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**2012-2035 Regional Transportation Plan and Sustainable Communities Strategy  
Draft Environmental Impact Report, SCH # 2011051018**

Dear Mr. Lieb:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State open space planning agency in Los Angeles and eastern Ventura Counties, comprising a substantial portion of the Southern California Association of Governments (SCAG) region in both land area and population. The Conservancy is primarily concerned with habitat loss resulting from many past decades of urban expansion and therefore promotes compact growth in existing urban areas to minimize future resource loss. Thus, the Conservancy shares many of SCAG's newfound regional objectives and looks forward to shaping growth in Southern California in a more sustainable and land-efficient direction.

The Conservancy's secondary interest is in creating an interconnected network of visitor-serving parkland that provides access to natural areas for all residents within the Conservancy Zone. As such, the Conservancy has a particular focus on multi-benefit projects such as river parkways that serve recreation, transportation, health, and economic development objectives while improving quality of life. The Conservancy is a major funder of revitalization efforts along the Los Angeles River and Ballona Creek. These river and trail corridors deserve a prominent place in regional transportation and land use plans in accordance with their multiple benefits.

The Conservancy has reviewed the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Draft Program Environmental Impact Report (PEIR) and offers the following comments in relation to our planning jurisdiction.

### **Avoidance of Growth in Resource Areas**

The RTP/SCS generally steers growth toward more compact forms in already urbanized areas, making efficient use of existing infrastructure and reducing impacts to resource lands. The policy decisions contained within the SCS are projected to save 408 square miles of nonurban land over the life of the plan. If realized, these gains are certainly an achievement, although there is no projection of where this growth will not occur and what mechanisms will preserve the land in perpetuity.

The lack of specificity makes it difficult for the Conservancy to evaluate the impacts of the proposed plan. While the projections are intended to be a meta-analysis of regional economic trends rather than a location-specific analysis of growth patterns, SCAG is clearly making assumptions about where development on resource lands is and is not appropriate. This process is not transparent. For example, the Regional Housing Needs Assessment (RHNA) assigns population targets for different subareas of the region, which are then used to justify additional development whether or not it is consistent with stated goals to encourage compact development within existing urban areas. Newhall Ranch has used the RHNA targets as the basis for its massive expansion into open space areas west of Santa Clarita, resulting in unmitigable habitat and connectivity loss. At least Newhall Ranch is contiguous with the existing Santa Clarita urban area. SCAG appears to endorse the proposed Centennial development at Tejon Ranch by projecting housing demand in the area--no doubt a self-fulfilling prophecy--despite flagrant inconsistency with SCS objectives. These decisions serve as the basis for urbanization of resource lands, yet are not made in consultation with resource agencies. With the understanding that land use authority belongs to local jurisdictions, a truly comprehensive regional plan would transparently set growth parameters in concert with resource conservation goals to eliminate these apparent contradictions. Projecting growth in resource areas sets in motion policies that induce that growth; therefore great care must be taken to ensure such growth meets regional objectives.

### **Wildlife Crossings of Transportation Facilities**

The Conservancy appreciates SCAG's recognition of the impact that linear transportation facilities have on natural areas and the need for well-designed wildlife crossings to partially mitigate these effects. Wildlife crossings serve two distinct purposes: reducing mortality and preserving genetic connectivity. Roads are the leading direct source of human-caused mortality for most species in Southern California and the entire country. They can become a population sink if a significant fraction of a local species is killed, affecting broader population distribution across the landscape. Additionally, for highly mobile predators,

individuals crossing roads are frequently dispersing from their home range in search of new territory and mates, a vital population dynamic that is devastating if interrupted. National Park Service research has documented significant genetic differences among carnivore populations on either side of the 101 Freeway in the Santa Monica Mountains.

Wildlife crossings need to be discussed in the context of habitat connectivity, which is the broader ecological goal for conservation areas. Wildlife crossings are but one critical tool to ensure that indicator species are able to safely move about their environment. The Conservancy has partnered extensively with the National Parks Service, U.S. Geological Survey, and UCLA to research movement corridors in Southern California, with an emphasis on our core jurisdiction in the Santa Monica Mountains, Simi Hills, Santa Susana Mountains, San Gabriel Mountains, and Verdugo Mountains. While much has been learned about movement patterns in these areas and the way in which key transportation facilities create genetic barriers to connectivity, the measures that might mitigate these impacts have not been thoroughly researched. Wildlife corridor design is a field in its infancy with few scientifically verified best practices for crossing dimensions and landscape features. Given that this research is needed to properly mitigate transportation impacts, SCAG should invest in connectivity research with a program specifically designed to establish measures that can be incorporated into the 2016 RTP revision. Such a program would aggregate existing research, propose new study areas, and develop design best practices specifically tailored to the Southern California eco-region.

