SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

50 YEARS

Responses to Comments

on the Draft Program Environmental Impact Report

CERTIFIED APRIL 2016 | STATE CLEARINGHOUSE # 2015031035

2016 2040 RTPSCS

FOR THE **2016-2040** REGIONAL TRANSPORTATION PLAN/ SUSTAINABLE COMMUNITIES STRATEGY

Southern California Association of Governments

8.0
RESPONSES TO COMMENTS
ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

8.1 OVERVIEW

The Draft Program Environmental Impact Report (PEIR) was completed and forwarded to the Governor's Office of Planning and Research (OPR) (State Clearinghouse [SCH] #2015031035), and a Notice of Completion (NOC) was posted with the County Clerks for the six counties in the SCAG region and distributed to various federal, state, regional and local government agencies, and other interested agencies, organizations, and individuals on December 4, 2015. The PEIR was circulated primarily using electronic mail to over 2,700 interested parties, including 144 representatives of Native American tribes. The PEIR was mailed directly to approximately 570 interested parties, including federal, state, regional and local agencies, organizations and major libraries in the region using the U.S. Postal Service certified mail service. Additionally, SCAG placed copies of the Draft PEIR at the offices of SCAG and at 55 public libraries throughout the region, and posted the Draft PEIR on its website.

The PEIR was also posted at the following SCAG Regional Office locations:

SCAG Main Office
818 West 7th Street, 12th Floor,
Los Angeles, CA 90017

SCAG Riverside County Regional Office
3403 10th Street, Suite 805
Riverside, CA 92501

SCAG Imperial County Regional Office
1405 N. Imperial Avenue, Suite 1
El Centro, CA 92243

SCAG San Bernardino County Regional Office
1170 West 3rd Street, Suite 140
San Bernardino, CA 92410

SCAG Orange County Regional Office
600 South Main Street, Suite 906
Orange, CA 92868

SCAG Ventura County Regional Office
950 County Square Drive, Suite 101
Ventura, CA 93003

The Draft PEIR was made available for public review at the above referenced locations until February 1, 2016, for a period of 60 days (December 4, 2015–February 1, 2016). A total of 81 comment letters were received by SCAG during the comment period (75 timely comment letters and 6 late comment letters).

This section of the EIR contains a summary of the distribution list for the Draft EIR and a listing of the parties that provided comments during the public review period. The distribution list/respondents have been divided into the following categories:

1. Sovereign Nations
2. Federal Agencies
3. State Agencies
4. Regional Agencies
5. SCAG Member Jurisdictions
6. SCAG Subregional Governments

7. County Transportation Commissions
8. Organizations and Individuals

Table 8.1-1, *List of Commenters on the Draft PEIR*, provides a list of the comment letters received in response to the Draft PEIR.

TABLE 8.1-1
LIST OF COMMENTERS ON THE DRAFT PEIR

Letter Number	Summary of Written Comments
Sovereign Nations	
	No Comments Received
Federal Agencies	
1	US Environmental Protection Agency Region IX
State Agencies	
2	Caltrans District 7
3	California Department of Fish and Wildlife
4	California Office of Planning and Research Letter No. 1
5	California Office of Planning and Research Letter Nos. 2 and 3
6	California State Assembly and State Senate
7	Lahontan Regional Water Quality Control Board
Regional Agencies	
8	Imperial County Air Pollution Control District
9	Local Agency Formation Commission for San Bernardino County
10	Ventura County Air Pollution Control District
SCAG Member Jurisdictions and Local Agencies	
11	5-Cities Alliance
12	City of Anaheim
13	City of Colton
14	City of Diamond Bar
15	City of Eastvale
16	City of El Centro
17	City of El Segundo
18	City of El Segundo
19	City of Irvine
20	City of La Canada Flintridge
21	City of Lake Forest
22	City of Mission Viejo
23	City of Rancho Cucamonga
24	City of San Clemente
25	City of South El Monte
26	City of South Pasadena
27	City of Tustin

TABLE 8.1-1
LIST OF COMMENTERS ON THE DRAFT PEIR

Letter Number	Summary of Written Comments
28	County of Los Angeles Public Health
29	County of Ventura
30	Orange County Public Works
31	Riverside County Planning Department
SCAG Subregional Governments	
32	Orange County Council of Governments
33	West Riverside Council of Governments
County Transportation Commissions	
34	Orange County Transportation Authority
35	San Bernardino Associated Governments
Organizations and Individuals	
36	Albert Perdon
37	Alliance for a Regional Solution to Airport Congestion
38	Ann Tarkington
39	Banning Ranch Conservancy
40	Bolsa Chica Land Trust
41	Building Industry Association of Southern California
42	California Construction and Industrial Materials Association
43	California Cultural Resources Preservation Alliance
44	California Native Plant Society
45	Center for Demographic Research
46	Endangered Habitats League
47	Environmental Coalition
48	Eric Johnson
49	Ezequiel Gutierrez
50	Five Point Communities
51	Friends of Harbors, Beaches, and Parks
52	Hank Fung
53	Hills for Everyone
54	Irene Sandler (Letter No. 1)
55	Irene Sandler (Letter No. 2)
56	Joyce Dillard
57	Kristy Norman
58	Laguna Canyon Foundation
59	Laguna Greenbelt, Inc.
60	Los Cerritos Wetlands Land Trust
61	March Joint Planning Area

TABLE 8.1-1
LIST OF COMMENTERS ON THE DRAFT PEIR

Letter Number	Summary of Written Comments
62	Mark Jolles
63	Marven Norman
64	National Trust for Historic Preservation
65	Naturalist For You
66	Orange County Business Council
67	Orange County League of Conservation Voters
68	Public Health Alliance of Southern California
69	Richard Helgeson
70	Robert Dale
71	Ronald Stein PTS Staffing
72	Rural Canyons Conservation Fund
73	Saddleback Canyons Conservancy
74	Sea and Sage Audubon Society
75	Southern California Leadership Council
76	Steve Rogers
77	Terry Goller
78	The City Project
79	Tressy Capps
80	Ventura County 350 Climate Hub
81	Ventura Hillside Conservancy

The comment letters received on the Draft PEIR are presented in **Appendix A** (included on CD inside the back cover of hard copies of the Final PEIR) with the comments numbered and annotated in the right margin. Comment letters are also available online along with the rest of the PEIR at: http://scagrtpscs.net/Pages/PROPOSEDFINAL2016PEIR.aspx.

For the purposes of identifying and responding to comments on the Draft PEIR, comment letters are assigned a number (top right hand corner of the first page of each letter) and each comment within each letter is assigned a bracketed comment number. (For example, the first comment received by the U.S. EPA is labeled **Comment 1-1**).

Several commenters on the Draft 2016 RTP/SCS PEIR indicated in the subject line of their letter that they were providing comments on the Draft PEIR but the substance of their letter included comments on both the Draft PEIR and Draft 2016 RTP/SCS or comments only on the Draft 2016 RTP/SCS. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15088(a), SCAG is required to evaluate comments on environmental issues received from public agencies and other interested parties who reviewed the Draft PEIR. However, SCAG recognizes the importance of public participation and as such, Plan specific comments were re-routed to SCAG's online form system which documents and tracks all Plan related comments by sub-category (Goods Movement, Environmental Justice, Conformity Analysis, etc.). Each comment related to the Plan was given a submission ID number (i.e., Submission ID 16285)

and have been logged appropriately for Planning staff to review and respond to through the 2016 RTP/SCS review process.

Please note that in the regional transportation process, SCAG aims to encourage public participation and maintain the integrity of input received from local jurisdictions. Commenters who are reviewing the responses to comments to the PEIR and are also interested in Plan related changes can look up the Plan related responses by searching for their submission ID number within the **Comments and Responses Appendix**, which is a sub-appendix of the Final 2016-2040 RTP/SCS **Public Participation and Consultation Appendix**. Responses to comments and revisions to the 2016 RTP/SCS are also available via the web at: http://scagrtpscs.net/Pages/PROPOSEDFINAL2016RTPSCS.aspx.

8.2 MASTER RESPONSES

As a result of public review of the Draft PEIR, some of the comments submitted to SCAG recurred in multiple letters. This subsection of the response to comments begins with "Master Responses" for each of those issues of that were identified by multiple commenters. The Master Responses address multiple similar comments on an issue and provide a comprehensive reply as well as additional information that may have been requested by any individual comment. The responses to the individual comment letters cite the Master Responses as appropriate. Master Responses for this Final PEIR are as follows:

Master Response No. 1: Comments related to the Draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("2016 RTP/SCS" or "Plan")

The Draft 2016 RTP/SCS was circulated for public review during the same time period as the Draft Program Environmental Impact Report for the 2016 RTP/SCS ("PEIR"), from December 4, 2015 until February 1, 2016. Eighty-one (81) comment letters on the Draft PEIR were received by SCAG during the comment period. Several of the comment letters contained only comments on the Draft PEIR, while others contained comments on both the Draft PEIR and Draft 2016 RTP/SCS or comments only on the Draft 2016 RTP/SCS.

Pursuant to California Environmental Quality Act (CEQA) Guidelines §15088(a), SCAG is required to evaluate comments on environmental issues received from public agencies and other interested parties who reviewed the Draft PEIR. It is important to note that CEQA requires good faith written responses to all "comments on environmental issues," but not all comments (*City of Irvine v County of Orange* (July 6, 2015) 238 Cal. App. 4th 526). As such, the PEIR provides responses to comments directly related to the environmental analysis that is the subject of the PEIR.

Guiding Principal No. 3 for the 2016 RTP/SCS is to respect input from local jurisdictions. Therefore, comments related to the Draft 2016 RTP/SCS were re-routed to SCAG's online form system which documents and tracks all Plan related comments by sub-category (Goods Movement, Environmental Justice, Conformity Analysis, etc.). Each comment related to the Plan was given a submission ID number (i.e., Submission ID 16285) and has been logged appropriately for Planning staff to review and respond to through the 2016 RTP/SCS review process.

Commenters who are reviewing the responses to comments to the PEIR and are also interested in Plan related changes can look up the Plan related responses by searching for their submission ID number within the Comments and Responses Appendix, which is a sub-appendix of the

Final 2016-2040 RTP/SCS Public Participation and Consultation Appendix. Responses to comments and revisions to the 2016 RTP/SCS are also available via the web at: http://scagrtpscs.net/Pages/PROPOSEDFINAL2016RTPSCS.aspx

Master Response No. 2: Program EIR versus. Project EIR

The 2016 RTP/SCS PEIR is a programmatic document that provides a region-wide assessment of the potential significant environmental effects of implementing policies, strategies, projects, and programs included in the 2016 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 § 15168). The PEIR for the 2016 RTP/SCS offers regional scale analysis of the impacts of the 2016 RTP/SCS and provides mitigation measures to be implemented by SCAG at the regional level, and performance standards-based 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 PEIR is on potential regional-scale impacts associated with implementation of the 2016 RTP/SCS as a whole. The 2016 RTP/SCS includes individual transportation projects and provides land use policies set forth in the SCS component of the Plan. Because the Plan and PEIR is from a regional perspective and is programmatic in nature, it does not include site-specific analysis of any project contained in the 2016 RTP/SCS. Many of the individual transportation projects included in the 2016 RTP/SCS are identified at an early stage of the development phase, and detailed project/site specific analysis is not possible or appropriate at this time. This 2016 RTP/SCS PEIR addresses environmental impacts and considers alternatives to the level that they can be assessed without undue speculation. (See CEQA Guidelines § 15126.6(f)(3)).

While the 2016 RTP/SCS PEIR identifies a number of significant impacts at the regional level, these impacts must be separately assessed at the project level to be adjusted and correlated to specific project conditions in order to determine whether any individual project would have significant impacts at the local or sub-regional level. Subsequent project-level environmental analyses will determine whether or not an individual project has significant, project-level impacts requiring the consideration of project-level mitigation measures.

Additionally, the use of a program approach ensures consideration of the cumulative effects of the transportation projects contemplated over the 25-year planning horizon and avoids duplicative reconsideration of the basic policy consideration in the RTP/SCS related to land use patterns, alternative modes of travel, active transportation, and sustainability. As specified by § 15168(c) of the state CEQA Guidelines, subsequent activities analyzed in the PEIR must be examined to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the PEIR, a new initial study would need to be prepared leading to determine the appropriate level of environmental compliance documentation pursuant to CEQA (See CEQA Guidelines § 15002(k)).

Master Response No. 3: Technical Process/Modeling

Environmental impacts for the 2016 RTP/SCS PEIR were determined by applying the thresholds of significance which compare future Plan conditions to the existing environmental setting (See CEQA Guidelines §15126.2(a)). The existing environmental setting was described in detail for each of the resource categories (see **Section 3.0** of the Draft 2016 RTP/SCS PEIR), and represents the most recent and representative data to describe current regional conditions during the publication of the NOP for the PEIR. Transportation modeling, which was the basis for the existing environmental conditions with respect to air quality, greenhouse gas emissions and climate change, and transportation, traffic and safety. Modeling was based on the 2012 "base year" transportation network, updated to reflect projects listed in the 2012 RTP/SCS as last amended in September 2014, as well as project information from the 2015 Federal Transportation Improvement Program (FTIP), adopted in September 2014 and approved by the Federal Highway Administration on December 2014. As such, in most instances, the most recent available data at the time of publication of the NOP was for 2014, while in some instances the most recent available data was 2012, in which case the 2012 data was projected to characterize the existing conditions appropriate for the CEQA resource categories.

The methodology for SCAG's modeling is shown in the Transportation Conformity Analysis Appendix and the Sustainable Communities Strategy Background Documentation Appendix for the 2016 RTP/SCS. SCAG's regional transportation modeling area covers the entire SCAG region, including the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's modeling area is divided into 11,267 Transportation Analysis Zones (TAZs) with an additional 40 external cordon stations, 12 airport nodes, and 31 port nodes for the Ports of Los Angeles and Long Beach. SCAG regional travel demand model accounts for the induced travel demand. The SCAG model was peer reviewed and updated based on the 2012 California Household Travel Survey. A comprehensive model validation was also performed to ensure that the model properly replicates base-year (2012) travel conditions, which is the base year for the 2016 RTP/SCS.

It is important to emphasize that SCAG's 2016 RTP/SCS does not primarily focus on specific or local projects, but analyzes the transportation network of the entire region. As such, modeling input and assumptions for SCAG's modeling include but are not limited to socioeconomic data, highway networks, and transit networks. This also includes all projects which were featured in the Plan's Project List Appendix which were provided by the six County Transportation Commissions (CTCs) in the SCAG region.

To achieve federal conformity, SCAG is required to model regionally significant and federally funded projects contained within the Federal Transportation Improvement Program (FTIP). SCAG is aware that some of the projects are currently under environmental review and that a preferred alternative has yet to be determined. Upon determination of the preferred alternative, SCAG will work with applicable local jurisdictions to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

The forecasted land use development patterns are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analysis. Data at the TAZ level or at a geographically smaller than the jurisdictional level are advisory only, and non-binding, since SCAG sub-jurisdictional forecasts are not adopted as part of the 2016 RTP/SCS. The data is controlled to be within the density range of local general plans and/or based upon input received from local jurisdictions. For purposes of evaluating a local project's eligibility to utilize CEQA streamlining opportunities, lead agencies have the sole discretion to determine project consistency with the 2016 RTP/SCS.

The California Air Resources Board (ARB's) EMFAC2014 (short for "EMission FACtor", approved by U.S. EPA in December 2015) model is a computer model capable of estimating both current year, back-cast and forecasted emission inventories for calendar years 2000 to 2050. EMFAC estimates the emission rates of 1965 and newer vehicles, powered by gasoline, diesel or electricity. Emission inventory estimates are made for 51 vehicle classes segregated by usage and weight. EMFAC calculates the emission rates of CO_2 and other criteria pollutants, such as ROG, NO_x, PM_{10}, $PM_{2.5}$, SO_x, and also CH_4 for 45 model years for each vehicle class within each calendar year, for twenty four (24) hourly periods, and each month of the year, for each district, air basin, county and sub-county in California.

The ARB's Vision Scenario Planning Tool is another computer model capable of estimating multi-pollutants (CO_2, $PM_{2.5}$, NO_x and ROG) for transportation system-wide categories such as passenger vehicles, Heavy duty trucks, locomotives, and ships. It is based on California specific data from different ARB's official emission inventories, such as EMFAC2014, Locomotives, and Ocean Going Vessels.

To determine regional CO_2 and other criteria pollutants for the "On-road" transportation sector which included Light and Medium-duty vehicles (LMDV; vehicles with weight class less than 8,500 lbs), Heavy-duty trucks (HDT; Trucks with weight class greater than 8,501 lbs) and all buses, SCAG simulates the EMFAC2014 model using the output from the trip-based regional transportation demand model. In order to compare with the regional GHG emissions targets derived using EMFAC2007, the EMFAC2014 model GHG emissions outputs have been converted to EMFAC2007 equivalents applying ARB's adjustment methodology.

For CO_2 equivalent (CO_{2e}) estimation, the three main Greenhouse Gases (GHGs): CO_2, Methane (CH_4) and Nitrous Oxide (N_2O) from both "On-road" and "Off-road" transportation sector are obtained from EMFAC2014 and ARB's Vision tool respectively. The "Off-road" transportation sector includes rail, aviation and Ocean-Going Vessel (OGV). Standard ratios are used to convert the GHGs into CO_{2e}. These ratios are based on the Global Warming Potential (GWP) of each gas which describes its total warming impact relative to CO_2. For example, GWP for CH_4 is 25, meaning that one ton of CH_4 will cause the same amount of warming as 25 ton of CO_2. After all GHGs are converted, they are aggregated as the regional total CO_{2e}.

Master Response No. 4: Performance Standards- Based Mitigation Measures

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 § 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 § 21081(a)(2) (emphasis added); CEQA Guidelines § 15091; *City of Marina v. Bd. of Trustees of the Calif. State Univ.* (2006) 39 Cal.4th 341, 366; see also *Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439). Under these circumstances, CEQA requires the lead agency to find that the measures "can and should" be adopted by the other agency or agencies said to have exclusive responsibility/jurisdiction over the measures. (CEQA Guidelines § 15091(a)(2); *see also City of Marina*, 39 Cal.4th at 366).

CEQA case law also provides 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]; *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 1028–1029 [deferral of agency's selection among several alternatives based on performance criteria was appropriate]).[1]

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 § 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 §§ 65800–65912), and the Subdivision Map Act (Government Code §§ 66410–66499.37). 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* implemented by SCAG.

As discussed in Section 1.6 of the Introduction to the PEIR, since SCAG does not implement transportation projects in the RTP/SCS, SCAG has no authority to require specific mitigation measures at the project level, and lead or responsible agencies have the discretion to determine which mitigation measures are applicable and feasible based on the location-specific circumstances. Identification of the performance standards along with project-level mitigation measures fulfill SCAG's responsibility, as such project-level measures (or other measures) may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Use of the word "may" or "should" 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.

This PEIR presents a region-wide assessment of existing conditions and potential impacts associated with implementation of the 2016 RTP/SCS. As such, this PEIR identifies programmatic mitigation measures for which SCAG would be responsible on a regional scale. While the 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

[1] Note that in litigation challenging the San Diego Association of Government's (SANDAG) adoption of its 2050 Regional Transportation Plan/Sustainable Communities Strategy, the California Court of Appeal found that "[a]n EIR may not defer the formulation of mitigation measures to a future time, but mitigation measures may specify performance standards which would mitigate the project's significant effects and may be accomplished in more than one specified way." *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2014) 231 Cal. App. 4th 1056, 1089. While this case has been appealed before the California Supreme Court, this issue is not under review.

generalized mitigation criteria (see, e.g., *Koster v. County of San Joaquin* (1996) 47 Cal.App.4th 29). In addition, in each resource area, the PEIR identifies mitigation measures which include performance standards which lead, responsible, or trustee agencies "can and should" comply with in assessing and mitigating project-specific impacts. SCAG then identifies project-level mitigation measures that may be required by lead agencies, to meet the specified performance standards. Lead agencies may also identify other comparable measures capable of achieving the specified performance standards.

As discussed above, lead or responsible agencies have the discretion to determine at the project level which mitigation measures are applicable and feasible, based on the project-specific circumstances. Identification of the performance standards-based project-level mitigation measures along with implementation of the mitigation measures within its authority fulfills SCAG's responsibility to mitigate the impacts of the 2016 RTP/SCS. Consistent with information provided in Section 1.6 of the Introduction to the PIER, use of the performance standards-based mitigation measures in this PEIR recognizes the limits of SCAG's authority; fulfills SCAG's responsibilities as a lead agency under CEQA; distinguishes between SCAG commitments from project-level, lead agency responsibilities; maintains flexibility for the lead agency at the project-level; and allows efficient and effective implementation of RTP/SCS projects by facilitating CEQA streamlining and tiering, where appropriate.

In sum, this performance standards-based mitigation approach includes three components: (1) SCAG programmatic-level mitigation measures; (2) a "catch-all" mitigation measure for each of the CEQA resource categories which sets forth performance standards specified in existing statutes, regulations, adopted general plans, and agreements; and (3) project-level mitigation measures which are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

This performance standards-based mitigation approach was approved by SCAG's governing board, the Regional Council, as part of its approval to release the Draft PEIR for public review on December 3, 2015, and based on support and recommended approval of this approach by SCAG's three standing policy committees at a Joint Meeting of the Policy Committees on November 5, 2015 and by the Energy and Environment Committee (EEC) at its meeting on October 8, 2015. For more information, see http://scag.granicus.com/MediaPlayer.php?view_id=15&clip_id=935&meta_id=17288, and http://www.scag.ca.gov/committees/CommitteeDocLibrary/eec100815fullagn.pdf.

8.3 SOVEREIGN NATIONS

No comments were received from sovereign nations on the Draft PEIR.

8.4 FEDERAL AGENCIES

One (1) comment was received from a federal agency:

1. U.S. Environmental Protection Agency Region IX

1. U.S. Environmental Protection Agency Region IX
Debbie Lowe Liang
Environmental Review Section (ENF-4-2)
75 Hawthorne Street
San Francisco, California 94105
415-947-4155

Response to Comment No. 1:

Thank you for your comments and the EPA's support for the Southern California Association of Government (SCAG) goal of incorporating environmental and community considerations in the regional transportation planning process.

Response to Comment Nos. 2-3:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16285, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 4:

Thank you for your comment on **Section 3.3, Air Quality** of the PEIR. The section did place a specific emphasis in linking air emissions to public health, as this comment notes. In addition to the environmental justice analysis completed for the 2016 RTP/SCS, the PEIR also acknowledges air quality issues which can impact low-income minority populations and localized impacts to sensitive receptors based on the level of development and proximity to approved transportation projects until the horizon year.

Response to Comment No. 5:

Thank you for your suggestion to modify **MM-Air-2(a)(1)XVI**. SCAG has accepted the recommendation and has made the changes in the **Clarifications and Revisions** (see **Section 3.3, Air Quality** and **0.4 Executive Summary**) section of the Final PEIR.

With regard to **MM-Air-2(a)(2)**, Please refer to **Master Response No. 2**. Additionally, the performance standards-based mitigation measures in the Draft PEIR recognize SCAG's limited authority; fulfill SCAG's responsibilities as a lead agency under CEQA; distinguish SCAG commitments from project-level lead agency responsibilities; maintains flexibility for the lead agency at project-level; and allows efficient and effective implementation of RTP/SCS projects by facilitating CEQA streamlining and tiering, where appropriate. Please refer to **Master Response No. 4**.

SCAG is actively coordinating and collaborating language with air districts and applicable stakeholders to address impacts to sensitive receptors within 500 feet of freeways and high volume roadways.[2,3] Increased use of transit and active transportation, rideshare, reduction of total VMT, and electric vehicle technologies contribute to lowering emissions and reducing impacts within 500 feet of freeways and high volume roadways. For specific programs to address on-road vehicle emissions, the California Air Resources Board implements the On-Road Heavy Duty Vehicle Program to address diesel emissions from heavy duty trucks. Heavy duty diesel vehicles are responsible for a highly disproportionate amount of the total on-road emissions, making them a good target for reducing overall on-road emissions.

Response to Comment No. 6:

Thank you for your suggestion to modify project level mitigation measure **MM-Air-2(b).** SCAG has accepted the recommendation and has made the changes in the **Clarifications and Revisions** (See revisions to **Section 3.3, Air Quality**) section for the Final PEIR.

Response to Comment No. 7:

Thank you for your comment on **MM-Air-4(b).** The performance standards-based mitigation measures in the Draft PEIR recognize SCAG's limited authority; fulfill SCAG's responsibilities as a lead agency under CEQA; distinguish SCAG commitments from project-level lead agency responsibilities; maintains flexibility for the lead agency at project-level; and allows efficient and effective implementation of RTP/SCS projects by facilitating CEQA streamlining and tiering, where appropriate. Please refer to **Master Response No. 4**.

Response to Comment No. 8:

Thank you for your comment to include the Council of Environmental Quality Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts in **Section 3.8, Greenhouse Gas Emissions and Climate Change** of the PEIR. As mentioned in the comment, the Revised Draft Guidance was not included as it relates to NEPA environmental review. However, the 25,000 MT CO_{2e} threshold identified in the Revised Draft Guidance is acknowledged through the GHG Reporting regulation at CARB.[4]

Response to Comment No. 9:

Thank you for your comment regarding the consideration of whether the ongoing California drought could result in land subsidence and its potential effects on infrastructure projects. The discussion of land subsidence in the SCAG region has been added to the **Clarifications and Revisions (**see revisions to **Section 3.7, Geology and Soils)** section of the Final EIR. SCAG intends to provide clarifications and/or revisions generally reflecting the following:

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2 California Environmental Protection Agency California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005. Available online at: http://www.arb.ca.gov/ch/handbook.pdf

3 California Environmental Protection Agency California Air Resources Board. Strategies to Reduce Near-Roadway Pollution Exposure. April 2015.

4 United States Environmental Protection Agency. Greenhouse Gas Reporting Program. 2010. Available online at: https://www.epa.gov/ghgreporting

In addition to the above mentioned causes, land subsidence in the SCAG region can also result from persistent and prolonged drought as has been experienced in California over the last five years. Prolonged drought can also exacerbate the above causes of subsidence as in the case of groundwater extraction for agricultural purposes. As there is less surface water available, more groundwater is extracted, thus increasing the potential for subsidence.[5,6]

The impact of subsidence could include lowering of the land surfaces, increased potential for flooding, potential disturbance or damage to transportation infrastructure, buried pipelines and associated structures, and damage to structures designed with minimal tolerance for settlement.

Response to Comment No. 10:

Thank you for your comment to highlight the environmental outcomes of the projects that won SCAG Sustainability Awards. SCAG has included a list of the qualities that these projects embody in the **Clarifications and Revisions** (See revisions to **Section 3.8, Greenhouse Gas Emissions and Climate Change**) of the Final PEIR.

Response to Comment No. 11:

SCAG acknowledges the comment on better defining "water related energy." Water related energy includes the electricity used in the transport, treatment, and distribution of water. This definition has been added to the **Clarifications and Revisions** (See revisions to **Section 3.3, Air Quality**) section for the Final PEIR.

Response to Comment No. 12:

Thank you for your comment on the mitigation measures. SCAG acknowledges the support for the SCAG mitigation measures stated in **Section 3.8, Greenhouse Gas Emissions and Climate Change** and will address the comment for the Project Level mitigation measures in USEPA **Comment No. 13**.

Response to Comment No. 13:

Thank you for your comment on **MM-GHG-3(b)**. Mitigation measure **MM-GHG-3(b)** has been revised based on EPA's recommendations. Please see **Clarifications and Revisions** (See revisions to **Section 3.8, Greenhouse Gas Emissions and Climate Change**) section of the Final PEIR.

Response to Comment No. 14:

SCAG appreciates the US EPA's review of the 2016 RTP/SCS and Draft PEIR. Web copies of the Final 2016 RTP/SCS is available at: http://scagrtpscs.net/Pages/PROPOSEDFINAL2016RTPSCS.aspx. Additionally, the Final PEIR is available at: http://scagrtpscs.net/Pages/PROPOSEDFINAL2016PEIR.aspx.

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5 U.S. Geological Survey. Areas of Land Subsidence in California. Available online at: http://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html

6 U.S. Geological Survey. USGS Land Subsidence Studies in California. Available online at: http://ca.water.usgs.gov/land_subsidence/california-subsidence-studies.html

8.5 STATE AGENCIES

Six (6) letters of comment were received from state agencies:

1. Caltrans District 7
2. California Department of Fish and Wildlife
3. State of California Office of Planning and Research (Letter No. 1)
4. State of California Office of Planning and Research (Letter Nos. 2 and 3)
5. California State Assembly and State Senate
6. Lahontan Regional Water Quality Control Board

2. Caltrans District 7
Gary T. Slater
Deputy District Director for Planning
100 S. Main Street, Suite 100
Los Angeles, Ca 90012
(213) 897-0362

Response to Comment Nos. 1-21:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16307, ID 16308, ID 16313, ID 16319, and ID 16323, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 22:

Thank you for your comment on the Health Risk Assessment (HRA). The HRA focuses on 16 select freeway segments (eight of which were evaluated in the previously conducted 2012 RTP/SCS PEIR) and analyzes the diesel emissions and associated cancer risk. Specifically, these 16 were chosen as they provide a conservative and worst case scenario within the region's transportation network.

Additionally, because the focus of the environmental analysis in the 2016 PEIR is on a regional scale, site-specific analysis of the projects contained in the 2016 RTP/SCS Project List are not individually analyzed (See **Master Response No. 2**).

Impacts to noise are considered in **Section 3.13, Noise.** Impacts to hazardous waste are considered in **Section 3.9, Hazards and Hazardous Materials.**

Thank you for your comment related to the 2016 RTP/SCS. Health Risk at a policy level is discussed in the 2016 RTP/SCS and impacts to the community are considered in the 2016 RTP/SCS **Environmental Justice Appendix**. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16370, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 23:

Thank you for your comment. Please see **Master Response No. 2.**

Response to Comment No. 24:

Thank you for your comment. SCAG has accepted the recommendation and has made changes in the **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic and Safety**) section of the Final PEIR.

