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November 25, 1996

Mr. Tim Vasquez, Chief Environmental Analysis Branch "A"
California Department of Transportation, District 11
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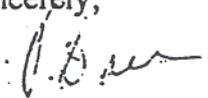
RE: Comments on the Notice of Preparation for the Draft
EIR/EIS for the State of California Department of
Transportation to Adopt a Route Alignment and Construct
the Brawley Bypass on State Routes 78, 86 and 111 -
SCAG No. I 9600387

Dear Mr. Vasquez:

Thank you for submitting the Notice of Preparation for the Draft
EIR/EIS for the Caltrans District 11 proposal to Adopt a Route
Alignment and Construct the Brawley Bypass on State Routes 78,
86 and 111 in Imperial County to SCAG for review and comment. As
areawide clearinghouse for regionally significant projects, SCAG
assists cities, counties and other agencies in reviewing projects and
plans for consistency with regional plans.

In addition, The California Environmental Quality Act requires that
EIRs discuss any inconsistencies between the proposed project and the
applicable general plans and regional plans (Section 15125 [b]). If
there are inconsistencies, an explanation and rationalization for such
inconsistencies should be provided.

Please provide a minimum of 45 days for SCAG to review the Draft
EIR/EIS when this document is available. If you have any questions
regarding the attached comments, please contact Bill Boyd at (213)
236-1963.

Sincerely,

VIVIANE DOCHE-BOULOS
Manager, Intergovernmental Review

H:VICBRAWBY.NOP

3-3.7-3.8-3.9-3.10-5-5
DEC 23 1996
cc: T Robinson

COMMENTS ON THE NOTICE OF PREPARATION OF
A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE COUNTY OF IMPERIAL
BRAWLEY BYPASS ON ROUTES 78, 86 AND 111

PROJECT DESCRIPTION

The project action is to adopt a route alignment and construct approximately 12.4 miles of State Routes 78 and 111 in Imperial County near Brawley from 0.5 miles south of Baughmen Riad on State Routes 86 and 78 to 0.3 miles north of Mead Road on State Route 111. The project is a four lane limited access expressway. The project will provide improved access to the future State Route 7 at the new US/Mexico Port of Entry east of Calexico.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide (RCPG) contains the following policy that is particularly applicable and should be addressed in the Draft EIR for the proposed project¹:

- *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*
- *In areas with large seasonal population fluctuations, such as resort areas, forecast permanent populations. However, appropriate infrastructure systems should be sized to serve high-season population totals.*
- *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*
- *Support subregional policies that recognize agriculture as an industry, support the economic viability of agricultural activities, preserve agricultural land, and provide compensation for property owners holding land in greenbelt areas.*

¹ See Endnote.

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- *Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.*
- *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*
- *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*
- *National Forests shall remain permanently preserved and used as open space. SCAG shall support policies and actions that preserve open space areas identified in local, state, and federal plans.*
- *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*
- *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*
- *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and develop emergency response and recovery plans.*

The Regional Mobility Element (RME) also has policies pertinent to this proposed project². This chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant policies of this chapter are the following:

- *Promote Transportation Demand Management (TDM) programs along with transit and ridesharing facilities as a viable and desirable part of the overall mobility program while recognizing the particular needs of individual subregions.*
- *Support the extension of TDM program implementation to non-commute trips for public and private sector activities.*
- *Support the coordination of land use and transportation decisions with land use and transportation capacity, taking into account the potential for demand management strategies to mitigate travel demand if provided for as a part of the entire package.*
- *Urban form, land use and site-design policies should include requirements for safe and convenient non-motorized transportation, including the development of bicycle and pedestrian-friendly environments near transit.*
- *Support the use of market incentives as a mechanism to affect and modify behavior toward the use of alternative modes for both commute and non-commute travel.*
- *Potential down-stream congestion impacts from capacity enhancing projects will be studied.*
- *HOV facilities shall be constructed and operated to encourage use of public and private transit, carpools, vanpools, and other HOVs.*
- *In addition to increasing occupancy thresholds on HOV facilities, consideration should be given to additional or expanded HOV capacity in the corridor.*
- *Alternative modes and projects shall be developed and implemented where implementation of HOV element projects is demonstrated to be unfeasible due to widespread local*

² See Endnote.

opposition.

