

**COMMENTS ON THE DRAFT RTP PEIR:  
SCAG 2001 Regional Transportation Plan Update  
Submitted on behalf of the  
Southern California Council on Environment and Development (SCCED)  
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Draft 3/12/01**

The 2001 RTP Update Program Environmental Impact Report (PEIR) has been prepared by the Southern California Association of Governments (SCAG) for the six county region comprised of Ventura, Los Angeles, Orange, Imperial, San Bernardino and Riverside Counties. SCAG is required to prepare both a regional transportation plan to meet federal air quality standards in non-attainment areas and a regional transportation plan for the California Transportation Commission.

**ANALYSIS OF IMPACTS**

Impacts 3.4-1 and 3.4-2 mention significant increases in air pollutants, especially PM10, but no mitigation measures are listed, yet there are many that could be done, such as increasing funding for transit and non-motorized transportation. This issue needs to be addressed, especially in light of the road dust issue discussed below.

Impact 3.5-3 clearly states that constraining LAX to existing activity levels produces the least noise impact. If the final plan proposes any capacity increase at LAX, major mitigation measures must be implemented.

Impact 3.10-2, increase of natural gas consumption, will be very significant, especially in light of the current natural gas shortage in California, and the global shortage that will occur in the plan period. More mitigation is necessary.

Impact 3.10-3, increase of natural petroleum and diesel consumption, will be very significant. The statement in the draft PEIR page ES-40 stating that the implementation of the RTP Update would reduce the amount of automotive fuel consumed is in error, page EN -17 indicates a 22% increase in fuel consumption. This increase must be mitigated, or at least stated that the impact will be significant.

Table AL-3, Page AL-72, is incorrect. It indicates a number of categories as "Less than significant impact, with major mitigation required" (represented as ++). However, the next pages, Long-Term Effects lists a number of significant unavoidable and irreversible impacts.

Long-Term Effects analysis is inadequate, as listed below:

Significant Unavoidable Environmental Changes (DEIR 5.1, page 1-2) neglects the huge 40% or more increases in PM10 for every Air Basin in the region listed in Appendix H, pages 97-99. And this impact cannot be dealt with by vehicle technological improvements because the PM10 is primarily coming from road dust. This point must be added, as well as a discussion of why mitigation measures, such as transit, are not included in the RTP to deal with this impact and many thousands of deaths that will result.

Significant Irreversible Impacts neglects to include the huge decline in the availability of oil. As the PEIR points out on pages EN-4 – 5, the consumption of oil is expected to exceed supply sometime between 2005 and 2025. The International Energy Agency has recently predicted the peak around 2012, other experts anticipate the peak much sooner, between 2005 and 2007. This point must be added, as well as a discussion of why mitigation measures, such as transit, are not included in the RTP to deal with this impact.

Finally, somewhere in this section the huge loss of mobility and economic and social impact of travel time delay must be included as an unmitigated result of this plan. As RTP Appendix J, page 7 reports, the Vehicle Hours Delayed will increase by over 100% from 1.5 to 3.0 million hours per day. Using the SCAG valuation of time (page J-16), of \$8.59 per hour for passenger vehicles and \$27.00 per hour for trucks, the cost to the region will rise from \$5.2 billion per year in the base year of 1997 to \$10.7 billion per year. The RTP and EIR must describe how this will be mitigated, and if not, what will be the economic impact on the region.

### **MITIGATION OF SIGNIFICANT IMPACTS**

CEQA section 15126.4 (a)(1) says: “An EIR shall describe feasible measures which could minimize significant adverse impacts...” The DEIR fails to present mitigation measures to avoid the above impacts.

The same section also says: “Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of the adoption of a plan, policy, regulation or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design.” The PEIR needs to include detailed descriptions of the mitigation measures.

### **MITIGATION MONITORING AND REPORTING PROGRAM**

The purpose of a monitoring or reporting program is to ensure the implementation of mitigation measures. The PEIR must include specific minimum measurable performance standards for all mitigation measures, and contingency plans if performance standards are not met.