Response to Comment No. 25:

Thank you for your comment. SCAG has accepted the recommendation and has made changes in the **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic and Safety**) section of the Final PEIR.

3. California Department of Fish and Wildlife
Betty Courtney
Environmental Program Manager I
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201

Response to Comment No. 1:

SCAG appreciates CDFWs review of the PEIR. Thank you for your comment.

Response to Comment No. 2:

SCAG appreciates CDFWs support for the PEIR's analysis of biological resources and project-level performance-standard based mitigation measures identified to address significant impact on biological resources.

Response to Comment No. 3:

Thank you for your comment regarding a minor correction to **Table 3.4.2-2** on page 3.4-20 of **Section 3.4, Biological Resources** of the PEIR for Townsend's Big-eared Bat. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR.

Response to Comment No. 4:

Thank you for your comment regarding a minor correction to **Table 3.4.2-2** on page 3.4-19 of **Section 3.4, Biological Resources** of the PEIR for Tricolored Black Bird. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR.

Response to Comment No. 5:

Thank you for your comment requesting the addition of California condor USFWS observation data points to **Figure 3.4.2-1**. The most current available USFWS California condor observation data have been added to **Figure 3.4.2-1, *State and Federally Listed Species Reported in the SCAG Region***. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR.

Response to Comment No. 6:

Thank you for your comment regarding a minor correction to **Table 3.4.2-4** on page 3.4-29 of **Section 3.4, Biological Resources** of the PEIR, for Coastal Cactus Wren and White-faced Ibis. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR.

Response to Comment No. 7:

Thank you for your comment requesting the addition of language regarding the potential for additional impacts to sensitive and riparian habitats beyond those associated with blue-line features. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR.

Response to Comment No. 8:

Thank you for your comment requesting the addition of language regarding project mitigation for nesting birds. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR.

Response to Comment No. 9:

Thank you for your comment requesting the recognition of the importance of urban habitats to wildlife movement on page 3.4-67 and **MM-BIO-4(b)** on page 3.4-80. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR.

Response to Comment No. 10:

Thank you for your comment requesting the reference of habitat connectivity data provided by South Coast Wildlands, the Biogeographic Information and Observation System, and the California Essential Habitat Connectivity Project. References to these sources of information on wildlife corridors have been added to the document on page 3.4-50. Additional language has been added to the document recognizing these additional sources of information. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR.

Response to Comment No. 11:

Thank you for your comment requesting that the DEIR evaluate the feasibility of implementing a regional conservation strategy as part of the Plan. Information regarding regional conservation strategy for the SCAG region is not yet available. However, SCAG will work together with stakeholders to consider a regional conservation strategy for the Plan and is open to suggestions on the regional mitigation measures for the next PEIR and 2020 RTP/SCS.

Response to Comment No. 12:

Thank you for your comment regarding a minor correction to **Appendix E, Biological Resources Technical Report** of the PEIR. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Appendix E, Biological Resources Technical Report**) section of the Final PEIR.

Response to Comment No. 13:

Thank you for your comment acknowledging the potential for Alternative 3 to concentrate growth in existing urban areas.

Response to Comment No. 14:

Thank you for your comment expressing the support of the Department for projects that avoid sensitive habitats and sensitive biological resources by encouraging the development of higher density projects that avoid these resources and accommodate urban wildlife movement.

4. State of California Office of Planning and Research (Letter No. 1)
State Clearinghouse and Planning Unit
Scott Morgan
Director, State Clearinghouse
1400 10th Street
Sacramento, California 95812-3044
(916) 445-0613

Response to Comment No. 1:

This letter acknowledges that SCAG has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act (CEQA), and the State Clearinghouse distribution of the NOC and Draft PEIR to state agencies. As noted on page 2 of the letter in the Document Details Report of the Draft PEIR, the Draft EIR was distributed to sixteen (16) state agencies for a review period of 60 days. This is 15 days beyond the 45-day statutory review period. SCAG has made note of the contents of this letter and acknowledges the distribution to state agencies that reviewed the Draft PEIR.

5. State of California Office of Planning and Research (Letter No. 2)
State Clearinghouse and Planning Unit
Scott Morgan
Director, State Clearinghouse
1400 10th Street
Sacramento, California 95812-3044
(916) 445-0613
(Letter 2)

Response to Comment No. 1:

This letter acknowledges that SCAG has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act (CEQA), and the review period closed on January 19, 2016.

5. State of California Office of Planning and Research (Letter No. 3)
State Clearinghouse and Planning Unit
Scott Morgan
Director, State Clearinghouse
1400 10th Street
Sacramento, California 95812-3044
(916) 445-0613
(Letter 3)

Response to Comment No. 1:

This letter acknowledges that SCAG has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the CEQA, and the State Clearinghouse distribution of the NOC and Draft PEIR to state agencies. As noted on page 2 of the letter in the Document Details Report of the Draft PEIR, the Draft EIR was distributed to sixteen (16) State agencies for the statutory review period of 60 days beginning December 4, 2015 and ending on February 1, 2016. This is 15 days beyond the 45-day statutory review period. SCAG has made note of the contents of this letter and acknowledges the distribution to state agencies that reviewed the Draft PEIR.

6. California State Assembly and State Senate
Ed Chau
Assembly member, 49th District
Ed Hernandez
Senator, 22nd District
Roger Hernandez
Assembly member, 48th District
Tony Mendoza
Senator, 32nd District
P.O. Box 942849
Sacramento, CA 94249-0115

Response to Comment No. 1:

SCAG appreciates California Legislature's comment letter that is in support of the 2016 RTP/SCS. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16287, Final 2016 RTP/SCS Comments and Responses Appendix.

It is important to note that the Draft 2016 RTP/SCS PEIR is a program level EIR. As such, the specific project-level impacts of the SR-710 North Study Project are not analyzed. Please refer to **Master Response No. 2.**

7. Lahontan RWQCB
Jan M. Zimmerman, PG
Engineering Geologist
14440 Civic Dr. #200,
Victorville, CA 92392
(760-241-6583)

Response to Comment No. 1:

Thank you for your comments regarding mitigation measures related to water quality. Project-level mitigation measures with respect to Low Impact Development (LID) has been stated in the Draft PEIR. Mitigation measure **MM-HYD-1(b)** in **Section 3.10, Hydrology and Water Quality**, encourages LID and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible. Methods of hydromodification (i.e. lining channels, flow diversions, culvert installations, armoring and other methods) are discussed in Mitigation measure **MM-HYD-1(b)** in **Section 3.10, Hydrology and Water Quality**. Mitigation measures designed to protect groundwater is discussed mitigation measure **MM-HYD-2(a) and MM-HYD-2(b).**

Response to Comment No. 2:

Thank you for your comment.

Response to Comment No. 3:

Thank you for your comments. Please refer to **Response 7-1.** Additionally, SCAG is actively coordinating and collaborating with applicable stakeholders to develop an approach for healthy watersheds.

Response to Comment No. 4:

Thank you for your comment on the Draft PEIR. Project-level mitigation measures with respect to Low Impact Development (LID) has been stated in the Draft PEIR. Mitigation measure **MM-HYD-1(b)** in **Section 3.10, Hydrology and Water Quality**, encourages LID and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible. Please refer to **Response 7-1.**

Response to Comment No. 5:

Thank you for your comment on the Draft PEIR. Please refer to **Response 7-1** and **7-4.**

Response to Comment No. 6:

Thank you for your comment on the Draft PEIR. Methods of hydromodification (i.e. lining channels, flow diversions, culvert installations, armoring and other methods) are discussed in Mitigation measure **MM-HYD-1(b)** in **Section 3.10, Hydrology and Water Quality**. Additionally, please refer to **Response 7-1.**

Response to Comment No. 7:

Thank you for your comment on the Draft EIR. Mitigation measures to protect groundwater is discussed mitigation measure **MM-HYD-2(a) and MM-HYD-2(b).** Additionally, please refer to **Response 7-1.**

Response to Comment No. 8:

Thank you for your comment on the Draft PEIR. For individual project specific related impacts, please refer to **Master Response No. 2** for additional discussion pertaining to this comment.

Response to Comment No. 9:

Thank you for your comment on the Draft PEIR. Permitting requirements are fully discussed in **Section 3.10, Hydrology and Water Quality**. Additionally, it is discussed under **MM-HYD-1(b).** In addition, please refer to **Response 7-1.** For project specific impacts, please refer to **Master Response No. 2** for additional discussion pertaining to this comment.

Response to Comment No. 10:

Thank you for your comment on the Draft PEIR. Please refer to **Master Response No. 2** for additional discussion pertaining to this comment.

8.6 REGIONAL AGENCIES

Three (3) letters of comment were received from regional agencies:

1. Imperial County Air Pollution Control District
2. Local Agency Formation Commission for San Bernardino County
3. Ventura County Air Pollution Control District

8. Imperial County Air Pollution Control District
Ashton Howington
APC Environmental Coordinator
Planning & Monitoring
150 South Ninth Street
El Centro, California 92243-2850
(442) 265-1800

Response to Comment No. 1:

Thank you for your comments. Please refer to **Master Response No. 2.**

Response to Comment No. 2:

Thank you for your comment. The grammatical error has been fixed in **Clarifications and Revisions** (see revisions to **Section 3.3, Air Quality**) section of the Final PEIR.

9. Local Agency Formation Commission for San Bernardino County
Kathleen Rollings-McDonald
Executive Officer
215 North D St, Suite 204
San Bernardino, CA 92415-0490
(909) 388-0480

Response to Comment No. 1:

Thank you for your comment regarding a minor correction on a reference to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. These revisions have been incorporated into the **Clarifications and Revisions** (see revisions to **Section 3.11, Land Use and Planning**) section of the Final PEIR.

Response to Comment No. 2:

Thank you for your comment. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16282, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 3:

Thank you for your comments regarding the alternatives and the impact of annexation. The SCAG model projects the relative performances of the alternatives which are substantively aligned with planning scenarios for the 2016 RTP/SCS (See the **Sustainable Communities Strategy (SCS) Background Documentation Appendix** of the 2016 RTP/SCS). As stated in the comment, Alternative 2, RTP/SCS Updated with Local Input, was prepared with input from local jurisdictions, and would result in 138 square miles of greenfield land consumption. Alternative 3, Intensified Land Use, would result in 91 square miles of greenfield land consumption. The proposed Project would result in 118 square miles of greenfield land consumption. As can be seen from the greenfield land consumption numbers for each of the above alternatives, the SCAG model has incorporated potential greenfield land consumption, much of which would occur in City sphere of influence areas. As described in **Section 4** of the PEIR, the alternatives differ in the density and distribution of anticipated development. The population growth in the SCAG region remains the same over all of the alternatives. As a result, the SCAG model accounts for population growth and increased density as a result of future annexations and potential differences with city and county land use designations. An annexation alternative is not warranted.

10. Ventura County Air Pollution Control District
Planning, Rules & Incentives Division
Alicia Stratton
Air Quality Specialist
669 County Square Dr., 2nd Floor
Ventura, California 93003
(805) 645-1426

Response to Comment No. 1:

Thank you for the concurrence on the findings in **Section 3.3, Air Quality, Appendix D, Health Risk Assessment,** and **Chapter 7, Air Quality and Greenhouse Gas Emissions Technical Report** related to Ventura and Ventura County in the PEIR.

Response to Comment No. 2:

SCAG agrees with VCAPCD and acknowledges that Impact Air-4 would create a significant cumulative impact. Diesel particulate emissions would remain above the cancer risk threshold of 10 in a million even after mitigation.

Response to Comment No. 3:

SCAG agrees with VCAPCD and acknowledges that Impact Air-2 would create a significant cumulative impact. However, it is important to note that in accordance with federal and state regulations, diesel emissions from heavy duty trucks are projected to decrease with the Plan and would provide improvement in overall air quality compared to existing conditions.

Response to Comment No. 4:

Thank you for the concurrence on the mitigation measures stated in **Section 3.3, Air Quality** as they relate to Ventura County. As discussed in **Section 3.3, Air Quality, Response 10-2** and **Response 10-3**, Impact Air-2 and Air-4 would result in significant cumulative impacts.

8.7 SCAG Member Jurisdictions

Twenty-one (21) letters of comment were received from SCAG member jurisdictions:

1. 5-Cities Alliance
2. City of Anaheim
3. City of Colton
4. City of Diamond Bar
5. City of Eastvale
6. City of El Centro
7. City of El Segundo (Time extension)
8. City of El Segundo (Noise)
9. City of Irvine
10. City of La Canada Flintridge
11. City of Lake Forest
12. City of Mission Viejo
13. City of Rancho Cucamonga
14. City of San Clemente
15. City of South El Monte
16. City of South Pasadena
17. City of Tustin
18. County of Los Angeles Public Health
19. County of Ventura
20. Orange County Public Works
21. Riverside County Planning Department

11. 5-Cities Alliance (on behalf of)
Shute, Mihaly & Weinberger, LLP.
Richard B. Hooper,
Laurel L. Impett
396 Hayes Street, San Francisco, CA 94102
(415)-552-7272

Response to Comment Nos. 1 to 8:

Thank you for your comments.

SCAG is required by federal law to prepare and update a long-range (minimum of 20 years) regional transportation plan (RTP) (23 U.S.C.A. §134 *et seq*). SCAG is also required to prepare an RTP pursuant to Section 65080 of the California Government Code, which requires each transportation planning agency in urban areas to adopt and submit an updated RTP to the California Transportation Commission and the California Department of Transportation (Caltrans) every four years.[7] The Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375) also requires that the RTP also include a sustainable communities strategy (SCS) (California Government Code §65080 (b)(2)(B). The RTP/SCS must

[7] California Transportation Commission. 7 April 2010. 2010 California Regional Transportation Plan Guidelines. Available at: http://www.catc.ca.gov/programs/rtp/2010_RTP_Guidelines.pdf

demonstrate that it meets federal transportation conformity and other applicable federal and state requirements, including Greenhouse Gas reduction targets pursuant to SB 375. SCAG does so through a rigorous technical analysis of all regionally significant transportation projects collectively identified as fiscally constrained projects within the 2016 RTP/SCS.

Projects included in the 2016 RTP/SCS **Project List Appendix** were submitted to SCAG by the six County Transportation Commissions (CTCs) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The projects provided by the CTCs are regarded as regionally significant and/or anticipated to receive (or already receiving) federal funds. In addition, the CTCs anticipate that these projects will be initiated or completed by the Plan's horizon year in this case, 2040. It is also important to emphasize that SCAG does not actually build, operate or implement projects included in the RTP/SCS.

The SR-710 North Study Project was submitted to SCAG by Los Angeles County Metropolitan Transportation Authority (LA Metro) for inclusion in the 2016 RTP/SCS, and it is one of over 4000 regionally significant projects in the Plan. To meet federal transportation conformity and other applicable requirements, SCAG is required to analyze all regionally significant transportation projects which are planned to occur over the next 25 year planning horizon. Since the SR-710 North Study Project is a regionally significant project, SCAG is required to model it for transportation conformity purposes.

SCAG's regional modeling program includes all regionally significant projects, including the SR-710 North Study Project, which is shown as four toll lanes in each direction since it is the most conservative (worst-case) scenario with respect to potential environmental impacts. SCAG fully recognizes that the SR-710 North Study Project is currently under environmental review and that a preferred alternative has yet to be determined. SCAG's modeling the four toll lanes does not express SCAG's preference for this alternative. While SCAG acknowledges the opposition of the Five Cities Alliance to the SR-710 North Study Project, as stated, SCAG is not an implementing agency and has no authority over project-level decisions. Nor does SCAG have the discretion to delete from consideration, a project for which the environmental review pursuant to CEQA and NEPA was underway at the time that the NOP for the 2016 RTP/SCS PEIR was published in March 2015. By using the worst case scenario, SCAG believes that the analysis adequately serves as a placeholder benchmark to analyze the effects of the SR-710 North Study Project on the SCAG region for conformity purposes. This approach is also consistent with CEQA which requires SCAG to analyze the potential environmental impacts of the 2016 RTP/SCS. Modeling the reasonable worst-case scenario for the Plan would yield the most potential impacts.

The determination regarding the alternative (an action alternative or the no-project/no action alternative) to be recommended for the SR-710 North Study Project will be made by Caltrans and LA Metro. The concerns regarding the public benefits and environmental impacts of the SR-710 North Study Project are best directed to Caltrans and LA Metro. When the SR-710 North Study Project EIR/EIS process is complete and a locally preferred alternative is identified in the final environmental document, SCAG will work with LA Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

SCAG acknowledges receipt of Exhibits 1, 2, and 3 of Five Cities Alliance Letter. Comments in Exhibit 1 are related to the 2016 RTP/SCS and have been provided to the SCAG RTP/SCS planning team for review and consideration in relation to finalizing the 2016 RTP/SCS. Please also see **Master Response No. 1** and Submission ID 16339. Exhibit 2 is addressed as part of this letter of comments. Exhibit 3 has been reviewed and taken in to consideration in the preparation of this Final EIR.

With respect to the Draft EIR/EIS for the SR-710 North Study Project, please note that SCAG is tasked with evaluating the environmental impacts from each of the RTP's transportation projects, including the SR-710 North Study Project, at a regional/programmatic level. Please see **Master Response No.2** which addresses the difference between a program level EIR (like this PEIR) and a project-Level EIR.

Response to Comment Nos. 9 to 15:

Thank you for your comments. **Response 11-1** to **11-8** above explains the project inclusion process for the 2016 RTP/SCS, i.e., the SR-710 North Study Project was submitted to SCAG by LA Metro. The toll road alternative was included in SCAG's regional modeling program since it would represent the worst case scenario for environmental impacts. The SR-710 North Study Project, as included in the 2016 RTP/SCS and PEIR is currently pending environmental review and hence its details are yet to be determined. As with other projects included within the RTP/SCS Project List, the project with RTP ID 1M0101 was submitted by LA Metro with the following project description, "SR-710 North Study Project Alternatives (Alignment TBD)." Requests to modify projects included within the RTP/SCS must come directly from the County Transportation Commissions, in this case, LA Metro. SCAG included the following footnote to describe the current status of the project, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete, the 2016 RTP/SCS will be updated to reflect the Locally Preferred Alternative (LPA) as identified in the final environmental document." When the SR-710 North Study Project EIR/EIS process is complete and an LPA is identified in the final environmental document, SCAG will work with LA Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

The 2016 RTP/SCS does not require that each individual project achieve all the Goals and Objectives of the RTP/SCS, rather that the projects when evaluated as part of bigger program of transportation improvements and land use decisions move the region towards achievement of the specified Goals and Objectives. As indicated in **Table 4.3-1** of the PEIR, the proposed project inclusive of the evaluation of the SR-710 North Study Project achieves a net reduction in total VMT and per capita VMT when compared to the No-Project Alternative. The analysis contained in **Section 3.8 Greenhouse Gases and Climate Change** of the PEIR demonstrates that the 2016 RTP/SCS will continue to move the SCAG Region toward attainment of targets for per capita reductions in VMT, consistent with Governor's Executive Orders. Similarly, the analysis contained in **Table 3.3.4-1 Criteria Pollutant Emission By County – Plan (2040) Vs. Existing Conditions (2015)** in **Section 3.3 Air Quality** of the PEIR demonstrates that when the future conditions with the 2016 RTP/SCS are compared to the existing condition, emissions of small particulate matter ($PM_{2.5}$) and other criteria pollutants, in tons per day would be reduced in all six counties in the SCAG region.

Please also refer to **Master Response No. 1** and Submission ID 16339.

Response to Comment Nos. 16 to 18:

Thank you for your comments related to SR-710 North Study Project impacts and alternatives. As indicated in **Table 4.3-1** of the PEIR, the proposed project inclusive of the evaluation of the SR-710 North Study Project achieves a net reduction in congestion when compared to the No-Project Alternative. As mentioned in the **Response 11-1** to **11-15**, the determination about whether to approve and action

alternative or a no-project/no-action alternative lies solely with Caltrans and LA Metro. Please also refer to **Master Response No. 1** and Submission ID 16339.

Response to Comment Nos. 19 to 24:

Thank you for your comments. As described in **Responses 11-1** to **11-8** above and **Master Response No. 2**, the 2016 RTP/SCS PEIR is a program level EIR, and not a project level EIR. As such, the PEIR analyzes the impacts of the 2016 RTP/SCS at a regional/programmatic level. Because SCAG is not the Lead Agency for the SR-710 North Study Project, it has no authority over which alternative is ultimately selected. However, for the purposes of CEQA, in order to assess the impacts of the Plan which includes the SR-710 North Study Project, SCAG must model this project (and all the other projects in the Plan). SCAG modeled the SR-710 North Study Project with toll roads because as described in Response to Comment Nos. 1-8, this represents the worst case scenario from the standpoint of environmental impacts.

The commentator suggests that despite the "programmatic" nature of the PEIR, SCAG is required to provide detailed analysis of the "Freeway Tunnel Alternative's effects on air quality, health risk and greenhouse gas emissions." SCAG respectfully disagrees. SCAG is neither the implementing agency nor the lead agency for the SR-710 North Study Project, and as such, it has no responsibility for or authority over project-level impact analysis. SCAG's sole responsibility is preparing the 2016 RTP/SCS and analyzing the impacts of the Plan at the regional level.

Response to Comment Nos. 25 to 28:

Thank you for your comments.

The commenter incorrectly assumes that the environmental analysis has been deferred. In actuality, as stated in the PEIR, the SR-710 North Study Project was evaluated in the RTP/SCS using a reasonable worst-case scenario. The modelling undertaken in the RTP/SCS for four planning scenarios was used as the basis for the environmental analysis which provided detailed quantitative and qualitative analysis of the proposed project and comparative analysis of the alternatives thus fulfilling the requirements for impact analysis. Please refer to **Table 4.3-1** of the PEIR for a summary of the data provided.

Similarly, there is a comprehensive exploration of mitigation measures with performance-standards based mitigation measures considered for all significant impacts of the 2016 RTP/SCS. Please see a summary of SCAG mitigation measures and project-level mitigation measures to be considered for later activities in the **Executive Summary** of the PEIR. As mentioned in the **Responses 11-9** to **11-15** above and **Master Response No. 2**, a toll road alternative is used only for technical modeling purpose since it would represent the worst case scenario for environmental impacts. The SR-710 North Study Project, as included is the 2016 RTP/SCS and PEIR is currently pending environmental review and hence its details is yet to be determined, as to whether it will be a toll road or not pending project level EIR process for which Caltrans and LA Metro are the lead agencies and SCAG is not. As with other projects included within the Project List, the project with RTP ID 1M0101 was submitted by LA Metro with the following project description, "SR-710 North Study Project Alternatives (Alignment TBD)." Requests to modify projects included within the RTP/SCS must come directly from the County Transportation Commissions, in this case, LA Metro. SCAG included the following footnote to describe the current status of the project, "This project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and an LPA is identified in the final environmental document, the 2016 RTP/SCS will be updated to reflect the LPA as identified in the final environmental document, and SCAG will work with LA Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

With respect to funding sources for the SR-710 North Study Project, SCAG's analysis and documentation of reasonably available sources is consistent with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained." Please also refer to **Master Response No. 1** and **Submission ID 16214.11.** Additionally, corrections to the PEIR's **Figure 2.4.2-1: Major Highway Projects** and **Figure 2.4.2-5: Major Toll Projects** that are referenced in **Response 11-25** have been incorporated in the **Clarifications and Revisions** section of the Final PEIR.

Response to Comment No. 29:

Thank you for your comment. SCAG recognizes that motor vehicles are a major source of emissions. As documented in the **Transportation Conformity Appendix** to the 2016 RTP/SCS, the Plan meets all Clean Air Act Transportation conformity requirements and demonstrates transportation conformity pursuant to the U.S. EPA's Transportation Conformity Regulations. In other words, the Plan has demonstrated that it will not create any new violations of the national ambient air quality standards (NAAQS) for the five [transportation related criteria pollutants (i.e., CO, NO_2, Ozone, $PM_{2.5}$, and PM_{10}), worsen the existing violations, or delay the timely attainment of these NAAQS. Therefore, the Plan's potential to violate the NAAQS is a less than significant impact. The 2016 RTP/SCS project impacts to air quality are addressed in **Section 3.3, *Air Quality,*** and **Appendix C, *Air Quality and Greenhouse Gas Emissions and Climate Change Technical Report.***

Response to Comment No. 30:

The technical modeling approach used to quantify the air quality emissions is described in **Master Response No. 3.** Appendix C includes a summary of the techniques used in the evaluation of air quality criteria pollutants. The air quality regulatory structure in **Section 3.3, *Air Quality*** discusses the federal, state, and regional (by air district) regulations on pages 3.3-10 to 3.3-22. For Impact Air-2, the significance determination is divided into two parts. The first part concludes a less than significant impact in the long term. The second part concludes a significant impact in the short term due to construction activities. The transportation upon which the analysis of air quality is based is summarized in **Section 3.17** and **Table 4.3-1** of the PEIR.

Response to Comment No. 31:

The SR-710 North Study Project has been appropriately included in the Plan transportation networks for the regional air quality analysis. As mentioned in the **Responses 11-9** to **11-15** above and **Master Response No. 2**, a toll road alternative is used only for technical modeling purpose since it would represent the worst case scenario for environmental impacts. The technical modeling approach used to quantify the air quality emissions are described in **Master Response No.3.** Because this is a programmatic document, impacts from the SR-710 North Study Project are not specifically analyzed. Please see **Master Response No. 2** for clarification on the Program EIR.

Response to Comment No. 32 to 33:

Thank you for your comments. The reason for the reduction in emissions is because EMFAC2014 was used, which includes lower emission factors for future years compared to EMFAC2011. EMFAC2014 is the latest and most up to date emissions model that was approved by the EPA and effective on December 14, 2015. The air quality analysis also used the 2015 OEHHA Guidance (Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments) for cancer risk, which increases perceived risk by three times in certain cases. The true impacts of the Plan from the approved transportation projects are modeled by ARB's Vision Scenario Planning Tool as described in **Master Response No 3.**

With respect baseline conditions. SCAG prepared the EIR in accordance with §15125(a) of the State CEQA Guidelines, which states that the existing conditions is the normal baseline under CEQA. SCAG understands that part of the reduction seen in the emissions is from stricter state and federal regulations on motor vehicles and other engines to be used and/or manufactured in future years. SCAG analyzed the joint effect of these newer emission factors combined with vehicle miles travelled by vehicle type, of which the latter is determined by the Plan. As evidenced in **Section 3.3** and **Table 4.3-1** of the PEIR, the combined effect of the 2016 RTP/SCS and the more aggressive regulation of emissions from light- and medium-duty vehicles and locomotive engines would result in net reductions on VMT per capita and reductions in criteria pollutants(measured in tons per day) over the 25-year planning horizon. SCAG does not believe a comparison of air quality emissions in the Plan vs. Existing Conditions to be misleading because multiple factors (land development, transportation projects, vehicle miles, emission factors) feed into the air quality analysis.

The use of "future" baseline conditions (i.e., No Plan in 2040) to determine significance is an option, but it is at the discretion of the lead agency and not a mandatory requirement. However, even if analysis was conducted to compare the implementation of the Plan vs. No Plan (future baseline), the analysis would show a greater reduction in emissions.

Response to Comment No. 34:

SCAG acknowledges that **Figure 3.3.4-1** and **Figure 3.3.4-2** show increases in CO and PM2.5 along certain transportation corridors. However, because the criteria emissions by county as shown in **Table 3.3.4-1** show equal or a decrease in emissions for all criteria emissions and the Plan meets the required transportation conformity emission tests, it is plausible to state that the Plan's cumulative impacts would be less than significant. While this does take credit for emission reductions achieved by the stricter regulatory standards on motor vehicles, the Plan does not add a sufficient number of vehicle miles to negate these benefits. Even though the region is in nonattainment for certain criteria pollutants, the Plan's net negative addition to the pollutant means there is not a cumulative impact.

Response to Comment No. 35:

Thank you for your comment regarding mitigating the Plan's determination of the potential for significant impacts on air quality for construction of transportation improvements and development projects. Please see **Clarifications and Revisions** to **Section 3.3** of the PEIR for additional information regarding known potential for projects or regional significance to result in significant impact due to exceedance of 8-hour and daily thresholds for emission of criterial pollutants from heavy-duty equipment. Please see **Master Response No. 2** on the level of analysis appropriate for a Program EIR.

MM-Air-2(b) identifies multiple project-level feasible measures to reduce construction emissions. These measures are based off of CARB and the air pollution districts. Quantifying these measures is not feasible nor necessary at this level of analysis. Additionally, the regulatory framework within **Section 3.3, Air Quality** lists for off-road construction equipment in the form of CARB Small Offroad Engine Exhaust Emission Standards and CARB Offroad Compression-Ignition Diesel Engine Exhaust Emission Standards.

Thank you for your suggestion to add more construction exhaust mitigation measures according to the Fox Report, but these were not included as SCAG has limited authority to enforce any project-level mitigation measure (Please see **Master Response No. 4**).

Response to Comment No. 36:

Thank you for your commendation on including public health in the 2016 RTP/SCS. The HRA was completed to evaluate cancer risk and inform the public. Additionally, the HRA was to evaluate impacts on a regional scale and not project scale. Please refer to **Master Response No. 2.**

Response to Comment No. 37:

Thank you for your comment about the HRA's comparison to existing conditions. Please see **Response 11-32** and **33.**

Response to Comment No. 38:

Thank you for your comments. It would not be feasible or reasonable to analyze all of transportation corridors in the SCAG Region. Eight of the 16 segments were chosen because they were chosen in the 2012 RTP/SCS and can be helpful to see a direct comparison of how the Plan has evolved since 2012. The additional eight segments were chosen based on the 2012 VMT data for HDT and LM vehicles for the maximum VMT segments per count where there is at least one sensitive receptor within 500 meters of the freeway and the additional segment is not just an extension of the one of the original eight segments. For specific portions of freeway segments that may experience an increase in traffic, this analysis is better suited for a Project level EIR. For methodology describing the selection of the 16 transportation segments, please see the **Health Risk Assessment Appendix** (Appendix D) to the Draft PEIR.

