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- FOOTHILL/EASTERN BOARD OF DIRECTORS

Report No. 14
File No. 2012J-005

BOARD MEETING DATE: February 9, 2012

SUBJECT: Southern California Association of Governments (SCAG)
Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy

STAFF RECOMMENDATION:

Direct staff to provide written comments and submit a formal comment letter to SCAG on the Draft 2012 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) and Draft Program Environmental Impact Report (PEIR) prior to the February 14, 2012 deadline for public comments.

SUMMARY:

With the Boards' direction, staff will finalize and submit comments on the draft 2012 RTP/SCS and associated Draft PEIR prior to the February 14, 2012 deadline for public comments.

CONTRACTOR/CONSULTANT: N/A

COST: F/E = - 0 -
SJH = - 0 -

REPORT WRITTEN BY: Valarie McFall, Director, Environmental Services

REVIEWED BY:

Engineering/Environmental
Communications/Public Affairs
Finance
Toll Operations
Chief of Staff

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TRANSPORTATION CORRIDOR AGENCIES

125 Pacifica, Irvine, CA 92618 949/754-3400 FAX 949/754-3467

DATE: February 9, 2012

TO: San Joaquin Hills Transportation Corridor Agency Board of Directors
Foothill/Eastern Transportation Corridor Agency Board of Directors

FROM: Valarie McFall, Director, Environmental Services

SUBJECT: Southern California Association of Governments (SCAG)
Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy

STAFF RECOMMENDATION:

Direct staff to provide written comments and submit a formal comment letter to SCAG on the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Draft Program Environmental Impact Report (PEIR) prior to the February 14, 2012 deadline for public comments.

BACKGROUND:

Every four years, SCAG prepares a long-range regional transportation plan for the six-county region under its jurisdiction. The 2012 RTP includes planned transportation projects and demographic assumptions through the year 2035. The 2012 RTP is also the first plan that will include a SCS, a requirement of Senate Bill 375. The SCS requires Metropolitan Planning Organizations within California to set attainable greenhouse gas (GHG) reduction goals. The approved GHG reduction goals for the SCAG region are eight percent per capita by 2020 and 13 percent per capita by 2035, when compared to 2005 levels. The draft 2012 RTP/SCS meets the 2020 reduction goal and exceeds the 2035 GHG reduction goal by achieving a 16 percent reduction versus the approved 13 percent.

DISCUSSION:

On December 30, 2011, SCAG released their Draft PEIR for the 2012 RTP/SCS for a 45 day public comment period, which closes on February 14, 2012. It is anticipated by SCAG that their Regional Council will certify the PEIR and adopt the RTP at its April 5, 2012 meeting.

In order to legally adopt the RTP/SCS, SCAG is required to prepare a PEIR to comply with the California Environmental Quality Act (CEQA). The Draft PEIR analyzes potential impacts associated with implementing the projects, programs and policies within the SCAG region. The

Draft PEIR must also identify measures to mitigate any potential impact associated with implementing any portion of the RTP/SCS.

The current Draft PEIR has identified 549 mitigation measures that must be implemented by all project proponents within the SCAG region to reduce the level of impacts identified in the 2012 RTP/SCS. SCAG has made a predetermination that these mitigation measures are feasible and effective, essentially providing prescriptive measures to the entities that fall within the SCAG region. Many of these measures are duplicative in nature and would typically be required by other regulatory agencies. Furthermore, many of these measures are unnecessary because they fail to acknowledge existing conditions and/or development identified within existing General Plans.

Staff has prepared a draft comment letter (attachment) suggesting clarifying language to SCAG that addresses the concerns identified below:

- **Fix Maps to Show Correct Constrained Transportation Network.**
For example, add SR 241 to 2020 and 2035 Land Use Growth Pattern maps in the RTP/SCS. Ensure that all technical reports and PEIR maps show SR 241 in 2020 and 2035, consistent with the RTP project list.
- **Cut Poorly Defined VMT Fee Proposal from Final PEIR “Plan” Alternative.**
The proposed 5-cent VMT fee should be removed from the final “Plan” Alternative pending much more work to describe how such a fee would work with the existing priced toll road, HOT lane, and express lane system, as well as the broader economic impacts of such a fee. Further, no future VMT fee proposal should advance without these clarifications and a return-to-source commitment.
- **Clarify Use of Mitigation Measure “Toolbox”.**
Provide clarifying language that hundreds of proposed “can and should” mitigation measures are in fact options for local agencies. State that lead agencies should select those mitigation measures that are relevant and applicable to a specific project.
- **Clean Up Mitigation Measure List.**
Remove inappropriate mitigation measures; approximately 175 listed mitigation measures are already required by various resource agencies. Change roughly 20 mitigation measures recommended for local agencies that use the words “shall” or “will”. Change “shalls” and “wills” in the RTP/SCS that refer to local agency required mitigation. Reconsider more than 35 proposed mitigation measures that recommend new fees, subsidies, incentives and taxes on top of the costs of the RTP itself. Consider deleting policy statements that are presented as mitigation measures. Delete mitigation measures that are problematic and overextend SCAG’s authority, notably MM-LU15, requiring project sponsors to permanently conserve at least one acre of unprotected open space for each acre of open space developed as a result of transportation projects and/or improvements.

- **Clarify that PEIR Alternatives are Consistent with Subregional SCSs.**
For example, per the Orange County Council of Governments/SCAG SCS Delegation Memorandum of Understanding, PEIR alternatives should be consistent with the Orange County SCS and Orange County Projections-2010 Modified.
- **Clarify the proposed Open Space Conservation Policy.**
Orange County already has in place significant open space conservation programs that meet the intent of SCAG's proposed open space conservation policy, which was championed by a coalition of Orange County organizations, including TCA. However, the document must make clear that each county should tailor the program to its own needs, and that all conservation programs should be based on voluntary participation by willing property owners.

FUNDING:

There is no funding associated with this staff recommendation.

SUMMARY:

With the Boards' direction, staff will finalize and submit comments on the Draft 2012 RTP/SCS and associated Draft PEIR prior to the February 14, 2012 deadline for public comments.

Attachment: Draft comment letter on SCAG's 2012 RTP/SCS and PEIR



Transportation Corridor Agencies

February 14, 2012

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

RE: Comments on the Draft 2012 Regional Transportation Plan and Program Environmental
Impact Report

Dear Mr. Ikhrata:

The Foothill/Eastern Transportation Corridor Agency and the San Joaquin Hills Transportation Agency (TCA) appreciates the opportunity to review and provide comments on the Draft 2012-2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and associated Draft Programmatic Environmental Impact Report (PEIR). TCA commends the SCAG staff for the tremendous amount of work and effort in putting these documents together. TCA also recognizes and supports the timely adoption of the RTP/SCS to enable the Southern California region to proceed with the planning and implementation of regionally significant transportation projects. Further, TCA recognizes that the SCS is particularly important for the region to meet its state mandated greenhouse gas (GHG) emissions reduction targets for 2020 and 2035.

Please find below TCA's specific comments on both the draft RTP/SCS and PEIR.

DRAFT 2012-2035 RTP/SCS

Page 23, Vision, Transportation Demand Management

Transportation pricing is not identified as part of the RTP/SCS "vision" either as a transportation demand management method or as a financing tool, even though it is clearly a component of the transportation plan and financial plan for implementation. The Orange County SCS includes a description of the current and planned priced transportation network that should be adapted to address the entire region.

Recommended Clarification:

Add information from the Orange County SCS (pages 126 and 127 of the Subregional Sustainable Community Strategies Technical Appendix) that describes the existing and planned inter-operable priced transportation network in the region, including toll roads,

Thomas E. Margro, Chief Executive Officer

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express lanes and high occupancy toll (HOT) lanes. The text can be expanded to address HOT lanes, toll facilities, express lanes and tolled truck lanes in the region as a whole, and should include the following points:

- Tolled centerline miles in the region will increase from 61 in 2008, to 408 in 2035, including toll roads, express lanes, HOT lanes, and tolled truck lanes.
- Priced lanes provide flexibility and options as part of the congestion relief toolbox of measures designed to help meet sustainability and emission reduction goals related to SB 375 and other state and federal mandates.
- “Priced facilities are an especially important tool for providing intra-county, inter-county and interregional capacity.”
- “The existing priced transportation network serves the locations where major employment and housing growth are projected to occur.”
- “Toll roads and express lanes charge users a fee for travel, but typically offer less congested traffic lanes than nearby freeways and roadways. Reduced congestion provides improved and more efficient mobility with fewer air pollutants and greenhouse gas (GHG) emissions caused by congestion.”
- “The toll road system is designed to interrelate with transit service. The toll roads can accommodate Bus Rapid Transit and express bus service, and toll road medians are sized and reserved to provide the flexibility for future transit, if appropriate.”
- Priced facilities such as the Orange County toll roads are privately funded. This insures that these facilities can relieve congestion and associated air pollution and GHG emissions without further stressing limited state, federal and local transportation funding resources.