### **Environmental Mitigation Program**

SCAG has identified the need for a regional Natural Lands Acquisition and Open Space Conservation Strategy to protect remaining resource lands and mitigate for impacts from transportation improvements. The Conservancy looks forward to working with SCAG on the development of such a strategy. In addition to mitigation banking, transfer of development rights, and payment of in-lieu fees, the Conservancy recognizes conservation easements as a powerful preservation tool for habitat areas. Conservation easements should be listed in the plan alongside the other preservation mechanisms.

The Conservancy has supported the establishment of transfer of development rights (TDR) programs in multiple updated general plans as a potentially useful market-based preservation mechanism that supports regional density goals. SCAG should take a leadership role in setting guidelines and best practices for these new county and municipal programs as well as explore the creation of a regionally unified TDR program.

### **High Quality Transit Areas and CEQA Streamlining**

SB 375 provides that developments that are consistent with the Sustainable Communities Strategy be rewarded with a streamlined CEQA process in order to incentivize dense developments in appropriate locations near transit. While the Conservancy is generally wary of processes that weaken CEQA protections, the law's narrow provisions are appropriate in this instance. However, SCAG's designated High Quality Transit Areas (HOTA) are overly broad with a low threshold of minimum transit service (15-minute frequency only during weekday peak) to qualify for the exemption. This threshold is not sufficient to attract significant mode share that would justify the CEQA exemption, as the off-peak headways in most of these "high quality" areas are likely not adequate to facilitate a car-light lifestyle in most of the designated HOTA corridors.

Of greater concern to the Conservancy, judging from the available HOTA maps, SCAG's methodology appears to reward proximity to transit lines rather than transit stops or stations. This creates absurd outcomes where properties are given an incentive to densify even if they are not serviced by transit or topographically suitable for urban development. Many of the "high quality" lines are actually point-to-point express buses run on the freeways. Within the Conservancy's area of interest, the Sepulveda Pass, Cahuenga Pass, and Conejo Grade corridors fit this description. This methodological problem could be corrected by excluding freeway service (which is not favorable for transit-oriented development anyway) from HOTA designation and by determining the quality of transit based on off-peak frequency, which is a better indicator of whether it supports the intended urban lifestyle.

### **River Parkways and Active Transportation**

As mentioned previously, the Conservancy is interested in urban river projects for their multiple recreational, environmental, and transportation benefits. The RTP/SCS should fully fund build-out of these active transportation corridors throughout the region. When well designed, these facilities serve as "bicycle freeways" connecting various parts of the region with uninterrupted travel for nonmotorized users. For this reason, the Los Angeles River trail featured prominently in the "Carmageddon" race between Jet Blue and a group of elite bicyclists from Burbank to Long Beach. Separated from traffic, such facilities are also inviting for bicyclists of all ages and abilities, which is necessary to attract substantial mode share away from automobiles. The draft Los Angeles County Bicycle Master Plan, among others, calls for build-out of the river trail system and includes preliminary cost estimates.

The RTP/SCS calls for \$6 billion over the next two decades for active transportation investments, which seems low when compared to the identified need in local bike and pedestrian plans. Given the central role active transportation plays in meeting regional planning objectives, funding levels should be set based on full build-out of local bicycle and pedestrian plans, with an appropriate amount projected for those jurisdictions that have not yet completed such plans. The currently proposed funding level does not appear to be rooted in such a need-based assessment. It is not adequate to simply compare the proposed expenditures with past levels independent of a needs assessment.

In addition to the total funding level, the proposed timing of active transportation investment is inadequate. Only 20 percent of the proposed expenditures would occur during the first 15 years of the 25-year planning period, leaving the vast majority of expenditures for the highly speculative future and of little use to current residents. Transit and transportation demand management are similarly back-loaded with only highway-related investments receiving funding priority in the near term. These non-highway investments are the ones most likely to generate greenhouse gas emissions savings, among other benefits, and the earlier they are made the longer the benefits can accumulate. The proposed expenditure plan runs directly counter to the stated emphasis of the SCS.

Active transportation projects, including the river parkways, are suffering for lack of funding. The most visionary plans, such as the City's Los Angeles River Revitalization Master Plan, require extensive funding to come to fruition and provide their multiple benefits. Planning is well underway, but capital dollars are in short supply for these projects. Furthermore, achieving greenhouse gas reduction and air quality goals requires early mode shift to maximize cumulative benefits over the life of the plan. The Conservancy suggests that the plan's funding priorities be reversed to immediately fund active transportation investments at a sufficient level to achieve build-out of the region's bicycle and pedestrian networks in the near and medium term. Such a change would make the RTP more consistent with the land use and mode share objectives outlined by the SCS, the intent of SB 375.