Response to Comment Nos. 39

Thank you for your comments. With respect to modeling, please refer to **Master Response No. 3.** It is important to note that the analysis in this PEIR was performed on a region wide scale; please refer to **Master Response No. 2.**

Response to Comment No. 40:

SCAG acknowledges the concern about including all sensitive receptors in the HRA analysis. The HRA does analyze health effects beyond 500 feet. The locations of sensitive receptors in the region were obtained from TomTom and TeleAtlas databases. In areas where there were multiple residences and possible worker locations, receptors were placed in a grid pattern with 100-meter spacing out to 500 meters from the transportation segment and 250-meter spacing out to 1,000 meters. A distance of 500 meters from the freeway links was used to capture the nearest and most dense areas of sensitive receptors and because previous studies by CARB have demonstrated that the potential health risk decreases dramatically with distance and the maximum impact is within 500 meters. Most of the maximally-affected residences, worker, and sensitive receptors are located less than 500 meters away. For a detailed description of the methodology, please refer to the Health Risk Assessment (HRA), which is attached as **Appendix B** within this Final PEIR.

Response to Comment No. 41:

Thank you for your comment on the HRA. The letter, *Air Quality Modeling Approach for 2016-2040 Regional Transportation Plan Southern California Association of Governments,* referenced on pg. 31 of the HRA, explains the focus on DPM as the major source responsible for potential cancer risk. A copy of the HRA is attached as **Appendix B** for the Final PEIR.

Response to Comment No. 42:

Thank you for your comment on the HRA. Isopleth maps were not created in the 2012 RTP/SCS and therefore were not created for the 2016 RTP/SCS. To have a true comparison on whether the Plan is effective, SCAG would have to produce the maps for both 2012 RTP/SCS and 2016 RTP/SCS.

Response to Comment No. 43:

Thank you for your comment regarding the 2016 RTP/SCS mitigation measures. Please refer to **Master Response No. 4.** SCAG's mitigation measures are included in the Mitigation and Monitoring and Reporting Plan and are enforceable. MM-Air-2(a)(1) provides that "SCAG shall determine as part of its conformity finding pursuant to the federal CAA [Clean Air Act] that the plan and updates provide for timely implementation of Transportation Control Measures [TCMs]. . . ." It then "identifies 17 measures as illustrative of TCMs." The mitigation measure clearly requires SCAG to implement the applicable TCMs as required under the CAA, which is enforceable under the MMRP as well as the CAA.

Response to Comment No. 44:

Thank you for your comment regarding the 2016 RTP/SCS mitigation measures. The commenter incorrectly states that four of the specified measures are infeasible due to the need for federal and state rule-making. However, the selected text is taken out of context, as the preceding sentence identifies the specified measures as strategies that have been stipulated by the California Air Resources Board:

> "Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB's strategy includes the following elements:
>
> - Set technology forcing new engine standards.
> - Reduce emissions from the in-use fleet.
> - Require clean fuels, and reduce petroleum dependency.
> - Work with US EPA to reduce emissions from federal and state sources.
> - Pursue long-term advanced technology measures."

Please refer to **Master Response No. 4.** There are two types of measures specified in the PEIR. The specified SCAG measures demonstrate the commitment of SCAG to continue to facilitate a regional dialogue to implement the changes that are necessary to achieve attainment. There are 17 TCMs identified in AIR-2(a). Many of the specified measures have been used effectively in the SCAG region to achieve reductions in criteria air pollutants. The commenter provides no substantial evidence that the mitigation options that are identified cannot be accomplished. Part of the mission of SCAG is to be actively engaged with State and Federal policy makers to facilitate change that support conformity with the NAAQS and CAAQS.

In addition, project-level mitigation measures are provided. Each project-level mitigation measure is attended to help to achieve performance standards that are embedded in the requirements of the Federal and California Clean Air Acts, as enforced through permitting administered by local air districts. These measures reflect the existing recommendations of the air districts in the SCAG Region.

Response to Comment Nos. 45 to 46:

Thank you for your comments. SCAG recognizes the importance of AB 32, Executive Order S-3-05, and Executive Order B-30-15 and the critical role of transportation emissions in meeting the state's climate policy. To this end, SCAG has complied with SB 375 by developing the 2016 RTP/SCS which meets or exceeds the regional GHG reduction targets for 2020 and 2035 established by the California Air Resources Board. Contrary to commentator's assertions, the 2016 RTP/SCS is consistent with the GHG reduction trajectory established by Executive Orders S-3-05 and B-30-15. The commenter provides no substantial evidence to the contrary.

The scope of the GHG impact analysis in this PEIR is limited to analyzing impacts of the RTP/SCS at a regional/programmatic level. Project level analysis (e.g., of the SR-710 North Study Project) was not undertaken. Rather, the PEIR examines the GHG emissions resulting from the 2016 RTP/SCS at a regional level (See **Master Response No. 2**). By meeting the GHG targets established by CARB, SCAG has

met its obligations to satisfy AB 32 and SB 375, however, for purposes of assessing consistency with AB 32, Executive Orders S-3-05 and B-30-15, SCAG went a step further to examine the trajectory of its GHG emissions (and even beyond the horizon year of 2040). SCAG has demonstrated that this trajectory is consistent with the goals expressed by the executive orders (See **Figure 3.8.4-1, SB 375 GHG (per capita) Reduction Trajectory** in the PEIR) As such, SCAG has established the Plan's consistency with state climate policy.

Response to Comment Nos. 47 to 50:

Thank you for your comments related to the Findings of the Superior Court in the *Center for Biological Diversity v. California Department of Fish and Wildlife*(2015) 62 Cal. 4th 204, 260-63 regarding the validity of using compliance with AB32 as a threshold of significance for greenhouse gas emissions. Please see **Response 11-45** and **11-46** and **Section 3.8** of the PEIR, which demonstrate that AB 32 was used as a threshold. The commenter incorrectly states that the PEIR does not provide an analysis of consistency with Executive Orders S-3-05 and B-30-15. Pursuant to Section 15064.7 of the State CEQA Guidelines, as the Lead Agency, SCAG has the discretion to determine the appropriate thresholds of significance. With respect to GHG emissions, "a lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." CEQA Guidelines § 15064.4(a). Moreover, the lead agency has the discretion to determine whether use a modeling or methodology to quantify GHG emissions or rely on a qualitative analysis. *Id.* While SCAG did not specifically designate consistency with Executive Orders S-3-05 and B-30-15 as a threshold of significance, the PEIR nevertheless analyzes the consistency of the Plan with the executive orders and demonstrates that the SCAG region is on a trajectory to meet or exceed the target reductions for greenhouse gas emissions embodied in the Executive Orders. The challenge of comparing the Plan with AB 32 and the goals of the executive orders is that AB 32 and the executive orders set forth goals for all sectors in the state combined (total GHG emissions) whereas the scope of the analysis to be considered with respect to an RTP is limited to the consideration of the contribution of proposed transit and transportation to greenhouse gas emissions in the region.[8] Furthermore, unlike San Diego Council of Governments which is able to utilize a county level Climate Action Plan (CAP), there is not a CAP for the six-county SCAG region or sufficient inventory data from adopted local CAPs in the region to estimate the GHG data for other modes of transportation. As such, SCAG has made a good-faith effort with its available data to analyze consistency with the executive orders (please see **Clarifications and Revisions** to **Section 3.8** of the PEIR).

With regard to the 2016 RTP/SCS's consistency with Executive Orders S-3-05 and B-30-15, SCAG is not required to use specific reduction targets listed in the executive orders as thresholds for comparison as these executive orders are not codified into law. The 2016 RTP/SCS, nonetheless, does abide by the goals and objectives listed in both those executive orders. EO S-3-05 sets a GHG reduction target to reduce by 80 percent below 1990 levels by 2050. EO B-30-15 establishes an interim goal to reduce GHG emissions 40 percent below 1990 levels by 2030. The 2016 RTP/SCS only focuses on the GHG sources from transportation so it should not be expected for the transportation sector alone to achieve the entire GHG reduction target. As shown in **Table 3.8.4-1**, GHG Emissions from transportation are projected to decrease overall in the SCAG Region between existing conditions and 2040. Therefore, it is

[8] California Transportation Commission. 7 April 2010. 2010 California Regional Transportation Plan Guidelines. Available at: http://www.catc.ca.gov/programs/rtp/2010_RTP_Guidelines.pdf

fair to state that the 2016 RTP/SCS is consistent with both EO B-30-15 and EO S-3-05 in that the 2016 RTP/SCS will set the SCAG region on a pathway of reducing GHGs (please see **Clarifications and Revisions** to **Section 3.8** of the PEIR).

Response to Comment Nos. 51 to 52:

Thank you for your comments. Please refer to **Response 11-1 to 11-8** above. Specifically, based on the analysis of all transportation projects included in the 2016 RTP/SCS including SR-710 North Study Project, these transportation projects collectively are expected to address the regional needs, including congestion relief, safety improvement, efficient movement of freight, air quality improvement, reduction in greenhouse gas emission, etc. The RTP/SCS must demonstrate that it meets federal transportation conformity and other applicable requirements (including GHG reduction targets per SB 375). SCAG does so through a rigorous technical analysis of all regionally significant transportation projects collectively identified as fiscally constrained projects within the 2016 RTP/SCS (See **Master Response No. 2)**.

In addition, as mentioned in **Response 11-9 to 11-15** above, a toll road alternative is used only for technical modeling purpose in conformity and GHG analysis since it would represent the worst case scenario for environmental impacts. The SR-710 North Study Project, as included is the 2016 RTP/SCS and PEIR is currently pending environmental review and hence its details are yet to be determined. As with other projects included within the Project List, when the SR-710 North Study Project EIR/EIS process is complete and an LPA is identified in the final environmental document, SCAG will work with LA Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

Response to Comment No. 53:

Thank you for your comments on GHG inventory analysis. As stated previously, the projects in the 2016 RTP/SCS **Project List Appendix** (which includes the SR-710 North Study Project) were submitted to SCAG by the six County Transportation Commissions (CTCs) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. To assess region-wide greenhouse gas emissions, all projects, including the SR-710 North Study Project, were included into the greenhouse gas emissions inventory that was used as the basis of regional greenhouse gas modeling that was completed in conjunction with the RTP modelling for the proposed project. To analyze region wide greenhouse gas emissions both EMFAC2014 and ARB's Vision Scenario Planning Tool were used.

The modeling of regional greenhouse gas emissions was accomplished using the California Air Resources Board (ARB's) EMFAC2014 (short for "EMission FACtor", approved by U.S. EPA in December 2015) model. EMFAC2014 is a computer model capable of estimating both current year, back-cast and forecasted emission inventories for calendar years of 2000 to 2050. EMFAC estimates the emission rates of 1965 and newer vehicles, powered by gasoline, diesel or electricity. Emission inventory estimates are made for 51 vehicle classes segregated by usage and weight. EMFAC calculates the emission rates of CO_2 and other criteria pollutants, such as ROG, NO_x, PM_{10}, $PM_{2.5}$, SO_x, and also CH_4 for 45 model years for each vehicle class within each calendar year, for twenty four hourly periods, and each month of the year, for each district, air basin, county and sub-county in California.

The ARB's Vision Scenario Planning Tool is another computer model capable of estimating multi-pollutants (CO_2, $PM_{2.5}$, NO_x and ROG) for transportation system-wide such as passenger vehicles, heavy duty trucks, locomotives, and ships. It is based on California-specific data from different ARB's official emission inventories, such as EMFAC2014, Locomotives, and Ocean Going Vessels.

To determine regional CO_2 and other criteria pollutants for "On-road" transportation sector, which included light and medium-duty vehicles (LMDV; vehicles with weight class less than 8,500 lbs), heavy-duty trucks (HDT; trucks with weight class greater than 8,501 lbs) and all buses, SCAG runs the EMFAC2014 model using the output from the trip-based regional transportation demand model. In order to compare with the regional GHG emissions targets derived using EMFAC2007, the EMFAC2014 model GHG emissions outputs have been converted to EMFAC2007 equivalents applying ARB's adjustment methodology.

For CO_2 equivalent (CO_{2e}) estimation, the three main Greenhouse Gases (GHGs): CO_2, Methane (CH_4) and Nitrous Oxide (N_2O) from both "On-road" and "Off-road" transportation sector are obtained from EMFAC2014 and ARB's Vision tool respectively. The "Off-road" transportation sector includes rail, aviation and Ocean-Going Vessel (OGV). Then standard ratios are used to convert the GHGs into CO_{2e}. These ratios are based on the Global Warming Potential (GWP) of each gas which describes its total warming impact relative to CO_2. For example, GWP for CH_4 is 25, meaning that one ton of CH_4 will cause the same amount of warming as 25 ton of CO_2. After all GHGs are converted, they will be aggregated as the regional total CO_{2e}.

For further clarification, please refer to **Master Response No. 3.** Additionally, the methodology for SCAG's modeling is shown in the **Transportation Conformity Analysis Appendix** and the **Sustainable Communities Strategy Background Documentation Appendix** for the 2016 RTP/SCS.

Response to Comment No. 54:

SCAG appreciates your review of the Draft 2016 RTP/SCS and PEIR. As mentioned in **Response 11-1 to 11-8** above, the SR-710 North Study Project, as included is the 2016 RTP/SCS and PEIR is currently pending environmental review through project level EIR process for which Caltrans and LA Metro are the lead agencies. As with other projects included within the Project List, the project with RTP ID 1M0101 was submitted by LA Metro with the following project description, "SR-710 North Study Project Alternatives (Alignment TBD)." Requests to modify projects included within the RTP/SCS must come directly from the County Transportation Commissions, in this case, LA Metro. SCAG included the following footnote to describe the current status of the project, "This project is currently pending environmental review." As with other projects included within the Project List, when the SR-710 North Study Project EIR/EIS process is complete and an LPA is identified in the final environmental document, SCAG will work with LA Metro to amend the RTP/SCS as necessary to reflect the LPA identified in the final environmental document and update the project description and associated modeling analysis.

Response to Comment Nos. 55 to 66:

Thank you for your comments. Please refer to **Response 11-1** to **11-8 and Response 11-9** to **11-15** above as well as **Master Responses No. 2**.

Response to Comment No. 67:

Thank you for your comment on the emissions analysis. **Table 3.3.4-1** does show a decrease or no change in emissions between existing conditions and the Plan by county. This is a regional, long term overview of the emissions reductions based on the regional criteria pollutant emission analysis accounting for all projects in the **Project List Appendix** of the Draft 2016 RTP/SCS. In addition, the geographic scope of the 2016 RTP/SCS as a Project is regional in nature. As documented in the **Transportation Conformity Analysis Appendix**, the Draft 2016 RTP/SCS demonstrates transportation conformity pursuant to the U.S. EPA's Transportation Conformity Regulations. In other words, the Draft 2016 RTP/SCS has demonstrated that it will not create any new violations of the national ambient air quality standards (NAAQS) for the five [transportation related criteria pollutants (i.e., CO, NO2, Ozone, PM2.5, and PM10), worsen the existing violations, or delay the timely attainment of these NAAQS.

The significance determination is significant for Impact Air-2 because multiple construction projects could occur simultaneously and within close proximity of each other, thereby causing a potential for short term construction emissions to be significant. However, individual transportation projects are required to meet project-level transportation conformity including CO and PM hot spot analysis. Project level hot spot analysis is outside the scope of the PEIR. Furthermore, construction emissions are addressed via project level transportation and general conformity. (Please refer to **Master Response No. 2.**).

Response to Comment No. 68:

Thank you for your comment regarding the approach of the air quality modeling. The SCAG RTP team completed the analysis of air quality impacts using the EMFAC 2014 model, consistent with the specifications of the model. Detailed data from the modeling efforts is available by contacting SCAG (Mr. Ping Chang chang@scag.ca.gov). Please see **Master Response No. 3**. Both Figures **3.3.4-1** and **3.3.4-2** have been updated in the **Clarifications and Revisions** section. Additionally, Page 3.3-41 has been revised to state, "In 2040, the Plan has less PM10, PM2.5, NOx, ROG, and CO emissions relative to Baseline" (see **Clarifications and Revisions** section).

Response to Comment No. 69:

Thank you for your comment. AERMOD was used for the HRA. Additionally please refer to **Response 11-67** about Impact Air-2. The purpose of the technical report is to document the technical analysis completed to support the analysis in the PEIR. The technical reports include additional information regarding the methods and assumptions used in the modelling efforts not typically included in the body of the PEIR. Detailed data from the modeling efforts is available by contacting SCAG (Mr. Ping Chang chang@scag.ca.gov). The regional analysis considers the effects of the entirety to the transportation improvements considered in the RTP at a programmatic level. Pursuant to §15168 of the State CEQA Guidelines is the duty of the Lead Agency considering approvals of "Later Actions" to determine if such action is consistent with the analysis in the PEIR.

Response to Comment No. 70:

Thank you for your comment. As documented in the **Transportation Conformity Analysis Appendix**, the Draft 2016 RTP/SCS meets all Clean Air Act transportation conformity requirements. In the long term, the Plan results in a decrease or no change in emissions from existing conditions. An accurate estimate of emissions is found in **Table 3.3.4-1.**

Response to Comment No. 71:

Thank you for your comment. In 2040, the Plan has less PM10, PM2.5, NOx, ROG, and CO emissions relative to Baseline. Please see **Response 11-32** and **11-33** with regards to baseline year.

Response to Comment No. 72:

Thank you for your comment. Please see **Response 11-32** and **11-33** with regards to the baseline year.

Response to Comment No. 73:

Thank you for your comment. Criteria air pollutants, including ROG and NO_x, were analyzed for each of the six Counties, as documented in **Table 3.3.4-1** of the PEIR. The purpose of the 2016 RTP/SCS is to determine if the anticipated transportation improvements over the planning horizon will allow the SCAG region to move towards conformity with the CAAQS and the NAAQS, rather than assessing construction and operation impacts of each of the more than 2000 transportation improvements identified by the CTCs to be considered over the planning horizon.

Both **Figures 3.3.4-1 and 3.3.4-2** have been updated in the **Clarifications and Revisions** (see revisions to **Section 3.3, *Air Quality***). SCAG recognizes that some areas have worse PM and/or CO with adoption of the Plan versus the no Plan alternative in 2040. This is due to new construction projects that are planned in the RTP planning horizon. Please refer to **Table 3.3.4-1** to see that the net effect by County of criteria air pollutant emissions is less than significant in the long term compared to existing conditions.

The geographic scope of the 2016 RTP/SCS as a Project is regional in nature. As documented in the **Transportation Conformity Analysis Appendix**, the Draft 2016 RTP/SCS demonstrates transportation conformity pursuant to the U.S. EPA's Transportation Conformity Regulations. In other words, the Draft 2016 RTP/SCS has demonstrated that it will not create any new violations of the national ambient air quality standards (NAAQS) for the five [transportation related criteria pollutants (i.e., CO, NO2, Ozone, PM2.5, and PM10), worsen the existing violations, or delay the timely attainment of these NAAQS.

Response to Comment No. 74:

Criteria air pollutants, including ROG and NOx, were analyzed for each of the six Counties, as documented in Table 3.3.4-1 of the PEIR. Please see the 2016 RTP/SCS Transportation Conformity Analysis Appendix. Page 4 of the Appendix concludes that, the 2016 RTP/SCS regional emissions for the Ozone precursors, i.e., NOx and ROG, meet all applicable emission budget tests for all milestone, attainment and planning horizon years in all ozone nonattainment areas in the SCAG region. Similar to PM10, PM2.5, and CO as reported in the Draft PEIR, in 2040, the Plan also has less NOx and ROG emissions relative to Baseline.

Response to Comment No. 75:

Thank you for your comment about evaluating interim years. **Table 3.8.4-1** through **3.8.4-3** in **Section 3.8** ***Greenhouse Gas Emissions and Climate Change*** evaluate emissions for 2012, 2020, and 2040. In addition, **Figure 3.8.4-1** ***SB 375 GHG (per capita) Reduction Trajectory*** shows interim points every 5 years from 2020 to 2040. For specific, local hot spots analysis, these would have to be analyzed on the project-level. Please refer to **Master Response No. 2** about the appropriate level of analysis for a Program EIR.

The required criteria pollutant emission analysis has been performed for all nineteen nonattainment and maintenance areas for all required milestone years including 2040 within the SCAG region (see **Section II. Regional Emissions Analysis** of the **Transportation Conformity Analysis Appendix**). In addition, as required by the EPA's Transportation Conformity Regulations, for every nonattainment and maintenance areas where there are EPA approved motor vehicle emission budgets, the budget test has been performed to ensure that the Plan's emissions do not exceed the conformity emission budgets for all required milestone years including 2040; for other nonattainment and maintenance areas where there are no EPA approved conformity budgets, the build vs. no-build test has been performed to ensure that the Plan/Build emissions do not exceed the emissions under the No-Build scenario for all milestone years including 2040.

In addition, if applicable, individual transportation projects are required to meet project-level transportation conformity including CO and PM hot spot analysis. Project level hot spot analysis is outside the scope of the PEIR.

Response to Comment No. 76:

Thank you for your comment. Both **Figures 3.3.4-1** and **3.3.4-2** have been updated in the **Clarifications and Revisions** section of the Final PEIR.

Response to Comment No. 77:

Thank you for your comment. AERMOD was used in **Appendix D**, HRA. Please see **Response 11-42** regarding the isopleth maps.

Response to Comment No. 78:

Thank you for your comment about using existing conditions as the point of comparison. Please refer to **Response 11-32** and **33.**

The geographic scope of the 2016 RTP/SCS as a Project is regional in nature. As documented in the **Transportation Conformity Analysis Appendix**, the Draft 2016 RTP/SCS demonstrates transportation conformity pursuant to the U.S. EPA's Transportation Conformity Regulations. In other words, the Draft 2016 RTP/SCS has demonstrated that it will not create any new violations of the national ambient air quality standards (NAAQS) for the five [transportation related criteria pollutants (i.e., CO, NO2, Ozone, PM2.5, and PM10), worsen the existing violations, or delay the timely attainment of these NAAQS.

Response to Comment No. 79:

Thank you for your comment about Impact Air-2. The cumulative impact of Impact Air-2 is significant as stated in **Section 3.3.5, Cumulative Impacts**.

Response to Comment No. 80:

Thank you for your comment about cumulative impacts. The cumulative impacts are described in **Section 3.3.5, Cumulative Impacts.**

Response to Comment No. 81:

Thank you for your comment. Construction emissions are addressed via project level transportation and general conformity. Please see **Response 11-35** and **Master Response No. 2**. Please see **Clarifications and Revisions** to **Section 3.3**.

Response to Comment No. 82:

Thank you for your comment. Please refer to Response 11-42 and **Master Response No. 4**. The referenced mitigation measure in the comment is taken out of context. The specified mitigation measure is extracted from a commitment by SCAG to continue to pursue seventeen TCMs. Detailed list of performance standards-based mitigation measures, that are enforceable by air districts (through their construction permitting programs) and federal, state, and local jurisdictions through their project approvals, and grading and building permit processes have been identified for each significant impact, which are tied to short-term construction impacts. SCAG does not implement projects contained in the RTP/SCS; that responsibility lies with the federal, state, and local agencies that approve and fund these projects.

Response to Comment No. 83:

Thank you for your comment. Please refer to **Master Response No. 4**.

Response to Comment No. 84:

Thank you for the suggestion to include further construction-related mitigation measures. Please refer to **Master Response No. 4.**

The measures provided in the MMRP are not intended to be an exhaustive list of possible mitigation measures. However, SCAG appreciates the additional list or mitigation measures for consideration at the project level and has added the measures, please refer to **Clarifications and Revisions** to MM-AIR-4(b).

Response to Comment No. 85:

Thank you for your comment about the construction mitigation measures. Again, the measures provided in the MMRP are not intended to be an exhaustive list of possible mitigation measures. The mitigation approach developed by SCAG is to provide a list of performance-standards based mitigation measures that lead agencies in developing future projects can adapt to develop project specific mitigations. These

performance-based mitigation measures that are developed have provided comparable strategies for reducing construction emission of off-road vehicles. Individual projects will have to abide by their applicable air district rules and ARB regulations to achieve environmental compliance. Please refer to **Master Response No. 4**.

Response to Comment No. 86:

Thank you for your comment regarding mitigation for fugitive dust. SCAQMD Rule 403 and its related rules for fugitive dust from the other air districts in the SCAG region have been included in **Section 3.3.1 Regulatory Framework** section of **Section 3.3, Air Quality**.

Response to Comment No. 87:

Thank you for your comment. Please see **Response 11-84**.

Response to Comment No. 88:

Thank you for your comment. The SCAG region is the largest region in the State of California, housing nearly half of the State's population; therefore, it is expected that it would have the highest incidents of health-related incidents associated with construction. Impact AIR-4 and **Table 3.3.4.-2** and **Table 3.3.4-3** of the PEIR correctly document the number of sensitive receptors located in the vicinity of proposed transportation improvements, and the potential to exceed established risk thresholds for 30-year exposure to cancer risk. Construction emissions account for a small fraction of overall emissions and would not change the findings provided in the PEIR.

The PEIR indicates the potential for significant impact to occur from construction in IMPACT-Air-2 and provides mitigation measures for reducing impacts at the project level.

Please see **Master Response No. 2** for clarification on the scope of a Program EIR. Specific off-road construction equipment regulations are mentioned in the form of CARB Small Offroad Engine Exhaust Emission Standards and CARB Offroad Compression-Ignition Diesel Engine Exhaust Emission Standards.

Response to Comment No. 89:

Thank you for your comment about the comparison to existing conditions. Please see **Response 11-33**. Thank you for your additional comments. **Table 3.3.4-3** is a reproduction of part of **Table 3-1,** which has been updated in the **Clarifications and Revisions** section of the Final PEIR.

Response to Comment No. 90:

Please see **Response 11-38**.

Response to Comment No. 91:

Please see **Response 11-41**.

Response to Comment No. 92:

Thank you for your comments.

Please see **Response 11-40** regarding sensitive receptor spacing.

Please see **Response 11-42** regarding isopleth maps.

Response to Comment No. 93:

Thank you for your comment. Because the transportation modeling was updated in mid-February 2016, the tables in the HRA have been revised in accordance with the new VMT numbers for each segment. Please see **Clarifications and Revisions** to **Section 3.3** and **Appendix D**. An increase in cancer risk means a greater number of people have the potential to get cancer. It does not state for certain whether anyone will actually get cancer as a result of the Plan or any project.

Please see **Response 11-40** about sensitive receptor spacing.

Please see **Response 11-42** about isopleth maps.

Thank you for your comment regarding a cancer burden analysis.

Response to Comment No. 94:

Thank you for your comments. Please see **Response 11-42** and **Master Response No. 4** regarding mitigation measures.

Response to Comment No. 95:

Thank you for your comments. Please refer to **Response 11-44.**

12. City of Anaheim
Susan Kim
Principal Planner
200 S. Anaheim Blvd.
Suite #162
Anaheim, CA 92805
(714) 765-5139

Response to Comment No. 1:

SCAG acknowledges the concurrence of the City of Anaheim with the comments in the Orange County Council of Governments Comment Letter. Please see **Responses to Comment Letter No. 32** (Orange County Council of Governments Comment Letter).

Response to Comment No. 2:

Thank you for your comment on the California High-Speed Train System. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16248, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 3:

Thank you for your comment on the water treatment facilities. Anaheim's Lenain Treatment Plant has been added to **Table 3.18.2-2 Active Water Treatment Facilities in the SCAG Region** in the **Clarifications and Revisions** (see revisions to **Section 3.18, Utilities and Service Systems)** section of the Final PEIR.

13. City of Colton
Mark R. Tomich, AICP
Development Services Director
650 N. La Cadena Drive
Colton, California 92324
(909) 370-5099

Response to Comment No. 1:

Thank you for your comment regarding a minor correction to **Table 3.18.2-1** on page 3.18-11 of **Section 3.18, Utilities and Services Systems** of the PEIR. These revisions have been incorporated into the table in the **Clarifications and Revisions** (see revisions to **Section 3.18, Utilities and Service Systems**) section of the Final PEIR.

14. City of Diamond Bar
James DeStafano
City Manager
21810 Copely Drive
Diamond Bar, California 91765-4178
(909) 839-7041

Response to Comment No. 1:

Thank you for your comment with regards to congestion along the East-West Freight Corridor Project. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16345, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 2:

Thank you for your comment regarding a concern that no studies have been conducted regarding the localized visual impacts of an elevated facility along the State Route 60 and the San Jose Creek Wash alignments as a viable East-West Freight Corridor Project in the 2016 RTP/SCS. Please refer to **Master Response No. 1** and **Master Response No. 2.** Please also refer to Submission ID 16345, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 3:

Thank you for your comment regarding a concern that visual ROW impacts along SR-60 and the San Jose Creek Wash have the potential to be greater than other corridors. The PEIR addresses the Plan as a whole and does not address individual projects. Please refer to **Master Response No. 1** and **Master Response No. 2** (Program EIR versus Project EIR)**.** Please also refer to Submission ID 16345, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Nos. 4-7:

Thank you for your comments on East-West Corridor and its role in the 2016 RTP/SCS. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16345, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 8:

Thank you for your comment with respect to zero emission vehicles. The air quality analysis contained in the PEIR takes into account fuel technology improvements over time. It uses CARB's latest EMFAC model (EMFAC 2014) and assumes the CARB- approved emission factors for the year 2040 (see **Master Response No. 3**). The air quality impact analysis was done as a conservative analysis to disclose worst-case scenario outcomes as part of the environmental review. For further clarification on SCAGs technical analysis, please refer to **Master Response No. 3.**

Response to Comment No. 9:

Thank you for your comment.

15. City of Eastvale
Michele Nissen
City Manager
12363 Limonite Ave., Suite 910
Eastvale, CA 91752
(951) 703-4421

Response to Comment No. 1:

Thank you for your comments with respect to the 2016 RTP/SCS Project List. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16304, Final 2016 RTP/SCS Comments and Responses Appendix. Please also refer to **Responses 11-1 through 11-5**.

Response to Comment No. 2-3:

Thank you for your comments with respect to project-level mitigation measures. For clarification, please refer to **Master Response No. 4.**

Response to Comment Nos. 4-5:

Thank you for your comments. SCAG has accepted the recommendations and has made changes in applicable areas within the **Clarifications and Revisions** section of the Final PEIR.