### **AIR QUALITY ISSUES**

SCAG has included non-viable projects in its air quality calculations. The Federal government is no longer considering Southern California for a \$960 million seed money grant for Maglev. With no federal grant readily available, and no assurance of private funding, Maglev cannot be forecast as a viable component of these plans. MTA has not included the 710 gap closure or truck lanes in its plan, so these should not be included in air quality calculations. According to the L.A. Times, March 8, 2001, page B3, relative to the CenterLine light rail, the OCTA has “scrapped plans to request federal funding for the project.” Therefore this project cannot be included.

In addition, although other levels of emissions will be reduced in the SCAG plan, PM10, the most dangerous of all pollutants, will increase by 39%,<sup>1</sup> causing thousands of deaths. The USEPA estimated over 3,000 excess deaths and 52,000 respiratory episodes occur annually in Southeast L.A. County alone from current levels of particulates.<sup>2</sup>

SCAG should show how it will attain a healthy standard for fine and ultrafine particulate matter (soot), PM10 and PM2.5 respectively, consistent with the aims of both the Federal and State Clean Air Acts.

The air quality analysis relative to PM10 in the PEIR needs to be completely redone. It ignores the impact of the huge increases in road dust over the plan period, caused by the additional VMT, plus the additional lane miles. As the PEIR states on page AQ-37, VMT would increase from 346 million in 1997 to 492 million by 2025. Freeway lane miles will increase by 2129 miles. The PEIR also claims that overall regional levels of PM10 will reduce, but increase in San Bernardino and Antelope Valley (page AQ-37).

The PEIR data are completely at odds with RTP Conformity Analysis Appendix H-91 which shows that SCAB levels of PM10 will increase from 191 tons per day in 2000 to 265 tons per day in 2025 under the recommended plan. The other Air Basins will also similarly increase. Since this 40% increase is almost all due to road dust, the only acceptable mitigation would be reduction of VMT by at least 40%, just to maintain current levels of PM10. But to achieve the current federal and state standards would require much larger reductions in VMT. The only mitigation to achieve these reductions would be for large increases in transit services. The RTP must be revised to increase transit services and decrease VMT to provide acceptable mitigation for PM10 and PM2.5.

In addition, the PEIR and RTP do not state the technologies that are going to be used to reduce emissions that are now in the so-called "black box." The plan must clearly state how the region is going to implement "new technologies" to achieve air quality conformity in 2006. It is too late to put this issue off to the 2004 Update, because 2006 will fall in the time of that plan. Waiting until 2004 will not allow the region enough time implement the technologies and other VMT control measures to achieve air quality conformity. Failure to adopt in this 2001 plan the means to achieve conformity in 2006 will place an impossible burden on the region in 2004. It appears that current planners and responsible officials are putting off difficult decisions, for political reasons.

The air quality calculations must include the additional emissions that will be caused by the California Air Resources Board's (CARB) recently scaled-back zero emission vehicle program. It would be preferable to use the most current emission model for calculating mobile source emissions, EMFAC 2000, which was recently adopted by CARB as being more representative of mobile source in-use emissions. This factor which will have to be used in the 2004 Update should be used now to help us appropriately prepare for the next plan update.

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<sup>1</sup> The SCAG Plan states (Appendix page H-12) that the 2025 PM10 level for the South Coast Air Basin will be 265 tons per day, only slightly lower than the "no-build" scenario of 270 tons per day, and 39% greater than the 191 tons per day in 2000.

<sup>2</sup> U.S. EPA Office of Air Quality Planning and Standards, "Review of the National Air Quality Standards for Particulate Matter, April 1996, page VI-13a. If this death rate applied across the region, it would mean 25,000 annual deaths in 2000 and 35,000 in 2025.

SCAG should also demonstrate how it will further reduce the region's levels of oxides of nitrogen (NOx), air toxics and global warming (CO2) emissions. Finally, with the Supreme Court's decision to uphold US EPA's tougher ozone and PM2.5 National Ambient Air Quality Standards, it would be a mistake for MTA and SCAG to overlook these impending health protective standards.