Page 42, Major Highway Completion Projects, Table 2.2

SR-241 (ORA052) is identified in Table 2.2 as a major highway completion project. However, the completion year is listed as 2020-2030. Although widening will occur in the 2020 to 2030 timeframe, the official project description identifies the completion date as 2030.

Recommended Clarification:

- In Table 2.2, we request that the completion date for SR 241 be clarified as 2030, consistent with the project description for ORA052.
- In the interest of establishing that some major highway projects in Table 2.2 provide emissions reduction benefits without burdening limited federal, state and local funding resources, we request the following clarifying footnote: *SR 241 is a privately funded Transportation Control Measure.*

Page 56, Express/HOT Lane Network

This appears to be the only “priced transportation” discussion in the transportation investments chapter. It does not identify how many miles of priced lanes exist now, or how much that network will be expanded in the plan. Toll roads are included in the priced transportation network, along with express Lanes, and HOT lanes, but are not included in the discussion. However, TCA’s Toll Roads are depicted in Exhibit 2.6, Regional HOT Lane Network. The terminology should be sorted out.

Recommended Clarification:

- Retitle this section, “Express Lanes, HOT Lanes and Toll Roads: The Priced Transportation Network.”
- Table 2.6 should be retitled “Express Lanes, HOT Lanes and Toll Roads”
- The text should provide brief definitions of each type of facility that makes up the priced transportation network, as Express Lanes, Toll Roads and HOT Lanes each operate differently.
- The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities.
- The text should discuss that all priced facilities in the SCAG region insure interoperability by using a common technology, FasTrak, to collect user fees.
- The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing, which is beneficial to reduced criteria and GHG emissions reductions.

Page 76, Conservation Planning Policy

The description of this policy requires clarification to express the intent of SCAG’s Energy and Environment Policy Committee and the coalition of more than 20 public, non-profit and private sector interests, including TCA that urged SCAG to include it.

Recommended Clarification:

Add a paragraph that explains why the conservation program benefits GHG emissions and other criteria pollutants reductions. Specifically, in addition to meeting SAFETEA-LU requirements, the open space lands conservation program would use natural land acquisition to sequester (store) carbon, avoid GHG emissions, and reduce vehicle miles traveled (VMT). This proposed program allows for early implementation and mitigation opportunities. Jurisdictions would have the option to invest early in this open space strategy which offers immediate GHG emissions avoidance benefits, while

simultaneously proceeding with the longer term and planning intensive projects to build transportation centers near existing residential areas, or employment centers near transit stations, etc.

Suggested steps to develop a regional conservation planning policy should be expanded to include the following key points supported by SCAG's Energy and Environment Committee and the coalition that recommended this program:

- Build upon existing open space land acquisition and open space programs in the region, tailoring programs to each individual county in the region. These include, but are not limited to, OCTA's Measure M Mitigation Program, and TCA's open space mitigation program, which has protected 2,200 acres in perpetuity to date.
- Pursue open space conservation in a voluntary manner, working with willing private sector landowners.

Page 78, Greenhouse Gases

The draft document states that "The transportation sector, primarily, cars and trucks that move goods and people, is the largest contributor [to greenhouse gas (GHG) emissions] with 36.5 percent of the State's total GHG emissions in 2008. On road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total." This statement covers only part of the transportation system's GHG emissions role. The text must recognize projects that reduce transportation network GHG emissions by relieving congestion and insuring free-flow conditions.

Because GHG emissions from vehicles increase in stop-and-go traffic, congestion relief projects that eliminate bottlenecks and maintain free-flow conditions actually reduce transportation network GHG emissions, much as Transportation Control Measures are transportation projects that reduce criteria pollutants. Further, the SB 375 Regional Targets Advisory Committee (RTAC) recommends tracking the performance of such strategies "to smooth extreme congestion to more carbon-friendly speeds" in its final report to the California Air Resources Board.

