue to work with local jurisdictions and energy providers, through its Energy and Environment Committee, and administration of the Clean Cities Program as well as by other means, to encourage regional-scale planning for improved energy management. Future impacts to energy may be minimized through cooperative planning, and information sharing within the SCAG region.</p>	Ongoing over the life of the Plan	X	



Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>MM-PS22:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to public services and utilities as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects. Appendix G contains a non-exclusive list of examples of measures that could reduce impacts to public services and utilities. Potentially significant impacts to severing utility lines that could result from construction activities are addressed through Best Management Practices and local permitting.	Ongoing over the life of the Plan		X
<b>TRANSPORTATION, TRAFFIC AND SAFETY</b>			
<b>MM-TR1:</b> SCAG shall establish a forum where policy-makers can be educated and can develop consensus on regional transportation safety and security policies	Ongoing over the life of the Plan	X	
<b>MM-TR2:</b> SCAG shall work with local officials to assist with implementation of regional transportation safety and security policies.	Ongoing over the life of the Plan	X	
<b>MM-TR3:</b> SCAG shall conduct workshops focusing on Sustainability Planning and Development strategies.	Ongoing over the life of the Plan	X	
<b>MM-TR4:</b> SCAG shall help ensure the rapid repair of transportation infrastructure in the event of an emergency. This will be accomplished by SCAG, in cooperation with local and State agencies, identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. In addition, SCAG shall establish transportation infrastructure practices that promote and enhance security.	Ongoing over the life of the Plan	X	
<b>MM-TR5:</b> SCAG shall continue to promote the use of intelligent transportation system (ITS) technologies that enhance transportation security. SCAG may work to expand the use of ITS to improve surveillance, monitoring and distress notification systems and to assist in the rapid evacuation of disaster areas. SCAG shall facilitate the incorporation of security into the Regional ITS Architecture.	Ongoing over the life of the Plan	X	
<b>MM-TR6:</b> SCAG shall share information and encourage transportation infrastructure practices that promote and enhance security. SCAG shall work with transportation operators to plan and coordinate transportation projects, as appropriate, with DHS grant projects, to enhance the regional transit security strategy (RTSS). SCAG shall share information and encourage transportation infrastructure practices that identify and prioritize the design, retrofit, hardening, and stabilization of critical transportation infrastructure to prevent failure, to minimize loss of life and property, injuries, and avoid long term economic disruption. SCAG shall establish a Transportation Security Working Group (TSWG) with goals of 2012-2035 RTP/SCS consistency with RTSS, and to find ways SCAG programs can enhance RTSS.	Ongoing over the life of the Plan	X	
<b>MM-TR7:</b> SCAG shall help to enhance the region's ability to deter and respond to acts of terrorism, human-caused or natural disasters through regionally cooperative and collaborative strategies. SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies.	Ongoing over the life of the Plan	X	

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<p><b>MM-TR8:</b> SCAG shall help to enhance the region's ability to deter and respond to terrorist incidents, human-caused or natural disasters by strengthening relationship and coordination with transportation. This will be accomplished by the following:</p> <ul style="list-style-type: none"> <li>• SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies.</li> <li>• SCAG shall encourage all SCAG elected officials to be educated in the National Incident Management System (NIMS).</li> <li>• SCAG shall work with partner agencies, federal, State and local jurisdictions to improve communications and interoperability and to find opportunities to leverage and effectively utilize transportation and public safety/security resources in support of this effort.</li> </ul>	Ongoing over the life of the Plan	X	
<p><b>MM-TR9:</b> SCAG shall work to enhance emergency preparedness awareness among public agencies and with the public at large.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-TR10:</b> SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-TR11:</b> SCAG shall work to improve the effectiveness of regional plans by maximizing the sharing and coordination of resources that would allow for proper response by public agencies.</p>	Ongoing over the life of the Plan	X	
<p><b>MM-TR12:</b> SCAG shall encourage and provide a forum for local jurisdictions to develop mutual aid agreements for essential government services during any incident recovery</p>	Ongoing over the life of the Plan	X	
<p><b>MM-TR13:</b> SCAG shall help to enhance the capabilities of local and regional organizations, including first responders, through provision and sharing of information. This will be accomplished by:</p> <ul style="list-style-type: none"> <li>• SCAG shall work with local agencies to collect regional GeoData in a common format, and provide access to the GeoData for emergency planning, training and response.</li> <li>• SCAG shall establish a forum for cooperation and coordination of these plans and programs among the regional partners including first responders and operations agencies</li> <li>• SCAG shall develop and establish a regional information sharing strategy, linking SCAG and its member jurisdictions for ongoing sharing and provision of information pertaining to the region's transportation system and other critical infrastructure.</li> </ul>	Ongoing over the life of the Plan	X	
<p><b>MM-TR14:</b> SCAG shall provide the means for collaboration in planning, communication, and information sharing before, during, or after a regional emergency. This will be accomplished by the following:</p> <ul style="list-style-type: none"> <li>• SCAG shall develop and incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities.</li> <li>• SCAG shall offer a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.</li> <li>• SCAG shall enter into mutual aid agreements with other MPOs (as feasible) to provide this data, in coordination with the California OES in the event that an event disrupts SCAG's ability to function.</li> </ul>	Ongoing over the life of the Plan	X	