- *HOV lanes shall be provided for in new facility construction and for capacity enhancements of existing facilities in accordance with the HOV program.*
- *Certain freeway facilities within the SCAG region lack adequate median, shoulder or existing rights-of-way to add HOV lanes. When the formation of two plus occupancy carpools on these facilities yield consistent directional HOV volumes averaging 1500 vehicles per hour³ during the daily peak periods of congestion, SCAG shall request Caltrans to initiate a study as to how the HOV improvement can be implemented before programming the project. The study shall examine alternatives for the HOV, operational considerations (including IVHS), public support for HOV (including conversion) within the corridor, and pricing, as well as the legal and environmental ramifications of each specific project.*
- *Toll facilities shall be designed, operated, and priced to encourage use of public and private transit, carpools, vanpools, and other HOV. Average vehicle occupancy (AVO) of the toll facilities shall be comparable to similar HOV facilities.*
- *Pricing policies may be applied to maintain appropriate levels of service on facilities.*
- *Necessary steps to develop and implement arterial HOV facilities in support of transit and rideshare activities shall be initiated.*
- *Necessary steps to develop and implement Smart Corridors and Smart Streets to achieve regional mobility objectives shall be initiated.*
- *Methods to improve safety and reduce incidents on the regional transportation system will be considered.*
- *The development of the regional transportation system should include a non-motorized transportation system that provides an effective alternative to auto travel for appropriate trips. The planning and development of transportation projects and systems should incorporate the following, as appropriate:*

³ Assumes that once the conversion takes place, HOV traffic volumes will increase 20%.

- a ○ *Provision of safe, convenient, and continuous bicycle and pedestrian infrastructure to and throughout areas with existing and potential demand such as activity areas, schools, recreational areas (including those areas served by trails), which will ultimately offer the same or better accessibility provided to the motorized vehicle.*
- b ○ *Accessibility to and on transit (bus terminals, rail stations, Park-And-Ride lots), where there is demand and where transit boarding time will not be significantly delayed.*
- c ○ *Maintenance of safe, convenient, and continuous non-motorized travel during and after the construction of transportation and general development projects. Existing bikeways and pedestrian walkways should not be removed without mitigation that is as effective as the original facility.*
- *Entities and programs that currently support the auto should be encouraged to provide the same types of services for non-motorized transportation, including education, promotion, and enforcement.*
- *Growth in the demand for goods movement will be accommodated through the provision of adequate multi-modal and intermodal infrastructure that is consistent with overall regional goals, objectives, and policies.*
- *Pricing strategies will be considered as one of the strategies to reduce peak-period congestion.*
- *Demand for increased goods movement will be given consideration in corridors where system connectivity and gap closure projects are being planned.*
- *Arterial truck access routes will be coordinated for the purpose of improving system connectivity, eliminating circuitous routings, and reducing delays.*
- *The potential for adverse impacts to mode shares, diversion of business to other ports and loss of cost-competitiveness in goods movement to, from, and through the SCAG region will be considered in the development and implementation of local and regional plans.*
- *Planning to accommodate multi-modal and inter-modal goods movement shall be an*

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integral part of the land use and circulation elements of local government general plans and specific plans.

- *In order to assist in the identification of potential bottlenecks that could occur downstream of cargo flows, the identification of potential intermodal routes that cross or connect to provide future transfer facility nodes (highway, rail, harbor or airports) shall be encouraged.*
- *Support long-range corridors that will employ multi-modal and inter-modal strategies designed to maintain mobility for people, goods, services, and information in ways that are safe, efficient, cost-effective, meet environmental mandates, and foster economic development.*
- *Support long-range projects and rights-of-way preservation programs that foster the development of an urban form conducive to reducing single occupant vehicle trips.*

ENDNOTE

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

SCAG is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. §134(g)-(h), 49 U.S.C. §1607(f)-(g) et seq., 23 C.F.R. §450, and 49 C.F.R. §613. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. §7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the Air Plan, pursuant to 42 U.S.C. §7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, *Environmental Impact Reports* of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. §1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.