### **Environmental Justice and Public Health**

Like SCAG, the Conservancy takes its commitment to environmental justice seriously as a State agency. The Conservancy is therefore delighted to see equal access to parks, one of its core missions, considered as a performance measure for environmental justice. The SCAG model does not currently include programs intended to ameliorate these access issues, such as the Mountains Recreation and Conservation Authority's (MRCA) Transit to Trails

program. Given the inherent remoteness of open space parkland, it is likely infeasible to run regular transit service to most parks. The highly successful Transit to Trails fills this gap, but is perpetually underfunded in comparison to the access demand. Funding for such programs from SCAG transportation funds would be appropriate mitigation for impacts to environmental justice populations.

Part of embracing environmental justice as a core mission includes looking holistically at issues that affect the community. Poor air quality is not the only impact from a transportation system that is overly reliant on cars. Obesity and related illnesses are a direct result from community design that does not allow for safe opportunities to walk and bike for everyday transportation. The RTP/SCS should therefore include obesity-related health outcomes as a performance measure for the regional transportation system. The currently unequal health outcomes will require targeted investments in disadvantaged communities to create active transportation networks that provide access to services, jobs, schools, and parks. River parkways directly address this need by providing bikeways through many of the poorest communities in the region.

Additionally, the safety performance measure appears to discount the health benefits of active transportation while overstating risks. SCAG methodology rewards shifts to "safer" modes, but uses datasets that penalize pedestrians and bicyclists for being hit by cars. This methodology would discourage investments that increase active transportation when it is precisely these investments that address the safety issues faced by those bicycling and walking on public streets. The methodology further does not include the well-documented "safety in numbers" phenomenon that decreases risk for active modes the more people utilize them. Likewise, it does not consider improved public health outcomes that have been calculated to more than offset risk. The poor safety performance of walking and bicycling modes is justification for increasing investment in active transportation, particularly separated facilities for bicyclists.

## **Comments on Proposed PEIR Mitigation Measures**

### *Biological Resources and Open Space*

The PEIR includes many mitigation measures for potential impacts to biological resources. Overall, these measures are comprehensive and based on sound practice. Inclusion of the proposed mitigation measures in project selection and design will greatly improve ecological outcomes in the SCAG region compared to a baseline scenario. The specific measures

calling for minimum mitigation ratios reflect current accepted practices without limiting the discretion of resource agencies to require greater mitigation if warranted.

The proposed measures addressing habitat fragmentation and connectivity are thorough and appropriate (MM-BIO/OS36 through MM-BIO/OS40). These impacts have been all too often unmitigated for transportation projects in the past.

The Conservancy looks forward to collaboration on regional conservation planning policy to address cumulative impacts to biological resources (MM-BIO/OS45). The Conservancy's joint powers partner MRCA administers highly successful restoration and preservation mitigation programs in close coordination with state and federal resource agencies. SCAG's planning and funding expertise is a welcome addition to ongoing efforts. The Conservancy requests an invitation to participate in this process.

The primary impact from transportation facilities is often the indirect and cumulative impact from growth induced by new improvements. As projects increase access and reduce commute times from remote areas, these resource lands become economic to develop. The Conservancy is therefore pleased to see SCAG recognize these impacts and call for their mitigation (MM-BIO/OS47). Without appropriate growth management along transportation corridors, wildlife crossings cannot mitigate connectivity impacts from expanding development footprints. Furthermore, induced growth along new corridors often negates the benefits of new transportation capacity, prompting even greater impacts from future facility expansion. SCAG should develop best practices that would be applicable to new transportation corridors such as the High Desert Corridor to prevent new development from extending into resource lands.

#### *Land Use and Agriculture Resources*

As stated previously, the Conservancy is encouraged to see transfer of development rights programs included in the RTP/SCS (MM-LU16). Los Angeles County and several municipalities in the Conservancy's jurisdiction are including programs in their respective general plan updates. SCAG should provide technical assistance and facilitate interjurisdictional transfer programs among member governments as appropriate.

The Conservancy is pleased to see strategic planning that encourages recreational access to natural lands be coupled with efficient land use strategies to preserve these lands (MM-LU25 and 26). Location-efficient and compact development is better for the economy and

environment by reducing infrastructure costs, increasing tax revenues per acre, and reducing consumption of agricultural land and habitat.

Urban growth and service boundaries are a critical tool local jurisdictions have to protect resource areas within greenbelts (MM-LU42). The Conservancy strongly supports efforts by local jurisdictions to establish such policies. SCAG should promote best practices in greenbelt planning and facilitate interjurisdictional collaboration to protect resource areas that separate discrete urban communities. The Conservancy notes that effective policies restrict densities to no more than ten dwelling units per acre outside of urban growth boundaries. Densities above this threshold begin to affect resource values, particularly habitat connectivity and sensitive species. Ten units per acre is an appropriate maximum density to reduce the proliferation of "ranchette" developments that highly fragment habitat in rural areas.