In addition, the additional road capacity in the RTP will generate more traffic ("if you build it, they will come") and thus produce more ozone, PM10 and other pollutants. The US District Court (Northern District of Illinois) rejected an EIS on January 21, 1997, stating that "Highways create demand for travel and expansion by their very existence. Swain v. Brinegar, 517 F.2d 766, 777 (7th Cr.1975; Def. 12(M) Par. 86. Accordingly, defendants must either prepare a study that explicitly compares ozone production with and without the toll road or explain why a study is not possible. . . . The environmental impact statements in this case fail in several significant respects to serve this purpose." The same arguments apply to the SCAG PEIR.

## **SUSTAINABILITY ISSUES**

Sustainability of the transportation system needs to be guaranteed for future generations. Our expenditures now should not remove viable options nor greatly increase the cost of transportation for future generations. Fuel supplies are projected to become increasingly scarce and expensive in the coming years.<sup>3</sup> If we do not implement more far-sighted solutions, SCAG and MTA plans forecast that over 80% of trips will still be made by private automobiles in 25 years, with little change in transit usage, resulting in over 22% increase in petroleum fuel use.<sup>4</sup> This will leave Southern California highly vulnerable to fuel supply disruptions and sustained price spikes, less competitive as a place to do business. We fear this current strategy may dramatically increase the cost of living in the Southern California region and reduce our quality of life economically, socially and environmentally.

### **Recommendation mitigation measures include:**

- a. **Long Range Planning:** True long range planning involves looking at the expected population growth and transportation needs over the next 50 years or more. This will enable us to put today's resources into building for the future rather than perpetuating current approaches to access and mobility.
- b. **More funding for maintenance:** Inadequate maintenance of the road system could place huge economic burdens on future generations. SCAG has calculated future highway operations and maintenance costs based on historical expenditures as well as data in the 2000 State Highway Operations and Protection Plan.<sup>5</sup> We fear these numbers are too low and will result in further deterioration of our roads and damage to the vehicles using

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<sup>3</sup> Published petroleum experts Colin Campbell, Jean Laherrère, A. Bartlett, R. Duncan, W. Youngquist all expect a "peak" followed by a severe decline in availability of "conventional oil" around 2005, according to a report presented by the US Geological Survey (<http://geopubs.wr.usgs.gov/open-file/of00-320/of00-320.pdf>). So-called "liquid gas" supplies may extend the date when global oil supply will be unable to meet global demand to 2010 ([www.RunningOnEmpty.org](http://www.RunningOnEmpty.org)), but severe country shortages are likely to appear sooner, according to the experts at the Hubbert Center of the Colorado School of Mines, one of the nation's leading oil geology institutions (<http://hubbert.mines.edu>).

<sup>4</sup> SCAG Program EIR, page EN-17.

<sup>5</sup> SCAG Appendix page F-36.

them. SCAG's \$12.96 billion for roadway operations and maintenance over the 1997 – 2025 period<sup>6</sup> appears inadequate. SCAG is recommending \$25,000 per freeway lane mile per year,<sup>7</sup> which requires \$8.9 billion for the 12,270 miles of mixed use and HOV lanes,<sup>8</sup> leaving \$4 billion for all 44,097 miles of arterials, which is only \$3,100 per year per lane mile. There is no mention in the SCAG plan of any money for local street maintenance. The MTA plan has no information on costs of roadway operations and maintenance.<sup>9</sup> The American Society of Civil Engineers has just issued a report stating that nearly a third of California's bridges are structurally deficient or functionally obsolete and nearly a third of the roads are in poor or mediocre condition. Billions are needed annually to fix these conditions.

We believe that the maintenance funding for arterials and local streets is woefully inadequate, with the resulting pavement deterioration and other roadway hazards causing significant damage to cars and trucks. Several more billions of dollars are needed over the 1997 – 2025 period.