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>MM-TR15:</b> Congestion Pricing: SCAG shall continue to analyze and develop potential implementation strategies for a regional, market-based system to price or charge for auto trips during peak hours.	Ongoing over the life of the Plan	X	
<b>MM-TR16:</b> Beyond the currently financially and institutionally feasible measures included in the 2012-2035 RTP/SCS, SCAG shall identify further reduction in VMT, and fuel consumption that could be obtained through land-use strategies, additional car-sharing programs, additional vanpools, additional bicycle programs, and implementation of a universal employee transit access pass (TAP) program.	Ongoing over the life of the Plan	X	
<b>MM-TR17:</b> SCAG shall (for its employees) institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.	Ongoing over the life of the Plan	X	
<b>MM-TR18:</b> SCAG shall create or accommodate car sharing programs, e.g., provide parking spaces for car share vehicles at convenient locations accessible by public transportation.	Ongoing over the life of the Plan	X	
<b>MM-TR19:</b> SCAG shall develop a vanpool program for employees for commute trips.	Ongoing over the life of the Plan	X	
<b>MM-TR20:</b> Transportation Planning: SCAG shall encourage that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.	Ongoing over the life of the Plan	X	
<b>MM-TR21:</b> The Plan includes measures intended to reduce vehicle hours of delay. These include: system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce delay. SCAG shall encourage local agencies to fully implement these policies and projects.	Ongoing over the life of the Plan	X	
<b>MM-TR22:</b> The Plan includes measures intended to reduce daily heavy-duty truck vehicle hours of delay. These include: goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. SCAG shall encourage local agencies to fully implement these policies and projects.	Ongoing over the life of the Plan	X	
<b>MM-TR23:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to transportation, traffic and security as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X

Mitigation Measures	Timing of Implementation	Responsible Party	
		SCAG	Local Jurisdiction
<b>WATER RESOURCES</b>			
<b>MM-W1:</b> SCAG shall continue to work with local jurisdictions and water quality agencies, to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided to the extent practical and feasible through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur as part of current and existing coordination, an integral part of SCAG's ongoing regional planning efforts.	Ongoing over the life of the Plan	X	
<b>MM-W2:</b> SCAG shall provide opportunities for information sharing with respect to wastewater treatment and program development in the region.	Ongoing over the life of the Plan	X	
<b>MM-W3:</b> SCAG shall build from existing efforts including those at the sub-regional and local level and shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge, including consideration of alternative recharge technologies and practices. Future adverse impacts may be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region.	Ongoing over the life of the Plan	X	
<b>MM-W4:</b> SCAG, in coordination with regional water agencies and other stakeholders, shall encourage regional coordination throughout California and the Colorado River Basin that develops and supports sustainable policies in accommodating growth.	Ongoing over the life of the Plan	X	
<b>MM-W5:</b> SCAG, in coordination with regional water agencies and other stakeholders, shall facilitate information sharing about the management and status of the Sacramento River Delta, the Colorado River Basin, and other water supply source areas of importance to local water supply.	Ongoing over the life of the Plan	X	
<b>MM-W6:</b> SCAG shall assist in minimizing future impacts to water supply through cooperation, information sharing, and program development as part of SCAG's on-going regional planning efforts, in coordination with regional water agencies and other stakeholders.	Ongoing over the life of the Plan	X	
<b>MM-W7:</b> SCAG, in coordination with the State Water resources Board, shall encourage cities, counties and water districts to develop local sources of potable water including recycling where feasible.	Ongoing over the life of the Plan	X	
<b>MM-W8:</b> SCAG, as part of its on-going outreach and technical assistance efforts, shall support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.	Ongoing over the life of the Plan	X	
<b>MM-W9:</b> Local agencies can and should comply with the requirements of CEQA to mitigate impacts to water resources as applicable and feasible. Local agencies may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects.	Ongoing over the life of the Plan		X



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