16. City of El Centro
Community Development Department
Planning & Zoning Division
Norma V. Villicafia, AICP
Director of Community Development
1275 W. Main Street, El Centro, California 92243
(760) 337-4545

Response to Comment No. 1:

Thank you for the commendation on the 2016 RTP/SCS and PEIR and SCAG's continuance of regional cooperation in the Southern California Region.

17. City of El Segundo (On behalf Of) (Letter No. 1)
Shute, Mihaly & Weinberger, LLP.
Joseph D. Petta
Attorney
396 Hayes Street, San Francisco, CA 94102
(415)-552-7272

Response to Comment No. 1:

Thank you for your comment. SCAG provided an extended 60-day public review and comment period in order to provide stakeholders and interested persons additional time to prepare their comments. However, the scheduled deadline of April 7, 2016 remained unchanged for SCAG's governing body, the Regional Council, to consider certification of the PEIR and proposed, final 2016 RTP/SCS. This April 7th deadline is necessary in order for SCAG to meet its deadline for submitting the updated regional transportation plan and associated transportation conformity determination in accordance with the federal Clean Air Act, to the U.S. Department of Transportation Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) which reviews the conformity determination in consultation with the U.S. Environmental Protection Agency. Such submittal is needed about two months prior to expiration on June 4, 2016 of the current regional conformity determination, in order to provide sufficient time for review by FHWA and FTA.

18. City of El Segundo (On behalf Of) (Letter No. 2)
Shute, Mihaly & Weinberger, LLP.
Joseph D. Petta
Attorney
396 Hayes Street, San Francisco, CA 94102
(415)-552-7272

Response to Comment Nos. 1-5:

Thank you for your comments related to the approach to aviation used in the 2016 RTP/SCS. SCAG acknowledges that the City of El Segundo (City) would prefer that projects that are under consideration at LAX not be included in the RTP/SCS. However, the County Transportation Commissions identify and submit to SCAG most of the projects within the boundaries of their respective counties that are to be evaluated in the RTP/SCS. As indicated in the 2010 Regional Transportation Plan Guidelines, there are eight (8) traditional steps undertaken during the regional planning process:

1. Providing a long-term (20 year) visioning framework;
2. Monitoring existing conditions;
3. Forecasting future population and employment growth;
4. Assessing projected land uses in the region and identifying major growth corridors;
5. Identifying alternatives and needs and analyzing, through detailed planning studies, various transportation improvements;
6. Developing alternative capital and operating strategies for people and goods;
7. Estimating the impact of the transportation system on air quality within the region; and,
8. Developing a financial plan that covers operating costs, maintenance of the system, system preservation costs, and new capital investments.[9]

Most of the projects included in the 2016 RTP/SCS Project List Appendix were provided by the six County Transportation Commissions (CTCs) for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The CTCs typically submit projects that are regarded as regionally significant and/or anticipated to receive (or already receiving) federal funds, and the CTCs anticipate that these projects will be initiated or completed by the Plan's horizon year, in this case, 2040. SCAG does not implement projects contained in the RTP/SCS. The ground access projects referred to in the comment letter were submitted to SCAG by the Los Angeles World Airport Authority with concurrence from LA Metro.

SCAG recognizes that the ground access projects at LAX are pending or will undergo environmental review. RTP/SCS is a long range plan. So, environmental clearance is not a prerequisite for including a transportation project in the RTP/SCS. In fact, the majority of the projects included in the RTP/SCS have not gone through the environmental review process. As with other projects included within the Project List, once a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with the CTC to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

Although SCAG is not a party to the Stipulated Settlement Agreement, the agreement states that the City will invite SCAG to participate in a working group to plan for regional distribution of air travel

[9] http://www.catc.ca.gov/programs/rtp/2010_RTP_Guidelines.pdf

demand. SCAG has participated in that working group, which appears to be the appropriate venue for resolving issues related to regional distribution of air travel demand. SCAG encourages the City of El Segundo to direct their comments related to Million Annual Passengers (MAP) data and funding of ground access improvements at LAX to the City of Los Angeles and the Federal Aviation Administration, who have the primary discretionary land use authority for improvements at LAX.

Please refer to **Master Response No. 1.** Please also refer to Submission ID 16305, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Nos. 6-9:

Thank you for your comments with respect to the analysis of aviation improvements in the Draft PEIR. It is important to note that the 2016 RTP/SCS PEIR is a program-level EIR. All projects listed within the RTP/SCS are expected to undergo project specific environmental review. For further clarification, please refer to **Master Response No. 2.**

With respect to MAP data presented in the PEIR, the forecast process employed in the 2016 RTP/SCS differed from the process employed in the 2012 RTP/SCS. Rather than generate forecasts for each airport and use the sum to calculate total regional demand, the 2016 RTP/SCS forecast began with development of an overall aviation demand forecast for the entire region. This approach is consistent with SCAG's regional growth forecast. The overall regional aviation demand is based primarily on the demographic trends, regional economic outlook and the global Gross Domestic Products (GDP). Several scenarios were then examined as to how the region's airports could accommodate this demand. All of the scenarios presented in the RTP assume that the region develops polices related to infrastructure development to accommodate the entire demand. The forecasted demand of 136.2 MAP in 2040 would occur with or without the ground access projects listed in the RTP, and there is no induced demand solely because of the RTP projects.

With respect to capacity analysis, on June 2015, SCAG's transportation committee (TC) was presented with the Urbanized and Constrained Airport Capacity Analysis. At this meeting, the TC concurred that the potential numbers (82.9 to 96.6 MAP) for LAX were higher than previous RTPs (78.9 MAP) and were aware of the expiring Settlement Agreement. Over the course of the following two TC meetings, the members actively debated the numbers for LAX and other airports. SCAG's Planning Staff was directed to work with specific airport sponsors on the forecasts and ample opportunity for stakeholder and public comments were provided at the meetings.

For further clarification, please refer to Airport Capacity Constraints memo available at: http://www.scag.ca.gov/Documents/AnalysisOfAirportCapacityConstraints.pdf.

Regarding the aviation noise impacts analysis under Impact Noise-5, implementation of transportation projects in the 2016 RTP/SCS would result in less than significant impacts related to projects located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, that would expose people residing or working in the project area to excessive noise levels.

The Airport Noise and Capacity Act (ANCA) and implementing regulations, 14 CFR Part 150, under the federal Airport Noise Compatibility Program, are the primary federal regulations guiding and controlling planning for aviation noise compatibility on and around airports. The purpose of this program is for

airports to show what measures the airport operator has taken or proposes to take to reduce non-compatible land uses and for preventing the introduction of additional non-compatible uses within the area covered by the airport's noise exposure map, to reduce aircraft noise impacts in the vicinity of airports.

The noise created by aircraft can negatively affect the quality of life for people that reside inside of the 65 CNEL noise contour. At airports in the SCAG region where the 65 CNEL contour area includes homes, there have been aggressive sound attenuation programs that lower the interior noise levels to federally acceptable standards (largely through the installation of HVAC units, double-paned windows, and reinforced doors). In addition, through the airport land use commission (ALUC) process, the State of California has charged counties with ensuring that new noise-sensitive land uses are not allowed near airports. Aside from homes, noise sensitive land uses includes places of worship, hospitals, schools with young children, outdoor theatres, etc. These land use measures have proactively made homes quieter for residents, but also safer for people on the ground and in aircraft.[10] As a result of the Final Stipulated Agreement referenced in the comment letter, the City of Los Angeles provided funding to the Cities of Inglewood and El Segundo, Los Angeles County, and ARSAC (Alliance for a Regional Solution to Airport Congestion) totaling $266 million over a 10-year period to include: (1) accelerated noise mitigation for the Cities of Inglewood and El Segundo and Los Angeles County; (2) job training and increased job opportunities; (3) traffic mitigation for Inglewood and El Segundo; (4) street removal and landscaping in the dunes west of Pershing Drive; and (5) street lighting in Westchester.[11]

Furthermore, as explained in the 2016 RTP/SCS Aviation and Airport Ground Access Appendix, state law mandates the creation of an ALUC to coordinate planning for areas that surround public use airports. The ALUC is tasked with preparing airport land use plans to protect the public by minimizing their exposure to excessive noise and safety hazards within these areas. The resulting airport land use plans provide guidance and policies on noise level and land uses in adjacent areas to limit impacts from noise. The development of airport land use plans are guided by three federal regulations and two state codes:

- Title 14 Code of Federal Regulations, Part 36, establishes maximum acceptable noise levels for specific aircraft types.

- Title 14 Code of Federal Regulations, Part 150, provides guidance for measuring noise at airports and surrounding areas, determining exposure of individuals to noise from the operations of an airport, identifying land uses that are normally compatible, and preparing and executing noise compatibility planning and implementation programs.

- As part of Title 24 Code of Federal Regulations, Part 51, Subpart B, the HUD exterior noise regulations state that noise levels of 65 dBA DNL or less are acceptable for residential land uses and noise levels exceeding 75 dBA DNL are unacceptable.

- California Government Code Section 65302 specifies that noise contours be shown for all facilities related to airport operations and be stated in terms of CNEL or Ldn. These noise contours are intended to guide how patterns of land uses are established in the

[10] California Air Resources Board. Accessed 19 July 2015. *Regulation to Reduce Greenhouse Gas Emissions from Vehicles Operating with Under Inflated Tires.* Available at http://www.arb.ca.gov/regact/2009/tirepres09/tirefinalreg.pdf

[11] LAX Master Plan Stipulated Agreement. Available at: http://www.lawa.org/ourLAX/ourLAX.aspx?id=9247. Downloaded March 13, 2016.

land use element in order to minimize the exposure of community residents to excessive noise.

- Title 21, California Code of Regulations Section 5000 et seq., identifies a noise exposure level of CNEL 65 dB as the noise impact boundary around airports. Within this noise impact boundary, airport proprietors are required to ensure that all land uses are compatible with the aircraft noise environment or the airport proprietor must secure a variance from Caltrans.

Additionally, each county and city in the SCAG region is required to adopt a noise element as part of its General Plan. Each noise element is required to analyze and quantify current and projected noise levels associated with airports that contribute to the community noise environment. Local jurisdictions also regulate noise through enforcement of local ordinance standards. Additionally, it is expected that local jurisdictions would conduct environmental review for projects that are within or near sensitive airport zones, and are expected to implement best management practices and mitigation measures on a project by project basis, to minimize any potential noise impacts.

To reduce airport noise, airports have addressed local community noise concerns by regulating runway use, modifying flight routes, modifying aircraft operational procedures, and restricting engine run-up. These actions generally are subject to approval by the FAA, which has the authority and responsibility to control aircraft noise sources, implement and enforce flight operational procedures, and manage the air traffic control system.

The SCAG region contains 57 airports, with 12 major commercial airports serving the region (Table 3.13.2-2).[12,13] There are approximately 41 linear miles of major projects and 10,785 acres of HQTAs within the 65 dBA CNEL of the 12 major airports.[14]

According to the August 2015 regional aviation forecast,[15] the 2016 RTP/SCS has a regional passenger demand forecast of 136.2 MAP in 2040, which is a decrease of approximately 7 percent at the regional level since the last regional aviation forecast in the 2012 RTP/SCS.[16] For informational purposes, the approximately 7 percent decrease in MAP at the regional level is intended to provide a perspective on the changes (here, a decreasing trend) in the air passenger demand forecast, not used to determine the level of significance. It is also intended to demonstrate a similar decreasing trend in the regional air passenger demand forecast as it was observed in the past RTPs.

The overall regional aviation demand in the 2016 RTP/SCS is based primarily on demographic trends, regional economic outlook and the global GDP. Several scenarios were then examined as to how the region's airports could accommodate this demand. All of the scenarios presented in the 2016 RTP/SCS assume that the region develops policies related to its infrastructure development to accommodate the

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12 California Energy Commission. May 2011. *California's Energy Future – The View to 2050.*

13 California Air Resources Board. May 2014. *First Update to the Climate Change Scoping Plan.* Available at: http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

14 SCAG GIS data, 2015.

15 Southern California Association of Governments. August 2015. *Regional Aviation Forecast: Analysis of Airport Capacity Constraints Technical Memorandum*. Prepared by: AECOM.

16 Southern California Association of Governments. December 2015. *Draft 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy*. Appendix: Environmental Justice Report. Los Angeles, CA.

entire demand. The forecasted demand of 136.2 MAP would occur with or without the implementation of the projects in the 2016 RTP/SCS. As discussed in the Regional Aviation Forecasts in the AECOM report on Airport Constraints Memo (June 2015), the LAX Overall Airport Capacity based on the updated 2040 regional aviation forecast accounts for increased aircraft loads after the 9/11 and very large aircraft in the future fleet mix, the estimate of existing runway capacity would be close to the forecasted demand when taking into consideration air passengers, operations, and air cargo. Further, the regional aviation forecast reflects that passenger demand is mainly driven by demographic trends, regional economic outlook and GDP, and airfield capacity based on current Airport Master Plan configuration. There is no information based on the Plan's aviation demand forecast showing induced demand solely due to implementation of the ground access projects listed in the 2016 RTP/SCS.

SCAG's TC identifies policy considerations used to develop the Aviation and Ground Access elements for the 2016 RTP/SCS. The vision of the 2016 RTP/SCS Aviation element is to recognize that the aviation industry is a business, not a public utility. As such, airlines and passengers have a choice in the airports they serve and use. However, every flight and every passenger that departs from a SCAG region airport is an economic benefit for the region. The Aviation element is intended to address all of the SCAG region's requirements and needs; use a forecast method that is technically sound, transparent, and inclusive; highlight the overall regional demand while developing airport-specific forecasts; educate policy makers on the fundamentals of airline economics and passenger behavior; and quantify and highlight the economic benefit of the SCAG region airports. The adoption of the Aviation element will set the stage for the subsequent RTP development cycles, and will allow SCAG to propose research, programs, and strategies in future RTP cycles that will better prepare the region's airports for the future.

With respect to capacity analysis, in June 2015, SCAG's TC was presented with the Urbanized and Constrained Airport Capacity Analysis. At this meeting the TC found that the potential numbers (82.9 to 96.6 MAP) for LAX were higher than previous RTPs (78.9 MAP) and were aware that most of the provisions of the Settlement Agreement were expiring at the end of 2015. The only remaining provision of the Settlement Agreement is the cap on number of gates to 153, which sunsets in 2020. Over the course of the following two TC meetings, the members actively debated the numbers for LAX and other airports, and the TC directed SCAG's aviation planner to work with specific airport sponsors on the forecasts, and ample opportunity for stakeholder and public comments were provided at the meetings.

The Airport Ground Access section in the 2016 RTP/SCS focuses on the ability of passengers to access each airport. It is not intended to analyze the factors that go into a passenger's choice of airports. The statement that "Passengers' choice of airports is based in part on the travel time to the airport and the convenience of access" is not intended to suggest that other factors are not important; indeed, it states that there are other factors that influence passengers' decisions.

Technology enhancements to aircraft have proven to be effective for noise reduction. Jet aircraft have also continued to get quieter since 1990. With new technology being used, jet engines are producing an ever-greater amount of thrust, while creating less noise and being more reliable. For example, a newly produced four-jet aircraft can hold more passengers with a smaller noise footprint than one produced in 1990. By 2040, the amount of noise produced at the airports in the region will be dramatically reduced because of the number of newer, quieter aircrafts operating. In the SCAG region, the most common aircraft types used on short-, medium-, and long-haul domestic travel (that typically seat between 140-200 passengers) also have new versions entering the market in the next five years that are already touting noise reductions. Lastly, this same technology is proving to reduce the noise even more

dramatically for aircraft arrivals. In Southern California, at airports that are coastal, the noise created by arrivals impacts more residents since departures are usually over water.[17]

The trend in the airline business seen at SCAG region airports, even through 2040, is a slight up-gauging of aircraft size with higher load factors. This means that an aircraft on a route that used to have 120 seats, may now have 150 seats. Previously, the 120-seat aircraft was 80-percent full, and in 2040, the 150-seat aircraft will be 90-percent full. The noise created by the 150-seat aircraft is the same (or less) than that of the 120-seat aircraft. Thus, for the same number of arrivals and departures, these newer, larger, and more efficient aircrafts are able to carry more passengers, while generating the same level of noise or less.[18]

As discussed above, the regional forecasted demand of 136.2 MAP would occur with or without implementation of the projects in the 2016 RTP/SCS, and there is no information based on the Plan's aviation demand forecast showing induced demand solely due to implementation of the ground access projects listed in the 2016 RTP/SCS. Additionally, implementation of airport land use controls, noise attenuation programs, improvements in jet engine technology, airline scheduling trends are expected to result in aviation noise levels staying the same or less at airports in the SCAG region. The projects in the 2016 RTP/SCS that are within 2 miles of a public airport are expected to be developed following the guidance provided by local land use plans. These projects will need to include noise control measures with respect to a variety of land use receivers in adjacent areas. SCAG does not implement projects contained in the RTP/SCS identified by the CTCs or individual airport authorities; it is the responsibility of the project sponsors to implement and decide what level of subsequent environmental reviews will be needed to implement the projects. Nevertheless, all projects within 2 miles of a public airport must adhere to the airport land use plan guidance. All projects subject to airport noise GIS guidance must include an airport noise analysis to demonstrate reduction of noise impact. With proper adherence to the airport land use plan measures and other site-specific noise reduction measures to lessen airport noise, impacts would be less than significant.

To clarify SCAG's analysis of Impact Noise-5, **Revisions and Clarifications** (see revisions to **Section 3.13, *Noise***) section of the Final PEIR, will reflect the above discussion.

Regarding the methodology for the airport noise GIS Analysis (Draft PEIR, Footnote 39, Page 3.13-32), the airport noise, major projects, and HQTA shapefiles were used for the GIS analysis where footnote 39 refers to "SCAG GIS data, 2015." The airport noise shapefile was intersected (overlapped) with the HQTA Plan 2040 shapefile to determine the "10,785 acres of HQTAs within the 65 dBA CNEL of 12 major airports." The airport noise shapefile was intersected (overlapped) with the major projects (Plan 2040 shapefiles to determine the "41 linear miles of major projects" in the Draft EIR. The GIS data shapefiles for airport noise analysis were provided to the Commenter in response to a public records request. The number of TomTom point data and existing land use residential parcels that fell within the 500-foot distance per sensitive land use category are included in **Table 3.13.4-1**.

This clarification will be included in the discussion for Impact Noise-5, to further explain the methodology for the aviation noise impacts analysis, in the **Revisions and Clarifications** (see revisions to

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[17] California Air Resources Board. Accessed 15 October 2015. *Cap and Trade Program.* Available at: http://www.arb.ca.gopv/cc/capandtrade/capandtrade.htm

[18] California Environmental Protection Agency (Cal/EPA). Accessed 9 February 2015. *Greenhouse Gas-Reduction Investments to Benefit Disadvantaged Communities.* Available at: http//www.calepa.ca.gov/EnvJustice/GHGInvest/

Section 3.13, Noise) section of the Final PEIR.

Response to Comment No. 10:

Thank you for your comment. SCAG's decision not to use the 78.9 MAP for LAX is not intended to be binding on local jurisdictions and local airports. The MAP range for LAX of 82.9 to 96.6 MAP is simply a forecast used as part of SCAG's regional aviation passenger demand forecast.

Please refer to **Master Response No. 1.** Please also refer to Submission ID 16305, Final 2016 RTP/SCS Comments and Responses Appendix.

19. City of Irvine
Steven S. Choi, Ph.D.
Mayor
One Civic Center Plaza
Irvine, California 92623-9575
(949)-724-6233

Response to Comment No. 1:

SCAG acknowledges the concurrence of the City of Irvine (City) with the letters of comment provided by the Orange County Council of Governments and the Orange County Transportation Authority. Please see **Responses to Comment Letter No. 32** (Orange County Council of Governments Comment Letter) and **Responses to Comment Letter No. 34** (Orange County Transportation Authority Letter).

Response to Comment No. 2:

Thank you for your comment relate to the Growth Forecast. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16306, Final 2016 RTP/SCS Comments and Responses Appendix.

Additionally, SCAG appreciates the input that the Intensified Land Use Alternative is not supported by City as the preferred alternative for the Plan. This information will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS. For the Intensified Land Use Alternative as included in the Final PEIR, SCAG staff has made the corrections based on input received to reflect existing development agreements, entitlements, and projects recently completed or under construction.

Response to Comment No. 3:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16306, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 4:

Thank you for your comments with respect to mitigation measures.
Please refer to **Master Response No. 4**.

Response to Comment No. 5:

Thank you for your comment regarding the 500 foot buffer. The commenter is correct in stating that there is currently no prohibition against development within 500 feet of freeways and high traffic roadways. Reference to this 500-foot study area is not intended to imply that development in these areas is prohibited. However, the California Air Resources Board has issued 2005 guidance for evaluating and reducing air pollution impacts in these areas. *See the Air Quality and Land Use Handbook published by the California Air Resources Board in 2005 and ARBs Strategies to Reduce Near-Roadway Pollution Exposure.*[19,20] These documents are an informational and advisory guide and are not

[19] California Environmental Protection Agency California Air Resources Board. April 2005. *Air Quality and Land Use Handbook: A Community Health Perspective.* Available at: http://www.arb.ca.gov/ch/handbook.pdf

mandatory, however, it does offer recommendations related to land uses in these areas. In response to this comment, the word "buffer" has been revised to "distance," where appropriate, in the **Clarifications and Revisions** section (see revisions to **Section 3.3, Air Quality**) of the Final PEIR.

The 2016 RTP/SCS includes regional policies to encourage growth in high quality transit areas (HQTAs) recognizes that the issue of health hazards within 500 feet of freeways is an evolving issue. The areas within the 500-foot "buffer" represent one-fifth of the HQTAs. The 2016 RTP/SCS balances growth distribution between HQTAs and 500 feet of freeways by increasing growth rate in the HQTAs while respecting growth to reflect local input and honor local control over land use and development, thereby balancing the growth distribution.

Note that distances other than 500 feet were used for placing worker and residential receptor spacing in **Appendix D, Health Risk Assessment**. Health impacts were captured within 1,000 meters of each evaluated transportation segment, starting about 100 meters away from the outer edge of the freeway. The 1,000 meter criterion was used to sufficiently capture where the health impacts may be expected to occur. The health risk was evaluated from 16 major freeway segments because major freeways have the highest potential for diesel particulate matter risk due to heavy duty truck traffic and the proximity of sensitive receptors.

Response to Comment No. 6:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16306, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 7:

Thank you for your comments. To clarify, **Appendix B** of the PEIR is part of the Project List for the Plan. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16306, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 8:

Thank you for your comment regarding state law requirements. The requested change has been incorporated into the **Clarifications and Revisions** section of the Final PEIR.

Response to Comment No. 9:

Thank you for your comment. See **Response 19-4**. Additionally, please refer to **Master Response No. 4**.

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[20] California Environmental Protection Agency California Air Resources Board. Strategies to Reduce Near-Roadway Pollution Exposure. April 2015.

Response to Comment No. 10:

Thank you for your comment. Mitigation Measure MM-TRA-1 (b) and Mitigation Measure MM-TRA-2(b), have been clarified to state that such measures need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities please refer to **Clarifications and Revisions for MM-TRA-1(b) and MM-TRA-2(b)** section of the Final PEIR

***Response to Comment No. 11*:**

Thank you for your comments. Please refer to Response **30-8** (Orange County Public Works Comment Letter)**.**

Response to Comment Nos. 12-13:

Thank you for your comments. Please refer to Response **30-9** (Orange County Public Works Comment Letter)**.**

Response to Comment Nos. 14-21:

Thank you for your comments. For changes and revisions to the 2016 RTP/SCS, please refer to **Master Response No. 1.** Please also refer to Submission ID 16306, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 22:

Thank you for your comments regarding the 47 recommended revisions to the PEIR located in the table on pages 13 through 19 of the comment letter. Please see **Responses to Comment Letter No. 32** (Orange County Council of Governments Comment Letter).

20. City of La Canada Flintridge
Mark R. Alexander
City Manager
1327 Foothill Boulevard
La Canada Flintridge, California 9101
(818) 790-8880

Response to Comment Nos. 1-23:

Thank you for your comments. Please see our response to the comment letter received from the 5-City Alliance (see responses to **Comment Letter No. 11**) and the City of South Pasadena (see responses to **Comment Letter No. 26**).

Response to Comment No. 24:

Thank you for your comments. With respect to the Draft EIR/EIS for the SR-710 North Study Project, to clarify, SCAG is not tasked with evaluating the project-level environmental impacts from each of the RTP's transportation projects (including the SR-710 North Study Project). Rather, SCAG assesses impacts of the projects in the 2016 RTP/SCS at a regional/programmatic level. Please see **Master Response No.2** which addresses the difference between a program level EIR (like this PEIR) and a project-Level EIR.

Response to Comment Nos. 25-38:

Thank you for your comments - they are legal conclusions. Please note that the Draft 2016 RTP/SCS PEIR is a program level EIR. Please refer to **Master Response No. 2.**

Response to Comment No. 39:

Thank you for your comment.

21. City of Lake Forest
Gayle Ackerman, AICP
Director of Development Services
25550 Commercentre Dr., Suite 100
Lake Forest, CA 92630
(949) 461-3400

Response to Comment No. 1:

Thank you for your comment acknowledging the efforts that were undertaken to respond to incorporate input related to the growth forecast.

22. City of Mission Viejo
Dennis Wilberg
City Manager
200 Civic Center
Mission Viejo, California 92691
(949) 470-3051

Response to Comment No. 1:

SCAG acknowledges the concurrence of the City of Mission Viejo (City) with the letters of comment provided by the Orange County Council of Governments and the Orange County Transportation Authority. Please see **Responses to Comment Letter No. 32** (Orange County Council of Governments Comment Letter) and **Responses to Comment Letter No. 34** (Orange County Transportation Authority Letter).

Response to Comment No. 2:

Thank you for your comment acknowledging the effort undertaken to integrate local input related to the Growth Forecast and the City's support the 2016 RTP/SCS.

Response to Comment Nos. 3-7:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16275, Final 2016 RTP/SCS Comments and Responses Appendix.

Additionally, SCAG appreciates the input that the Intensified Land Use Alternative is not supported as the preferred alternative for the Plan. This information will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS. For the Intensified Land Use Alternative as included in the Final PEIR, SCAG staff has made the corrections based on input received to reflect existing development agreements, entitlements, and projects recently completed or under construction (Please see **Response 19-2**).

Response to Comment No. 8:

With respect to financing, fees and taxes, local lead agencies are responsible for drafting, implementing and developing a nexus study including documenting the anticipated effectiveness of a fee or tax. Please refer to **Response 19-10, Master Response No. 2** and **Master Response No. 4.**

23. City of Rancho Cucamonga
Thomas Grahn
Associate Planner
10500 Civic Center Drive
PO Box 807
Rancho Cucamonga, CA 91729-0807
(909) 477-2750

Response to Comment No. 1:

SCAG acknowledges that the City of Rancho Cucamonga does not have any comments on the Draft RTP/SCS PEIR.

24. City of San Clemente
Department of Community Development
Cecilia Gallardo-Daly
Community Development Director
910 Calle Negocio Suite 100
San Clemente, CA 92673
(949) 361-8200

Response to Comment Nos. 1-2:

SCAG appreciates the review of the 2016 RTP/SCS and Draft PEIR undertaken by the City of San Clemente (City). This comment letter will be included as part of the public record.

Response to Comment No. 3:

SCAG acknowledges the concurrence of the City with the letters of comment provided by the Orange County Council of Governments and the Orange County Transportation Authority. Please see **Responses to Comment Letter No. 32** (Orange County Council of Governments Comment Letter) and **Responses to Comment Letter No. 34** (Orange County Transportation Authority Letter).

Response to Comment No. 4:

SCAG appreciates the stated support, by the City, of the 2016 RTP/SCS growth forecast and the adoption of the growth forecast at a geographic level no lower than the jurisdictional level.

Response to Comment No. 5:

Thank you for your comment regarding 2016 RTP/SCS growth forecast. SCAG appreciates the input that the Intensified Land Use Alternative is not supported, by the City, as the preferred alternative for the Plan. This information will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS. For the Intensified Land Use Alternative as included in the Final PEIR, SCAG staff has made the corrections based on input received to reflect existing development agreements, entitlements, and projects recently completed or under construction (See **Response 19-2)**.

Response to Comment No. 6:

Thank you for your comment. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16311, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 7:

Thank you for your comment. Please refer to **Response 19-4** and **Master Response No. 4.**

Response to Comment Nos. 8-13:

Thank you for your comment about the 500-foot buffer language. Please refer to **Response 19-5.**

Response to Comment Nos. 14-19:

Thank you for your comment. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16311, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Nos. 20-25 and Attachment 1:

Please see **Responses to Comment Letter No. 32** (Orange County Council of Governments Comment Letter).

25. City of South El Monte
Joseph J. Gonzales
Councilman
1415 Santa Anita Ave.
South El Monte, CA 91733
626-422-1253

Response to Comment No. 1:

Thank you for your comment related to the 2016 RTP/SCS. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16288 and ID 16345, Final 2016 RTP/SCS Comments and Responses Appendix.

26. City of South Pasadena
Diana Mahmud
Mayor
Office of the City Council
1414 Mission
South Pasadena, Ca 91030
(626) 403-7210

Response to Comment No. 1:

SCAG appreciates the City of South Pasadena's review of the Draft 2016 RTP/SCS and Draft PEIR. Thank you for your comments.

Response to Comment Nos. 2 to 13:

Thank you for your comments. Please see our response with regards to the SR-710 North Study Project in **Responses 11-1** to **11-28 and Master Response No. 1** and Submission ID 16214.

Response to Comment Nos. 14 to 18:

Thank you for your comment on the Draft PEIR's Air Quality Impact Analysis and expressing concerns that the findings in the Draft PEIR Air Quality Impact Analysis for the 2016 RTP/SCS are inconsistent with the findings in the SR-710 North Study Project EIR/EIS. Please refer to **Responses 11-29** to **11-42.** It is important to note that this PEIR is a programmatic document that conducts a region-wide assessment of potential significant effects of the 2016 RTP/SCS. The conclusions presented in the Draft PEIR's Air Quality Impact Analysis were on a regional level and based upon Plan-level results of the entire Plan as a whole. This is consistent with the provisions of Section 15168 of the CEQA Guidelines (see **Master Response No. 2**).