**c. Plan now for the end of cheap oil:**

The looming oil shortage requires immediate actions to greatly reduce auto and truck use before 2010:

- A major expansion in public transportation availability and improvement of service quality.
- New goods movement strategies to reduce dependency on trucks.
- Limit increases in road capacity.
- Increases in parking fees and taxes, with revenues for expanding transit and non-motorized facilities.
- Large increases in registration fees for high fuel consumption vehicles, with the income going to expanding transit and non-motorized facilities.
- Parking cash-out required for all employers.
- Large increases in taxes on gasoline and diesel fuel, to support transit services.
- Expanded transportation demand management (TDM) measures.

**PROJECT DESCRIPTION**

We find the project description in need of clarification in the following areas:

1. The Regional Performance Indicators and Objectives (Table PD-2, page PD-5) are not consistent with the Indicators and Objectives previously outlined in the September 18, 2000 Notice of Preparation (NOP). Specifically, the performance indicator, Transportation Sustainability, was deleted in the PEIR. We believe this is an important indicator, and therefore should be included as it was in the NOP. Please explain why this indicator was deleted.

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<sup>6</sup> SCAG RTP page 65 and Appendix page F-37.

<sup>7</sup> SCAG Appendix page F-68.

<sup>8</sup> SCAG Appendix page C-8.

<sup>9</sup> MTA Plan Page 7-2 says that the \$10.7 billion allocated for highways does not include state and local operations costs. However, the MTA plan provides \$10.1 billion for "Local Return," but does not specify the use of these funds.

2. The performance indicator, Environment, is defined as “Transportation system should sustain development and preservation of the existing system and the environment (all trips).” This will apparently be measured by air quality standards for identified compounds. In addition to air quality, we believe that the Environmental performance indicator should include biological resources, water quality, and energy (non-renewable resources). Such an inclusion, together with measurable objectives for each, would recognize the important link between the region’s natural resource base and its economic well-being.

Under the Livable Communities indicator, it states that no consensus was reached on indicators. However, the SCAG Transportation and Communications Committee (TCC) has endorsed the concept of Livable Communities for many years and asked SCAG staff to include Livable Communities Performance Indicators in the RTP. The RTP TAC set up a Livable Communities Subcommittee that worked with SCAG staff for nearly a year and prepared recommendations for Livable Communities Performance Indicators.

The Draft RTP on page 96 states that “The Subcommittee has identified the Location Efficiency Index and Transit and Non-motorized Mode Split as two performance indicators of “livability.” Their recommendations led to current efforts of realizing quantifiable impacts of program strategies on vehicle trips, vehicle miles traveled, and air quality.” In fact the Location Efficiency Index has been validated for the SCAG region by a consultant to SCAG and is now being used by mortgage lenders to offer larger home mortgages than families would normally qualify for. The air quality benefits of livable communities have been documented in terms of reduced VMT. Therefore we ask SCAG to explain in detail why they have ignored the Subcommittee report on Livable Communities Performance Indicators.

3. For the Indicator, Cost Effectiveness, we recommend including cost of degraded biological resources, tourist revenues (expansion of bike paths, for example, brings in huge tourist revenues for local communities as well as improving air quality) and energy consumption.

## **PROJECT ALTERNATIVES**

CEQA Guidelines Section 15126.6 (b) states, “Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”

Neither the No Project alternative nor the 1998 RTP fulfill this requirement. We request that you consider and analyze a project alternative that integrates transportation planning, land use reform, and energy efficiency standards compatible with smart growth or livable communities scenarios. Such an option would address a range of significant environmental impacts, including loss and degradation of wildlife habitat and ecosystem function, polluted water runoff, air pollution, high rates of automobile dependence, as well as sustainability issues in terms of petroleum. Components of such an alternative have been recommended in a paper entitled “Solving Southern California’s Transportation Crisis,” submitted as a comment to the RTP by the Coalition for Sustainable Transportation (viewable at [www.scced.org/hotissues/mobility.pdf](http://www.scced.org/hotissues/mobility.pdf)).