Recommended Clarification:

Insert the following statements on page 78:

- Congestion relief projects reduce transportation network GHG emissions, which otherwise result from idling.
- Consistent with the SB 375 RTAC's recommendation in its final report to the California Air Resources Board, the RTP/SCS includes projects and strategies designed "to smooth extreme congestion to more carbon-friendly speeds."
- A subset of projects included in the Draft RTP/SCS reduce GHG emissions by providing relief of existing and projected congestion. These include toll roads,

express lanes, HOT lanes, high occupancy vehicle (HOV) lanes, and dedicated truck toll lanes.

- Congestion pricing is a powerful transportation demand management tool incorporated in the Draft RTP/SCS for reducing GHG emissions. SCAG has launched a two-year study of congestion pricing strategies that can provide needed transportation facilities while reducing the region's GHG emissions associated with vehicle trips.
- Orange County's toll road network is a prime example of priced congestion relief projects. The toll roads have variable pricing incentives that spread out vehicle use to limit peak-hour congestion that leads to increased GHG emissions.
- As a specific example, SR 241 is designed to maintain free flow conditions that reduce congestion on the regional transportation system. The SR 241 environmental analysis documents transportation network GHG reductions from congestion relief by means of variable tolls that maintain free-flow capacity.
- Other specific examples of projects that reduce GHG emissions on the regional transportation network include express lanes, HOT lanes, HOV lanes and dedicated truck toll lanes for goods movement.

Page 79, Air Quality

Transportation Control Measures (TCMs) are mentioned as mitigation measures, but are not defined or illustrated. The importance of TCMs needs to be clarified and expanded to clearly communicate their air quality role in the RTP.

Recommended Clarification:

- Provide a brief description of projects that qualify as TCMs
- Explain the role of TCMs in reducing emissions
- Provide a reference to the list of TCMs contained in the Conformity Technical Report.

Page 86, Financial Plan, Introduction

The draft document states that "We have successfully implemented toll systems in the past with the Transportation Corridor Agencies' network of toll roads and the SR-91 Express Lanes in Orange County. This kind of innovation in transportation continues as neighboring counties within our region consider a broader network of toll systems." However, the statement needs to clarify the financial planning importance of privately funded toll facilities.

Recommended Clarification:

Priced transportation facilities also provide the opportunity for financial innovation. The Orange County toll roads (SR 73, SR 133, SR 241, and SR 261) are privately funded.

They provide congestion relief and associated air pollution and GHG emissions reduction without further stressing limited federal, state, and local transportation funding.

Page 92, Core Revenues, Regional Revenues

Table 3.6, Regional Revenues, identified federal, state and local sources of transportation funding for the plan. Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, expansions, and new tolled facilities that are privately funded are included in the plan and in the total cost of the plan.

Accurately describing the extent of private funding is an important public disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding.

Recommended Clarification:

- Clarify in the text the percentage of total funding contributed by private sources. This sum should include the privately funded Orange County toll roads (SR 73, SR 133, SR 241, and SR 261).
- A companion pie-chart, similar to Table 3.6, showing the split between public and private funding would also clarify this point.

Page 103, Table 3.5 2012 RTP Revenues (in Nominal Dollars, Billions)

The draft does not clarify how the cost of a proposed new VMT fee, increased gas tax fee, and tolls and user fees would layer over each other. It appears that they would accumulate for individual drivers, with a potentially significant economic impact on drivers and households. Drivers paying to use toll roads, express lanes and HOT lanes would be paying twice for the same mileage.

Recommended Clarification:

- The RTP/SCS should establish the principle that only one mileage fee should apply for each mile driven.
- In order to avoid double-charging drivers for the same trip, their common FasTrak monitoring technology should be used to deduct priced mileage from any VMT fee imposed on drivers.

Page 145, Exhibit 4.17, Land Use Pattern Orange County (2035)

The southerly portion of SR 241 (ORA052), from Oso Parkway to the San Diego County border, has been inadvertently left off this map.

Recommended Clarification:

- Please show the SR 241 alignment on Exhibit 4.17 consistent with the project modeling list and other transportation network maps in the Draft RTP/SCS.

Page 161, Performance Outcomes

This text should clearly state that performance measures and outcomes are not intended to apply to individual areas or projects, but rather to the region as a whole.

Recommended Clarification:

We recommend that the following clarification be inserted:

- Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.

Page 207, Strategic Plan

SCAG assumes \$100 billion will be available from a future VMT fee starting in 2025, but funding for mileage-based user fee demonstration projects and implementation strategies are not included in the constrained RTP/SCS; they are listed in the unfunded Strategic Plan.

