



February 14, 2012



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



**Re: Draft 2012 Regional Transportation Plan and Program Environmental Impact Report**

Dear Mr. Ikhata:

The Orange County Transportation Authority, Transportation Corridor Agencies, Orange County Council of Governments, Association of California Cities - Orange County, County of Orange, Orange County Business Council, and undersigned organizations representing local agencies thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG's) Draft 2012 Regional Transportation Plan (RTP) and associated Program Environmental Impact Report (PEIR). We acknowledge SCAG's effort to deliver the draft documents, and your commitments to incorporate the Orange County Sustainable Communities Strategy (OC SCS) and Long-Range Transportation Plan (LRTP) as presented to you.

Each of our agencies has prepared individual comment letters; however, this letter emphasizes some issues of common concern raised through our collaborative review.

- Induced growth discussions incorrectly imply a lack of coordination between land-use and transportation planning agencies and are contrary to the balanced plans provided through the LRTP and OC SCS collaboration process. Please state that land-use plans and transportation projects identified in the OC SCS and LRTP are balanced and, if necessary, clarify under what circumstances "induced growth" may occur.
- The preliminary determination that all of the mitigation measures are feasible is not supported within the draft documents. Moreover, the "can and should" language incorrectly implies that mitigation measures are feasible for the identified agencies. SCAG should provide a clear statement that all mitigation measure recommendations are advisory and replace the "can and should" phrase with "may" when referencing mitigation measures.
- Multiple mitigation measures appear to exceed SCAG's authority and responsibilities for implementation. These mitigation measures should be restated or removed as appropriate.
- New revenue sources and innovative financing strategies used to demonstrate financial constraint can have significant impacts on businesses and the economy that must be clearly understood before advancing. In fact, the RTP

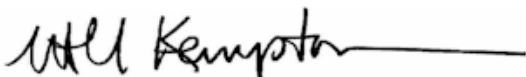


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vision statement recognizes the linkages between economy and the regional transportation system. Specifically, details on how any new user fees would be further defined, evaluated, and advanced must be evaluated through a full economic analysis prior to final adoption of the RTP. In addition, this analysis should demonstrate, by county, the need for new revenues, how the new revenues are proposed to be invested, and how a county-level return to source mechanism can be ensured.

We encourage SCAG to pay particular attention to these issues and the specific comments submitted by the respective agencies and ensure that they are appropriately addressed in the RTP and PEIR revisions.

Regards,



Will Kempton, Chief Executive Officer  
Orange County Transportation Authority



Tom Margro, Chief Executive Officer  
Transportation Corridor Agencies



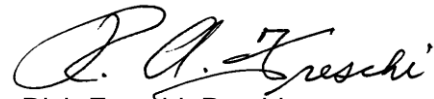
Tom Mauk, Chief Executive Officer  
County of Orange




Lucy Dunn, President  
Orange County Business Council



Lisa Bartlett, President  
League of California Cities,  
Orange County



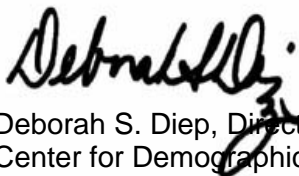
Rich Freschi, President  
Independent Special Districts of  
Orange County



Peter Herzog, Chairman  
Orange County Council of Governments



Lacy Kelly, Chief Executive Officer  
Association of California Cities -  
Orange County



Deborah S. Diep, Director  
Center for Demographic Research

c: OCTA Board of Directors  
OCCOG Board of Directors  
Orange County City Managers Association