Response to Comment No. 19:

Thank you for your comment on the **Greenhouse Gas Emissions and Climate Change** section of the Draft PEIR. The greenhouse gas emissions and climate change impact analysis is programmatic in nature. It approached the 2016 RTP/SCS as a whole and viewed the six counties and 191 cities within the SCAG region in aggregate. The scope of the GHG impact analysis is relevant to and kept within the scope to RTP/SCS. While acknowledging each project must comply with the CEQA requirements, the GHG impact analysis is in response to the worst case scenario when projects are unable to fully mitigate their adverse impacts (See **Master Response No. 2** for a complete discussion on the differences between a program EIR [such as this PEIR] and a project-level EIR). At the regional level, the 2016 RTP/SCS does not cause additional induced travel demand that has not been captured and reflected in the regional transportation network that serves as the basis for the greenhouse gas emissions modeling for the Draft PEIR. Modeling input and assumptions for the transportation modeling include, but not limited to, socioeconomic data, highway networks, parking, biking, walking, and transit networks. This regional transportation modeling also includes all of the transportation projects that were included in the Plan's **Project List Appendix** which were provided by the six County Transportation Commissions (CTCs). The socioeconomic data that serves as the basis for the Policy Growth Forecasts for the land use strategies in the 2016 RTP/SCS is completed through an extensive bottom-up local input process that takes local growth and local authority into account. For further discussion on technical modeling/process, see **Master Response No. 3.**

Response to Comment No. 20:

Thank you for your comment on mitigation measures in **Section 3.17, Transportation, Traffic, and Safety**, and in particular **MM-TRA-2(b).** This PEIR uses the performance standards-based mitigation measures, please refer to **Master Response No. 4**. With respect to **MM-TRA-2(b),** local lead agencies are responsible to designing and implementing congestion management plan and ensuring a project compliance with the adopted congestion managements, where the lead agency has identified that a project has the potential significant impact (See **Master Response No. 4**). With respect to the SR-710 North Study Project, please also refer to **Responses 11-1** to **11-15** and **Master Responses No. 1.**

Response to Comment Nos. 21 to 22:

Thank you for your comment. Please refer to **Master Response No. 1 1** and Submission ID 16214 and ID 16221.

Response to Comment Nos. 23 to 41:

Thank you for your comment. Please refer to **Master Response No. 1** and Submission ID 16214 and ID 16221.

Responses to Comment No. 42:

Thank you for your comment. Please refer to **Master Response 2**. The correction to **Figure 2.4.2-1: Major Highway Projects** of **Section 2.0, Project Description,** of the PEIR has been incorporated into the figure in **Clarifications and Revisions** (see revisions to **Section 2.0, Project Description**) of the Final PEIR. Please also refer **to Response 11-1 through 11-95**.

Responses to Comment No. 43:

Thank you for your comment. Please refer to **Master Response 2**. The correction to **Figure 2.4.2-5: Major Toll Projects** of **Section 2.0, Project Description,** of the PEIR has been incorporated into the figure in **Clarifications and Revisions** (see revisions to **Section 2.0, Project Description**) of the Final PEIR. Please also refer **to Response 11-1 through 11-95**.

Responses to Comment No. 44:

Thank you for your comment. Please refer to **Master Response 1** and **Master Response 2**. SCAG recognizes that the SR-710 North Study Project is currently pending environmental review. As with other projects included within the 2016 RTP/SCS Project List, when the SR-710 North Study Project EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document, SCAG will work with Metro to amend the RTP/SCS as necessary to update the project description, associated modeling analysis, and exhibits, and will conduct an environmental assessment for the RTP/SCS amendment.

Responses to Comment No. 45:

Thank you for your comment regarding the correction to "the SR-710 Gap Closure in Los Angeles" on page 3.17-39 of **Section 3.17, Transportation, Traffic, and Safety** of the PEIR has been incorporated into the language in **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic, and Safety**) of the Final PEIR.

Responses to Comment No. 46:

Thank you for your comment regarding the correction to **Figure 3.17.4-2: Existing and Proposed Toll Projects** of **Section 3.17, Transportation, Traffic, and Safety** of the PEIR. The correction has been incorporated into the figure in **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic, and Safety**) of the Final PEIR.

Responses to Comment No. 47

This comment provides the LA County Fact Sheet. Thank you for your comment.

Responses to Comment No. 48:

This comment is a copy of an electronic correspondence inquiring about transportation model project list. Please see **Master Response 1**.

Responses to Comment Nos. 49 to 53:

Thank you for comments. Please also see **Response 26-46** above regarding the SR-710 North Study Project EIR/EIS comment letters from County of Los Angeles Department of Public Health, South Coast Air Quality Management District, and Environmental Protection Agency. With respect to the Draft EIR/EIS for the SR-710 North Study Project, the comments note that SCAG is tasked with evaluating the environmental impacts from each of the RTP's transportation projects, including the SR-710 North Study Project, at a regional/programmatic level. This 2016 RTP/SCS PEIR is a Program level EIR and not a Project level EIR. Please see **Master Response No.2** which addresses the difference between a program level EIR (like this PEIR) and a project-Level EIR.

27. City of Tustin
Community Development Department
Elizabeth A. Binsack
Community Development Director
300 Centennial Way
Tustin, CA 92780
(714) 573-3016

Response to Comment No. 1:

Thank you for your comment that the City of Tustin (City) supports the 2016-2040 RTP/SCS growth forecast for Orange County and for the adoption of the growth forecast at the jurisdictional level.

Additionally, SCAG appreciates the input that the City does not support the Intensified Land Use Alternative (Alternative 3) as the preferred alternative. This information will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS. For the Intensified Land Use Alternative as included in the Final PEIR, SCAG staff has made the corrections based on input received to reflect existing development agreements, entitlements, and projects recently completed or under construction (See **Response 19-2)**.

Response to Comment No. 2:

Thank you for your comment regarding the "can and should" language in the mitigation measures. Please refer to **Master Response No. 4.**

Thank you for your comment relating to the consistency of the incorporation of the phrase "as applicable and feasible" in the project-level mitigation measures. SCAG has made revisions in the Final PEIR to ensure this phrase is incorporated consistently in project-level mitigation measures. Please see Corrections and Revisions to **MM-CUL-2(b)**, **MM-USS-3(b)**, and **MM-USS-6(b)** in the Summary of Mitigation Measures in the **Executive Summary**, in **Section 3.5 Cultural Resources**, and in **Section 3.18 Utilities and Services Systems**.

Response to Comment No. 3:

Thank you for your comment regarding the 500-foot buffer. The commenter is correct in stating that there is currently no prohibition against development within 500 feet of freeways and high traffic roadways. Reference to this 500-foot study area is not intended to imply that development in these areas is prohibited (also see **Response 19-5**). However, the California Air Resources Board has issued guidance for evaluating and reducing air pollution impacts in these areas. *See* the Air Quality and Land Use Handbook published by the California Air Resources Board in 2005[21] and ARBs Technical Advisory titled, "Strategies to Reduce Near-Roadway Pollution Exposure."[22] These documents are an

[21] http://www.arb.ca.gov/ch/handbook.pdf

[22] California Environmental Protection Agency California Air Resources Board. Strategies to Reduce Near-Roadway Pollution Exposure. April 2015.

informational and advisory guide and are not mandatory, however, it does offer recommendations related to land uses in these areas. In response to this comment, the word "buffer" has been revised to "distance" in the **Clarifications and Revisions** (see revisions to **Section 3.3, Air Quality**) section in the final PEIR.

Note that distances other than 500 feet were used for placing worker and residential receptor spacing in **Appendix D, Health Risk Assessment**. Health impacts were captured within 1,000 meters of each evaluated transportation segment, starting about 100 meters away from the outer edge of the freeway. The 1,000 meter criterion was used to sufficiently capture where the health impacts may be expected to occur. The health risk was evaluated from 16 major freeway segments because major freeways have the highest potential for diesel particulate matter risk due to heavy duty truck traffic and the proximity of sensitive receptors.

Response to Comment No. 4:

Thank you for your comment regarding mitigation measures about fees or taxes to pay for a variety of programs or for the acquisition of land for mitigation purposes. The performance standards-based mitigation measures in the PEIR includes a catch-all mitigation measure which sets forth performance standards specified in existing statutes, regulations, adopted general plans, and agreements for each of the CEQA resource categories and a list of project-level mitigation measures which are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, or other comparable measures, to meet the performance standards for each of the CEQA resource categories. The performance standards-based mitigation approach in this PEIR recognizes the importance of project-level mitigation measures to minimize project-level significant effects while maintains flexibility for consideration and/or implementation by project-level lead agency. With respect to financing, fees and taxes, local lead agencies are responsible for drafting, implementing and developing a nexus study including documenting the anticipated effectiveness of a fee or tax. Please refer to **Master Response No. 2** and **Master Response No. 4.**

Response to Comment No. 5:

Thank you for your comment regarding the PEIR's mitigation measures. While many of the project-level measures require compliance with existing regulations, such approach is consistent with CEQA. "[A] condition requiring compliance with regulations is a common and reasonable mitigation measure, and may be proper where it is reasonable to expect compliance." *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 246 (quoting *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906). Indeed, the regulations provide the performance standards for future (project-level) mitigation to satisfy CEQA. *See id.* ("These regulations [requiring the development of hatchery genetic management plans] provide sufficient performance standards to satisfy CEQA."). Please see **Master Response No. 4** for a complete discussion on the performance standards-based mitigation measures.

Response to Comment No. 6:

SCAG acknowledges the City of Tustin's concurrence with your comments in the OCCOG Comment Letter. Please refer to the response to comments provided in the **Comment Letter No. 32.**

28. County of Los Angeles Public Health
Paul Simon, M.D., M.P.H.
Director, Division of Chronic Disease and Injury Prevention
3530 Wilshire Blvd., Suite 800
Los Angeles, California 900 I 0
(213) 351-7825

Response to Comment Nos. 1-7:

Thank you for your comment. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16292, Final 2016 RTP/SCS Comments and Responses Appendix.

29. County of Ventura
Tricia Maier
Manager, Planning Programs Section
800 South Victoria Avenue, L#. 1740
Ventura, CA 93009
(805) 654-2481

Response to Comment No. 1:

Thank you for your comment regarding a math error in **Table 3.17.4-6** of the PEIR. The error has been corrected and is reflected in the **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic and Safety**) section of the Final PEIR.

Response to Comment Nos. 2-6:

Thank you for your comments. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16235, Final 2016 RTP/SCS Comments and Responses Appendix.

30. Orange County Public Works
Shane L. Silsby
Director
300 N. Flower Street
Santa Ana, California 92703
(714) 667-8800

Response to Comment No. 1:

Thank you for your comment regarding the use of Cities vs. Jurisdictions. It is generally understood that the SCAG region includes both cities and counties. In order to clarify this, the term "cities" is revised to "jurisdictions" where appropriate, and the following language has been added to **Section 1.0, Introduction** in the **Clarifications and Revisions** of the Final PEIR:

> *Where the term "Cities" is used in this document, it is understood that the term is inclusive of cities and counties within the region.*

Response to Comment No. 2:

Thank you for your comment. Please refer to **Master Response No. 4** and **Response 19-4** (City of Irvine comment letter).

Response to Comment No. 3:

Thank you for your comment seeking clarifications on vacant areas that are permanently preserved or undevelopable. The definition of what was characterized by SCAG as "vacant land" is described on in **Section 3.11, Land Use and Planning** (pages 3.11-8 and 3.11-9). The source and classification of the land use data used to generate **Table 3.11.2-2, Figure 3.11.2-7,** and the underlying analysis in **Section 3.11, Land Use and Planning,** of the PEIR is SCAG's land use data that is based upon local input through the bottom-up local input process. Please see **Clarifications and Revisions (Section 3.11, Land Use and Planning** for updated version **of Figure 3.11.2-7, SCAG Region Open Space, Recreation, and Agricultural Land Uses**).The analysis underlying **Section 3.11** in the PEIR is programmatic in nature and focuses on potential regional-scale and cumulative impacts associated with implementation of the 2016 RTP/SCS from the land use and planning perspective. Land use maps in the PEIR are for the purpose of advising and conducting a programmatic assessment of the Plan's environmental effects.

The land use data related to regional and local parkland and protected Open Space is provided in **Table 3.16.2-1**, including a citation for the source of the data. The determination regarding the short- and long-term preservation of vacant lands is subject to the Federal, State, and local land use authorities with the primary discretionary land use authority for the respective lands; therefore, it would not be appropriate for SCAG to categorize such lands in the categories (permanently preserved/undevelopable or developable) requested by the commenter.

Revised **Figure 3.11.2-7** correctly depicts the four categories of data described in the legend Open Space and Recreation, Agriculture, Vacant, and Water. The four National Forests (Angeles, Cleveland, Los Padres, and San Bernardino) in the SCAG region are depicted in **Figure 3.2.2-2** and included in the revised Open Space and Recreation category in revised **Figure 3.11.2-7.**

Response to Comment No. 4:

Please refer to **Response 27-3**. Please refer to **Response 19-5**.

Response to Comment No. 5:

Thank you for your comment.

Response to Comment No. 6:

Thank you for your comment. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16299, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 7:

Thank you for your comment recommending the replacement of the word "require" with "encourage" in the project-level mitigation measures. The performance standards that are included in the preamble before the project-level mitigation measures are specified in and required by existing statutes, regulations, adopted general plans, and agreements for each of the CEQA resource categories at the time that this PEIR is prepared. For a complete discussion on the performance standards-based mitigation measures, please see **Master Response No. 4.**

Response to Comment No. 8:

With respect to the use of fees and taxes, local lead agencies are responsible for drafting, implementing and developing a nexus study including documenting the anticipated effectiveness of a fee or tax. The mitigation measures state that such strategies should only be considered where "applicable and feasible." Please refer to **Response 19-10, Master Response No. 2** and **Master Response No. 4.**

Response to Comment No. 9:

Thank you for your comment regarding the mitigation measures. While many of the project-level measures require compliance with existing regulations, such approach is consistent with CEQA. "[A] condition requiring compliance with regulations is a common and reasonable mitigation measure, and may be proper where it is reasonable to expect compliance." *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 246 (quoting *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906). Indeed, the regulations provide the performance standards for future (project-level) mitigation to satisfy CEQA. *See id.* ("These regulations [requiring the development of hatchery genetic management plans] provide sufficient performance standards to

satisfy CEQA."). For a complete discussion of the performance standards-based mitigation measures used in this PEIR, please see **Master Response No. 4.**

Response to Comment No. 10:

Thank you for your comment acknowledging the level of effort undertaken in the preparation of the 2016 RTP/SCS and supporting PEIR. Please see **Response 17-1.**

Response to PEIR Comment Table Comments 1 to 47:

Please see **Responses to Comment Letter No. 32** (Orange County Council of Governments Comment Letter).

31. Riverside County Planning Department
Steve Weiss, AICP
Planning Director
4080 Lemon Street, 12th Floor
Riverside, California 92502-1409
(951) 955-3200

Response to Comment No. 1:

Thank you for your comment. This PEIR provides a programmatic environmental assessment of the Plan and reviewed and consulted the data and sources during this programmatic assessment. **Section 6.0, Persons and Sources Consulted,** of the PEIR listed data and sources reviewed and consulted in preparing the PEIR and included information on where the data and sources may be viewed. Please refer to **Master Response No. 2** for a complete discussion on the differences between a program EIR (such as this PEIR) and a project-level EIR. The VMT and VHD values in the "Methodology" discussion on **page 3.17-38** of the PEIR can be examined in **Table 3.17.4-1** and **Table 3.17.4.-2** of **Section 3.17, Transportation, Traffic, and Safety**. Please refer to **Master Response No. 3** for a complete discussion on the technical process and modeling underlying the environmental impact analysis in the PEIR. Minor corrections to **Table 3.17.4-1** and **Table 3.17.4.-2** have been incorporated into the tables in the **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic, and Safety**) of the Final PEIR.

Response to Comment Nos. 2-3:

Thank you for your comment. This greenhouse gas emissions and climate change impact analysis was performed at the programmatic level. The analysis approached the 2016 RTP/SCS as a whole and viewed the six counties and 191 cities within the SCAG region in aggregate. The GHG impact analysis limits its scope within the RTP/SCS. While acknowledging each project must comply with the CEQA requirements, the GHG impact analysis is in response to the worst case scenario when projects are unable to fully mitigate their adverse impacts. Please refer to **Master Response No. 2** for a complete discussion on the differences between a program EIR (such as this PEIR) and a project-level EIR. A complete list of jurisdictional level GHG emissions data for each of the six counties and 191 cities within the region is not currently available. Therefore, this PEIR is not able to list such level of GHG data. Please refer to **Master Response No. 2** for a complete discussion on the greenhouse gas emissions modeling and calculation methodology. On February 11, 2016, the Governor's Office of Planning and Research (OPR) released a draft list of plans and initiatives adopted by California jurisdictions, including jurisdictions in the SCAG region, to address climate change. This draft list is a result of OPR's 2012 and 2013 Annual Planning Survey and personal interviews and is currently under review and refinement. To facilitate a good faith disclosure of the efforts addressing climate change by the jurisdictions in the SCAG region, **Table 3.8.2-2, Draft 2016 California Jurisdictions Addressing Climate Change in the SCAG Region,** based upon the OPR's draft list of plans and initiatives adopted by California jurisdictions, is added in the **Clarifications and Revisions** (see revisions to **Section 3.8, Greenhouse Gas Emissions and Climate Change**) of the Final PEIR.

Response to Comment No. 4:

Thank you for your comment. The transportation-related GHG emissions in the PEIR included county-level and regional level GHG emissions for light/medium-duty vehicles and heavy duty trucks. The revisions to account for GHG emissions from both on-road (e.g., light/medium-duty vehicles, heavy duty trucks, and buses) and off-road (aviation, rail, and ocean-going vessels) vehicles have been added in the **Clarifications and Revisions** (see revisions to **Section 3.8, Greenhouse Gas Emissions and Climate Change**) of the Final PEIR. A minor correction to **Table 3.8.4-6** (formally **Table 3.8.4-2**) is also included the **Clarifications and Revisions** (see revisions to **Section 3.8, Greenhouse Gas Emissions and Climate Change**) of the Final PEIR. The GHG impact analysis is conducted at a programmatic level based upon the Plan- and regional-level results of the 2016 RTP/SCS as a whole. See **Response 31-2 to 3 and Master Response No. 2**.

Response to Comment No. 5:

Thank you for your comment. The Riverside County Climate Action Plan has been included in lieu of the City of Riverside Green Action Plan. Please see **Section 3.8, Greenhouse Gas Emissions and Climate Change** in the **Clarifications and Revisions** section of the Final PEIR.

Response to Comment Nos. 6-7:

Thank you for your comment. Please see the **Sustainable Communities Strategy (SCS) Background Documentation Appendix** of the 2016 RTP/SCS for a complete discussion on SCAG Scenario Planning Model (SPM) data, assumption, and development and peer review process.

Response to Comment No. 8:

Thank you for your comment. Please see the **Demographics & Growth Forecast Appendix** and the **Sustainable Communities Strategy (SCS) Background Documentation Appendix** of the 2016 RTP/SCS for the land use data for the SCAG region. See also **Response 19-5** regarding the 500-foot distance.

Distances greater than 500 feet were used for placing worker and residential receptor spacing in **Appendix D, Health Risk Assessment**. Health impacts were captured within 1000 meters of each evaluated transportation segment, starting about 100 meters away from the outer edge of the freeway. The 1,000 meter criterion was used to sufficiently capture where the health impacts may be expected to occur. The health risk was evaluated from 16 major freeway segments because major freeways have the highest potential for diesel particulate matter risk due to heavy duty truck traffic and the proximity of sensitive receptors. **Table 3.11.3-1** in **Section 3.11, Land Use and Planning,** of the PEIR shows the current land uses that are located within 500 feet of either side of the Plan's major transportation projects to assess impacts (worst-case scenario) from implementation of major transportation projects anticipated to be undertaken in the region over the 25-year planning horizon. A geographic information system (GIS) was used to identify the areas within this 500-foot potential impact zone and to calculate the number of acres that could be affected by the construction and operation of major transportation projects included in the 2016 RTP/SCS.

Sensitive land uses within the SCAG region were determined using two sources of data from SCAG. The first source of data was TomTom GIS points of particular feature types that fell into a sensitive land use category. The TomTom GIS points were reviewed for accuracy, and duplicate points and points that were not sensitive locations/land uses were removed to the greatest extent practicable. The second source of data was existing land use parcel data in the SCAG region using SCAG's local input-based land use parcel data. Because the TomTom data lacked residential locations, the existing land use parcel data where the land use was categorized as residential (i.e., single family residential, multi-family residential, mobile homes and trailer parks, mixed residential, or rural residential) was used to locate sensitive land uses within the SCAG region.

The environmental impact analysis underlying the CEQA impact areas such as the transportation, GHG emissions and climate change, and growth-inducing impacts reflects region-wide impacts of the transportation and land use policies and strategies in the 2016 RTP/SCS as a whole by comparing the 2016 RTP/SCS to the existing conditions while recognizing the region will continue to grow and add approximately 3.8 million people by 2040. The PEIR's impact analysis is not limited a geographic portion or portions of the region, or to the 2016 RTP/SCS Project List. For a complete discussion on this PEIR's programmatic approach to the environmental impact analysis, please refer to **Master Response No. 2**. For further clarifications on technical process and modeling, please refer to **Master Response No. 3.**

Response to Comment No. 9:

Thank you for your comment regarding the scale of the maps and the exhibits in the PEIR. SCAG believes that the scales used for the maps in the PEIR are adequate for the purposes of a programmatic CEQA document. Additionally, the maps are meant to show information at a regional scale appropriate for the regional-wide environmental assessment of the 2016 RTP/SCS, which covers six counties of the SCAG region as a whole. Land use data maps at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG's sub-jurisdictional level data and/or maps are not to be adopted as part of the 2016 RTP/SCS. However, maps at a smaller geographic scale in electronic format are made available to SCAG jurisdictions upon request.

Response to Comment No. 10:

Thank you for your comment on the transportation safety and Office of Transportation Safety (OTS) ranking table. The ranking represent total vehicular, bicycle, and pedestrian victims killed and injured by County in the State of California. For example, 4/58 on **Table 3.17.2-13** means that out of the 58 counties, Los Angeles County ranked fourth in terms of total number of pedestrian facilities and injuries. The relevance of this table is to show that safety and security consideration need to be taken into account in design and provisioning for emergency services to ensure that hazards due to a design feature or incompatible use would not cause a significant impact to the environment.

Response to Comment No. 11:

Thank you for your comment. The sentence on page 3.17-11 should be read as: the goals of the Active

Transportation Plan are to reduce the number of bicycle and pedestrian fatalities to less than 50 percent of current levels by 2035. Please see **Section 3.17, Transportation, Traffic and Safety** in the **Clarifications and Revisions** section of the Final PEIR.

Response to Comment No. 12:

Thank you for your comment on City of Los Angeles bike plan discussion. The City of Los Angeles Bicycle Plan is intended as an example of bike plan envisioned by a local municipality, and is not intended to be the only represented plan discussed in the PEIR. Please refer to **Master Response No. 2**.

8.8 SCAG SUBREGIONAL GOVERNMENTS

Two (2) letters of comment were received from SCAG subregional governments:

1. Orange County Council of Governments
2. West Riverside Council of Governments

32. Orange County Council of Governments
Art Brown
Chairman
550 South Main Street
Orange, California 92863-1584
(714) 560-6282

Orange County Council of Governments Comment Letter

Response to Comment Letter Comment No. 1:

Thank you for your comment supporting the growth forecast in the 2016 RTP/SCS. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Letter Comment No. 2:

Thank you for your comment indicating that OCCOG does not support the use of Alternative 3 in the PEIR or the corresponding scenario in the 2016 RTP/SCS. This information will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS. For the Intensified Land Use Alternative as included in the Final PEIR, SCAG staff has made the corrections based on input received to reflect existing development agreements, entitlements, and projects recently completed or under construction (Please see **Response 19-2).**

Additionally, please refer to **Master Response No. 1**. Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Letter Comment No. 3:

Thank you for your comments to "Our Vision" and "Our Overarching Strategy" in the 2016 RTP/SCS. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Letter Comment No. 4:

Thank you for your comment stating concurrence of the Orange County Council of Governments (OCCOG) with the comments provided by the Orange County Transportation Authority (OCTA) in **Letter**

No. 32. Please refer to the response to comments in **Comment Letter No. 34**.

Response to Comment Letter Comment No. 5:

Thank you for your comments with respect to the use of "can and should" in mitigation measures as potentially overreaching SCAG's authority. Consistent with the provisions of § 15091(a)(2) of the State CEQA Guidelines, the scope of SCAG's responsibility as a Lead Agency to identify feasible performance-standards based mitigation measures is described in Section 1.6 of the Introduction to the PEIR. Similarly, Section 1.6 of the Introduction to the PEIR describes the limits of SCAG's authority and the discretion of Lead Agencies responsible for the consideration of approval of subsequent projects. Consistent with the explanation provided in Section 1.6 of the Introduction to the PEIR, the performance standards-based mitigation measures in the Draft PEIR recognize SCAG's limited authority; fulfill SCAG's responsibilities as a lead agency under CEQA; distinguishes SCAG commitments from project-level lead agency responsibilities; maintains flexibility for the lead agency at the project-level; and allows efficient and effective implementation of RTP/SCS projects by facilitating CEQA streamlining and tiering, where appropriate. Please refer to **Master Response No. 4**.

Regarding the request to delete "can and" from "can and should consider" in the project-level mitigation measures, SCAG is unable to provide the requested deletions for the reasons explained in **Master Response No. 4.**

Thank you for comment relating to the consistency of the incorporation of the phrase "as applicable and feasible" in the project-level mitigation measures. SCAG has made revisions in the Final PEIR to ensure this phrase is incorporated consistently in project-level mitigation measures. Please see Corrections and Revisions to **MM-CUL-2(b)**, **MM-USS-3(b)**, and **MM-USS-6(b)** in the Summary of Mitigation Measures in the **Executive Summary**, in **Section 3.5 Cultural Resources**, and in **Section 3.18 Utilities and Services Systems**.

Response to Comment Letter Comment Nos. 6-11:

Thank you for your comment about the 500 foot "buffer" language. Please see **Response 19-5**.

Response to Comment Letter Comment No. 12:

Thank you for your comment regarding changing the references to "jurisdiction" or "jurisdictions" from "city" or "cities" references. Please see **Response 30-1.**

Response to Comment Letter Comment No. 13:

Thank you for your comment about remaining neutral on technology in the development of the 2016 RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Letter Comment No. 14:

Thank you for your comment on PEIR mitigation measures. The performance standards that are included in the preamble of the project-level mitigation measures are specified in existing statutes, regulations, adopted general plans, and agreements for each of the CEQA resource categories at the time that this PEIR is prepared. For a complete discussion on the performance standards-based mitigation measures, please see **Master Response No. 4.**

Response to Comment Letter Comment No. 15:

Thank you for your comment recommending the replacement of the word "require" with "encourage" or "it is recommended" in the project-level mitigation measures. The performance standards that are included in the preamble before the project-level mitigation measures are specified in and required by existing statutes, regulations, adopted general plans, and agreements for each of the CEQA resource categories at the time that this PEIR is prepared. For a complete discussion on the performance standards-based mitigation measures, please see **Master Response No. 4.**

Response to Comment Letter Comment No. 16:

Thank you for your comment regarding priority and funding preference for transportation projects in project-level mitigation measures in **Section 3.17, Transportation, Traffic, and Safety**, of the PEIR. Please refer to **Response 19-10**, **Master Response No. 2** and **Master Response No. 4.**

Response to Comment Letter Comment No. 17:

Thank you for your comment regarding fees and taxes in the development of the RTP/SCS. Please see **Responses 30-8** and **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Letter Comment No. 18:

Thank you for your comment regarding duplicative with existing regulations in many of the mitigation measures. Please see **Responses 27-2.** For more clarifications on the performance standards specified in the preamble before the project-level mitigation measures in the PEIR, please see **Master Response No. 4.**

Response to Comment Letter Comment No. 19:

Thank you for your comment. Please see **Response 19-13**.

Response to Comment Letter Comment No. 20:

Thank you for your comment. See **Response 17-1.**

Orange County Council of Governments Response Comment Letter Attachment 1

Responses to 2016 RTP/SCS Table Comment Nos. 1-48:

Thank you for your detailed comments related to the 2016 RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Responses to Active Transportation Appendix Comment Nos. 1-14:

Thank you for your detailed comments related to consideration of the Active Transportation in the 2016 RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Responses to Demographic/Growth Forecast Appendix Comment Nos. 1- 2:

Thank you for your detailed comments related to Demographic/Growth Forecast in the 2016 RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix. ***Responses to Goods Movement Comment No. 1:***

Thank you for your detailed comments Goods Movement in related to the 2016 RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Responses to Performance Measures Appendix Comment Nos. 1-4:

Thank you for your detailed comments. Please see **Master Response No. 1**. Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Responses to Public Health Appendix Comment Nos. 1-22:

Thank you for your detailed comments related to the consideration of Public Health in the 2016 RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Responses to SCS Background Documentation Appendix Comment Nos. 1-11:

Thank you for your detailed comments related to the SCS Background Documentation in 2016 the RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to PEIR Comments Table Comment No. 1:

Thank you for your comment regarding ensuring that changes to mitigation measure language should be updated in both the **Executive Summary** and the chapters throughout the PEIR, as well as the RTP/SCS

document. Revisions have been incorporated where applicable in the PEIR and are reflected in the **Clarifications and Revisions** section of the Final PEIR. Please refer to **Response 32-5**.

Response to PEIR Comments Table Comment No. 2:

Thank you for your comment regarding citing original source data. Revisions have been incorporated where applicable in the PEIR and are reflected in the **Clarifications and Revisions** section of the Final PEIR.