Recommended Clarification:

- Demonstration projects and testing of the VMT fee should be included in the constrained plan.
- TCA would be amenable to participating in preparations for VMT fee demonstration projects to ensure a common transparent inter-operable technology for pricing and to avoid double-charging express lane, HOT lane and toll road drivers who pay mileage-based tolls.

Highways and Arterials Technical Report

Page 15, Express/ High Occupancy Toll (HOT) Lane Network.

As with the comment on page 57 of the main RTP/SCS document, the technical report should clearly include toll facilities in the description of projects included in this category. Orange County toll roads are not categorized as express or HOT lanes, but collect tolls as a means of insuring low-emission free-flow capacity and funding the construction and operation of the facility. Toll roads integrate with express lane and HOT lane facilities via the common FasTrak technology that allows inter-operability and convenience for drivers.

Recommended Clarification:

- Retitle this section, “Express Lanes, HOT Lanes and Toll Roads: The Priced Transportation Network.”
- Table 2.6 should be retitled “Express Lanes, HOT Lanes and Toll Roads”

- The text should provide brief definitions of each type of facility that makes up the priced transportation network, as express lanes, toll roads and HOT lanes each operate differently.
- The text should discuss that all priced facilities in the SCAG region ensure interoperability by using a common technology, FasTrak, to collect user fees.
- The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities.
- The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing which is beneficial to reduced criteria and GHG emissions reductions.

Performance Measures Technical Report

Page 2, discussion of types of performance measures.

As with the comment on page 160 of the main RTP/SCS document, the text must make clear that the performance indicators are intended to be applied to the RTP/SCS at the regional level and are not proposed for project-specific application.

Recommended Clarification:

We recommend that the following clarification be inserted:

- Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.

SCS Background Documentation

Pages 36 and 37, Land Use Pattern Maps for 2020 and 2035.

Both of these maps are inconsistent with transportation network maps in the document and do not include SR 241 (ORA052), specifically called out in the RTP as a TCM and priced transportation project in southern Orange County.

Recommended Clarification:

Please show the SR 241 alignment on the Land Use Pattern Maps for 2020 and 2035 consistent with the project modeling list and other transportation network maps in the Draft RTP/SCS.

Page 54, Pricing and Vehicle Policy Assumptions.

This discussion only refers to a 2-cent per mile VMT fee; the Plan proposes a 5-cent per mile fee. This confusion should be eliminated.

Recommended Clarification:

- Amend the reference to a 2-cent VMT fee to a 5-cent per mile VMT fee starting in 2025, consistent with the RTP/SCS main document.

Add the following sentence:

- Toll roads, express lanes and HOT lanes charge varying tolls per mile for use of their facilities. Tolls are project-specific and typically vary by time of day and day of the week. Tolls collected for existing toll roads in Orange County are dedicated to operational expenses and retiring the bonds issued for construction.

Transportation Conformity Technical Report

Page 14, Toll Roads

The discussion of toll road assumptions specifically mentions express lanes and HOT lanes, but not tolled facilities such as existing toll roads SR 73, SR 241, SR 133 and SR 261 in Orange County.

Recommended Clarification:

- SR 241 should be added to Table 6 as a tolled facility and the effect of the toll charges on it should be incorporated into the highway assignment procedure.
- Table 6 should be retitled appropriately to include “Express Lane, HOT Lane and Toll Road Networks.” This change should also be made in the main RTP/SCS document

Transportation Security Technical Report

General

This report addresses the need for the transportation system to enhance emergency preparedness, and transportation security and preparedness. Projects that enhance the region’s security are not identified.

Recommended Clarification:

Provide illustrations of transportation projects needed in the RTP/SCS to improve transportation security. For example, the southerly extension of SR 241 provides an alternative route connecting the SCAG and San Diego Association of Governments coastal regions with very high current and projected travel volumes. This route will ease future projected congestion to ensure critical capacity for access and evacuation in times of environmental or other emergencies, such as earthquakes, wildfires, traffic accidents, and potential nuclear threats at the San Onofre plant. The need for an alternative route was recently illustrated by the lack of evacuation capacity from the 2007 North San Diego County wildfires.