The Conservancy supports using variable development fees as an economic incentive to direct growth to desired areas. In particular, increasing impact fees for development in greenfield areas would recognize the resource impacts of such developments while rewarding new developments that minimize the burden on public infrastructure by locating in existing urban areas (MM-LU81). Such fees would need to be considerable to actually have an effect on land economics at the regional scale. SCAG should undertake an economic analysis to determine what level of fees would be required to achieve regional growth objectives.

#### *Public Services and Utilities*

The PEIR lacks a public safety mitigation measure that promotes project design that minimizes urban-wildland interface, which is the source of wildfire risk to persons and property. Past development patterns include long, meandering urban edges with high risk exposure to catastrophic events, causing great strain on local and State firefighting resources largely subsidized by those living in lower risk locations. A mitigation measure should include two components addressing both project location and project design. First, development that extends into high fire hazard areas should be discouraged. Second, there should be an emphasis on utilizing project design strategies to reduce risk, such as building within compact and defensible footprints and minimizing perimeter length. Projects should be sited in order to reduce impacts of required brush clearance on native habitat areas, including adequate buffers to protect sensitive resources from brush clearance impacts. The draft Los Angeles County Significant Ecological Area Ordinance contains model language to this effect.



The Conservancy concurs that project sponsors and local jurisdictions should work to increase public access to open space (MM-PS21 and 26). River parkways and other urban natural parks serve a vital purpose in connecting urban residents to natural parkland (MM-PS22). The City and County of Los Angeles have both recognized these projects in master plans for their respective river corridors. While planning for these projects is the responsibility of local jurisdictions and partners, SCAG has a critical responsibility for funding by including bikeway projects in the RTP.

Regional partnerships are necessary to achieve open space conservation objectives (MM-PS29). The City of Santa Clarita partnered with the Conservancy to form the joint powers Santa Clarita Watershed Recreation and Conservation Authority, an example of the kind of local partnership that should be encouraged throughout the region. The City of Santa Clarita brought to the table a local assessment that can be used for open space acquisitions outside the City boundaries to establish a continuous greenbelt for its residents to enjoy. As previously mentioned, the Conservancy welcomes SCAG's assistance with planning and identifying funding sources for open space acquisition (MM-PS31 and 34). SCAG's participation in coordinating regionally significant trail networks is also appreciated, however the greatest contribution SCAG could make to these efforts would be including those greenways that serve transportation functions, such as the river parkways, in the RTP so that they can be fully developed in the short and medium-term (MM-PS33). SCAG should focus on projects that close gaps in regional networks, such as the bikeway gap from Riverside Drive to Vernon along the Los Angeles River through downtown, and projects that provide connectivity across jurisdictional boundaries.

Regarding renewable energy development projects in open space areas, the Conservancy concurs that it should be allowable, but with careful attention paid to biological and visual resources to ensure compatibility and minimal impacts (MM-PS98). The constraints analysis approach outlined is an appropriate framework for renewable energy decisions (MM-PS97).

### *Transportation*

As previously mentioned, the Conservancy plays an active role in developing bicycle and pedestrian trails that access parks and open space (MM-TR42). The Conservancy looks forward to SCAG support and urges that ample funding be provided for full build-out of the planned river parkway system, combining transportation and recreation functions to improve the quality of life for Southern California residents. These parkways often connect with schools, parks, libraries, and other community facilities (MM-TR43). Such connections should be enhanced through regular transportation improvements and the development of

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regional and local networks of multi-use trails with adequate end-of-trip facilities (MM-TR78).

### *Water Resources*

The Conservancy believes that preservation of remaining riparian resources should be the highest priority at both the regional and project level, followed by restoration of previously impacted areas (MM-W1 and 9). To the extent feasible, natural methods for stormwater control, water quality improvements, and infiltration should be encouraged.

SCAG sets an appropriate standard that new projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters (MM-W22). When evaluating projects during the environmental review process, SCAG should identify regionally significant projects that may impact downstream waters and include comments to that effect in NOP and EIR responses. This is a critical issue wherever natural rivers interact with urban areas, such as the Santa Clarita Valley in the Conservancy's area of interest. Recent approval of the Landmark Village of Newhall Ranch did not meet this standard of ecological sustainability, threatening the natural hydrogeomorphology of the Santa Clara River by elevating the 100-year flood plain and armoring the natural banks along the development's edge. SCAG should participate in the development of models of natural processes for the remaining natural rivers in the SCAG region to ensure that environmental review can comprehensively evaluate project impacts based on the best available information.

Thank you for your consideration of these comments. If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200, ext. 128.

Sincerely,

ANTONIO GONZALEZ  
Chairperson