Response to PEIR Comments Table Comment Nos. 3-4:

Thank you for your comment regarding the use of "can and should" language in the mitigation measures of the PEIR. Please refer to **Master Response No. 4** for a complete discussion on the performance standards-based mitigation measures. Please refer to **Response 32-5**.

Please also see **Response 19-4 and Response 32-15** with respect to the word "encourage" versus "require" in the project-level mitigation measures.

Response to PEIR Comments Table Comment No. 5:

Thank you for your comment seeking the definition of Natural Resource Inventory Database and Conservation Framework and Assessment. The Inventory of Natural Resources Databases in SCAG Region is an inventory of the publically available open space data and data sources relevant to conservation and mitigation planning in the SCAG region. The databases include information covering the entire SCAG region, individual counties, or portions of counties. The Conservation Framework & Assessment outlines a regional natural resource conservation approach that accounts for impacts and improvements in a consistent manner across all habitats and landscapes. This assessment also includes a multi-species habitat evaluation method, the Combined Habitat Assessment Protocol (CHAP), at the regional scale and at a local, pilot scale. These revisions have been incorporated into the Clarifications and Revisions section (see revisions to **Section 3.4, Biological Resources**) of the Final PEIR.

Response to PEIR Comments Table Comment No. 6:

Thank you for your comment seeking the definition of "Conservation Plan." The following definition has been incorporated where appropriate in the PEIR and reflected in the **Clarifications and Revisions** (see revisions to **Section 3.4, Biological Resources**) section of the Final PEIR:

> *HCPs and NCCPs are formal conservation plans at the federal and state level and are administered by the USFWS and CDFW. However, additional informal conservation programs and efforts at the local, regional, state, federal, and private level may exist throughout the SCAG region. Private and public lands within the SCAG region may be included within the conservation programs of private or public organizations, and the conservation programs associated with these plans should be considered during the environmental impact evaluation of projects. Any project within the SCAG region would need to demonstrate avoidance of conflict with any*

applicable conservation efforts including those outside of formal federal and/or State designation.

Response to PEIR Comments Table Comment No. 7:

Thank you for your comment seeking the definition of "mitigation banks." The following definition has been incorporated where appropriate in the PEIR and reflected in the **Clarifications and Revisions** section of the Final PEIR:

The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking)

"A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permitees who need to satisfy legal requirements and compensate for the environmental impacts of developmental projects.

A privately owned conservation or mitigation bank is a free-market enterprise that:

•offers landowners economic incentives to protect natural resources;
•saves permitees time and money by providing them with the certainty of pre-approved compensation lands;
•consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values;
•provides for long-term protection and management of habitat.

A publicly owned conservation or mitigation bank:

•offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance."

In 2013, the University of California published an article entitled "*Reforms could boost conservation banking by landowners"* that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs.[23]

Response to PEIR Comments Table Comment Nos. 8- 9:

Thank you for the comments seeking clarifications on the mitigation measures in MM-Air-2(b) and MM-Air-4(b). Please see **Comment Letter Response 32-14** and **32-15,** and **Master Response No. 4.**

[23] *California Agriculture* 67(2):86-95. DOI: 10.3733/ca.v067n02p86. April-June 2013.

Response to PEIR Comments Table Comment No. 10:

Thank you for the comment regarding the striking out of language in MM-Air-4(b) referring to development projects resulting from land use patterns. Mitigation measures as they pertain to each CEQA question related to air quality are described in **Section 3.3, *Air Quality.*** Mitigation measures are categorized into two categories: SCAG mitigation measures and project-level mitigation measures. SCAG mitigation measures shall be implemented by SCAG over the lifetime of the 2016 RTP/SCS. Project-level mitigation measures can and should be considered for implementation by the Lead Agencies for transportation and development projects, as applicable and feasible (emphasis added). As such, development projects are included in the project-level mitigation measures. Please see **Master Response No. 4** for a complete discussion on the performance standards-based mitigation measures.

Response to PEIR Comments Table Comment Nos. 11-22:

Please see **Comment Letter Response 32-14** and **15,** and **Master Response No. 4.**

Response to PEIR Comments Table Comment No. 23:

Thank you for your comment regarding the inclusion of language for Diode (LED) technology or similar technology. SCAG's policies are technology neutral. This inclusion has been incorporated where appropriate in the PEIR and reflected in the **Clarifications and Revisions** section (see **Section ES, Executive Summary,** and **Section 3.17, Traffic Transportation and Safety**) of the Final PEIR.

Response to PEIR Comments Table Comment Nos. 24-25:

Please see **Comment Letter Response 32 -14** and **32-15,** and **Master Response No. 4.**

Response to PEIR Comments Table Comment No. 26:

Thank you for your comment regarding discouraging the export of locally generated waste outside of the SCAG region. This language has been incorporated where appropriate in the PEIR and reflected in the **Clarifications and Revisions** (see **Section ES, Executive Summary**) section of the Final PEIR.

Response to PEIR Comments Table Comment No. 27:

Thank you for your comment regarding the use of the American Lung Association grading system. The American Lung Association grading for the SCAG region is provided as background information to paint a picture of the regional air quality for the average reader. It is not used as a basis of comparison in the impact analysis nor does it have any bearing on the findings in this PEIR.

Response to PEIR Comments Table Comment No. 28:

Thank you for your comment regarding the clarification on sources of data for sensitive receptors shown on maps in the PEIR. Sensitive land uses within the SCAG region were determined using two sources of

data from SCAG. The first source of data was TomTom GIS points of particular feature types that fell into a sensitive land use category. The TomTom GIS points were reviewed for accuracy, and duplicate points and points that were not sensitive locations/land uses were removed to the greatest extent practicable. The second source of data was existing land use parcel data in the SCAG region using SCAG's local input-based land use parcel data. Because the TomTom data lacked residential locations, the existing land use parcel data where the land use was categorized as residential (i.e., single family residential, multi-family residential, mobile homes and trailer parks, mixed residential, or rural residential) was used to locate sensitive land uses within the SCAG region.

Response to PEIR Comments Table Comment No. 29:

Thank you for your comment regarding revisions to **Figure 3.3.2-3**. The figure has been revised in the PEIR and reflected in the **Clarifications and Revisions** (see **Section 3.3, Air Quality**) section of the Final PEIR.

Response to PEIR Comments Table Comment No. 30:

Thank you for the comment seeking clarification on the definition and citation of a Municipal Separate Storm Sewer System (MS4). The following definition and citation have been incorporated where appropriate in the PEIR and reflected in the **Clarifications and Revisions** (see **Section 3.10, Hydrology and Water Quality**) section of the Final PEIR:

> *Municipal separate storm sewer means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):*
>
> *(i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States;*
>
> *(ii) Designed or used for collecting or conveying storm water;*
> *(iii) Which is not a combined sewer; and*
> *(iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.*

Response to PEIR Comments Table Comment No. 31:

Thank you for your comment regarding Orange County's Stormwater Program Drainage Area Management Plan. The suggested language revisions have been incorporate into the Hydrology section in the PEIR and reflected in the **Clarifications and Revisions** (See **Section 3.10, Hydrology and Water Quality**) section of the Final PEIR.

Response to PEIR Comments Table Comment No. 32:

Thank you for your comment regarding the Regional Water Quality Board jurisdiction for San Juan Creek. The suggested language revisions have been incorporate into the Hydrology section in the PEIR and reflected in the **Clarifications and Revisions** (See **Section 3.10, Hydrology and Water Quality**) section of the Final PEIR.

Response to PEIR Comments Table Comment No. 33:

Thank you for your comment requesting the replacement of mitigation strategies identified in the final ten bullet points of Mitigation Measure HYD-1(b) with a reference to Orange County's DAMP/Model WQMP and comparable documents in the region's other Counties. Please see **Clarifications and Revisions** (See **Section 3.10, Hydrology and Water Quality**) where the information regarding the plan has been added to the regulatory framework. However, the purpose of the project-level mitigation measures listed is to demonstrate that there are feasible mitigation strategies that can be used to mitigate the significant impacts of projects. Please refer to **Master Response No. 4** for additional information regarding the responsibilities of SCAG to define performance-based mitigation measures in the Program EIR, and the responsibilities of Lead Agencies for later activities to determine the specific mitigation measures that are feasible for site-specific projects.

Response to PEIR Comments Table Comment No. 34:

Thank you for your comment regarding carrying out a quantitative analysis of pollutant loads for a proposed project in the mitigation measures of **Section 3.10** of the PEIR. The suggested language additions has been incorporated and reflected in the **Clarifications and Revisions** (See **Section 3.10, Hydrology and Water Quality)** section of the Final PEIR.

Response to PEIR Comments Table Comment No. 35:

Please see **Comment Letter Response 32-14** and **32-15,** and **Master Response No. 4**

Response to PEIR Comments Table Comment No. 36:

Please refer to **Response 30-3**.

Response to PEIR Comments Table Comment No. 37:

Thank you for your comment seeking the definition of "Established Communities." The following definition has been incorporated where appropriate in the PEIR and reflected in the **Clarifications and Revisions** (see **Section 3.11, Land Use and Planning**) section of the Final PEIR:

> *The term "established community" for purposes of the PEIR analysis generally refers to a place where there are existing populations of people are well settled in that place. The term is used in Appendix G of the CEQA guidelines under the land use thresholds of significance to determine if a*

project will divide an established community. Some but not all established communities in the SCAG Region are shown in ***Figure 3.11.2-4, Established Communities****.*

Response to PEIR Comments Table Comment No. 38:

Thank you for your comment seeking the definition of "carbon sinks." The following definition been incorporated where appropriate in the PEIR and reflected in the **Clarifications and Revisions** (see **Section 3.11, Land Use and Planning**) section of the Final PEIR:

"Carbon sinks are natural or artificial reservoirs that remove and store carbon from the atmosphere, thereby offsetting carbon dioxide emissions. Examples include forests, soils, and oceans."

Response to PEIR Comments Table Comment No. 39:

Thank you for your comment seeking the definition of medium, high, and low density housing. The definition for these types of housing has been incorporated into the Land Use section of the PEIR and reflected in the **Clarifications and Revisions** (see revisions to **Section 3.11, Land Use and Planning**) section of the Final PEIR.

Response to PEIR Comments Table Comment No. 40:

The cited language for **IMPACT LU-1** in **Section 3.11 Land Use and Planning** makes clear that local land use authorities are not required to modify their respective General Plans to adopt all the policies and strategies articulated in the 2016 RTP/SCS. Therefore, even after considering the SCAG and project – level mitigation measures identified in the PEIR, the potential remains for there to be a conflict between the policies and strategies considered in the 2016 RTP/SCS and the goals and policies in existing adopted General Plans, and General Plan Updates and Amendments that may be considered during the 25-year planning horizon. As such, as the comment notes, the direct, indirect, and cumulative impacts would remain significant and unavoidable.

Response to PEIR Comments Table Comment Nos. 41-43:

Thank you for your comment regarding updating **Table 3.14.2-1**, **Table 3.14.2-3,** and **Table 3.14.2-5** in the **Section 3.14, Population, Housing, and Employment Section**. The baseline for the determination of significance of environmental effects is detailed in each resource section of **Section 3** of the PEIR, and presented the most recent, reliable, and representative data to describe the current regional conditions at the time of publication of the Notice of Preparation for the PEIR (March 2015). When preparing **Table 3.14.2-1, Table 3.14.2-3, and Table 3.14.2-5,** the most recent, reliable, and representative data was 2014 data. The minor correction to **Table 3.14.2-1** to label as "Households" not "Housing Units" is reflected in the **Clarifications and Revisions** (see revisions to **Section 3.14, Population, Housing and Employment)** section of the Final PEIR.

Response to PEIR Comments Table Comment No. 44:

Thank you for your comment seeking a definition of the subject of **Figures 3.14.2-1, 3.14.2-2, and 3.14.2-3**. An explanation of the subject of each of these maps has been included in the **Clarifications and Revisions (**see revisions to **Section 3.14, Population, Housing and Employment)** section of the Final PEIR.

Response to PEIR Comments Table Comment No. 45:

Thank you for your comment seeking a clarification on the discussion on lane miles and a definition of "additional transportation facilities." The discussion on lane miles on page 3.14-22 is on new lane miles for the 2016 RTP/SCS in 2040. Transportation facilities are defined as freeways, toll roads, major and minor arterials, collectors, high-occupancy toll (HOT), and high-occupancy vehicle (HOV). This clarification and definition on transportation facilities have been incorporated in the **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic, and Safety**) of the Final PEIR.

Response to PEIR Comments Table Comment No. 46:

Thank you for your suggested clarifying language. In response to the request, the following language will be added in section 4.1:

> "*If an alternative is rejected and the project is approved, it is the EIR for the approved project that is to be used for future tiering purposes*."

Response to PEIR Comments Table Comment No. 47:

Thank you for your comment regarding Alternative 3, Intensified Land Use. It is generally understood that all of the alternatives are hypothetical projections extrapolated from data available at the time the PEIR was written.

Orange County Council of Governments Response Comment Letter Attachment 2

Response to Comment Nos. 21-27:

Thank you for your comment that attaches a copy of the Orange County Transportation Authority to SCAG (Mr. Hasan Ikharta). Please see **Master Response No. 1.** Please also refer to Submission ID 16296, Final 2016 RTP/SCS Comments and Responses Appendix.

33. Western Riverside Council of Governments (WRCOG)
Rick Bishop
Executive Director
4080 Lemon St.
Riverside, California 92501
(951) 955-7985

Response to Comment No. 1:

Thank you for your comment requesting that SCAG compile a distinct list of all commitments made of SCAG and/or others in the document that could affect WRCOG, such as MM-AES-3(b), in a separate document and that SCAG denote an action plan to fulfill such commitments. The Mitigation Monitoring and Reporting Program serves this purpose by providing a table that lists each impact, mitigation measure, the implementing agency, and the implementing date. WRCOG and/or its member agencies are identified as "Lead Agency" in the "Implementing Agency" column of the table for project-level mitigation measures, as SCAG has authority only for SCAG's mitigation measures. For a complete discussion on the performance standards-based mitigation measures, please see **Master Response No. 4.**

8.9 COUNTY TRANSPORTATION COMMISSION

Two (2) letters were received from the County Transportation Commission.

1. Orange County Transportation Authority
2. San Bernardino Associated Governments

34. Orange County Transportation Authority
Joe Alcock
Section Manager, Corridor Studies and Long Range Planning
550 S. Main Street
Orange, California 92863-1584
(714) 560-5372

Response to Comment Nos. 1-147:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID [16059], Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 148:

Thank you for your comment regarding **MM-TRA-1(b)** and **MM-TRA-2(b)** in the **Executive Summary** section of the PEIR. This PEIR uses the performance standards-based mitigation measures. With respect to **MM-TRA-2(b),** local lead agencies are responsible to designing and implementing congestion management plan and ensuring a project compliance with the adopted congestion managements, where the lead agency has identified that a project has the potential significant impact (See **Response 19-10, Response 30-8** and **Master Response No. 4**).

Response to Comment No. 149:

Thank you for your response regarding revisions to the language in **Section 3.14, Population, Housing, and Employment**. The revision has been incorporated into the **Clarifications and Revisions** (see **Section 3.14, Population, Housing, and Employment**) section of the Final PEIR.

35. San Bernardino Associated Governments
Raymond Wolfe
Executive Director
1170 W. 3rd Street, 2nd Floor
San Bernardino, California 92410
Phone: (909) 884-8276 Fax

Response to Comment No. 1:

Thank you for your comments in regards to the status report on the Sustainability MOU that SCAG and SANBAG jointly executed. SCAG appreciates SANBAG's review of the 2016 RTP/SCS and PEIR.

Response to Comment Nos. 2-15:

Thank you for your comments regarding the Final 2016 RTP/SCS. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16181, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 16:

Thank you for your complimentary comment on the PEIR. Regarding the comment about the 500 foot "buffer" language. The following revisions has been incorporated where appropriate in the PEIR and reflected in the **Clarifications and Revisions** (see revisions to **Section 3.3, Air Quality**) section of the Final PEIR:

The 2016 RTP/SCS aims to promote to reduce the impacts associated with health risks for sensitive receptors within 500 feet of freeways and high-traffic volume roadways.

Response to Comment No. 17:

Thank you for your comment regarding the clarification on SCAG mitigation measures, MM-TRA-1(a)(7) about SCAG vanpool programs, the **Executive Summary** section and the **Section 3.17, Transportation, Traffic, and Safety** of the PEIR. These revisions to clarify that SCAG vanpool programs are for its employees. These revisions have been incorporated into the sections and are reflected in the **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic and Safety**) section of the Final PEIR.

8.10 ORGANIZATIONS AND INDIVIDUALS

Forty-six (46) letters of comments were received from organizations and individuals:

1. Albert Perdon
2. Alliance for a Regional Solution to Airport Congestion
3. Ann Tarkington
4. Banning Ranch Conservancy
5. Bolsa Chica Land Trust
6. Building Industry Association of Southern California
7. California Construction and Industrial Materials Association
8. California Cultural Resources Preservation Alliance
9. California Native Plant Society
10. Center for Demographic Research
11. Endangered Habitats League
12. Environmental Coalition
13. Eric Johnson
14. Ezequiel Gutierrez
15. Five Point Communities
16. Friends of Harbors, Beaches and Parks
17. Hank Fung
18. Hills for Everyone
19. Irene Sandler (Letter No. 1)
20. Irene Sandler (Letter No. 2)
21. Joyce Dillard
22. Kristy Norman
23. Laguna Canyon Foundation
24. Laguna Greenbelt, Inc.
25. Los Cerritos Wetlands Land Trust
26. March Joint Planning Area
27. Mark Jolles
28. Marven Norman
29. National Trust for Historic Preservation
30. Naturalist for You
31. Orange County Business Council
32. Orange County League of Conservation Voters
33. Public Health Alliance of Southern California
34. Richard Helgeson
35. Robert Dale
36. Ronald Stein PTS Staffing
37. Rural Canyons Conservation Fund
38. Saddleback Canyons Conservancy
39. Sea and Sage Audubon Society
40. Southern California Leadership Council
41. Steve Rogers
42. Terry Goller
43. The City Project

44. Tressy Capps
45. Ventura County 350 Climate Hub
46. Ventura Hillside Conservancy

36. Albert Perdon Associates, Inc.
Albert Perdon
President
12748 Castleford Ln.
Cerritos, California 90703
(310) 871-1113

Response to Comment No. 1:

Thank you for your comment. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16233, Final 2016 RTP/SCS Comments and Responses Appendix.

37. ARSAC Alliance for a Regional Solution to Airport Congestion
Denny Schneider
President
7929 Breen Ave
Los Angeles, California 90045
(310) 641-4199

Response to Comment No. 1:

Thank you for your comment.

Response to Comment Nos. 2-3:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16284, ID 16289, and 16291 for the Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 4:

Thank you for your comment with respect to the 2016 RTP/SCS Project List. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16284, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 5:

Thank you for your comment. Please refer to **Response 18-9** (City of El Segundo Comment Letter). To clarify SCAG's analysis of Impact Noise-5, SCAG will expand the discussion justifying the less than significant findings in the **Revisions and Clarifications** (see revisions to **Section 3.13, Noise**) section of the Final PEIR.

Response to Comment No. 6:

Thank you for your comment. To clarify SCAG's analysis of Impact Noise-5, SCAG will clarify the findings in the **Revisions and Clarifications** (see revisions to **Section 3.13, Noise**) section of the Final PEIR.

Response to Comment Nos. 7-31:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16284, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 32:

Thank you for your comments. The "unconstrained scenario" as shown on **Table 3**, of the 2016 RTP/SCS **Aviation Plan and Scenario Appendix**, represents a scenario in which there are no RTP/SCS in place, and there are no legal restrictions. What it is meant to portray is a 2040 MAP forecast purely driven by the

market (airline supply and passenger demand). Thus, in a world with no Plan or legal restrictions the socio-economic distribution of demand (both by residents and visitors) is highly concentrated. The purpose of the unconstrained scenario represents a conservative and worst case scenario which was used for informational purposes only. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16284, Final 2016 RTP/SCS Comments and Responses Appendix.

Figure 3.17.4-1, Anticipated Future Passenger Demands at Major Southern California Airports, within the Draft 2016 RTP/SCS PEIR has been revised be consistent with **Table 3** of the **2016 RTP/SCS Aviation Plan and Scenario Appendix**. Please refer to the **Clarifications and Revisions** (see revisions to **Section 3.17, Transportation, Traffic and Safety**) Section of the PEIR.

38. Ann Tarkington
No address available

Response to Comment No. 1:

Thank you for your comment regarding density in the SCAG region. Land Use designations and residential densities for each local jurisdiction are determined through the General Plan process required by state Law. Specifically, this occurs through the Land Use Element of the local General Plan. This process requires substantial public participation. This PEIR is a programmatic assessment of the 2016 RTP/SCS for the entire region of six counties and 191 cities as a whole. For a complete discussion on the differences between this PEIR and the subsequent project-level (for example, General Plan) environmental analysis, please refer to **Master Response No. 2**. Please also refer to **Master Response No. 1** on the regional policies for the land use patterns envisioned in the 2016 RTP/SCS and associated bottom-up local input process. Please also refer to Submission ID 16365, Final 2016 RTP/SCS Comments and Responses Appendix.

39. Banning Ranch Conservancy
Terry Welsh, M.D.
President
P.O. Box 15333
Newport Beach, California 92659-5333
(310) 961-7610

Response to Comment No. 1:

Thank you for your commendation related to the incorporation of Natural Land and Farmland as their own categories under the 2016 Plan and the Conservancy's support of the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16241, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 2:

Thank you for your comment on the wildlife corridors and the reference to Fixing America's Surface Transportation (FAST) Act. Please see **Clarifications and Revisions** (see **Section 1.0 Introduction and Section 3.17 Transportation, Traffic, and Safety**) section of the Final PEIR. References to the FAST Act have been addressed into the 2016 RTP/SCS (see **Master Response No. 1).** Please also refer to Submission ID 16241, Final 2016 RTP/SCS Comments and Responses Appendix.

Please also see SCAG mitigation measures **SCAG MM-BIO-1(a)(1) and MM-BIO-1(a)(2)** with respect to wildlife corridors.

40. Bolsa Chica Land Trust
Kim Kolpin
Executive Director
5200 Warner Avenue, Suite 108
Huntington Beach, California 92649
(714) 846-1001

Response to Comment No. 1:

Thank you for your commendation related to the incorporation of Natural and Farmland as their own categories under the 2016 Plan and the Trust's support of the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 2:

Thank you for your comments reiterating the Trust's support of the addition of an Appendix devoted directly to natural and farmlands protection in the 2016 RTP/SCS and commendation for incorporation of natural and farmlands protection strategies into the 2016 RTP/SCS.

Response to Comment No. 3:

Thank you for your comment regarding the internal consistency of maps. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to conduct the underlying environmental analysis appropriate to the resources categories that have different purposes. The underlying data source for the figures generally belong to one of the two categories: SCAG's existing land use data or CPAD. Each data source is to serve different analysis purposes and has its own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps will be clarified to properly identify the purpose of the open space, land use, and recreation maps in the PEIR and the specific data source in the legend in the **Clarifications and Revisions** (see revisions to **Section 3.11** and **Section 3.16**) section of the Final PEIR.

Response to Comment Nos. 4-5:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 6:

Thank you for your comment. Please refer to **Master Response No. 2** for the programmatic approach to assessing population growth impacts to existing and future parklands.

The Recreation Section of the Draft PEIR (**Section 3.16**) discloses that implementation of the transportation projects and land use patterns anticipated by the strategies in the 2016 RTP/SCS would have the potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and would have the potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, constituting potentially significant impacts, and concludes that impacts to recreation would remain significant and unavoidable after mitigation. SCAG mitigation measures include, but are not limited to, facilitating the reduction of impacts as a result of increased use in recreational facilities through cooperation with member agencies, information sharing, and program development in order to ensure consistency with planning for expansion of new neighborhood parks within or in nearby accessible locations to HQTAs in funding opportunities and programs administered by SCAG. See **SCAG MM-REC-1(a)(1)** and **MM-REC-1(a)(2)**. SCAG does not hold authority to impose mitigation measures on local jurisdictions, transportation agencies, or project sponsors (See **Master Response No. 4**). With respect to the mechanism, please also refer to the **Natural and Farmlands Appendix** of the 2016 RTP/SCS and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

In coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Thank you for your comment and your organization is encouraged to continue to participate in the effort.

Response to Comment No. 7:

Thank you for your comment regarding the FAST Act. References to the FAST Act have been incorporated into the 2016 RTP/SCS (see **Master Response No. 1).** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix. Additionally, references to the FAST Act have been incorporated into the **Clarifications and Revisions** (see **Executive Summary, Section 2.0, Section 3.17, Transportation, Traffic, and Safety**) sections of the Final PEIR.

41. Building Industry Association of Southern California (BIASC)
Steven Schuyler
E.V.P. Government Affairs
24 Executive Park Suite 100
Irvine, California 92614
(949) 553-9500

Response to Comment No. 1:

Thank you for your comment expressing support of SCAG's core principals and the BIASC's opposition to the Intensified Land Use Alternative (Alternative 3) of the PEIR. Your comment that BIASC does not support the Intensified Land Use Alternative (Alternative 3) as the preferred alternative will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS. For the Intensified Land Use Alternative as included in the Final PEIR, SCAG staff has made the corrections based on input received to reflect existing development agreements, entitlements, and projects recently completed or under construction (see **Response 19-2**).

Response to Comment Nos. 2-3:

Thank you for your comments. Please see **Master Response No. 1.** Please also refer to Submission ID 16364, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 4:

Thank you for your comment regarding the 500-foot buffer. Please see **Response 19-5** and **Response 27-3.**

Response to Comment No. 5:

Thank you for your comments regarding the mitigation measures. Please see **Master Response No. 4**.

Response to Comment No. 6:

Thank you for your comment. While many of the project-level measures require compliance with existing regulations, such approach is consistent with CEQA. "[A] condition requiring compliance with regulations is a common and reasonable mitigation measure, and may be proper where it is reasonable to expect compliance. [Citations.]" *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 246 (quoting *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906). Indeed, the regulations provide the performance standards for future (project-level) mitigation to satisfy CEQA. *See id.* ("These regulations [requiring the development of hatchery genetic management plans] provide sufficient performance standards to satisfy CEQA.").

Response to Comment Nos. 7-8:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16364, Final 2016 RTP/SCS Comments and Responses Appendix.

Please see **Response 19-10** that provides clarification that such measures need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities.

Please also refer to Submission ID 16364, Final 2016 RTP/SCS Comments and Responses Appendix.

42. California Construction and Industrial Materials Association
Suzanne Seivright
Director, Local Governmental Affairs
3890 Orange Street, No.167
Riverside, California 92501-9998
(951) 941-7981

Response to Comment No. 1:

Thank you for your commendation regarding the ongoing efforts of SCAG to coordinate with the Department of Conservation (DOC) and California Geological Survey (CGS) to maintain a mineral resources data base for the SCAG region including permitted and unpermitted aggregate resources and to work with local agencies to create strategies in anticipation of the aggregate demand in the SCAG region.

Response to Comment No. 2:

Thank you for your comment regarding definitions of the terms 'non-permitted,' 'unpermitted,' and 'known mineral resource.' SCAG has accepted the recommendation and has made changes in the **Clarifications and Revisions** (see revisions to **Section 3.12, Mineral Resources**) section of the Final PEIR.

Response to Comment No. 3:

Thank you for your comment. Significant mineral resources areas are identified for the SCAG region as are shown in **Figure 3.12.2-1, Mineral Resources in the SCAG Region**. The California Geological Survey (CGS) prepared map regarding general information about the current availability of California's permitted construction aggregate resources reserves are contained in **Figure 3.12.2-2, Aggregate Supply in the SCAG Region**.

Response to Comment No. 4:

Thank you for your comment regarding the inclusion of a map clarifying MRZs identified as permitted and non-permitted within urban and environmentally sensitive areas.

Response to Comment No. 5:

Thank you for your comment. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16294, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 6:

Thank you for your commendation regarding the ongoing efforts of SCAG to coordinate and facilitate with local jurisdictions to identify and update aggregate and mineral resources within regional jurisdictions with the implementation and use of web-based planning tools and other software available

to local governments and allowing cooperation and sharing of information for ongoing regional development planning efforts.

Response to Comment No. 7:

Thank you for your comments. With respect to revisions to the Plan, please refer to **Master Response No. 1**. Please also refer to Submission ID 16294, Final 2016 RTP/SCS Comments and Responses Appendix. For comments related to SCAG's travel demand model, and air quality and greenhouse gas emissions (GHG) modeling and process, please refer to **Master Response No. 3.** For comments related to project-level CEQA analysis, please refer to **Master Response No. 2.**

43. California Cultural Resources Preservation Alliance
Patricia Martz, Ph.D.
President
P.O. Box 54132
Irvine, California 92619-4132

Response to Comment No. 1:

Thank you for your comment. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16302, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 2:

Thank you for your comment. Please see **Response 40-2.**

Response to Comment No. 3:

Thank you for your comment regarding the internal consistency of maps. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to conduct the underlying environmental analysis appropriate to the resources categories that have different purposes. The underlying data source for the figures generally belong to one of the two categories: SCAG's existing land use data or CPAD. Each data source is to serve different analysis purposes and has its own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps will be clarified to properly identify the purpose of the open space, land use, and recreation maps in the PEIR and the specific data source in the legend in the **Clarifications and Revisions** (see **Section 3.11 and Section 3.16**) section of the Final PEIR. Please see **Response 40-3.**

Response to Comment Nos. 4-6:

Thank you for your comments. Please see **Response 40-6** and also refer to **Master Response No. 1** and **Master Response No. 2** for the programmatic approach to the environmental assessment in this PEIR. Please also refer to Submission ID 16302, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 7:

Thank you for your comments. References to the FAST Act have been addressed into the 2016 RTP/SCS (see **Master Response No. 1).** Please also refer to Submission ID 16302, Final 2016 RTP/SCS Comments and Responses Appendix. Additionally, references to the FAST Act are addressed and reflected in the **Clarifications and Revisions** section of the Final PEIR. Please also see **Response 39-2.**

Response to Comment No. 8:

SCAG appreciates California Cultural Resources Preservation Alliance's review of the Draft 2016 RTP/SCS and associated Draft PEIR.