DRAFT PROGRAM EIR

General

The Draft PEIR sets forth 500 mitigation measures that SCAG states are “feasible” and reasonable to assume that they will be implemented. Further, it is difficult to sort through these voluminous mitigation measures to identify those that are mandatory vs. advisory and those that apply to transportation projects as opposed to other types of developments. This can be improved by reformatting and clarifying the proposed mitigation measures as follows:

Recommended Clarifications:

- Provide a clear statement to the following effect: All mitigation measure recommendations to project sponsors and agencies are advisory. Lead agencies are responsible for identifying and addressing those measures they deem practical and feasible, or applicable to specific projects.
- Sort out mitigation measures so that those that are mandatory upon SCAG appear first in each category and can be easily distinguished from Best Management Practices or Best Available Control Measures that SCAG is recommending to project sponsors and other agencies.
- For mitigation measures that simply restate existing regulatory agency requirements or recommendations, e.g. California Department of Fish and Game survey protocols and mitigation requirements, reference the specific regulation and include in the description “or successor regulation or guideline” so that as time moves forward the measure does not recommend out of date regulations or guidance.

Page 3.6-15 and 17 Greenhouse Gas Emissions, Transportation Network Improvements.

On page 3.6-15, the Draft PEIR states that the transportation sector is a major source of California’s greenhouse gases. Further, on page 3.6-18, the discussion cites information on the GHG emissions from new vehicle trips. However, in both places, the document does not clarify that certain transportation projects reduce greenhouse gases by virtue of their design, location and operation. Similar to the way that Transportation Control Measures reduce precursors to ozone, projects that reduce congestion and idling reduce GHG emissions from the regional transportation network. The PEIR must explain the relationship between GHG emissions and congestion relief, and the components of the RTP that provide congestion and idling relief on the regional network.

Recommended Clarification:

Consistent with our recommended clarification for page 78 of the Draft RTP/SCS document, the PEIR text should state the following on pages 3.6-15 and 3.6-18:

- Congestion relief projects reduce transportation network GHG emissions due to idling.
- Consistent with the SB 375 RTAC's recommendation in its final report to the California Air Resources Board, the RTP/SCS includes projects and strategies designed "to smooth extreme congestion to more carbon-friendly speeds."
- A subset of projects included in the Draft RTP/SCS reduce GHG emissions by providing relief of existing and projected congestion. These include toll roads, express lanes, HOT lanes, HOV lanes, and dedicated truck toll lanes.
- Congestion pricing is a powerful transportation demand management tool incorporated in the Draft RTP/SCS for reducing GHG emissions. SCAG has launched a two-year study of congestion pricing strategies that can provide needed transportation facilities, while reducing the region's GHG emissions associated with vehicle trips.
- Orange County's toll road network is a prime example of priced congestion relief projects. The toll roads have variable pricing incentives that spread out vehicle use to limit peak-hour congestion that leads to increased GHG emissions.
- As a specific example, SR 241 is designed to maintain free-flow conditions that reduce congestion on the regional transportation system. The SR 241 environmental analysis documents transportation network GHG reductions from congestion relief by means of variable tolls that maintain free-flow capacity.
- Other specific examples of projects that reduce GHG emissions on the regional transportation network include express lanes, HOT lanes, HOV lanes and dedicated truck toll lanes for goods movement.

Maps 2, Project Description

General, SR 241 Missing from 2035 Base Maps

Please ensure that all 2035 base maps include the southerly extension of SR 241. For example, Map 2.13, 2035 Grade Separation Projects, does not show SR 241, which will be completed by 2030, on the base map, while it is depicted on Map 2.6 and 2.8. Map 2.19, Land Use Pattern in Orange County, does not depict SR 241; this is accurate only if the map is intended to show 2008 land use; SR 241 should be included in all maps for 2020 and 2035.

Recommended Clarifications:

Consistent with the transportation modeling network and TCM timely implementation report, show SR 241 as part of the 2035 base map for all transportation maps in the PEIR. Specifically, add SR 241 to Map 2.13 and Map 2.19

Mr. Hasan Ikhata
February 14, 2012
Page | 12

TCA thanks you in anticipation of your written responses to these comments. We look forward to the amendments in the final 2012-2035 RTP/SCS and PEIR to incorporate the recommended changes. Should you have any questions or require any clarification regarding these comments, please feel free to contact Ms. Valarie McFall, Director, Environmental Services at 949.754.3475 or via email: vmcfall@thetollroads.com.

Sincerely,

Scott Schoeffel, Chair
San Joaquin Hills Transportation Corridor
Agency

Bill Campbell, Chair
Foothill/Eastern Transportation Corridor
Agency

cc: Jacob Lieb, SCAG, Manager of Environmental and Assessment Services
TCA Board of Directors