44. California Native Plant Society
Orange County Chapter
Celia Kutcher
Conservation Chair
P.O. Box 54891
Irvine, California 92619-4891

Response to Comment No. 1:

Thank you for your comment regarding the data and services from the Orange County Chapter of the California Native Plant Society (OCCNPS). The references to the OCCNPS Manual of Vegetative Plants and the OCCNPS Emergent Invasive Plants program have been incorporated in the **Clarifications and Revisions** section of the Final PEIR.

Response to Comment No. 2:

Thank you for your commendation on the incorporation of Natural and Farmland as their own categories under the 2016 Plan and the Trust's support of the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and DPEIR. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your coalition is encouraged to participate in the effort.

Response to Comment No. 3:

Thank you for your comment on the consistency in maps. Each of the maps identified in the comment serve a distinct purpose and as such may reference a different data set to conduct the underlying environmental analysis appropriate to the resources categories that have different purposes. The underlying data source for the figures generally belong to one of the two categories: SCAG's existing land use data or CPAD. Each data source is to serve different analysis purposes and has its own set of constraints, not limited to richness of data and scale, which primarily explains the differences in mapping between PEIR and the RTP/SCS. Maps will be clarified to properly identify the purpose of the open space, land use, and recreation maps in the PEIR and the specific data source in the legend in the **Clarifications and Revisions** (see **Section 3.11 and Section 3.16**) section of the Final PEIR. Please see **Response 40-3 and Response 43-3.** For maps in the **Natural and Farmlands Appendix** of the 2016 RTP/SCS, please refer to **Master Response No. 1.** Please also refer to Submission ID 16231, Final 2016 RTP/SCS Comments and Responses Appendix.

Thank you for your comment regarding the internal consistency of maps. Please refer to **Response 40-3.** For maps in the **Natural and Farmlands Appendix** of the 2016 RTP/SCS, please refer to **Master Response No. 1.** Please also refer to Submission ID 16231, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 4:

Thank you for your comments. See **Response 44-2** and **Master Response No. 1.** Please also refer to Submission ID 16231, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 5:

Thank you for your comment regarding potential mechanisms that can or will be used to accommodate access to preserved lands. The 2016 RTP/SCS and supporting PEIR recognize that the land use authority for the management of public and private open space lands lies with the federal, state, and local jurisdictions within which these lands are located. Nothing in the 2016 RTP/SCS is intended to supercede existing statutes, regulations, and/or adopted plans that specify management and access of open space lands. Rather, the 2016 RTP/SCS seeks to acknowledge the importance of having opening space areas for both purposes: (1) conservation of natural resources; and (2) opportunities for passive and active recreation. Please also refer to Submission ID 16231, Final 2016 RTP/SCS Comments and Responses Appendix. In coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to continue to participate in the effort.

Response to Comment No. 6:

Thank you for your comment regarding the importance of formal and informal conservation plans. Consistent with the recommendations of Appendix G of the State CEQA Guidelines, the PEIR emphasizes the analysis of impacts on Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs). HCPs and NCCPs are afforded protection pursuant to the Federal and State Endangered Species Acts. However, SCAG recognizes the important of the other mechanisms articulated in the comment as a means of amassing addition open space lands in the region to provide for conservation of habitat for plants and wildlife and facilitate passive and active recreation. SCAG's commitment to fully engage in support local jurisdictions in integrating sustainable strategies in to land use planning efforts is articulated in **MM-LU-1(a)(1**) through **MM-LU-1(a)(8).** In the coming years, SCAG will be working with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your organization is encouraged to participate in the effort. Please also see **Master Response No. 1.** Please also refer to Submission ID 16231, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 7:

Thank you for your comment regarding support for regional wildlife corridors. Please see **Master Response No. 1**. Please also refer to Submission ID 16231, Final 2016 RTP/SCS Comments and Responses Appendix. Please also see SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2),** that describe the commitment of SCAG to continue to facilitate a regional conversation strategy among stakeholders related to conservation of wildlife habitat and movement corridors.

Response to Comment Nos. 8-9:

Thank you for your comment regarding tree species proposed to be used as part of SCAGs climate resilient strategy. Specifically, comments related to the need to carefully select drought-tolerant species that can survive and flourish in urban environments has been provided to the 2016 RTP/SCS planning tem. SCAG will be working with local entities to assist in the cross-jurisdictional coordination of the climate resiliency strategy. Recommendations for specific tree species, understory plantings/conditions, and care requirements will be encouraged and appreciated. Your group is encouraged to participate in the effort. Please also see **Master Response No. 2**. Please also see mitigation measures **MM-AES-1(b), MM-BIO-2(b) and MM-BIO- 5(b))** that provide more specific information related to restoration of vegetation in natural habitats, replacement of native trees, and use of appropriate plant materials.

Response to Comment No. 10:

Thank you for your comment. Your contact information has been added to the SCAG 2016 RTP/SCS PEIR contact list database.

45. Center for Demographic Research
Deborah S. Diep
Director
2600 Nutwood Avenue, Suite 750
Fullerton, CA 92831-5404
(657) 278-3009

Response to Comment 1:

Thank you for your comment expressing support for the Plan and continued coordination between SCAG and your organization. The support comment will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS.

Response to Table 1 Comments Nos. 1-47:

Thank you for your comment. Please refer to responses to **Comment Letter No. 32** (OCCOG Comment Letter).

46. Endangered Habitats League
Dan Silver
Executive Director
8424 Santa Monica Blvd Suite A 592
Los Angeles, California 90069-4267
(213) 804-2750

Response to Comment No. 1:

Thank you for your comment. SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Response to Comment No. 2:

Thank you for your comment regarding the implementation mechanism. Please see **Response 40-6.**

Please refer to **Response 44-5**.

Please also refer to the **Natural and Farmlands Appendix** of the 2016 RTP/SCS and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix. In coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to continue to participate in the effort.

Response to Comment No. 3:

Thank you for your comment regarding regional wildlife corridors and the reference to the FAST Act. Please see **Master Response No. 1.** This comment is on the 2016 RTP/SCS, not the PEIR; please see Submission ID 16250. Please also see **Response 39-2** and SCAG mitigation measures **SCAG MM-BIO-1(a)(1) and MM-BIO-1(a)(2).**

Response to Comment No. 4:

Thank you for your comment. Your contact information has been added to the SCAG 2016 RTP/SCS PEIR contact list database.

47. Environmental Coalition
No Contact Information Available

Response to Comment Nos. 1-5:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16255, Final 2016 RTP/SCS Comments and Responses Appendix.

48. Eric Johnson
Chair
Puente-Chino Hills Task Force of the Sierra Club
ericsj@mindspring.com

Response to Comment No. 1:

Thank you for your comment regarding natural lands and farmlands. SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Response to Comment No. 2:

Thank you for your comment. **See Response 39-1 and Master Response No. 1.** Please also refer to Submission ID 16168, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 3:

Thank you for your comment regarding an identification of a conservation mechanism for natural and farmlands preservation. Please see **Response 40-6.** SCAG does not hold authority to impose mitigation measures on local jurisdictions, transportation agencies, or project sponsors (See **Master Response No. 4**). However, SCAG has identified mitigation measures that SCAG will be responsible (see **SCAG MM-REC-1(a)(1), MM-REC-1(a)(2)**). Please also refer to the **Natural & Farm Lands Appendix** of the 2016 RTP/SCS and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix. In coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to continue to participate in the effort.

Response to Comment No. 4:

Thank you for your comment regarding regional wildlife corridors and the reference to the FAST Act. Please see **Master Response No. 1.** Please also refer to Submission ID 16168, Final 2016 RTP/SCS Comments and Responses Appendix. For the reference to the FAST Act, please see **Response 39-2.** Strategies for regional wildlife corridors are discussed in SCAG mitigation measures **SCAG MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).**

Response to Comment No. 5:

Thank you for your comment. Your contact information has been added to the SCAG 2016 RTP/SCS PEIR contact list database.

49. Ezequiel Gutierrez Esq.
18605 Laurie Lane
Adelanto, California 92301

(Letter 1)

Response to Comment No. 1:

Thank you for your comment on the Draft 2016 RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16314, Final 2016 RTP/SCS Comments and Responses Appendix.

(Letter 2)

Response to Comment No. 1:

Thank you for your comment. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16314, Final 2016 RTP/SCS Comments and Responses Appendix. SCAG has developed a PEIR based on a region-wide assessment of potential significant impacts based on the goals and policies of the Draft 2016 RTP/SCS. As a programmatic environmental document, SCAG has taken into consideration planning the PEIR based on a balance of environmental impacts from the high desert, mountain, valley, urban, and coastal environments encompassing the six county region (see **Master Response No. 2**).

50. Five Point Communities
Jennifer Bohen
Vice President of Engineering
25 Enterprise, Suite 400
Aliso Viejo, CA 92656
(949) 349-1000

Response to Comment Nos. 1-3

Thank you for your comments related to the 2016 RTP/SCS planning process and those areas identified for growth in the Growth Forecast. Please refer to **Master Response No. 1** and **Master Response No. 3.** Please also refer to Submission ID 16315, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 4:

Thank you for your comments related concerns regarding Alternative 3, Intensified Land Use Alternative regarding housing units in the City of Irvine's Northern Sphere and Great Parks Neighborhood Development area. Please refer to **Master Response No. 3.**

Response to Comments Nos. 5-6

Thank you for your comments related to the 2016 RTP/SCS planning process and those areas identified for growth in the Growth Forecast. Please refer to **Master Response No. 3.**

Response to Comment No. 7:

Thank you for your comments. Please see **Response 19-2** with respect to the technical corrections on entitlements. For the Intensified Land Use Alternative as included in the Final PEIR, SCAG staff has made the corrections based on input received to reflect existing development agreements, entitlements, and projects recently completed or under construction.

Response to Comment No. 8:

Thank you for your comments regarding ongoing coordination with SCAG with respect to the 2016 RTP/SCS. Based on the letter of comment, it is understood that the referenced Five Point Communities project is located in the City of Irvine Sphere of Influence. The City of Irvine is a SCAG member agency. As a member agency, the City of Irvine provides SCAG with land use data, including existing and proposed entitlements. It would be most beneficial to coordinate with the City of Irvine to ensure that all data files reflect the referenced project. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16315, Final 2016 RTP/SCS Comments and Responses Appendix.

51. Friends of Harbors, Beaches and Parks
Jean H. Watt
President
Post Office Box 9256
Newport Beach, CA 92653
949-399-3669

Response to Comment No. 1:

Thank you for your comment regarding the FHBP and its close involvement with SCAG.

Response to Comment No. 2:

Thank you for your commendation on the incorporation of Natural and Farmland as their own categories under the 2016 Plan and the Trust's support of the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and DPEIR. In the coming years, SCAG will be working with local entities to assist in the cross-jurisdictional coordination of habitat conservation strategies. Friends of Harbors, Beaches, and Parks is encouraged to participate in the effort.

Response to Comment No. 3:

Thank you for your comment regarding habitat conservation plans and the **Natural and Farmlands Appendix**. Please see **Master Response No. 1.** Please also refer to Submission ID 16330, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 4:

Thank you for your comment regarding areas afforded long-term protection versus Conservation Plan areas, as described on page 3.4-52 of the PEIR. Please see **Clarifications and Revisions** (see **Section 3.4 Biological Resources**) section of the Final PEIR that describes the detailed tables and citations for the approximately 23 million acres classified as "open space" within the SCAG region. As indicated in Table 3.16.2-1, approximately 14,404,698 acres are in recreational areas and protected open space areas. There are an additional 2,631,978 acres of important farmlands. These lands provide incidental values for plant and wildlife species. The value of these lands range based on the level of disturbance and suitability to accommodate native plants and wildlife. In addition, there are 12 regional HCPS and NCCPs that are wholly or partially located in the SCAG region. These Conservation Plans specify required mitigation to compensate for development and operations and maintenance activities that occur within the plan boundaries. As the commenter noted, not all lands within the Conservation Plan area will be conserved, rather the Conservation Plan provides for required mitigation for the impacts of development, and operations and maintenance of projects, and in some instances includes a mitigation bank or other mechanisms for compensatory mitigation.

Response to Comment No. 5:

Thank you for your comment expressing concerns about the proposed policy to "ensure adequate access to open space and preservation of habitat" under land use strategies listed in **Section 2.4.4, Land Use and Transportation Strategies**.

Please refer to **Response No. 44-5.**

Habitat conservation strategies (including regional mitigation policies) are discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to continue to participate in the effort. SCAG will work together with your organization and others to collaboratively find solutions to address the concerns.

As stated in **Section 2.4.4** of the Draft PEIR, the 2016 RTP/SCS envisions future regional growth that is well coordinated with the transportation system improvements, as well as anticipates new transportation projects planned by the region's CTCs and transit providers, and is dedicated to detailing recommended land use strategies and transportation investments. These proposed land use strategies recognize a higher portion of new households and employment in areas well-served by transit, and reduce growth in high value habitat areas along with neighborhoods that are adjacent to highways. The foundational policy to ensure adequate access to open space and preservation of habitat focuses on concentrating the population growth that is anticipated whether or not the transportation related projects are realized, in order to reduce development on greenfields and open space and habitat lands. Open space is not necessarily developed parkland.

The Recreation Section of the Draft PEIR (**Section 3.16**) discloses that implementation of the transportation projects and land use patterns anticipated by the strategies in the 2016 RTP/SCS would have the potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and would have the potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, constituting potentially significant impacts, and concludes that impacts to recreation would remain significant and unavoidable after mitigation.

SCAG does not hold authority to impose mitigation measures on local jurisdictions, transportation agencies, or project sponsors (See **Master Response No. 4**). Please also refer to Submission ID 16315, Final 2016 RTP/SCS Comments and Responses Appendix.

However, SCAG has identified mitigation measures that SCAG will be responsible (see **SCAG MM-REC-1(a)(1), MM-REC-1(a)(2)**). Please also refer to the **Natural and Farmlands Appendix** of the 2016 RTP/SCS and **Master Response No. 1.** Please also refer to Submission ID 16330, Final 2016 RTP/SCS Comments and Responses Appendix. In coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to continue to participate in the effort.

The Draft PEIR is a programmatic document that that provides a region-wide assessment of the potential significant environmental effects of implementing goals, policies, strategies, programs, and projects included in the Draft 2016 RTP/SCS. The 2016 RTP/SCS does not generally introduce projects; it provides goals, policies, strategies, and programs in consideration of already anticipated projects in the SCAG region. The focus of the environmental analysis in the Draft PEIR is on potential regional scale and cumulative impacts of the Draft 2016 RTP/SCS. The conclusions presented in the Draft PEIR were regional-level and Plan-level results of the Draft 2016 RTP/SCS as a whole. As a programmatic environmental document for a region-wide, long-range Plan, the Draft PEIR is not intended to analyze local impacts or provide information in sufficient detail for a project or site-specific level of analysis. Project or site-specific environmental analysis to assess impacts at the project level must be separately assessed for each individual project to determine whether any individual project would have significant impacts and warrant the consideration of mitigation measures (see **Master Response No 2**).

Response to Comment No. 6:

Thank you for your commendation for including Natural Lands Preservation as one of the six strategies listed in the Draft PEIR. For the comment regarding the implementation mechanism, please see **Response 40-6** and **Master Response No. 1.** Please also refer to Submission ID 16330, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Nos. 7-8:

Thank you for your comment. Please see **Response 40-3** and **Response 44-3.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 9:

Thank you for your comment regarding the mission of SCAG in relation to the 2016 RTP/SCS. Please also refer to **Master Response No. 1.** Please also refer to Submission ID 16330, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 10:

Thank you for your comment regarding misconceptions about land preservation in the 2016 RTP/SCS. Please note that Habitat conservation strategies (including regional mitigation policies) are discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation. Suggestions for strategies beyond HCPs and NCCPs will be encouraged and appreciated. Your organization is encouraged to continue to participate in the effort. Additionally, please refer to **Master Response No. 1**. Please also refer to Submission ID 16330, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 11:

Thank you for your comment regarding increasing population and limited parks. Park accessibility is an integral part of sustainable communities as it improves public health, air quality, and quality of life. Providing parks within infill areas has a different set of challenges that varies by jurisdiction. SCAG encourages jurisdictions to look at funding sources, such as the California Department of Housing and Community Development (HCD) Housing-related Parks program, to help build and maintain local parks. The Housing-related Parks program awards money to build and maintain parks based on the number of affordable housing units a jurisdiction has built, which can help increase park accessibility in traditionally underserved areas. SCAG will continue to provide jurisdictions information regarding funding opportunities and encourage jurisdictions to provide parks as part of their long-range plans. The term "Natural Lands" is used intentionally to differentiate between potentially sensitive habitat areas and urban/suburban parks that provide open space and active recreation. Specifically, ""Natural Lands" for purposes of the 2016 RTP/SCS include habitat areas such as grasslands, wetlands, deserts, forests, shrub lands, riparian zones, and other types of natural environments. Natural Lands are not intended to include agricultural croplands, grazing/rangeland, other working lands, or municipal parks serving primarily recreational purposes. Additionally, this PEIR identifies SCAG mitigation measures that SCAG will be responsible (see **SCAG MM-REC-1(a)(1), MM-REC-1(a)(2)**). Please also refer to the **Natural and Farmlands Appendix** of the 2016 RTP/SCS and **Master Response No. 1.** Please also refer to Submission ID 16330, Final 2016 RTP/SCS Comments and Responses Appendix. In coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to continue to participate in the effort.

Response to Comment No. 12:

Thank you for your comment expressing concern about the considerable pressure of an increasing population on existing parkland in the region. See **Response 40-6.** The Recreation Section of the Draft PEIR (**Section 3.16**) discloses that implementation of the transportation projects and land use patterns anticipated by the strategies in the 2016 RTP/SCS would have the potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and would have the potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, constituting potentially significant impacts, and concludes that impacts to recreation would remain significant and unavoidable after mitigation. SCAG does not have any authority to impose mitigation measures on local jurisdictions, transportation agencies, or project sponsors. See **Master Response No. 4**. However, this PEIR identifies SCAG mitigation measures that SCAG will be responsible (see **SCAG MM-REC-1(a)(1), MM-REC-1(a)(2)**).

The Draft PEIR is a programmatic document that that provides a region-wide assessment of the potential significant environmental effects of implementing goals, policies, strategies, programs, and projects included in the Draft 2016 RTP/SCS. The 2016 RTP/SCS does not introduce projects; it provides goals, policies, strategies, and programs in consideration of already anticipated projects in the SCAG region. The focus of the environmental analysis in the Draft PEIR is on potential regional scale and cumulative impacts of the Draft 2016 RTP/SCS. The conclusions presented in the Draft PEIR were

regional-level and Plan-level results of the Draft 2016 RTP/SCS as a whole. As a programmatic environmental document for a region-wide, long-range Plan, the Draft PEIR is not intended to analyze local impacts or provide information in sufficient detail for a project or site-specific level of analysis. Project or site-specific environmental analysis to assess impacts at the project level must be separately assessed for each individual project to determine whether any individual project would have significant impacts and warrant the consideration of mitigation measures. See **Master Response No. 2.**

Through the 2016 RTP/SCS's policies reflect in the proposed land use strategies including to "ensure adequate access to open space and preservation of habitat" listed in **Section 2.4.4, Land Use and Transportation Strategies**, of the Draft PEIR, the 2016 RTP/SCS envisions future regional growth that is well coordinated with the transportation system improvements, as well as anticipates new transportation projects planned by the region's County Transportation Commissions and transit providers, and is dedicated to detailing recommended land use strategies and transportation investments. These proposed land use strategies recognize a higher portion of new households and employment in areas well-served by transit, and reduce growth in high value habitat areas along with neighborhoods that are adjacent to highways. The policy to ensure adequate access to open space and preservation of habitat focuses on concentrating the population growth that is anticipated whether or not the transportation related projects are realized, in order to reduce development pressure on greenfields and open space and habitat lands. Open space is not necessarily developed recreational parkland.

The following language has been added to **Section 3.16** of the PEIR in the **Clarifications and Revisions** section of the Final PEIR regarding parkland access:

"In 2011, The City Project, a nonprofit legal and policy advocacy organization, prepared a policy report, *Healthy Parks, Schools, and Communities: Green Access and Equity for Southern California*, that mapped and analyzed green access and equity in Southern California region. The report established "park poor" as below 3 park acres per 1,000 residents Based on the Quimby Act goal of 3 acres of parkland per 1,000 population, established "income poor" as below $47,331 household income under California law, and established a disproportionately "people of color" category as over the state average of 53.3% based on 2000 census data in order to map the park poor, income poor communities of color in each county. The report indicated that combined park poor/income poor/disproportionately people of color areas were generally concentrated in urbanized areas:

- **Imperial County:** 2,253.34 net acres of parks per 1,000 residents in Assembly District 80; combined park poor/income poor/disproportionately people of color areas were concentrated in the communities of Calipatria, Westmorland, Brawley, and Holtville, as well as the city of El Centro.[24]
- **Los Angeles County:** park access ranged from 0.55 net acres/person in Assembly District 46 (central Los Angeles) to 177.48 net acres/person in District 41 (Santa Monica Mountains); combined park poor/income poor/disproportionately people of color areas were concentrated in the San Fernando Valley, City of Lancaster, City of Santa Clarita, City of Burbank, and more

[24] The City Project. 2011. *Imperial County Green Access and Equity.* Website. Available at: http://www.mapjustice.org/imperial

urban areas in the Los Angeles basin from Santa Monica east to Diamond Bar and from Pasadena south to Long Beach.[25]

- **Orange County:** park access ranged from 1.45 net acres/person in District 56 (Buena Park) to 77.46 net acres/person in District 71 (Trabuco Canyon); combined park poor/income poor/ disproportionately people of color areas were dispersed throughout the northwestern half of the county and communities including Laguna Hills and Laguna Niguel towards the southern portion of the county.[26]
- **Riverside County:** park access ranged from 8.03 net acres/person in District 63 (northeastern Riverside) to 2,674.22 net acres/person in District 80 (Banning/Imperial County); combined park poor/income poor/disproportionately people of color areas were concentrated in communities within Corona, Riverside, Banning, and La Quinta.[27]
- **San Bernardino County:** park access ranged from 0.00 net acres/person in District 32 (China Lake) to 27,777.12 net acres/person in District 34 (southeastern San Bernardino County); combined park poor/income poor/disproportionately people of color areas were concentrated in communities within Adelanto, Victorville, Chino, Ontario, Rancho Cucamonga, Fontana, Rialto, San Bernardino, and Redlands.[28]
- **Ventura County:** park access ranged from 12.58 net acres/person in District 35 (Ventura) to 172.55 net acres/person in District 41 (Port Hueneme);combined park poor/income poor/ disproportionately people of color areas were concentrated in communities within Port Hueneme, Oxnard, Ventura, Santa Paula, and Fillmore.[29]"

Response to Comment Nos. 13-21:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16330, Final 2016 RTP/SCS Comments and Responses Appendix.

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[25] The City Project. 2011. *Los Angeles County Green Access and Equity.* Website. Available at: http://www.mapjustice.org/losangeles

[26] The City Project. 2011. *Orange County Green Access and Equity.* Website. Available at: http://www.mapjustice.org/orange

[27] The City Project. 2011. *Riverside County Green Access and Equity.* Website. Available at: http://www.mapjustice.org/riverside

[28] The City Project. 2011. *San Bernardino County Green Access and Equity.* Website. Available at: http://www.mapjustice.org/sanbernardino

[29] The City Project. 2011. *Ventura County Green Access and Equity.* Website. Available at: http://www.mapjustice.org/ventura

52. Hank Fung
No Contact Information Available

Response to Comment No. 1:

Thank you for your comment regarding the programmatic nature of the 2016 RTP/SCS PEIR. The Draft PEIR is a programmatic document that that provides a region-wide assessment of the potential significant environmental effects of implementing goals, policies, strategies, programs, and projects included in the Draft 2016 RTP/SCS. The focus of the environmental analysis in the Draft PEIR is on potential regional scale and cumulative impacts of the Draft 2016 RTP/SCS. The conclusions presented in the Draft PEIR were regional-level and Plan-level results of the Draft 2016 RTP/SCS as a whole. As a programmatic environmental document for a region-wide, long-range Plan, the Draft PEIR is not intended to analyze local impacts or provide information in sufficient detail for a project or site-specific level of analysis. Project or site-specific environmental analysis to assess impacts at the project level must be separately assessed for each individual project to determine whether any individual project would have significant impacts and warrant the consideration of mitigation measures (See **Master Response No. 2**).

53. Claire Schlotterbeck
Hills for Everyone
714-996-0502
Claire@schlotterbeck.net

Response to Comment No. 1:

Thank you for your comment. SCAG will be working with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort. Additionally, please refer to **Master Response No. 1.** Please also refer to Submission ID 16170, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 2:

Thank you for your comment. Please see **Response 40-3** and **Response 44-3.**

Response to Comment No. 3:

Thank you for your comment regarding the identification of a conservation mechanism for the natural and farmlands preservation. Please refer to **Response 44-6, Master Response No. 1** and **Master Response No. 4**. Please also refer to Submission ID 16170, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 4:

Thank you for your comment regarding formal and informal conservation plans. Please refer to **Response 44-6** and **Master Response No. 4**.

Response to Comment No. 5:

Thank you for your comment related to Fixing America's Surface Transportation (FAST) Act. Please see **Clarifications and Revisions** (see **Section 1.0 Introduction and Section 3.17 Transportation, Traffic, and Safety**) section of the Final PEIR. Please refer to **Master Response No. 1** and **Master Response No. 4**. **.** Please also refer to Submission ID 16170, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 6:

Thank you for your comment. Your contact information has been added to the SCAG 2016 RTP/SCS PEIR contact list database.

54. Irene Sandler (Letter 1)
55. Irene Sandler (Letter 2)
Bel Air Crest Resident
Los Angeles, CA 90077

Response to Comment No. 1:

Projects included in the 2016 RTP/SCS **Project List Appendix** were provided by the six County Transportation Commissions (CTCs) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The projects provided by the CTCs are regarded as regionally significant and/or anticipated to receive (or already receiving) federal funds. In addition, the CTCs anticipate that these projects will be initiated or completed by the Plan's horizon year in this case, 2040.

The Sepulveda Reversible Lane and Improvement Project was provided by Los Angeles County Metropolitan Transportation Authority (LA Metro) for inclusion in the 2016 RTP/SCS, and it is one of over 2000 regionally significant projects in the Plan.

Please also see **Master Response No. 2** which addresses the differences between a program-level EIR (such as this PEIR) and a project-level EIR.

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

Response to Comment Nos. 1-5:

Thank you for your comments. With respect to revisions to the Plan, please refer to **Master Response No. 1**. Please also refer to Submission ID 16312, Final 2016 RTP/SCS Comments and Responses Appendix. For comments related to project-level CEQA analysis, please refer to **Master Response No. 2.** For comments related to SCAG's technical modeling and process, please refer to **Master Response No. 3.**

57. Kirsty Norman
Inland Empire Biking Alliance
P.O. Box 9266
Redlands, California 92375
(909)-213-4303

Response to Comment No. 1:

Thank you for your comment on the SCAG Draft 2016 RTP/SCS PEIR. SCAG has considered and incorporated proposed strategies based on inclusion of a variety of transit and transportation options, including an Active Transportation Plan (ATP) supported by regional goals, policies, and strategies for the six county region with integration of transportation and land use strategies to account for the investments that are foreseeable and reasonable in the long range transportation planning horizon. Implementation of an ATP will require SCAG to continue and build upon existing partnerships with county and local planning agencies during implementation of the 2016 RTP/SCS (See **Master Response No. 1.** Please also refer to Submission ID 16139, Final 2016 RTP/SCS Comments and Responses Appendix). SCAG has and will take into consideration the recommendation provided in the comment card, and goals and vision of the latest ATP, other recent ATP planning documents in Riverside and San Bernardino Counties, and other relevant ATPs developed by counties and cities in the region, in preparing the Final PEIR.

58. Laguna Canyon Foundation
Hallie Jones
Executive Director
P.O. Box 4895
Laguna Beach, California 92652
(949) 497-8324

Response to Comment No. 1:

Thank you for your commendation related to the incorporation of Natural and Farmland as their own categories under the 2016 RTP/SCS and the support of Laguna Canyon Foundation for the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

Habitat conservation strategies (including regional mitigation policies) are fully discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Response to Comment No. 2:

Thank you for your commendation on the incorporation of an appendix devoted to natural and farmlands projection in the 2016 RTP/SCS. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16280, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 3:

Thank you for your comment regarding conservation mechanisms. Please refer to **Response 40-6** and **Response 44-6** and **Master Response No. 4**

Response to Comment No. 4:

Thank you for your comment regarding wildlife corridors. Regional Wildlife Corridors are discussed in SCAG mitigation measures **MM-BIO-1(a)(1) and MM-BIO-1(a)(2).** Thank you for your comment related to Fixing America's Surface Transportation (FAST) Act. Please see **Clarifications and Revisions** (see **Section 1.0, Introduction and Section 3.17, Transportation, Traffic, and Safety**) section of the Final PEIR. Please refer to **Master Response No. 1** and **Master Response No. 4**. Please also refer to Submission ID 16170, Final 2016 RTP/SCS Comments and Responses **Response to Comment No. 5:**

Thank you for your comment and your expressed willingness to continue to collaborate with SCAG on these important issues. Your contact information has been added to the SCAG 2016 RTP/SCS PEIR contact database.

59. Laguna Greenbelt, Inc
Elisabeth M. Brown Ph.D
President
P.O. Box 4895
Laguna Beach, California 92652
(949) 497-8324

Response to Comment No. 1:

Thank you for your comment regarding implementation of regional conservation plans. Habitat conservation strategies (including regional mitigation policies) are fully discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

60. Los Cerritos Wetlands Land Trust
Elizabeth Lambe
Executive Director
P.O. Box 30165
Long Beach, CA 90853
(714) 357-8576

Response to Comment No. 1:

Thank you for your comment. Habitat conservation strategies (including regional mitigation policies) are discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will also continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Response to Comment No. 2:

Thank you for your commendation related to the incorporation of Natural and Farmland as their own categories under the 2016 RTP/SCS and the support of Los Cerritos Wetlands Land Trust for the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

Habitat conservation strategies (including regional mitigation policies) are fully discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

61. March JPA
Dan Fairbanks, AICP
(951) 656-7000

Response to Comment Nos. 1-3:

Thank you for your comment regarding inclusion of the March JPA General Plan. The maps in the PEIR are intended to reflect a programmatic CEQA document and are meant to show information at a regional scale (see **Master Response No. 3**). The maps shown in the 2016 RTP/SCS and PEIR reflects the most current general plan data that was provided by Riverside County. SCAG will work with Riverside County and the March JPA to amend the RTP/SCS as necessary to update the maps.

Response to Comment No. 4:

Thank you for your comment regarding the RTP/SCS **Appendix B** (Project List). Projects featured in the Plan's **Project List Appendix** were provided by the six County Transportation Commissions (CTCs) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The projects provided by the CTCs are regarded as regionally significant and/or anticipated to receive (or already receiving) federal funds. In addition, the CTCs anticipate that these projects will be initiated or completed by the Plan's horizon year in this case, 2040. SCAG will work with Riverside County to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

62. Mark Jolles

Response to Comment Nos. 1-16:

Thank you for your comments. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16263, Final 2016 RTP/SCS Comments and Responses Appendix.

63. Marvin Norman
1158 Bautote Lane
Colton, California 92324

Response to Comment No. 1:

Thank you for your comment on the Draft 2016 RTP/SCS PEIR. Implementation of SCAG's region-wide transit strategies and ATP will require SCAG to continue and build upon existing partnerships with county and local planning agencies to ensure that both regional and local goals are met. SCAG has and will take into consideration the recommendation provided in the comment card while maintain flexibility as a CEQA lead agency for this programmatic PEIR to fulfill the goals and vision of the latest Plan while taking into consideration other recent transit and active transportation planning documents developed by southern California counties and cities in preparing the Final PEIR. Additionally, please refer to **Master Response No. 1** and **Master Response No. 2.** Please also refer to Submission ID 16138, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Nos. 2-3:

SCAG appreciate your suggestions to include transit as a mitigation measure for all newly developed projects. SCAG has recommended a performance standards-based mitigation measures approach that clearly laid out a region-wide strategy to reduce impacts from roadway congestion, improve smart use of land, and encourage alternative transit. The mitigation measures include transit and active transportation strategies with specified performance standards including targets for VMT reduction. SCAG PEIR mitigation measures have considered and incorporated strategies based on inclusion of a variety of transit and transportation options, including active transit strategies to manage travel demand and reduce sprawl from automobile congestion in the long range transportation planning horizon. Also see **Master Response No. 2** and **Master Response No. 4**.

Response to Comment No. 4:

Thank you for your comment. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16138, Final 2016 RTP/SCS Comments and Responses Appendix.

Thank you for your comments. Please refer to **Response 11-1** to **Response 11-28.**

64. National Trust for Historic Preservation
Elizabeth S. Merritt
Deputy General Counsel
The Hearst Building, 5 Third Street, Suite 707
San Francisco, California 94103
(415) 947-0692

Response to Comment No. 1:

SCAG appreciates the National Trust for Historic Preservation review of the Draft 2016 RTP/SCS and Draft PEIR. Please see our response with regards to the SR-710 North Project (**Master Response No. 1** and Submission ID 16298). Projects featured in the Plan's **Project List Appendix** were provided by the six County Transportation Commissions (CTCs) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The projects provided by the CTCs are regarded as regionally significant and/or anticipated to receive (or already receiving) federal funds. In addition, the CTCs anticipate that these projects will be initiated or completed by the Plan's horizon year in this case, 2040. Regarding the SR-710 North Project, SCAG recognizes that the project is currently pending environmental review. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with LA Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

Response to Comment No. 2:

Thank you for your comments. Please refer to **Response 11-1** to **Response 11-28** and **Master Response No. 1** and Submission ID 16298.

65. Naturalist For You
Joel Robinson
Director/Head Naturalist
Naturalist for You
www.naturalist-for-you.org
(714) 649-9084

Response to Comment Nos. 1-2:

Thank you for the commendation on the incorporation of **Natural and Farmland Appendix** as their own categories in the 2016 Plan.

Response to Comment No. 3:

Thank you for your comment on the consistency in maps. Please see **Response 44-3.** For maps in the **Natural and Farmland Appendix** of the 2016 RTP/SCS. Additionally, please refer to **Master Response No. 1**. Please also refer to Submission ID 16278, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Nos. 4-5:

Thank you for your comments. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16278, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 6:

Thank you for your comment regarding population growth impacts to existing and future parklands. Please see **Response 40-6** and **Response 44-5.** SCAG does not hold authority to impose mitigation measures on local jurisdictions, transportation agencies, or project sponsors and clarifies the intent concerning mitigation for other agencies in **Master Response No. 4**.

Response to Comment No. 7:

Thank you for your comment on the wildlife corridors and the reference to the Fixing America's Surface Transportation (FAST) Act. Please see **Clarifications and Revisions** (see **Section 1.0, Introduction and Section 3.17, Transportation, Traffic, and Safety**) section of the Final PEIR. References to the FAST Act have been addressed into the 2016 RTP/SCS (see **Master Response No. 1;** Please also refer to Submission ID 16278, Final 2016 RTP/SCS Comments and Responses Appendix). Please also see SCAG mitigation measures **SCAG MM-BIO-1(a)(1) and MM-BIO-1(a)(2)** with respect to wildlife corridors.

Response to Comment No. 8:

Thank you for your comment. Your contact information has been added to the SCAG 2016 RTP/SCS PEIR contact database.

66. Orange County Business Council
Bryan Starr
Senior Vice President
2 Park Plaza, Suite 100
Irvine, CA 92614
(949) 554-8563

Response to Comment No. 1:

Thank you for your comment. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16297, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 2:

Thank you for your comment. Please refer to **Master Response No. 1**. Please also refer to Submission ID 16297, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 3

Thank you for your comment regarding the Intensified Land Use, Alternative 3. SCAG acknowledges the input that the Intensified Land Use Alternative is not supported as the preferred alternative for the Plan. This information will be presented to SCAG's Regional Council at the time it considers the certification of the Final PEIR and the adoption of a preferred alternative for the 2016 RTP/SCS. For the Intensified Land Use Alternative as included in the Final PEIR, SCAG staff has made the corrections based on input received to reflect existing development agreements, entitlements, and projects recently completed or under construction (See **Response 19-2)**.

Response to Comment No. 4:

Thank you for your comment regarding "can and should" language. Please refer to **Response 19-4** and **Master Response No. 4**.

Response to Comment No. 5:

Thank you for your comment regarding the OCTA letter. Please refer to **Responses to the Comment Letter 34 (**the OCTA letter**)**.

Response to Comment No. 6:

Thank you for your comment on the concurrence with comments in the OCCOG letter regarding Priority and Funding Preference for Transportation Projects. Please **Response 10-4, Response 32-16, Master Response No. 2** and **Master Response No. 4** with respect to **MM-TRA-1(b)** and **MM-TRA-2(b).**

Response to Comment No. 7:

Thank you for your comments regarding California Transportation Commission (CTC) funding. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16297, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 8:

Thank you for your comment. Please refer to the "Changes to CEQA for Transit-Oriented Development" in the **Regulatory Framework** of **Section 3.17, Transportation, Traffic, and Safety,** in the Draft EIR. This section discusses SB 743 and acknowledges that OPR is currently in the process of updating the CEQA Guidelines with respect to the alternative metrics to the Level of Service. Additionally, SCAG is aware of the recent California Supreme Court decision in *Cal. Building Assn. v. Bay Area Air Quality Mgmt. Dist.*, 62 Cal.4th 369 (2015). The Court found that while CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents, it does mandate that the agency analyze how a project might exacerbate existing environmental hazards. *Id.* at 392. The Court also acknowledged that "CEQA does not prohibit an agency from considering - as part of an environmental review for a project it proposes to undertake - how existing conditions might impact a project's future users or residents." *Id.* at 388, fn. 12 (emphasis in original). Finally, the Court recognized that there are various exceptions to the general rule that CEQA does not require evaluations of effect of existing hazards on future users, including certain airport and school construction projects, some housing development projects, and transit priority projects. *Id.* at 391. These exceptions do require consideration of existing hazards. SCAG maintains that as the Lead Agency, it has broad discretion to develop its thresholds of significance, and it believes that the impact analyses in the PEIR are consistent with *Cal. Building Assn*. decision. However, SCAG is open to suggestions regarding its CEQA approach for the next PEIR for the 2020 RTP/SCS.

Response to Comment No. 9:

SCAG appreciates Orange County Business Council's support on managed lane strategies as not only as a funding source, but as a means to enhance mobility.

67. Orange County League of Conservation Voters
Michael Wellborn
President
P.O. Box 1303
Huntington Beach, California 92647
(714)-525-5377

Response to Comment Nos. 1-3:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16169, Final 2016 RTP/SCS Comments and Responses Appendix.

68. Public Health Alliance of Southern California
Susan Harrington M.S., R.D.
Director, County of Riverside Department of Public Health
Co-Chair, Public Health Alliance of Southern California
sharring@rivcocha.org
(951) 358-7036
Selfa Saucedo, MPH
Manager, Public Health and Behavioral Health Depts.
Ventura County Health Care Agency
Co-Chair, Public Health Alliance of Southern California
Selfa.saucedo@ventura.org
(805) 677-5231
Tracy Delaney Ph.D., R.D.
Executive Director,
Public Health Alliance of Southern California
tdelaney@phi.org
Office: (619) 452-1180

Response to Comment No. 1:

Thank you for your commendation of the 2016 RTP/SCS PEIR.

Response to Comment Nos. 2-9:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16230, Final 2016 RTP/SCS Comments and Responses Appendix.

69. Richard Helgeson
Attorney at Law
1602 Camden Parkway
South Pasadena, CA 901030-4912

Response to Comment No. 1:

Thanks for the comments, including the historical information about the SR-710 North Project. Please see **Responses 11-1** to **11-15**. To further clarify, SCAG has not "pre-determined" the SR-710 Tunnel Alternative. SCAG has no jurisdiction over the selection of the project-alternative. However, as described in the aforementioned responses, for the purposes of analyzing the impacts of the 2016 RTP/SCS, SCAG modeled the worst case scenario which for the SR-710 Study Project is the tunnel alternative. As with other projects included within the Project List, when the SR-710 North Study EIR/EIS process is complete and a locally preferred alternative (LPA) is identified in the final environmental document SCAG will work with LA Metro to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

Response to Comment No. 2:

Thank you for your comments. This PEIR is a programmatic document that conducts a region-wide assessment of potential significant effects of the 2016 RTP/SCS. This is consistent with the provisions of Section 15168 of the CEQA Guidelines. It is not intended to be used in assessing project level impacts. Please refer to **Responses 11-19** to **11-24** and **Master Response No. 2**.

Response to Comment Nos. 3-6:

Thank you for your comments. For clarifications on the differences between a program-level EIR such as this PEIR and project-level EIR, please refer to **Master Response No. 2**. For further clarifications on SCAG's modeling process, please refer to **Master Response No. 3**.

Response to Comment Nos. 7-12:

Thank you for your comments. The PEIR analyzes the impacts of the 2016 RTP/SCS, as a whole, at a regional and programmatic level. Please refer to **Response 11-18** and **Master Response No. 2**. For further clarifications on SCAG's modeling process, please refer to **Master Response No. 3.**

70. Robert Dale
Robert Dale Planning
1401 Sierra Vista Dr.
La Habra, CA 90631

Response to Comment No. 1:

Thank you for your commendation related to the incorporation of Natural and Farmland as their own categories under the 2016 RTP/SCS and the support of Robert Dale Planning for the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

Habitat conservation strategies (including regional mitigation policies) are fully discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Please refer to **Master Response No. 1. .** Please also refer to Submission ID 16163, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 2:

Thank you for your comment regarding population growth impacts to existing and future parklands. Please see **Response 40-6.**

Response to Comment No. 3:

Thank you for your comment regarding wildlife corridors. Regional Wildlife Corridors are discussed in SCAG mitigation measures **MM-BIO-1(a)(1) and MM-BIO-1(a)(2).** Thank you for your comment related to Fixing America's Surface Transportation (FAST) Act. Please see **Clarifications and Revisions** (see **Section 1.0, Introduction and Section 3.17, Transportation, Traffic, and Safety**) section of the Final PEIR. Please refer to **Master Response No. 1** and **Master Response No. 4**. Please also refer to Submission ID 16163, Final 2016 RTP/SCS Comments and Responses Appendix). Additionally, references to the FAST Act are addressed and reflected in the **Clarifications and Revisions** section of the Final PEIR. Also see **Response 39-2.**

Response to Comment No. 4:

Thank you for your comment regarding regional bike trails. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16163, Final 2016 RTP/SCS Comments and Responses Appendix.

71. Ronald Stein PTS Staffing
No Contact Information Available

Response to Comment No. 1:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16067, Final 2016 RTP/SCS Comments and Responses Appendix.

72. Rural Canyons Conservation Fund
Ray Chandos
Secretary/Treasurer
P.O. Box 556,
Trabuco Canyon, California 92678-0556
(949) 858-0157

Response to Comment No. 1:

Thank you for your commendation related to the incorporation of Natural and Farmland as their own categories under the 2016 RTP/SCS and the support of Rural Canyons Conservation Fund for the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.
Habitat conservation strategies (including regional mitigation policies) are fully discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Please refer to **Master Response No. 1.** Please also refer to Submission ID 16236, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 2:

Thank you for your comment regarding conservation mechanisms. Please see **Response 44-5** and **Master Response No. 4.**

73. Saddleback Canyons Conservancy
Gloria Sefton, Attorney at Law, Co-founder
Richard Gomez, Co-founder
P.O. Box 1022
Trabuco Canyon, California 92678

Response to Comment No. 1:

Thank you for your commendation related to the incorporation of Natural and Farmland as their own categories under the 2016 RTP/SCS and the support of Rural Canyons Conservation Fund for the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

Habitat conservation strategies (including regional mitigation policies) are fully discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Please refer to **Master Response No. 1.** also refer to Submission ID 16227, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment Nos. 2-3:

Thank you for your comment regarding conservation mechanisms. Please see **Response 44-5** and **Master Response No. 4.**

Response to Comment No. 4:

Thank you for your comment regarding formal and informal conservation plans. Please see **Responses 44-6, Master Response No. 1** and **Master Response No. 4**. Please also refer to Submission ID 16227, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 5:

Thank you for your comment regarding wildlife corridors. Please see **Response 44-7**, and **Master Response No. 4**

Response to Comment No. 6:

Thank you for your comment. Your contact information has been added to the SCAG 2016 RTP/SCS PEIR contact database. In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

74. Sea and Sage Audubon Society
Scott Thomas
Conservation Committee Special Projects
P.O Box 5447
Irvine, California 92616-5447

Response to Comment Nos. 1-2:

Thank you for your commendation related to the incorporation of Natural and Farmland as their own categories under the 2016 RTP/SCS and the support of Sea and Sage Audubon Society for the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16247, Final 2016 RTP/SCS Comments and Responses Appendix.

Habitat conservation strategies (including regional mitigation policies) are fully discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Please refer to **Master Response No. 1.** also refer to Submission ID 16227, Final 2016 RTP/SCS Comments and Responses Appendix. Also refer to Submission ID 16225, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 3:

Thank you for your comment regarding conservation mechanisms. Please see **Response 44-5** and **Master Response No. 4.**

Response to Comment No. 4:

Thank you for your comment. Your contact information has been added to the SCAG 2016 RTP/SCS PEIR contact database. In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

75. Southern California Leadership Council
Richard J. Lambros | Managing Director
444 S. Flower Street, 37th Floor
Los Angeles CA 90071
(213) 236-4810

Response to Comment No. 1:

Thank you for your comment regarding the legal jurisdiction of SCAG to impose mitigation measures. Please see **Master Response No. 4.**

Response to Comment No. 2:

Thank you for your comment regarding the impacts of the environment on the project. Please see **Master Response No. 2**. SCAG is aware of the recent California Supreme Court decision in *Cal. Building Assn. v. Bay Area Air Quality Mgmt. Dist.*, 62 Cal.4th 369 (2015). The Court found that while CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents, it does mandate that the agency analyze how a project might exacerbate existing environmental hazards. *Id.* at 392. The Court also acknowledged that "CEQA does not prohibit an agency from considering - as part of an environmental review for a project it proposes to undertake - how existing conditions might impact a project's future users or residents." *Id.* at 388, fn. 12 (emphasis in original). Finally, the Court recognized that there are various exceptions to the general rule that CEQA does not require evaluations of effect of existing hazards on future users, including certain airport and school construction projects, some housing development projects, and transit priority projects. *Id.* at 391. These exceptions do require consideration of existing hazards. SCAG maintains that as the Lead Agency, it has broad discretion to develop its thresholds of significance, and it believes that the impact analyses in the PEIR are consistent with *Cal. Building Assn*. decision. However, SCAG is certainly open to suggestions regarding its CEQA approach for the next PEIR for the 2020 RTP/SCS.

Response to Comment No. 3:

Thank you for your comment. The organization of the environmental analysis in the PEIR follows the organization of CEQA resource categories as outlined in the Appendix G of the CEQA Guidelines, with the addition of the energy section (Appendix F of the CEQA Guidelines). The thresholds of significance that were used in the PEIR environmental impact analysis are substantively aligned with the sample questions in the Appendix G. Additionally, staff proposes to clarify that the lead agency, pursuant to the provisions of the State CEQA Guidelines §15064.7, has discretion to set its own thresholds of significance. This requires the lead agency to make a judgment about how to distinguish impacts which are adverse, but significant, from impacts which are adverse, but not significant. The lead agency may select a threshold of significance based on its judgment about an appropriate standard of significance. The thresholds of significance used in the environmental impact analysis may also rely upon policies adopted and implemented by the lead agency. SCAG, as lead agency for the 2016 RTP/SCS, developed the thresholds of significance that were relevant to the consideration of the RTP/SCS and reflected the

scope of questions articulated in the Appendix G and Appendix F of the State CEQA Guidelines. Please also see **Response 75-2** and **Master Response No. 2.** SCAG is open to suggestions regarding the thresholds of significance for the next PEIR for the 2020 RTP/SCS.

Response to Comment No. 4:

Thank you for your comment regarding the use of VMT in the CEQA analysis and asking SCAG to provide clarification that it is not directing lead agencies using the RTP/SCS PEIR as a tiering document for CEQA purposes to label VMT as a negative impact under CEQA. Senate Bill 743, which was passed by the State Legislature in 2013, includes provisions of CEQA exemptions and streamlining that was intended to promote transit-oriented development to reduce per capita GHG emissions, an important objective of SB 375. Accordingly, SB 743 contributes to meet the objectives of SB 375. Specifically SB 743 provides CEQA exemptions for residential, mixed-use and employment center projects within the Transit Priority Areas (TPA) with conditions.

As part of the CEQA streamlining provisions, Section 2, Paragraph 2 of SB 743, requires the Office of Planning and Research (OPR) to update the Guidelines Implementing the California Environmental Quality Act to replace existing level-of-service-based approach for studying transportation impacts under CEQA at least for projects within the TPA.[30] Currently, the VMT-based metrics have been included in the OPR proposal for discussion. The PEIR discusses VMT as an anticipated change that may be made to State CEQA guidelines within the RTP/SCS planning horizon of 2040.[31]

Section 1.6 of the Introduction to the PEIR describes the limits of SCAG's authority and the discretion of Lead Agencies responsible for the consideration of approval of subsequent projects. Consistent with the provisions of § 15068(c) of the State CEQA Guidelines, the consideration of "Later Activities" leaves the discretion with the Lead Agency for the subsequent activity to determine whether the activity can be determined to be consistent with the Program EIR, or whether the "Later Activity" should be evaluated in a new Initial Study. The thresholds of significance used in the PEIR are used solely to fulfill the responsibility of SCAG as a Lead Agency in the consideration of the potential for the 2016 RTP/SCS to result in significant impacts. SCAG does not have the authority to specify the thresholds of significance to be considered by Lead Agencies considering "Later Activities" at the project level. As established in § 15064.7 of the State CEQA Guidelines, each public agency (or jurisdiction) has the authority to establish significance thresholds to be used in the consideration of the potential for significant impacts. Therefore each jurisdiction will determine the thresholds of significance to be used in the consideration of the potential for significant impacts in relation to Transportation, Traffic, and Safety. The preparation of a new environmental document for a "Later Activity" triggers the discretion of the Lead Agency to evaluate the consideration of the potential for significant impacts pursuant to §15126.2 of the State CEQA Guidelines and consideration of mitigation measures proposed to minimize significant effects pursuant to §15126.4 of the State CEQA Guidelines.

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[30] State of California. California Legislative Information. Approved by Governor September 27, 2013. *Senate Bill No. 743.* Chapter 386. Available at: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743

[31] State of California. The Governor's Office of Planning & Research. Accessed 13 March 2016. *Updating the Analysis of Transportation Impacts Under CEQA*. Available at: https://www.opr.ca.gov/s_sb743.php

Please see **Response 66-8**. Also, SCAG agrees that **Section 3.17** of the PEIR does not imply that "each project or plan that increases the daily VMT" conflicts with the "established measures of effectiveness for the performance of the circulation system." As discussed in **Master Response No. 2**, SCAG is analyzing the impacts of the 2016 RTP/SCS at the regional/programmatic level.

SCAG is open to suggestions regarding the thresholds of significance for the next PEIR for the 2020 RTP/SCS.

Response to Comment No. 5:

Thank you for your comment regarding the need to establish nexus between significant impacts and the mitigation measure imposed to reduce impacts to below the threshold of significance concerning cumulative impacts, VMT thresholds of significance, thresholds of significance concerning energy, and federal constitutional requirements on mitigation requirements.

Please see **Clarifications and Revisions** (see **Section 1.0, Introduction**) section of the Final PEIR regarding the concept of "nexus" or "rough proportionality" standards for mitigation.

Response to Comment No. 6:

Thank you for your comment regarding the "buffers to land uses in close proximity to major highways and roads." Please see **Response 19-5**.

Response to Comment No. 7:

Thank you for your comment requesting clarification whether SCAG is intending to direct lead agencies that may use the RTP/SCS as a tiering document for CEQA to use the "shade threshold" that is not indicated as a negative impact in Appendix G of the State CEQA Guidelines.

Section 1.6 of the Introduction to the PEIR describes the limits of SCAG's authority and the discretion of Lead Agencies responsible for the consideration of approval of subsequent projects. Consistent with the provisions of § 15068(c) of the State CEQA Guidelines, the consideration of "Later Activities" leaves the discretion with the Lead Agency for the subsequent activity to determine whether the activity can be determined to be consistent with the Program EIR, or whether the "Later Activity" should be evaluated in a new Initial Study. The thresholds of significance used in the PEIR are used solely to fulfill the responsibility of SCAG as a Lead Agency in the consideration of the potential for the 2016 RTP/SCS to result in significant impacts. SCAG does not have the authority to specify the thresholds of significance to be considered by Lead Agencies considering "Later Activities" at the project level. As established in §15064.7 of the State CEQA Guidelines, each public agency (or jurisdiction) has the authority to establish significance thresholds to be used in the consideration of the potential for significant impacts. Therefore each jurisdiction will determine the thresholds of significance to be used in the consideration of the potential for significant impacts in relation to Aesthetics, including shade and shadow. The preparation of a new environmental document for a "Later Activity" triggers the discretion of the Lead Agency to evaluate the consideration of the potential for significant impacts pursuant to §15126.2 of the State

CEQA Guidelines and consideration of mitigation measures proposed to minimize significant effects pursuant to §15126.4 of the State CEQA Guidelines.

This PEIR addresses shade and shadow impacts because the issue has been adopted by multiple (generally urban) lead agencies as a threshold for aesthetics impacts. For example, the City of Los Angeles' 2006 L.A. CEQA Thresholds Guide includes shading impacts as a significance threshold for impacts to visual character or quality. As stated for MM-AES-4(b), "where the Lead Agency has identified that the project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, **as applicable and feasible**" [emphasis added]. Lead Agencies can and should follow the applicable ordinances (such as dark skies ordinances), planning documents (e.g., general plans, specific plans), and CEQA threshold guides in evaluation of impacts at a project level. Additionally, SCAG does not mean to direct lead agencies to use the "shade threshold" at the project-level environmental document. Lead agencies have sole discretion to develop their own thresholds of significance.

Response to Comment No. 8:

Thank you for your comment regarding some minor discrepancies in population and development forecast in the 2016 RTP/SCS. Please see **Master Response No. 1.** Please also refer to Submission ID 16290, Final 2016 RTP/SCS Comments and Responses Appendix.

76. Steve Rogers

Response to Comment No. 1:

Thank you for your comment regarding your introduction of your independent engineering firm.

77. Terry Goller

Response to Comment No. 1:

Thank you for your comment on the 2016 RTP/SCS PEIR. Please see **Master Response No. 1**. Please also refer to Submission ID 16224, Final 2016 RTP/SCS Comments and Responses Appendix.

78. The City Project
Robert Garcia, Ariel Collins, Nancy Negrete
1055 Wilshire Blvd., Suite 1660
Los Angeles, California 90017
(213) 260-1035

Response to Comment No. 1:

Thank you for your commendations on SCAG's strategies to improve public access to parks and open space.

Response to Comment Nos. 2-3:

Thank you for your comment regarding the preparation of an environmental justice analysis for the PEIR. To clarify, the Environmental Justice analysis was prepared as an appendix to the 2016 RTP/SCS, not the PEIR. CEQA does not require an analysis of environmental justice as an issue area, however, this PEIR cross references the data and information from the 2016 RTP/SCS Environmental Justice analysis, where appropriate.

Response to Comment No. 4:

SCAG acknowledges the comment to include an environmental justice analysis in the PEIR. As the comment notes, there is an **Environmental Justice Appendix** in the 2016 RTP/SCS. While **Section 3.3** does address the impacts of criteria air pollutants on sensitive receptors, it does not specifically analyze how minorities or low income communities are affected. This level of analysis is not required by the CEQA Guidelines.

The referenced document, *The Environmental Justice State Guidance: How to Incorporate Equity & Justice Into Your State Clean Power Planning Approach (2016)*, discusses equity, health, and meaningful engagement. The 2016 RTP/SCS embodies similar goals of improving public health (see the **Public Health Appendix** of the 2016 RTP/SCS), embracing stakeholder engagement, and promoting clean fuel technologies.

Response to Comment No. 5:

Thank you for your comment requesting that the PEIR address the fact that the urbanized areas of Los Angeles that are significantly park poor are also low-income and disproportionately communities of color as a part of evaluation of environmental justice issues. Appropriate language has been added to **Section 3.16** of the PEIR in the **Clarifications and Revisions** of the Final PEIR regarding parkland access (see **Response 51-12).**[32]

[32] The City Project. 2011. *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for Southern California.* Website. Available at: http://www.mapjustice.org/socal

Response to Comment No. 6:

Thank you for your comment regarding the Environmental Justice maps in the **Population, Housing, and Employment** section of the PEIR. Additional and more detailed information can be found in the **Environmental Justice Appendix** of the 2016 RTP/SCS.

79. Tressy Capps
5498 Withers Avenue
Fontana, California 92336

Response to Comment No. 1:

Thank you for your comments. Please refer to **Master Response No. 1.** Please also refer to Submission ID 16303, Final 2016 RTP/SCS Comments and Responses Appendix.

80. Ventura County 350 Climate Hub – A Coalition
No Contact Information Available

Response to Comment No. 1:

Thank you for your comment. The referenced SANDAG document is reviewed. Please see **Master Response No. 1** regarding the comment on the SCAG's plan. Please also refer to Submission ID 16274, Final 2016 RTP/SCS Comments and Responses Appendix.

81. Ventura Hillside Conservancy
Derek Poultney, M.S.
Executive Director
P.O. Box 1284
Ventura, California 93002
(805) 643-8044

Response to Comment Nos. 1-2:

Thank you for your commendation related to the incorporation of Natural and Farmland as their own categories under the 2016 RTP/SCS and the support of Ventura Hillside Conservancy for the creation of a **Natural and Farmlands Appendix** and comments in support of the 2016 RTP/SCS and PEIR. Please see **Response 39-1** and **Master Response No. 1.** Please also refer to Submission ID 16344, Final 2016 RTP/SCS Comments and Responses Appendix.

Habitat conservation strategies (including regional mitigation policies) are fully discussed in SCAG mitigation measures **MM-BIO-1(a)(1)** and **MM-BIO-1(a)(2).** In the coming years, SCAG will continue to work with stakeholders to assist in the cross-jurisdictional coordination of habitat conservation strategies. Your organization is encouraged to participate in the effort.

Please refer to **Master Response No. 1.** Please also refer to Submission ID 16344, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 3:

Thank you for your support regarding wildlife corridors. Please see **Response 44-7** and **Master Response No. 4**

Response to Comment No. 4:

Thank you for your comment regarding formal and informal conservation plans. Please see **Response 44-6 and Master Response No. 1.** Please also refer to Submission ID 16344, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 5:

Thank you for your comment regarding conservation mechanisms. Please see **Response 40-6, Master Response No. 1, and Master Response No. 4.** Please also refer to Submission ID 16344, Final 2016 RTP/SCS Comments and Responses Appendix.

Response to Comment No. 6:

Thank you for your comment regarding population growth impacts to existing and future parklands. Please see **Response 40-6.** Also see **Master Response No. 4**.

Response to Comment No. 7:

Thank you for your comment on the consistency in maps. General corrections to the PEIR maps will be made to properly identify the purposes of the open space maps and land use maps, and provide accurate data sources in the legend for the maps in the **Clarifications and Revisions** section of the Final PEIR. Please see **Response 40-3.** For maps in the **Natural and Farmland Appendix** of the 2016 RTP/SCS, please refer to **Master Response No. 1.** Please also refer to Submission ID 16344, Final 2016 RTP/SCS Comments and Responses Appendix.

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